



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REDUCTION IN COMMITMENTS IN QUALITY ASSURANCE PROGRAM DESCRIPTION

ILLINOIS POWER COMPANY

CLINTON POWER STATION

DOCKET NO. 50-461

1.0 INTRODUCTION

By letter dated December 4, 1998, Illinois Power Company submitted changes to the Clinton Power Station (CPS) Updated Safety Analysis Report (USAR) and Operations Requirements Manual (ORM) that will impact commitments made in the Quality Assurance Program Description (QAPD). The changes were submitted in accordance with requirements in 10 CFR 50.54(a)(3) and constitute a reduction in commitment. The CPS proposal allows the applicable Department Head/Designee the final approval of safety-related procedures. The Manager - Clinton Power Station will continue to approve administrative procedures and procedures requiring a 10 CFR 50.59 safety evaluation.

2.0 EVALUATION

CPS has opted to delegate responsibility for the approval of certain documents and activities to a lower level of authority in the organization as described below.

1. Proposed USAR Section 13.5.1.2 of Clinton's QAPD states that safety-related procedures are approved by the applicable Department Head/Designee prior to implementation. Previously, safety-related procedures were approved by the Manager - Clinton Power Station. The Manager - Clinton Power Station will continue to approve administrative procedures and procedures requiring a safety evaluation.
2. Proposed ORM Section 6.5.3.1.a of Clinton's QAPD states that the applicable Department Head/Designee shall approve all plant procedures and changes thereto, prior to implementation. Previously, all plant procedures were approved by the Manager - Clinton Power Station or the responsible manager.
3. Proposed ORM Section 6.8.2 of Clinton's QAPD states that 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 applicable and shall be approved by the applicable Department Head/Designee prior to

implementation and reviewed periodically as set forth in administrative procedures. Previously, each procedure of Technical Specification 5.4.1 and Operational Requirement 6.8.1 was approved by the Manager-Clinton Power Station or the responsible manager.

4. Proposed ORM Section 6.8.3.c of Clinton's QAPD states that the change [temporary procedure change] is documented, reviewed in accordance with Operational Requirements 6.5.1.6 and 6.5.3 as appropriate, and approved by the applicable Department Head/Designee within 14 days of implementation. Previously, temporary procedure changes of Technical Specification 5.4.1 and Operational Requirement 6.8.1 procedures were approved by the Manager-Clinton Power Station or the responsible manager.

CPS is committed to Regulatory Guide 1.33, Revision 2 (February 1978) "Quality Assurance Program Requirements (Operation)," which conditionally endorses the 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, and (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.

The staff reviewed the December 4, 1998, 10 CFR 50.54(a) submittal, in accordance with NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Chapter 13.5. The staff determined that the proposed changes to the Updated Safety Analysis Report and Operational Requirements Manual continue to satisfy the criteria of Appendix B to 10 CFR Part 50. The staff finds the proposed changes to be acceptable because (1) CPS continues to implement ANSI Standard N18.7-1976 which is one acceptable method of complying with Appendix B to 10 CFR Part 50, and (2) the changes are consistent with Clinton's Quality Assurance Manual, Chapter 5, Section 5.2.1, which states that each department is responsible for developing, reviewing, approving and complying with formal instructions, procedures, drawings and related material for performing activities affecting the quality or functions of applicable systems, structures, or components at Clinton.

### 3.0 CONCLUSION

The staff determined that the proposed changes to the Updated Safety Analysis Report and Operational Requirements Manual continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and are acceptable.

Principal Reviewer: M. Bugg

Date: February 3, 1999