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L42-87(03-17)-L
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ILLINOIS POWER COMPANY

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

March 17, 1987

PRIORITY ROUTING

First		Second	
RA		RC	
DRA		ETC	
DRP		SRA	
DRS		ML	
DRSS		PL	
DRMA		PAO	
		FILE	

Docket No. 50-461

Mr. A. Bert Davis
Acting Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Improvements in Maintenance and Quality Programs and Administrative Controls Affecting Quality

Dear Mr. Davis:

The purpose of this letter is to provide an updated status of the improvements Illinois Power Company (IP) has made in the areas of Maintenance and Quality Programs and Administrative Controls Affecting Quality. Previously, IP provided corrective action plans for improving these areas (Reference Letter #U-600803, dated December 30, 1986) as requested in the Systematic Assessment of Licensee Performance (SALP) 6 Board Report dated November 28, 1986.

MAINTENANCE

Improvements in the Maintenance area are centered around the Maintenance Improvements Program. A listing of the key elements of this program with an updated status is provided below.

1. Expand the Management of the Maintenance Department

Required actions for this element are complete. Mr. R. D. Freeman has been assigned as the Assistant Plant Manager - Maintenance. The following personnel report to Mr. Freeman:

Mr. R. Richey, Director - Maintenance
Mr. J. Carter, Supervisor - Maintenance Planning
Mr. V. Harris, Technical Advisor - Maintenance Programs

This organization has proved to be very functional in that Mr. Richey is tasked with completing field work, Mr. Carter is solely responsible for all maintenance planning and Mr. Harris is directing the upgrading of various maintenance programs.

2. Consolidate All Maintenance Planning

Required actions for this element are complete. As stated, all maintenance planning has been consolidated under Mr. J. Carter, Supervisor - Maintenance Planning, who reports directly to the Assistant Plant Manager - Maintenance. Maintenance Work Request (MWR) planning, scheduling, interface and work statusing is performed by Maintenance Planning. This change has resulted in significant improvement in the quality and consistency of the maintenance work packages.

3. Develop Standards for Evaluating Maintenance Planning

Attributes and standards for evaluation have been established as follows:

	Attribute	Standard
a)	Re-jobstepping	10%
b)	Generation of problem reports	15 per month
c)	Material non-availability	2%
d)	QC rejection of completed packages	5%
e)	Rework	2%

Further management review of the original standards for attributes b and c above (generation of problem reports and material non-availability), has resulted in revision of the standards for these attributes from 0 to 15 per month and 2%, respectively. With the exception of rework, each of these attributes is currently being monitored, and periodic reports are provided to appropriate management. The current computerized trending program is not easily utilized to develop rework data. However, IP is continuing investigation to develop a method of statusing this attribute.

- Re-jobstepping is monitored by Maintenance Planning. The data shows that IP is within the standard set for this attribute.

- Problem reports are monitored for the site by Plant Staff Compliance. Those problem reports assigned to the Maintenance Department are investigated for root cause and assigned appropriate corrective action to prevent recurrence. All corrective actions are reviewed for adequacy by the Assistant Plant Manager - Maintenance. Trending of departmental problem reports is performed and evaluated to ensure adequacy of corrective actions. Trending results are evaluated by management. While not yet meeting the IP standard in this area, improvements have been made in the timeliness of bringing problems to management attention, and the timeliness of document closures.

- Material nonavailability is currently being monitored by Materials Management according to the number of items out of stock or not carried rather than actual time lost. This indicator is considered adequate for evaluating the time maintenance loses while waiting for parts. Data shows that the number of items found not to be in stock is on a decreasing trend. The number of items not carried is remaining fairly constant; however, this number is expected to go down with completion of the Master Equipment List (MEL) validation and provisioning of the plant.

- QA rejection of completed quality MWR packages for insufficient information is being tracked by Maintenance Planning. Data shows that IP is within the standard set for this attribute.

4. Improve Communications Within the Maintenance Department

Maintenance supervisors are spending more time observing work in the plant. This has been facilitated by the work Maintenance Planning is doing to provide complete work packages and resolve problems. Technicians have been briefed, in turn, to provide direct feedback to supervisors when problems occur. Additionally, a monthly meeting is held with supervisors and foremen, as well as frequent meetings with the maintenance contractor management, to discuss current problems and future plans.

Maintenance has also begun distribution of a periodic internal newsletter which highlights department problems, accomplishments and current events. These activities will be ongoing throughout 1987.

5. Improve the Quality of the Completed MWR

An internal maintenance monitoring group has been established to monitor field activities and evaluate any deficiencies noted, including the quality of the completed work documentation. Procedural changes have been made to specify that required supporting documentation will be filed with the completed MWR or referenced on the MWR for traceability to the document. Training has been conducted for key individuals on how to properly review a completed MWR. Additional training in this area scheduled for completion by March 31, 1987, will provide increased improvements.

6. Establish Additional Required Maintenance Procedures

A list of additional procedures required has been developed and is currently under review. Those procedures required to complete the first refueling outage will be issued by December 15, 1987.

Development of procedures is an ongoing process at Clinton Power Station (CPS). It is the long-term goal of the Assistant Plant Manager - Maintenance to establish an approved CPS procedure for all maintenance activities, preventative and corrective.

7. Develop Generic Lists for Preapproved Expendable Maintenance Items

Work is in progress by NSED-FE to develop generic lists for valve lubrication and packing. This is scheduled for completion by late 1987. Additional lists for fuses, tapes and torquing are scheduled for completion by NSED-FE by mid 1988. While the current methodology provides for proper control of these items, the generic lists will provide increased consistency and improved facilitation of maintenance planning at CPS.

8. Conduct a Top-down Review of Maintenance Procedures

In conjunction with the procedural development discussed in element #6 above, IP will conduct a top-down maintenance procedure review to ensure that CPS maintenance procedures fully implement upper tier regulatory and IP procedural requirements. This review will be completed by December, 1987.

9. Nuclear Station Engineering - Field Engineering Group Support of the Maintenance Planning Organization

Procedure CPS 1029.01, "Preparation and Routing of MWRs" has been revised to require NSED-FE to review job steps on all safety-related MWRs for proper equipment classification, design compliance, resolution of engineering problems and preparation of installation sketches for non-safety field routed piping systems.

NSED-FE is now operational and performing these functions.

In addition to the actions stated above, IP Quality Assurance has recently completed an audit of specific CPS maintenance activities. No deficiencies were identified during the audit which would impact equipment operability. An additional audit will be conducted by an outside agency in the March/April, 1987 timeframe in order to further evaluate the CPS Maintenance Program. Based upon the results of these audits, IP will make appropriate adjustments to the Maintenance Program.

IP has also begun decreasing the backlog of preventive and corrective maintenance. Additionally, several difficult maintenance activities, such as replacement of Control Rod Drives and installation of Reactor Vessel Internals, have recently been completed without problems.

In summary, substantial strides have been taken to improve the quality of the CPS Maintenance Program. The results of these efforts are evidenced by the improved workmanship, documentation and attitude in the CPS Maintenance Department.

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS AFFECTING QUALITY

As reported in our previous response to SALP 6, Illinois Power has taken a number of actions to increase effectiveness of Quality programs and administrative controls affecting quality at CPS. These actions have been implemented and are ongoing at the present time. One of the key areas addressed in the response was the subject of corrective action. Illinois Power has taken action and has achieved positive results in this area as follows:

Corrective Action

- One Hour Reporting - The Condition Report Procedure has been revised to require that management be notified within one hour of conditions requiring a condition report. This action has resulted in increased management involvement in, and control of, immediate action taken and corrective action planning, and has provided earlier notification of significant conditions to management.

- Significant Event Critique - Following a significant operating event, critiques are held to determine the sequence of events and formulate the initial corrective actions to focus the investigation of the event. A systematic method for critiques has been recently promulgated in an administrative practice. Marked improvements have been evidenced in CPS's Licensee Event Report experience as a result of aggressive corrective actions implemented in November 1986.

- LER Briefings - Briefings are held with appropriate Nuclear Program personnel to ensure widespread understanding of the lessons learned and the root causes of each event.

- Overdue Corrective Action - Improvements have been realized in the area of overdue corrective action to QA audit findings and condition reports due to increased management involvement in correcting problems in a timely manner.

- Identification of Significant Conditions - Briefings were held in February with site personnel regarding the identification and reporting of significant conditions to management.

To ensure that IP's actions continue to show resultant improvements in the area of Quality Programs and administrative controls, IP Quality Assurance will perform an evaluation of the effectiveness of actions taken in this area, scheduled for completion by May 1, 1987.

Sincerely yours,

F. A. Spangenberg
Manager - Licensing and Safety

KAB/bsa

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
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