

**ILLINOIS  
POWER**

An Amstar Company

Illinois Power Company  
Clinton Power Station  
P.O. Box 678  
Clinton, IL 61727  
Tel 217 835-6220  
Fax 217 835-4632

Wayne D. Romberg  
Assistant Vice President - Nuclear

U-602824

4F.190

August 29, 1997

DC  
PDR

Docket No. 50-461

Mr. James Lieberman  
Director, Office of Enforcement  
United States Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

Subject: Extension of Reply to Notice of Violation Clinton Power  
Station NRC Inspection Report 97003 and EA 97-132

Dear Mr. Lieberman

Per the discussion and agreement between you and J. V. Sipek of my staff, Illinois Power (IP) requests a thirty day extension to the date for replying to the Notice of Violation and Civil Penalty concerning circuit breakers contained in Enforcement Action 97-132. This extension is requested so that lessons learned and corrective actions from the August 5, 1997, Westinghouse safety-related circuit breaker failure can be analyzed and included in the response. IP admits the violations outlined in Enforcement Action 97-132 occurred and has enclosed the \$110,000 for payment of the civil penalty. 1/0

Notwithstanding this extension request, many actions have been completed in response to the problems described in the Notice of Violation. A detailed plan was developed to provide assurance that the safety-related low and medium voltage circuit breakers would operate when required. This plan was previously provided to the Nuclear Regulatory Commission (NRC), Region III, Regional Administrator in letter U-602721 dated April 14, 1997. The results of the actions taken to provide reasonable assurance that the safety-related low and medium voltage air circuit breakers would operate when required were provided in letter U-602782 to the Nuclear Regulatory Commission (NRC), Region III, Regional Administrator. Additionally, subsequent to the failure of the Westinghouse 4160-volt safety-related circuit breaker on August 5, 1e14

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1997, a team was formed to identify the cause of that circuit breaker failure. This team included individuals from the circuit breaker manufacturer, outside circuit breaker experts and equipment failure determination experts. IP has determined the cause of the August 5, 1997, circuit breaker failure and is conducting extensive maintenance to correct this condition and also performing additional preventive maintenance activities in other Westinghouse 4160-volt circuit breakers. These corrective actions will be outlined in the final response to this violation.


Also, the cause of the failure to use approved lubricants and cleaners on circuit breakers at Clinton Power Station has been determined. Actions have been taken to ensure the proper use of these lubricants and cleaners. These actions include: revising circuit breaker maintenance procedures to identify specific lubricants needed during maintenance by noun names, conducted seminars with maintenance technicians on ensuring consumable materials, such as cleaners and lubricants, are approved for the intended application prior to use, and preparing a revision to maintenance procedures to clarify the requirement to ensure that only approved consumable materials are used. IP is continuing to look at actions necessary to improve the preventive maintenance program.

IP has also taken steps to improve the corrective action program. A Director from outside IP has been hired to improve the corrective action program. Administration of the corrective action program has been moved from the Plant Staff to a new organization. This change should provide a greater emphasis on the corrective action program. Also, IP has instituted an Independent Analysis Group to conduct detailed root cause investigations of significant station events. However, recent circuit breaker failures have identified shortcomings in the corrective action program that need to be addressed.

In order to provide a comprehensive response to the identified shortcomings in the corrective action program and describe other corrective actions that have been recently undertaken an extension to respond to this Notice of Violation is necessary. IP views this Notice of Violation as significant and believes that an extension is warranted so that the actions to improve the corrective action program is contained in the response.

Please contact me at (217) 935-8881 extension 3400 if you have any questions regarding this request to extend the due date for the response to the Notice of Violation contained in Enforcement Action 97-132.

Sincerely yours,



Wayne D. Romberg  
Assistant Vice President

MRS/krk

Attachments

cc: Regional Administrator, Region III, USNRC  
Clinton Licensing Project Manager, Region III, USNRC  
Branch Chief, Region III, USNRC  
Document Control Desk, USNRC  
Illinois Department of Nuclear Safety  
Dave Zemel, T-31Z