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L41-86(07-24)-L
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ILLINOIS POWER COMPANY



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

July 24, 1986

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Director,
BWR Project Directorate No. 4
Division of BWR Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Clinton Power Station
Atomic Safety and Licensing Board
Joint Stipulation, dated January 28, 1985

Dear Dr. Butler:

Illinois Power (IP) and the NRC have programs in place and plans for action that were addressed in the Atomic Safety and Licensing Board (ASLB) Joint Stipulation, dated January 28, 1985. This letter serves to report the implementation and completion of the described programs and actions.

Clinton Power Station (CPS) conforms to the facility description in the Final Safety Analysis Report (FSAR) and information submitted by IP to the NRC in support of the application on the CPS docket. Certification of the FSAR material through Amendment #38, submitted on May 30, 1986, is completed.

By Letter U-600514 dated April 3, 1986, IP informed the NRC and the Illinois Attorney General (IAG), by copy, that the Overinspection Program was concluded as agreed to in NRC Region III letters dated July 2, 1985 and November 21, 1985. Also, based on the results of the Record Verification Program provided to NRC Region III in IP Letter U-600393 dated January 22, 1986, IP suspended this program effective February 4, 1986. The NRC Region III concurred with the termination of this program by letter dated March 17, 1986. The status of other special programs and actions described in Paragraph 7.a of the Joint Stipulation Preamble will be provided to the IAG by separate correspondence; a copy of which will be provided to the NRC Staff.

The Independent Design Review (IDR) was performed by Bechtel Power Corporation and reported by the NRC in the CPS Safety Evaluation Report Supplement No. 5, Section 17.5, dated January, 1986. IP submitted responses to NRC requested actions in SER Supplement No. 5, via IP letters U-600340 and U-600434 dated November 26, 1985 and February 5, 1986. The NRC will document their review of these completed actions in a subsequent SER supplement.

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The NRC has performed a Construction Appraisal Team (CAT) inspection for CPS on May 20-31 and June 10-21, 1985 (Inspection and Enforcement Inspection Report No. 50-461/85030). Three technical issues that were raised by NRC Nuclear Reactor Regulation (NRR) during the CAT inspection were tracked by the Closure of Licensing Issues Program (CLIP) and were satisfactorily resolved by IP with the NRR Staff. Mr. B. L. Siegel, NRC Project Manager has indicated these issues will be addressed in the CPS Safety Evaluation Report Supplement No. 6.

Six findings resulting from the CAT inspection were issued by NRC Region III August 30, 1985, and responded to by IP letter U-600282 dated September 30, 1985. These findings have been resolved by NRC Region III in subsequent inspection reports and all followup action has been completed except issue IE 85-30-05. Remaining open items on this issue address the implementation of inspection programs for installation of cable terminations in accordance with design documents and re-ordering of qualified material. Full compliance, including the closure of this one issue is scheduled to be achieved prior to CPS fuel load.

With respect to instrumentation and control items identified in Joint Stipulation Paragraph B.1, seven (7) commitments were tracked to completion in the CLIP program. They were designated Other Major Concerns (OMC) within the CLIP program and resolution of these items was obtained as follows:

OMC #3 - Fuel Zone Instrumentation

Joint Stipulation Preamble Paragraph 8.a.2:

"Applicants have now committed to fully qualify the fuel zone instrumentation from an environmental and seismic standpoint (except for one recorder, which is isolated) and to provide redundant power supplies prior to restart after the first CPS refueling outage in accordance with Applicants' Regulatory Guide ("R.G.") 1.97 Conformance Report, Revision 1, submitted to the NRC by letter dated December 11, 1984."

Response:

Illinois Power (IP) letter dated December 11, 1984, submitted the IP Regulatory Guide 1.97 Conformance Report. The NRC has completed its review of the IP conformance report and provided an acceptable evaluation in the Safety Evaluation Report Supplement No. 5, Section 7.5.3, dated January, 1986. Specifically, the fuel zone level instrumentation was discussed in detail. The requirement for environmentally qualified fuel zone level instrumentation and redundant Class IE power supplies will be implemented prior to restart following the first refueling outage. On the basis of this evaluation, the NRC will add a license condition to the CPS Operating License.

Illinois Power Company has incorporated the action required to meet the Operating License Condition into CPS Plant Modification No. NB-18 to be completed prior to startup following the first refueling outage. This stipulation item is considered resolved.

OMC #4 - NRC Documentation of WLMS

Joint Stipulation Preamble Paragraph 8.b.2:

"NRC plans to document its review of the CPS WLMS."

Response:

The NRC has completed its review of the CPS Water Level Measurement System (WLMS) and has reported on the results of its review in the CPS Safety Evaluation Report Supplement No. 4, Section 4.4.2, dated February, 1985. This stipulation item is considered complete.

OMC #5 - Sensing Lines Vertical Drop

Joint Stipulation Preamble Paragraph 8.b.3(i):

"Improvements have been made to the WLMS design to significantly reduce errors caused by high drywell temperatures and associated sensing line fluid flashing under low Reactor Pressure Vessel pressure conditions. This will be accomplished prior to fuel load by reducing the vertical drop of selected sensing lines and relocation of sensing line flow restricting orifices in the drywell."

Response:

These improvements to the Reactor Water Level Measurement system were completed in December, 1984 and were found acceptable by the NRC in the CPS Safety Evaluation Report Supplement No. 4, Section 4.4.2, dated February, 1985.

OMC #6 - Installation of Isolators

Joint Stipulation Preamble Paragraph 8.d.1:

"Applicants have committed to install isolators prior to fuel load to isolate computer signals from safety related signals in accordance with Applicants' October 2, 1984 responses to NRC questions 420.01(a)-(f), and has committed to either present documentation of test results acceptable to the NRC staff or perform additional tests in accordance with Applicants' letter to the NRC dated January 11, 1984 [sic - actually 1985]."

Response:

The isolators described above have been installed and the referenced test results have been completed and submitted to the NRC Staff. As described in the CPS Safety Evaluation Report Supplement No. 5, Section 7.5.3, dated January, 1986, the NRC has determined these devices are qualified isolators that are acceptable and meet the requirements of NUREG-0737, Supplement No. 1.

OMC #7 - Resolve Safety Parameter Display Systems (SPDS)

Joint Stipulation Preamble Paragraph 8.d.2:

"Applicants have committed to carry out an action plan in order to resolve the NRC's Safety Parameter Display System ("SPDS") Audit findings (December 12-13, 1984) and to provide the results to the NRC in accordance with Applicants' letter to the NRC dated December 21, 1984. NRC plans to document its December 12-13 audit and to conduct subsequent reviews of the CPS SPDS to assure that the system is adequate. Applicants are committed to have the resolution of the following issues in regard to the SPDS determined prior to initial fuel load:

- a. Color consistency between the ARM/PRM and SPDS displays;
- b. Consistency of color coding within the SPDS; and
- c. Inclusion of ARM/PRM parameter(s) on the SPDS display."

Response:

Illinois Power has carried out the above action plan in order to resolve the NRC's SPDS Audit findings. Results have been provided to the NRC and the NRC has documented its audit and review in the CPS Safety Evaluation Report Supplement No. 5 Section 7.5.3, dated January, 1986, and have resolved issues 8.d.2 a-c.

OMC #8 - Detailed Control Room Design Review (DCRDR) and Identification of R.G. 1.97 Instruments

Joint Stipulation Preamble Paragraph 8.e.2:

"With regard to equipment identification, Applicants are committed to perform a detailed control room design review in accordance with the CPS Detailed Control Room Design Review Program Plan. Applicants hereby commit that applicable R.G. 1.97 instrumentation will be specifically identified, with a common designation on the control panels so that the operator can easily discern that those instruments are intended for use under accident conditions, prior to operation at greater than five (5) percent power except for any instruments that are unavailable or not in place for such designation at that time."

Response:

The Detailed Control Room Design Review (DCRDR) has been performed. Identification of R.G. 1.97 instrumentation as described above was accomplished prior to the NRC's audit of the DCRDR. The NRC has published their evaluation of the CPS control room design review in the Safety Evaluation Report Supplement No. 5, Section 18, dated January 1986 and found that the requirements of Supplement No. 1 to NUREG-0737 have been met. SER Supplement No. 5, Section 18.2(9) found that the Regulatory Guide 1.97 equipment identification commitment has been met.

OMC #9 - NRC Document Review of R.G. 1.97

Joint Stipulation Preamble Paragraph 8.e.3:

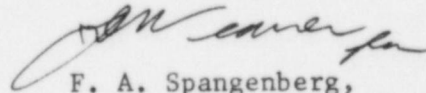
"Applicants' R.G. 1.97 Conformance Report, Rev. 1, submitted to the NRC on December 11, 1984 documents adequate justification for IPC's deviations from R.G. 1.97, including the basis in regard to drywell sump level and drywell drain sump level. NRC plans to document its review of the CPS R.G. 1.97 Conformance Report, Rev.1."

Response:

This activity was completed by the NRC in the CPS Safety Evaluation Report Supplement No. 5 Section 7.5.3, dated January, 1986.

Please contact me if you have any questions regarding this information. Illinois Power Company considers the information contained herein complete and adequate confirmation that the commitments within the Joint Stipulation have been met.

Sincerely yours,



F. A. Spangenberg,
Licensing & Safety Manager

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