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Docket No. 50-461

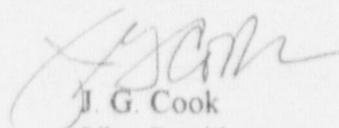
Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Response to Notice of Violation Contained in
Inspection Report 50-461/94014 (DRP)

Dear Sir:

The attachment to this letter contains the Illinois Power (IP) response to the violation of Nuclear Regulatory Commission (NRC) requirements documented in NRC inspection report 50-461/94014 (DRP). The notice of violation discusses the failure to have a maintenance activity for periodically replacing the "B" diesel fire pump fuel oil filter. IP admits the violation occurred as described in the NRC inspection report. On the basis of an extensive review of this issue, IP is confident that other preventive maintenance activities that could lead to degraded equipment if not performed have not been inadvertently deleted.

Sincerely yours,



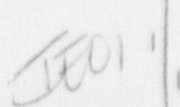
J. G. Cook
Vice President

RSF/csm

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

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PDR



The Notice of Violation states in part:

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Clinton Updated Safety Analysis Report, Table 3.2-1, specified that the quality assurance requirements of 10 CFR Part 50, Appendix B, were applicable to the diesel driven fire pumps.

Contrary to the above, from November 18, 1992, to August 31, 1994, no procedure existed to change the "B" diesel fire pump fuel oil filter, which is an activity affecting quality.

Background and Reason for the Violation

On August 31, 1994, during a scheduled run of the "B" diesel-driven fire pump, the operator noted a decrease in the fire pump engine speed below acceptable limits. The immediate cause for the decrease in speed was determined to be a clogged fuel oil filter. The filter had become clogged because it was not periodically replaced as recommended by the diesel engine manufacturer and the system engineer. A preventive maintenance (PM) activity which periodically replaced the fuel oil filter had been inadvertently deleted from the PM program. Condition report (CR) 1-94-09-005 was initiated to track the root cause and corrective action determinations for this deficiency.

Investigation of this issue identified that in 1992, the system engineer and the diesel engine manufacturer representative performed a review of diesel fire pump engine maintenance activities, surveillances and procedures to improve the performance and reliability of the fire pump engines. The review identified several recommended changes to diesel fire pump PM activities including a change to the PM task (PMMFPA001) which replaced the "B" diesel fire pump fuel oil filter on an annual frequency. The review recommended that the fuel oil filter replacement activity be incorporated into another PM task (PMMFPA046) which included several other PM activities performed on the "B" diesel fire pump engine at an annual frequency. The review further recommended that the existing fuel oil filter replacement PM task (PMMFPA001) be cancelled.

As recommended by the review, on November 18, 1992, a Maintenance planner cancelled the existing fuel oil filter replacement task, PMMFPA001; however, he failed to incorporate the fuel oil filter replacement activity into annual PM task PMMFPA046. As a result of this failure, no mechanism was in place to periodically replace the fuel oil filter. The fuel oil filter was replaced on October 20, 1992, and not replaced again until August 31, 1994, when the fuel oil filter was found clogged.

A human performance enhancement system (HPES) evaluation was performed to determine the causes and contributing factors for the fuel oil filter replacement task cancellation. The evaluation determined that the cause of this violation was inattention to detail by the Maintenance planner in his failure to ensure the fuel oil filter replacement activity was incorporated into annual PM task PMMFPA046. The format of the memo recommending the changes to PM tasks contributed to the planner's error. The memo contained numerous recommended changes and listed the changes by PM task number but the memo was misleading for PM tasks PMMFPA001 and PMMFPA046. The changes listed for PMMFPA001 were to incorporate the fuel oil filter change into PM task PMMFPA046 and cancel PM task PMMFPA001. However, the changes listed for PM task PMMFPA046 did not include incorporating the fuel oil filter replacement activity.

In addition, reviews which could have identified the planner's error did not do so. Reviews of condition report (CR) 1-91-12-021, the corrective action document which originated the review of maintenance activities, and reviews of centralized commitment tracking (CCT) item 059074, issued to track completion of the PM program changes recommended by the engine manufacturer representative and the system engineer, did not identify the inadvertently deleted PM task.

Corrective Steps Taken and Results Achieved

Preventive maintenance task PMMFPA001 was reestablished as the periodic fuel oil filter replacement activity for the "B" diesel fire pump. The frequency for replacing the fuel oil filter on the "B" diesel fire pump engine was changed to six months to be consistent with the frequency for replacing the "A" diesel fire pump engine fuel oil filter.

The "B" diesel fire pump fuel oil was sampled and analyzed for the presence of particulate and none was found.

An extensive review of the PM program and diesel fire pump commitments was performed to determine the extent of the violation.

- ° Diesel fire pump maintenance activities for the past six months were reviewed to ensure that any deficiencies identified during those activities were appropriately resolved. The review identified that the deficiencies noted during the activities were resolved appropriately.
- ° Commitments made in the past three years related to the diesel fire pumps were reviewed and continue to be in place.
- ° Commitments made in the past three years to the NRC regarding the PM program were reviewed and continue to be in place.

- PM tasks that were cancelled in the past three years for equipment included in the Clinton Power Station quality assurance program were reviewed to ensure the cancellations did not adversely impact any commitments. The review concluded that no commitments were affected.
- The other recommended PM activity changes identified by the engine manufacturer representative and the system engineer were reviewed to ensure those commitments remain in place as appropriate. The review concluded that required PM activities have not been deleted.
- PM tasks that were cancelled in the past three years for equipment included in the CPS quality assurance program were reviewed to ensure that the preventive maintenance activities in the cancelled PM tasks were incorporated into other PM tasks if appropriate. The review identified three discrepancies. Two PM activities were cancelled with the provision that they would be incorporated into a procedure; however, they were not incorporated. A reevaluation of the two cancelled activities concluded that they were not required. Proper cancellation documentation for these PM activities has been initiated. One other PM activity was inadvertently cancelled in 1989; however, the error was discovered in 1991 and the activity was reinstated. This activity has been performed three times as required since being reinstated and no adverse impacts have been identified.

On the basis of these reviews, IP is confident that other preventive maintenance activities that could lead to degraded equipment if not performed have not been inadvertently deleted.

Corrective Steps Taken to Avoid Further Violations

This violation was discussed with the involved personnel and they understand the errors made.

Plant Engineering and Maintenance Planning personnel will be made aware of this violation and the errors that caused it. IP plans to complete this action by November 30, 1994.

The current procedures governing condition reports and the centralized commitment tracking system have sufficient controls to avoid the recurrence of a similar violation.

Date When Full Compliance Achieved

Illinois Power is in full compliance with 10CFR50, Appendix B, Criterion V regarding this violation.