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Public

Wayne D. Romberg
 Assistant Vice President - Nuclear

U-602781
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July 2, 1997

Docket No. 50-461

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

PUBLIC DOCUMENT

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Subject: Clinton Power Station Long-Term Improvement Plan

Dear Mr. Beach:

Following the September 5, 1996, event at Clinton Power Station (CPS), Illinois Power (IP) established a Startup Readiness Action Plan (SRAP) to address the issues and root causes arising from the September 5 event. Based upon subsequent assessments by IP and inspections by the Nuclear Regulatory Commission, and additional events which occurred earlier in the current CPS outage, IP determined that there was a need for a more deliberate and comprehensive approach to assessing CPS readiness to restart and achieving long-term improvements in performance. Accordingly, in March 1997, IP developed a Strategic Recovery Plan (SRP), which incorporated the SRAP and included a provision to establish a Long-Term Improvement Plan (LTIP). The purpose of this letter is to provide the CPS Long-Term Improvement Plan to the NRC.

The attached CPS LTIP identifies elements for improvements in the areas of systems, programs, and organizations, and identifies actions for implementing each of the improvement elements. CPS line managers are responsible for developing implementing plans for each action and submitting these plans to the CPS Vice President for review and acceptance. The detailed plans will include responsible managers/owners, goals and performance measures, tracking of activities, and assessment of the effectiveness of improvements.

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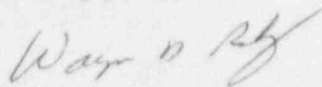
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Based upon further information or evaluation, line management may identify a need to revise the LTIP. CPS will provide LTIP updates and status to the NRC on a periodic basis.

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

Sincerely yours,



Wayne D. Romberg
Assistant Vice President

BGS/krk

Attachment

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

**CLINTON POWER STATION (CPS)
LONG TERM IMPROVEMENT PLAN**

EXECUTIVE SUMMARY

Following an event at CPS on September 5, 1996, the plant was shut down. Illinois Power (IP) performed assessments of the event and implemented corrective actions. IP also established a Startup Readiness Action Plan (SRAP) to address the issues and causes arising from the September 5 event. Subsequent to development of the SRAP, IP developed a Strategic Recovery Plan (SRP), which incorporated the SRAP, established comprehensive restart readiness reviews, included a provision to establish a Long Term Improvement Plan (LTIP), and established performance measures to ensure the effectiveness of the SRAP, readiness reviews, and LTIP. Thus, the SRP provides a deliberate and comprehensive approach to ensuring the readiness of IP to restart CPS and to achieving long term improvements in performance.

To ensure that the SRP receives appropriate management focus, IP established a dedicated Turn-Around Team headed by a newly created Assistant to the Vice President of CPS. The Turn-Around Team has the responsibility for development of the SRP, coordination of implementation of the SRP, monitoring the progress and results of the implementation, and making recommendations to the CPS Vice President for restart and long term improvements. In particular, the Turn-Around Team has coordinated development of the LTIP, will be coordinating and monitoring implementation of the LTIP, and will be monitoring the plant's performance measures to determine whether additional improvements are needed.

The SRP (including the LTIP) covers the areas of systems, programs, and organizations. Within each of these areas, the Turn-Around Team and management identified various improvement elements. These elements were identified based upon a review of available information, the experience of the Turn-Around Team and management, and input from the results of the readiness reviews. In particular, the Turn-Around Team reviewed information in significant IP and NRC inspections, assessments, and root cause determinations. Based upon this review, the Team developed a table which lists each significant issue identified in those reports, and established elements and actions for the Long Term Improvement Plan corresponding to those issues. Based upon the reviews and the input from the restart readiness reviews, the Turn-Around Team and management identified the following elements for long-term improvement.

Systems

- a. Improvements related to design and licensing basis. This includes a vertical-slice inspection, reviews for conformance with the Updated Safety Analysis Report (USAR), and the 50.59 improvement program.

- b. Improvements in materiel condition. This includes monitoring by system engineers, improvements in trending, establishment of integrated decision making led by Operations to prioritize work, and corrective action for degraded conditions.
- c. Improvements in work planning and control. This includes improvements in plant work control, engineering work control, plant work control, and outage management.

Programs

- a. Reviews of programs and procedures. This includes reviews of surveillance procedures, reviews of CPS programs for adequacy, and establishing benchmarks for CPS procedures.
- b. Improvements in assessments and corrective actions. This includes improvements in reviews by Quality Assurance and Quality Control; improvements in self-assessments; and improvements in event critiques and root cause analyses, performance monitoring and trending, and communication of information to plant personnel regarding problems and their resolution.
- c. Improvements in other programs. This includes improvements in testing, design control, vendor manual control, radiation protection, operations, and the operating experience program.

Organizations

- a. Improvements in leadership and accountability. This includes training in management skills, establishing management expectations, management observations and performance reviews to assess satisfaction of expectations, and improving teamwork among departments.
- b. Improvements in human performance. This includes human error reduction training, training on procedure performance and conservative decision-making, and improvements in monitoring.

For each of the elements, the Plan provides a description of the actions to be accomplished, and identifies the personnel responsible for these actions, the deliverables to be produced as a result of the action, and the due dates for the deliverables.

Each element includes a defined goal and assessments to determine whether the goal has been met. Additionally, as part of the readiness reviews, the Turn-Around Team and management developed performance measures for systems, programs, and organizations. A number of these performance measures include long term goals. The Turn-Around

Team will monitor these performance measures to compare performance against the established goals. The Turn-Around Team will also monitor the other performance measures to arrive at an integrated assessment of improvement in the areas of systems, programs, and organizations. If a particular goal for a performance measure is not met, or if the integrated assessment does not indicate sufficient improvement, the responsible managers will determine the cause of the lag in performance improvement. Similarly, if an assessment shows that a goal for an element is not met, the responsible managers will determine the cause. Based upon the cause, the Turn-Around Team will coordinate development of a plan of action for approval by the CPS Vice President to achieve the desired improvement.