

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

As a result of the inspection conducted on January 26 through February 3, 1987, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1986), the following violations were identified:

1. CPS Technical Specification 6.8.1.b states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures required to implement the requirements of NUREG-0737 and Supplements thereto. Paragraph 7.1.e of Supplement 1 to NUREG-0737 states that the licensee implement upgraded Emergency Operating Procedures (EOPs). Paragraph 7.1.c of this supplement further states that the licensee upgrade the EOPs to be consistent with Technical Guidelines and an appropriate Procedures Writers Guide.

Contrary to the above, as of the date of this inspection, the following upgraded Emergency Operating Procedures (EOPs) were not consistent with either the Clinton Plant-Specific Technical Guidelines or the Plant-Specific Writers Guide:

- a. Although Clinton Power Station (CPS) Emergency Operating Procedure No. 4406.01, "Secondary Containment/Radioactivity Release Control Emergency," required entry at a secondary containment differential pressure of $>+0.125$ inches, the corresponding Technical Guidelines specified >0.0 inches psid.
- b. Although step 4.1.4 of CPS Emergency Operating Procedure No. 4404.01, "Reactivity Control Emergency," specified that procedure CPS No. 3314.01, "Standby Liquid Control," be used to inject Boron using the RCIC Storage Tank, the EOP was not maintained in that this method for Boron injection is not addressed in CPS No. 3314.01.
- c. Although Step 3.1.1 of CPS Emergency Operating Procedure No. 4402.01, "Containment Control Emergency," does not require a scram if a relief valve is stuck open, a scram is specified in the corresponding Technical Guidelines.
- d. The control rod drive differential pressures specified in steps 4.5.5 and 4.7.7 of CPS Emergency Operating Procedure No. 4404.01, "Reactivity Control Emergency," are different from those specified in the corresponding Technical Guidelines.
- e. CPS Emergency Operating Procedure No. 4401.01, "Level Control Emergency," does not include the intent and scope of the EOP as required by the Procedure Writers Guide.

This is a Severity Level IV Violation (Supplement I).

2. 10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, as implemented by Illinois Power Operational Quality Assurance Manual, Chapter 16, requires that measures shall be established to assure that conditions adverse to quality, such as nonconformances, are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, the following examples of failure to implement Criterion XVI of 10 CFR Part 50, Appendix B, were identified:

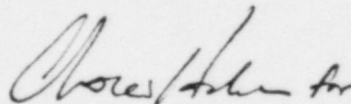
- a. CPS Condition Report No. 1-85-11-107 dated November 8, 1985, documented that the licensee's administrative controls failed to provide for proper verification and validation of revisions to Emergency Operating Procedures (EOPs); however, this nonconformance was not promptly corrected in that as of January 30, 1987, the seven procedure revisions identified by Condition Report No. 1-85-11-107 had still not received the required verification and validation and the condition report was still open. In addition, the licensee's corrective action was not effective in preventing recurrence in that EOP revision packages for Revision 7 to CPS Procedure 4401.01 and Revision 5 to CPS Procedure 4402.01 failed to implement the corrective actions specified for CPS Condition Report No. 1-85-11-107.
- b. Although Condition Report CFR-1-86-10-169 identified the fact that modifications IS-7 and IA-12 resulted in the need to revise seven control and instrumentation surveillance procedures which were not identified on the "Detailed Impact Assessment Form" as required by CPS No. 1003.01; the condition report was invalidated without determining the cause of the failure to properly identify the required revisions or effecting any corrective action to preclude repetition.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further violations; and (3) date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

MAR 17 1987

Dated _____



N. J. Chrissotimos, Acting Director
Division of Reactor Safety