

NOTICE OF VIOLATION

Illinois Power Company
Clinton Station, Unit 1

Docket No. 50-461
License No. NPF-62

During an NRC inspection completed on May 23, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Technical Specification 5.4.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide (RG) 1.33, Appendix A, Revision 2 (February 1978).

RG 1.33, Appendix A, recommends that procedures be implemented which address personnel access and monitoring, chemistry instructions and calibration of laboratory instruments, and radioactive contamination control.

- a. Step 8.2.2 of Procedure No. CPS 1032.02 (Revision 24), "Security Access Control," requires that workers contact radiation protection personnel after twice alarming the security portal monitors.
- b. Sections 2.1.4 and 2.1.9 of Procedure No. CPS 6001.01 (Revision 21), "Sampling and Analysis," requires a daily recording of in-service in-line monitors during operational modes 4 and 5 and requires a compensatory sample and analysis program for those monitors declared inoperable.
- c. Step 8.4.6 of Procedure No. CPS 6118.01 (Revision 2), "Gravimetric Pipette Operation and Calibration," requires that if the data obtained at the low end point of the pipette's volume range did not meet the acceptance criteria, that the test be repeated using a higher volume.
- d. Steps 8.5 through 8.5.5 of Procedure No. CPS 6003.01 (Revision 4), "On-Line Monitor Accuracy Verification," requires that if a disagreement occurs between a laboratory analysis result and an in-line monitor reading, a reanalysis of a sample be performed. If a subsequent comparison yielded a disagreement, additional corrective actions were required: the detector was to be cleaned/refurbished and/or calibrated/standardized, an additional comparison was to be performed, and a maintenance request was to be submitted if the comparison failed to yield an agreement.
- e. Section 8.3 of Procedure No. CPS 3222.01 (Revision 5), "Auxiliary Building Sample Panel," requires that the sample sink hood be closed prior to providing flow to the conductivity monitor and requires that the portable, in-line monitor be attached to the condensate supply spigot prior to providing condensate flow.
- f. Step 8.2.6.1 of Procedure No. CPS 7105.01 (Revision 0), "Radiological Surveys and Posting," requires that each area having removable contamination equal to or greater than 1000 dpm/100 cm² beta-gamma be conspicuously posted with a sign or signs bearing the radiation symbol and the words "Caution Contaminated Area."

Contrary to the above:

- a. On April 23, 1997, the licensee identified that a worker alarmed the security portal monitors twice, failed to contact radiation protection personnel, and exited the plant.
- b. On February 10, 1997, during plant operational mode 4, the licensee identified that a chemistry technician did not perform the required compensatory analysis for an in-line feedwater conductivity instrument, which had been declared inoperable.
- c. On May 20, 1997, an NRC inspector identified that a chemistry technician, performing a quarterly pipette calibration verification on an adjustable pipette at the low end point, repeated the verification at the same volume after failing to meet the acceptance criteria.
- d. An NRC inspector identified that:
 1. On January 27, 1997, a reanalysis was not performed to resolve a disagreement between a laboratory result and the in-line control rod drive (CRD) conductivity monitor reading.
 2. On April 7 and 14, 1997, maintenance requests were not written to resolve repeated disagreements between laboratory analysis results and the CRD and reactor recirculation system dissolved oxygen in-line monitor readings.
- e. On May 21, 1997, an NRC inspector identified that a CT did not close the sample sink hood prior to providing flow to the conductivity monitor and that a CT attempted to connect the portable, in-line monitor to the condensate supply spigot with condensate makeup water flowing.
- f. On May 22, 1997, an NRC inspector identified an area having removable beta-gamma contamination ≥ 1000 dpm/100 cm², located within the post-accident sampling station, that was not conspicuously posted with a sign bearing the words "Caution, Contaminated Area."

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Illinois Power Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice of Violation (Notice), within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid a further

violation, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g. explain why the disclosure or information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois,
this 14th day of July 1997