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Docket No. 50-461

Mr. A. Bill Beach
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: Clinton Power Station Corrective Action

and Self-Assessment Programs Improvements

Dear Mr. Beach:

The purpose of this letter is to inform you of efforts being taken by Illinois Power (IP) to improve the Clinton Power Station (CPS) Corrective Action and Self-Assessment programs. IP has recognized that weaknesses exist in the CPS corrective action program and that CPS is lagging behind industry peers in the area of self-improvement.

To achieve and sustain improved performance, CPS must take full advantage of prevention, detection, and correction with regard to plant problems. Prevention includes the training of all levels of personnel in error avoidance, as well as learning from other's mistakes, at CPS and elsewhere within the nuclear industry. Detection requires a diligent and intelligent approach to monitoring and trending the station's performance and consistent, effective self-assessment. Correction is effective when it focuses on the root cause, assesses generic implications, is based on established solutions, and is carried out in a timely fashion.

CPS has taken previous efforts to improve the corrective action program. These efforts include incorporating Performance Improvement International (PII) processes and technology into the CPS corrective action program. Additionally, an Independent Analysis Group (IAG) has been created. The IAG functions to prevent events and

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facilitate improved station performance by performing rigorous root cause analyses, developing effective, technology-based corrective actions, developing and maintaining a mature performance monitoring program, and ensuring proper execution of performance improvement actions.

Further improvements in the corrective action program and self-assessment process will be pursued under the direction of Mr. Richard F. Phares who will have clear authority to implement changes. As a first step, the Licensing, Corrective Action, Independent Safety Engineering, Employee Concern, Independent Analysis, and Strategic Planning (which includes the long-term improvement oversight function) functions will be combined into a new department reporting to Mr. Phares (see attached organization chart). Mr. Phares' highest priority in filling the new leader positions within this new department has been achieved by bringing an individual with extensive nuclear experience to IP as the Director of the Corrective Action Program.

This organizational change will combine a number of existing CPS assessment groups (e.g., ISEG, IAG, Corrective Action, etc.) into one organization. This will enhance IP's capability to conduct integrated evaluations of the results of various assessments, thereby improving IP's ability to identify potential weaknesses that may have escaped detection previously. This organization will include a group dedicated to development, coordination and monitoring of site wide improvements. It will also help elevate identified weaknesses to management for corrective action. It will provide a group focused on detection and correction of problems and achieving and demonstrating improved performance. IP has begun filling the leader positions in this new department by hiring an individual whose responsibility will be Director of the Corrective Action Program.

If you have any questions on this information, please contact me at (217) 935-8881, extension 3400.

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Wayne D. Romberg Assistant Vice President

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Attachment

cc: NRC Clinton Licensing Project Manager NRC Resident Office, V-690 NRC Document Control Desk Illinois Department of Nuclear Safety

