

NOTICE OF DEVIATION

Illinois Power Company

Docket No. 50-461

Based on the results of an NPC inspection conducted during the period February 24 through March 7, 1986, it appears that one of your activities was not conducted in conformance with your commitments to the Commission and with industry standards as indicated below:

The Clinton Power Station Final Safety Analysis Report commits to meet the guidance of Regulatory Guide 1.80, Preoperational Testing Of Instrument Air Systems. Section C and paragraph C.5 of that regulatory guide recommend that the Instrument Air System be tested to meet cleanliness requirements with respect to oil, water, and particulate matter contained in the product air after major modifications or repairs to a facility.

Nureg-0853, Safety Evaluation Report related to the operation of Clinton Power Station, Unit No. 1, paragraph 9.3.1, includes information which was the basis for NRC acceptance of the Clinton Instrument Air System. That paragraph includes an apparent applicant commitment to meet the guidelines of ANSI MC 11.1-1976/ISA S7.3, Quality Standard For Instrument Air, for instrument air quality and to periodically test the product air for dew point and particulate contamination.

ANSI MC 11.1-1976/ISA S7.3, paragraph 4, Instrument Air Quality Standard, subparagraph 4.2 requires that the maximum particle size in the air stream at the instrument be three (3) micrometres. Subparagraph 4.4 recommends that a regular periodic check be made to assure high quality instrument air.

Contrary to the above commitments and standard, procedure CPS No. ITP2603.01N, Instrument Air Quality, the purpose of which was to monitor and maintain instrument air quality, did not provide for test of the product air to verify cleanliness requirements were met after major modifications or repairs to the facility; did not provide for periodic test of the product air for particulate contamination; and did not provide acceptance criteria concerning the size of particulates present in the product air at the instrument. The procedure referenced Safety Evaluation Report paragraph 9.3.1 and ANSI MC 11.1-1976 but did not incorporate all applicable recommendations and requirements. The applicant identified no other procedures which addressed the requirements and recommendations cited above.

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