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Docket No. 50-461

Mr. James L. Caldwell
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: Corrective Actions for the 1998 Clinton Power Station
Emergency Response Organization Integrated Graded Exercise

Dear Mr. Caldwell:

The Clinton Power Station (CPS) Graded Exercise was conducted on November 18, 1998. The results of this exercise demonstrated that the CPS Emergency Response Organization (ERO) could protect the health and safety of the public. However, several areas for improvement were identified during the critique process. The more significant critique findings are identified below.

- Improper Protective Action Recommendations (PARs) were provided to the state by the TSC and EOF. This was originally caused by personnel in the Technical Support Center (TSC) marking a Nuclear Accident Reporting System (NARS) notification form incorrectly. This error was subsequently detected by personnel in the EOF; however, it took approximately 20 minutes to correct the improper notification. A second improper PAR was caused by incorrectly reporting field team readings. Field readings taken at the protected area fence were reported to dose assessment personnel as readings from the site boundary. The protected area fence is substantially closer to the site than the site boundary. This error confused dose assessment personnel as field readings were higher than expected and resulted in an error when reporting PARs.
- The prioritization of repair activities by the Operations Support Center (OSC) and TSC was ambiguous and inadequate. Both of these facilities identified multiple activities as being priority 1; however, a sense of urgency was not exhibited when dispatching the repair teams associated with these activities. Additionally, the practice of identifying multiple priority 1 activities can create an inefficient use of resources and a lack of focus on critical emergency response activities.

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- Turnover of command authority from the Main Control Room (MCR) to the Technical Support Center (TSC) was hindered due to the need for field team members to staff the EOF as required by EPIP EC-01, "CPS Emergency Response Organization and Staffing." These teams were available within the required time, but the TSC was unaware of their availability.
- The Operational Support Center (OSC) Supervisor became involved in specific tasks and did not maintain proper oversight of OSC activities at all times.
- In addition to the findings identified above, operating errors were made by the crew in the simulator.

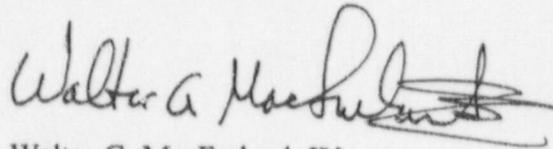
Illinois Power (IP) is in the process of taking action to improve performance in the areas described above. The following is a list of corrective actions to address these areas:

- A review of the PAR process is being performed to streamline the process by reducing the number of people involved in PAR decision making. Additionally, the PAR flowchart is being revised to describe the default PAR recommendations in laymen's terms and to make the recommendation easily transferable to the NARS notification form. Remedial training will also be provided to individuals involved in the PAR process. Field team members, field team coordinators and dose assessment personnel are being provided remedial training on the difference between the site boundary and the protected area fence. Pre-established field monitoring points for the site boundary are also being established and additional training will be provided to field team members to ensure the proper areas for taking field readings are understood and reported properly. Remedial training will also be provided to the TSC and EOF communicators on properly completing the NARS forms and to reaffirm the requirement for notifications and follow-up notifications to state and federal agencies.
- Appropriate procedure(s) will be revised to provide guidelines on establishing priorities during emergency events and expediting dispatch of high priority OSC repair teams. Training will be provided to appropriate personnel on the new procedures.
- EPIP EC-01, will be revised to eliminate the requirement for two field teams to be staffed in the EOF prior to activating the TSC.
- Remedial training will be provided to OSC Supervisors on maintaining oversight of activities in the OSC.
- The errors made by the operating crew in the simulator are being addressed separately by the Operations Continuing Training Program.
- To demonstrate the effectiveness of the corrective actions being taken, an EOF/Joint Public Information Center (JPIC) facility drill, a TSC/OSC/Simulator facility drill, and an integrated drill have been scheduled before the end of the first quarter of 1999.

Although the results of the graded exercise on November 18, 1998, demonstrated that the Clinton Power Station ERO can adequately protect the health and safety of the public, prompt corrective actions are being taken to address the performance weaknesses noted during the exercise.

If you have any questions or require additional information, please contact Mr. Dennis L. Smith, Director-Security and Emergency Preparedness, at (217) 935-8881, extension 3356.

Sincerely yours,



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