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L42-86(12-19)-L
1A.120

ILLINOIS POWER COMPANY



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

December 19, 1986

Mr. J. 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
October 17, 1986, in I&E Inspection Report 50-461/86060

Dear Mr. Keppler:

This letter is in response to the October 17, 1986, letter identifying certain activities which appeared to be in violation of NRC requirements. Attachment A provides Illinois Power Company's response to the Notice of Violation concerning Post Maintenance Testing evaluations of Maintenance Work Requests.

I trust that our response is satisfactory to ensure compliance with our previous commitments.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'F. A. Spangenberg'.

F. A. Spangenberg
Manager - Licensing and Safety

REL/ckc

Attachment

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

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ATTACHMENT A
ILLINOIS POWER COMPANY
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Subject: Post Maintenance Testing

The Notice of Violation states in part:

"10 CFR 50, Appendix B, Criterion XVI, as implemented by the Illinois Power (IP) Company Operational Quality Assurance Manual requires that each IP organization have a documented corrective action system which assures that conditions adverse to quality or which render quality indeterminate are promptly identified, reported to appropriate levels of management, analyzed for causes, corrected to preclude recurrences, and followed up to verify and closeout corrective actions in a timely manner.

Contrary to the above requirements, corrective actions taken in response to IPQA Audit Finding Q38-86-10-ID3 and IPQA Surveillance Finding M-86-005 were not effective in that:

- a. On September 5, 1986, a NRC inspection identified two maintenance work requests (MWRs) (C-24375 and C-25145) that had not received a required post maintenance testing (PMT) evaluation. A subsequent licensee review identified 400 additional MWRs that had not received the required PMT evaluation.
- b. On September 18, 1986, a NRC followup inspection identified one MWR (C-06503) that had not received a required PMT evaluation. A subsequent licensee review identified 578 additional MWRs that had not received the required PMT evaluation.
- c. On September 26, 1986, a NRC followup inspection identified one MWR (C-05302) that had not received the required PMT evaluation.

All of the above inspection findings were identified after closure of IPQA Audit Finding Q-38-86-10-ID3 (closed August 1, 1986) and closure of IPQA Surveillance Finding M-86-005 (closed July 29, 1986). Both of the IPQA findings identified deficiencies in the programmatic controls established to evaluate and process maintenance work requests (MWRs) for post maintenance testing requirements."

I. Corrective Actions Taken and Results Achieved

- A. On September 5, 1986, a NRC inspector identified MWR C-24375 and MWR C-25145 which had not received the required PMT evaluation. On July 1, 1986, the PMT evaluation group began keeping a log of copies of closed MWRs received from maintenance to determine PMT requirements in response to a Quality Assurance (QA) audit finding. Both MWRs identified above were closed after July 1, 1986, but did not receive an evaluation because they were not received by the PMT group for evaluation. A review of MWRs closed after

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July 1, 1986, was performed; this identified four hundred (400) additional MWRs that had not received the required PMT evaluation. These MWRs have received the proper PMT evaluations and are being processed in accordance with the procedure.

- B. On September 18, 1986, a followup review by the NRC was performed that identified MWR C-06503 as not receiving a PMT evaluation. MWR C-06503 was closed on April 30, 1986, prior to the new program implemented July 1, 1986, to resolve the IPQA audit finding. Further investigation identified an additional five hundred seventy-eight (578) MWRs closed prior to July 1, 1986, that required PMT evaluations but had not been previously evaluated. These MWRs have received the proper PMT evaluation and are being processed in accordance with the procedure.
- C. On September 26, 1986, another followup inspection by the NRC identified MWR C-05302 as not having the required PMT evaluation. MWR C-05302 was closed on April 15, 1986, and had been identified in the previous IP review as not requiring a PMT evaluation. Subsequently, a PMT evaluation was conducted on MWR C-05302 and no PMT was required.

An evaluation of the process used during previous reviews of the PMT program was conducted to determine the mechanism that eliminated MWRs from the listing of those that required a PMT evaluation. The MWR historical file maintained on the computer was used to develop a listing of MWRs involved in the previous reviews. The computer file was used to determine the classification of each MWR by reviewing MWR "classification" blocks 26 through 29. When the "classification" blocks were blank, the MWR was considered not to require a PMT evaluation and the hard copy of the MWR was not reviewed. In the case of MWR C-05302, the hard copy did not agree with the computer file, in that it indicated a different classification from the computer file. This disparity had occurred because the classification on an MWR is provided to the computer file from the Master Equipment List (MEL). The hard copy, with classification from the MEL, is routed through Nuclear Station Engineering Department (NSED) for classification verification. Feedback to the MEL occurs at this point, but no correction is made to the MWR historical file to reflect the exact classification if it has been changed by NSED. NSED indicated that 5 to 10% of MWRs typically have the classification changed such that a disparity would exist between the hard copy file and the MWR historical file maintained in the computer.

A record of the MWR listing used for the previous reviews had been retained. Review of this listing revealed that an additional seven thousand five hundred forty-nine (7549) MWRs had not been reviewed for PMT requirements. A program has been initiated to review these MWRs for PMT requirements. All PMT requirements identified from this review will be performed prior to their applicable milestones being declared.

II. Corrective Action Taken to Prevent Further Violations

Procedures requiring a copy of the completed MWR be received by the PMT evaluator prior to closing out the MWR in the computer file have been implemented and are formalized in a proposed change to the MWR Preparation and Routing Procedure. This proposed change is in its review cycle. The process is reviewed daily to assure proper PMT evaluations are completed and all MWRs (hard copy) are being reviewed by a PMT evaluator. In addition, the PMT evaluators have been physically relocated with maintenance planners to enhance the group's participation in the MWR flowpath.

III. Date by When Full Compliance Will Be Achieved

Illinois Power will be in full compliance on December 30, 1986.