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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

May 27, 1988

Docket No. 50-461

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

Subject: Clinton Power Station
Request for Additional Information - Generic Letter 83-28

Dear Sir:

In response to the letter from J. A. Stevens to F. A. Spangenberg dated April 18, 1988, regarding Generic Letter 83-28, attached is the additional information requested. If there are any questions concerning this information, please contact me.

Sincerely yours,

F. A. Spangenberg, III
Manager - Licensing and Safety

DWW/bjq

Attachment

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

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Attachment 1

1. Item 2.2.1 - Requested Information

The submittal did not provide information confirming that all components designated as safety-related in the Q-List are properly designated on documents and in information handling systems. The applicant should provide, for staff review, a description of the program which controls the designation of safety-related components on documents and in information handling systems.

Response

Safety-Related components were originally identified in the GE Master Parts List, controlled Sargent & Lundy component listings, Design Documents (Drawings, Specifications, etc.), and the Final Safety Analysis Report (FSAR). These listings were developed based on engineering evaluation. Any changes to these documents were controlled by procedures and/or instructions of the responsible organization.

A computerized Master Equipment List (MEL) database is being developed to consolidate classification information from the above documents and is available, as completed, for the purpose of identifying safety-related component classifications. If the component(s) in question is not in MEL and is not verified, the above documents are utilized to determine the classification. Component classification data being entered into the database is being extracted from the above approved design documents. Any changes to this baseline classification data will originate from a design change document review and/or verification. The required changes are entered into the MEL database, and verified for accuracy.

2. Item 2.2.1.2 - Requested Information

We find that the information contained in the licensee's submittal is not sufficient to allow us to conclude that the source listings have been combined and coordinated into a single information handling system. The licensee should describe procedures and controls that illustrate how the listing (the master equipment list) was originally prepared, how new safety-related items are added, how changes in the classification of items are made, how listed items are verified, how unauthorized changes are prevented, and how the information is maintained and distributed to users as a single, official, consistent, and unambiguous source of information.

Response

The source listings of component classification are those described in response to item 2.2.1 above. The MEL database was initially created by electronically transferring component information to it from the GE Master Parts List and Sargent & Lundy component listings. In addition, plant systems were physically walked down, where accessible, or documents were researched to capture/verify nameplate data, physical location, function, and other required database information.

In conjunction with this effort, component classification data is being extracted from the existing design reference documents. The resultant information from walkdown and classification activities is being entered into the MEL database in accordance with approved procedures and instructions. System walkdown data and component classification are scheduled for completion in the second quarter of 1989. Items may subsequently be added to the database as a result of reviewing new/revised design documents. A change in classification to a component in the MEL database may result from the review of a new/revised design document initiated and/or approved by Nuclear Station Engineering Department.

The MEL and the Design Status System (DSS) databases contain the reference documents (ie. design drawings, modifications, etc.) which are used during development and maintenance of the MEL database. When revisions/changes to these reference documents occur, DSS electronically notifies MEL of the change, which results in the revised/changed reference document being reviewed by the MEL group to identify which MEL database record(s) requires updating to reflect the latest design.

The computerized Master Equipment List, as it is completed for each system/component, is available to users as a single, consistent and unambiguous source of information for components installed in the plant. The MEL database is a sub-system of the on-line Power Plant Maintenance Planning System (PPMPS) and provides information necessary to create Maintenance Work Requests (MWRs) (including component classification and other associated data related to the component being worked on). Database security prevents unauthorized entry of data into the MEL.

3. Item 2.2.1.4 - Requested Information

The licensee's submittal is inadequate to address this item. The licensee should provide a description of those controls that are used to verify that the information handling system for equipment classification has been properly prepared, that its contents are validated, that it is being maintained current, and that it is being used to determine the classification of equipment as intended.

Response

In addition to the program controls identified in items 2.2.1 and 2.2.1.2, evaluations and audits are periodically performed by internal/external organizations to evaluate the program(s) that determines and/or identifies classification of components. These evaluations/audits include as a minimum the following activities:

- ° The procedures and instructions that implement the program(s)
- ° Validation of new or revised data
- ° Status of classification documents versus current design
- ° Utilization of proper documents to determine classification of components during preparation of maintenance work requests, modifications, procurement documents, etc.