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ILLINOIS POWER COMPANY



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

July 11, 1986

Docket No. 50-461

Mr. James G. Keppler  
Regional Administrator  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Response to the Notice of Violation  
dated June 5, 1986, in Inspection Report 50-461/86023

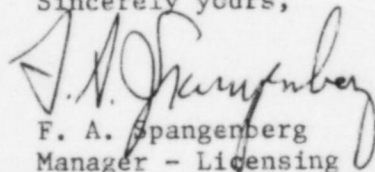
Dear Mr. Keppler:

This letter is in response to the June 5, 1986, letter identifying certain activities which appeared to be in violation of NRC requirements. Attachment A provides Illinois Power Company's response concerning the improper implementation of Maintenance Work Requests (MWRs).

The delays involved in providing this letter by July 5, 1986, were discussed with the NRC Senior Resident Inspector, Mr. T. P. Gwynn. Mr. Gwynn indicated that submittal of this letter by July 11, 1986, would be satisfactory.

I trust this response will ensure compliance with regulatory requirements.

Sincerely yours,

  
F. A. Spangenberg  
Manager - Licensing  
and Safety

PRS/pjr

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager  
NRC Resident Office  
Illinois Department of Nuclear Safety

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The Notice of Violation states in part:

"... activities affecting quality were not accomplished in accordance with CPS No. 1029.01 in that:

- a. MWR B-27868 had work performed under the MWR, as documented in the remarks section, that did not address the problem described. In addition, the post maintenance functional testing required by the MWR job steps was not documented as having been performed. Thus, the work and post maintenance testing associated with the MWR was not completed but the MWR was signed as complete by the Maintenance Group Supervisor.
- b. "Q" MWRs B-35651 and C-05923 were closed and vaulted without a review by Quality Assurance after completion of work.
- c. MWR C-03982 was closed and vaulted with unauthorized work performed without routing the MWR back to planning when a change in scope was required.
- d. MWRs B-31300, B-31305, and C-05024 were not reviewed by the ISI Repair Coordinator for Section XI repair or replacement criteria."

I. Corrective Action Taken and Results Achieved

- A. Maintenance Work Request (MWR) C20749 was initiated to perform a functional test of computer point 1AP-BC504 and its associated annunciator. This retest verified that the annunciator circuitry functions as designed. A more detailed report is available in Condition Report 1-86-06-073.
- B. Illinois Power Company's Maintenance contractor, Stone and Webster Engineering Corporation (SWEC), initiated CR No. 1-86-05-004. An investigation was implemented to identify all SWEC Q-MWRs. It was determined that twelve MWRs had been classified as Q-MWRs. Further investigation determined that: one Q-MWR (B24187) had received the appropriate final review and IPQA sign-off, one Q-MWR (B27621) had not received final IPQA review due to the MWR being closed with no work performed, and the remaining ten Q-MWRs did not appear to have been reviewed by IPQA for closeout. Four of those ten had been processed to the vault (C05009, C05923, B35650, and B35651).

All twelve original Q-MWRs were submitted/resubmitted to IPQA for final review, and no adverse conditions were identified. IPQA signed Block 63 on all twelve Q-MWRs.

- C. SWEC initiated CR No. 1-86-05-006. Subsequent investigation verified that the SWEC electrician was required to troubleshoot the Shutdown Service Water (SSW) Division IA pump breaker as the Mechanism Operated Cell (MOC) switch on the right hand side of the breaker was sticking occasionally. In accordance with Job Step 49.02 of the MWR, the craftsman was to troubleshoot the MOC switch, record cause and location of the sticking in Block 54 of the MWR and return the MWR to the Maintenance Engineer (ME). Contrary to the Job Step, the electrician found and fixed the problem and noted same in Block 54 of the MWR.

The MOC switch was visually inspected by IPQA/QC and found no evidence of physical damage.

- D. SWEC initiated CR 1-86-05-008 to investigate the scope and cause of this condition.

A computer sort was run selecting all Inservice Inspection (ISI) MWRs completed prior to May 3, 1986, as determined by the Equipment Identification Number (EIN). Each selected MWR was then reviewed to determine if ISI was required and if an ISI Review had been performed. This review indicated that from 273 identified MWRs, 217 required no action because ISI was not required, the MWR had been cancelled, or the MWR had been returned to IP Maintenance for further action.

The remaining 56 documents, requiring further investigation, were identified. Several originals were found to have been previously reviewed. Of 56 reviewed MWRs, 42 MWRs were found to need ISI Repair Coordinator review. All 42 MWRs were reviewed by the ISI Repair Coordinator, and two MWRs (B31199 and B24182) were found to require Post Maintenance Testing (PMT). The PMT Forms were initiated and forwarded to Illinois Power Operations for completion of Post Maintenance Testing.

## II. Corrective Action to be Taken to Avoid Further Violations

- A. The technician and Assistant Supervisor involved with MWR B27868 have received letters from the Supervisor - Control & Instrumentation (C&I), stressing the importance of completing MWR job steps, paying attention to detail, and reviewing work documents to ensure all work is complete prior to closure of the document. The above points have been reiterated at C&I group meetings.
- B. To prevent recurrence of this condition, the following corrective actions have been taken:



- i) Clinton Power Station (CPS) procedure 1029.01 "Preparation and Routing of Maintenance Work Requests" (Rev. 8) was revised to appropriately identify those MWRs requiring IPQA review.
  - ii) The SWEC MWR tracking form was revised to help monitor the flow and review of Q-MWRs.
  - iii) It was re-emphasized to the SWEC MEs that "QMWRs" require IPQA final review and sign-off.
- C. To prevent recurrence of this condition a memo was issued to the Job Supervisor and craftsman to reiterate the requirement to follow the job steps of an MWR explicitly.
- D. Training was performed with the SWEC Maintenance Supervisors, Planners, and Engineers who have responsibility for assuring that MWRs are properly processed for ISI review. It was re-emphasized to the SWEC engineers that MWRs are to receive ISI review before the package is sent to the field. The training to the SWEC engineers will be on-going, in accordance with MMM 2.4, Maintenance Training, and will prevent recurrence of this condition.

III. Date When Full Compliance Will Be Achieved

Illinois Power will be in full compliance by July 30, 1986.