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July 2, 1997

Mr. A. Bill Beach Regional Administrator U.S. Nuclear Regulatory Commission'97 JUL 14 A10:04 Region III 801 Warrenville Road PUBLIC BOCUMENT RUM Lisle, Illinois 60532-4351

Subject: Meeting Summary

Dear Mr. Beach:

The purpose of this letter is to summarize a meeting held between Messrs. G. C. Wright and T. W. Pruett of your staff with myself and members of Clinton Power Station (CPS) Operations, Licensing, and Nuclear Station Engineering Departments at CPS on June 24, 1997. The purpose of the subject meeting was to discuss the method by which degraded and nonconforming conditions affecting structures, systems, and components (SSCs) are identified and resolved at CPS.

CPS Procedure 1014.06, "Operability Determination," provides guidelines and instructions for the Operations Shift Supervisor (SS) to determine operability of potentially degraded or nonconforming SSCs. Since CPS procedure 1014.06 specifically addresses structures, systems, and components (SSCs) explicitly subject to CPS Technical Specifications, including those contained within the Operational Requirements Manual (ORM), and those SSCs which support CPS Technical Specification SSCs, the focus of the meeting was on the processing of other degraded or nonconforming SSCs which are described in the CPS Updated Safety Analysis Report (USAR). The impact of a degraded or nonconforming SSC is evaluated using processes described in CPS procedures 1016.01, "CPS Condition Reports," and 1029.01, "Preparation and Routing of Maintenance Work Documents." These FE45 procedures allow an NRC licensed Senior Reactor Operator (SRO) to evaluate newly identified potential degraded or nonconforming SSCs for their effect on CPS systems operation. Based on this evaluation, an Operability Determination performed per CPS procedure 1014.06 or an engineering evaluation as described in CPS procedure 1016.01 can be used by the SRO to determine the impact of the degraded or nonconforming condition.





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As documented in Inspection Report 50-461/97003(DRS) dated May 5, 1997, the CPS Operability Determination (OD) Program used to implement Generic Letter (GL) 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," was reviewed during the subject inspection and was found to be acceptable with one comment. This comment was in regard to the performance of safety evaluations for the degraded or nonconforming condition described on open ODs prior to startup from unit outages. This comment has been addressed by adding the requirement that a safety evaluation be performed prior to startup if an operable but degraded condition is not corrected before startup from the next/current refueling outage into CPS procedure 1014.06, "Operability Determination." The purpose of the safety evaluation is to evaluate whether an unresolved safety question exists as a result of not correcting the nonconforming or degraded condition. Timeliness in correcting the degraded or nonconforming condition is determined via the CPS corrective action program.

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The other major topic discussed in this meeting concerned the disposition of known CPS USAR discrepancies. Specifically, during CPS plant system startup readiness reviews conducted as part of the CPS Strategic Recovery Plan, system engineers were required to identify condition reports. Of those condition reports identified, 70 potential USAR discrepancies were identified which had not been corrected in a timely manner. As a result, each of these 70 potential discrepancies are being dispositioned by either correcting the "as-built" condition of the plant to match the USAR, revising the CPS USAR in accordance with CPS procedures to match the "as-built" condition exists, or determining that a USAR discrepancy does not actually exist. A list was provided to Mssrs. Wright and Pruett which identified each potential discrepancy and the difference between the "as-built" and the USAR. Illinois Power (IP) is taking action to address the timelines issue with correcting the known USAR discrepancies via the CPS procedure 1016.01 process.

In addition to the USAR discrepancy list discussed above, copies of all currently open CPS procedure 1014.06 operability determination packages were provided to Mr. Pruett for review.

IP understands that the material presented to Mssrs. Wright and Pruett provides reasonable assurance that degraded or nonconforming structures, systems, and components at CPS are being evaluated by licensed SROs for any impact the condition may have on the safe operation of CPS and that appropriate actions are taken as a result of these evaluations. We understand that these actions are consistent with the guidance offered in GL 91-18 as represented in Inspection Report 50-461/97003 (DRS).

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Please contact me if I can be of further assistance.

Sincerely yours,

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Richard F. Phares Assistant to the Vice President

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