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Walter G. MacFarland IV
Senior Vice President
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U-603097
1A.120

December 4, 1998

Docket No. 50-461

10CFR50.54(a)(3)

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

Subject: Clinton Power Station Quality Assurance Program Revision

Dear Madam or Sir:

Attached for NRC review and approval are proposed changes to the Clinton Power Station (CPS) Updated Safety Analysis Report (USAR) and Operations Requirements Manual (ORM) which will impact commitments made in the CPS Quality Assurance Program Description (QAPD). These changes concern the procedure approval process at CPS.

Currently, per USAR section 13.5.1.2 and ORM sections 6.5.3.1, 6.8.2, and 6.8.3, the Manager-Clinton Power Station provides final approval for changes to and initial issue of all station administrative procedures, safety-related procedures, and all procedure changes which require the completion of a 10CFR50.59 safety evaluation.

Illinois Power is proposing to allow the final approval of safety-related procedures and changes to these procedures be performed by the applicable Department Head/Designee. By delegating the approval of these procedures to the appropriate level of management, the Manager-CPS will be able to focus his attention on the station administrative procedures and those procedures, or procedure changes, which require a 10CFR50.59 safety evaluation.

This change will affect the Updated Safety Analysis Report (USAR) section 13.5.1.2 and the Operational Requirements Manual (ORM) sections 6.5.3.1, 6.8.2, and 6.8.3. The attachment to this letter identifies the specific USAR and ORM changes Illinois Power is proposing.

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Per USAR section 1.8, CPS complies with the requirements of Regulatory Guide (RG) 1.33, Rev. 2 (February 1978) "Quality Assurance Program Requirements (Operation)," with exceptions as noted. RG 1.33 endorses American National Standards Institute (ANSI) Standard N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." Pertaining to the approval of procedures, ANSI N18.7-1976/ANS-3.2, section 5.2.15, "Review Approval and Control of Procedures," requires in part that:

- 1). "Procedures shall be approved as designated by the owner organization before initial use."
- 2). "Rules shall be established which clearly delineate the review of procedures by knowledgeable personnel other than the originator and the approval of procedures and procedure changes by authorized individuals."
- 3). "Changes to documents shall be reviewed and approved by the same organization that performs the original review and approval unless the owner organization designates another qualified organization".

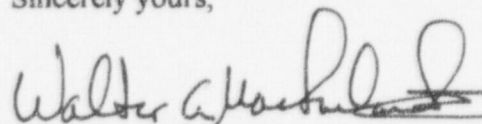
IP has evaluated the proposed changes to the CPS procedure approval process against the procedure approval process as stated in ANSI N18.7-1976/ANS-3.2. This evaluation has concluded that the CPS proposed procedure approval process meets the requirements as stated in ANSI N18.7-1976/ANS-3.2, section 5.2.15.

Implementation of the proposed method for approval of procedures at CPS will not affect IP's ability to comply with 10CFR50, Appendix B, criteria or other previously accepted Quality Assurance Program Description commitments contained in the CPS USAR.

Illinois Power has evaluated these proposed changes and has concluded that the changes constitute a reduction in commitment to the previously approved CPS Quality Assurance Program Description (QAPD). Therefore, these changes require NRC approval prior to implementation.

Illinois Power requests approval of the proposed changes within sixty (60) days as provided in 10 CFR 50.54(a)(3)(iv).

Sincerely yours,



Walter G. MacFarland, IV
Senior Vice President
and Chief Nuclear Officer

MEM/krk

Attachment: Affected USAR and ORM pages

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

13.5.1.2 Preparation of Procedures

Procedures needed for fuel loading shall be written by the plant staff or consultants prior to fuel loading. Procedures required for plant operations under normal and emergency conditions shall be written by the plant staff or consultants, to the extent practical, for use during the initial plant testing phase to allow for correction prior to fuel loading and for use in the plant operator training program. The responsibility for writing and preparing plant procedures is assigned to the appropriate members of the plant staff as indicated in Table 13.5-1.

Administrative procedures and procedures requiring a safety evaluation are reviewed by the FRG and approved by the Manager-Clinton Power Station prior to implementation. Safety-related procedures are approved by the Manager-Clinton Power Station prior to implementation. They are reviewed periodically as set forth in Administrative Procedures. Temporary changes to procedures which clearly do not change the intent of the approved procedure shall, as a minimum, be approved by two members of the plant staff knowledgeable in the areas affected by the procedure. At least one of the two members of plant management staff shall hold a Senior Reactor Operator's license or prior to personnel being licensed, shall be certified on the unit affected. Section 13.4 defines types of procedures requiring FRG review.

Appropriate plant management shall approve all permanent and temporary procedures in accordance with Administrative Procedure requirements. Distribution of the CPS Operating Manual and portions thereof shall be controlled as prescribed in appropriate Administrative Procedures. Subsequent revisions, changes or temporary changes shall be controlled in accordance with the Administrative Procedures and as prescribed by the Technical Specifications and the Operational Requirements Manual (ORM). Changes which conflict with the intent of the Operating License and/or the Technical Specifications or involve an unreviewed safety question shall be made only with the review of the FRG and the NRAG and authorization from the Nuclear Regulatory Commission.

13.5.1.3 Procedures

Administrative Procedures which consist of Plant Management Procedures (PMP's), Department Administrative Procedures, and Plant Management Special Procedures define the responsibilities, methodology, and procedural actions required to assure that the plant shall be managed in a safe and dependable manner. They include basic guidelines and controls for efficient dissemination of information and direction to plant personnel and describe the interfaces with external organizations. Plant procedures describe the method by which operating experience information is disseminated to plant personnel.

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6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

Procedures required by Technical Specification 5.4.1 and ORM 6.8 and other procedures which affect plant nuclear safety as determined by the Manager-Clinton Power Station or the responsible manager* and changes thereto, other than editorial or typographical changes, shall be reviewed as follows:

6.5.3.1 TECHNICAL REVIEW

- a. Each such procedure or procedure change shall be independently reviewed by an individual knowledgeable in the area affected other than the individual who prepared the procedure, or procedure change. The Manager-Clinton Power Station or the responsible manager* shall prior to implementation approve all plant procedures and changes thereto.
- b. Individuals responsible for reviews performed in accordance with Item 6.5.3.1.a above shall be designated by the Manager-Clinton Power Station or the responsible manager*. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.

Individuals performing these reviews shall meet or exceed the qualifications stated in ANSI/ANS 3.1-1978 for the appropriate discipline.
- c. When required by 10 CFR 50.59, a safety evaluation to determine whether or not an unreviewed safety question is involved shall be included in the procedure or the procedure change review. If it is determined that an unreviewed safety question is not involved, a written safety evaluation to support that decision will be prepared and submitted to the FRG for review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to the Manager-Clinton Power Station approval for implementation.
- d. Written records of reviews performed in accordance with Item 6.5.3.1.a above, including recommendations for approval or disapproval, shall be prepared and maintained.

[* The responsible manager must be the equivalent of the Manager - Clinton Power Station with respect to his/her level of responsibility within the corporate structure.]

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TO

OPERATIONAL REQUIREMENTS MANUAL (ORM)

6.8 PROCEDURES AND PROGRAMS

PROCEDURES

- 6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. Refueling operations;
 - b. Surveillance and test activities of safety-related equipment;
 - c. Security Plan implementation;
 - d. Emergency Plan implementation;
 - e. Fire Protection Program implementation;
 - f. Process Control Program implementation; and
 - g. Offsite Dose Calculation Manual implementation.

REVIEW AND APPROVAL

- 6.8.2 Each procedure of Technical Specification 5.4.1 and Operational Requirement 6.8.1 and changes thereto, shall be reviewed in accordance with Operational Requirements 6.5.1.6 and 6.5.3 as appropriate and shall be approved by the Manager-Clinton Power Station or the responsible manager* prior to implementation and reviewed periodically as set forth in administrative procedures.

[*The responsible manager must be the equivalent of the Manager-Clinton Power Station with respect to their level of responsibility within the corporate structure.]

TEMPORARY CHANGES

- 6.8.3 Temporary changes to procedures of Technical Specification 5.4.1 and Operational Requirement 6.8.1 may be made provided:
- a. The intent of the original procedure is not altered;
 - b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and

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To

6.8 PROCEDURES AND PROGRAMS (continued)

- c. The change is documented, reviewed in accordance with Operational Requirements 6.5.1.6 and 6.5.3 as appropriate, and approved by the Manager-Clinton Power Station or the responsible manager* within 14 days of implementation.

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6.8.4 The following programs shall be established, implemented, and maintained:

a. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

b. Fire Protection Program

A program to implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Safety Analysis Report as amended, and as approved in the Safety Evaluation Report (NUREG-0853) dated February 1982 as supplemented. Noncompliance with the above Fire Protection Systems described in plant procedure CPS No. 1893.01 shall be reported in accordance with Operational Requirement 6.6.1.

c. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

From

6.8 **PROCEDURES AND PROGRAMS** (continued)

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