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September 19, 1997

Mr. A. Bill Beach  
Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Subject: Completion of Stand Down of Work Activities at Clinton Power Station

Reference: Letter from W. D. Romberg to A. B. Beach dated September 11, 1997,  
Regarding Stand Down of Work Activities at Clinton Power Station

Dear Mr. Beach:

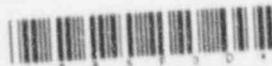
We have completed the actions described in my September 11, 1997 letter to you, and have accordingly lifted the stand down of work activities at Clinton Power Station (CPS).

The decision to impose the stand down was precipitated by a series of events as noted in my September 11, 1997 letter. These events led us to conclude that vigorous action to address personnel performance problems was necessary across the site. These included incidents in which maintenance personnel performed work on incorrect components, equipment tagout errors were made, improper Equipment Identification Numbers were listed in work packages, errors were made by Radiation Protection personnel, and various other problems involving weak human performance or human error.

The most recent event was the inattention of a plant operator during reactor water level adjustment. During that adjustment, reactor water level was reduced below our administrative limit of 90 inches (shutdown range) to a level of 74 inches. While reactor water level remained well above the 44 inch level necessary for proper natural circulation during shutdown, and the amount of reduction presented no safety risk or consequence, plant management was seriously concerned by the failure of the operator to stay sufficiently focused on his task to keep the level within the prescribed range. We were also concerned that the other operators and shift supervision did not ensure that the proper level was maintained.

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Specific actions taken in response to the drain down have included: (1) performance of a detailed fact-finding investigation and review to determine the sequence of events and causes of the drain down; (2) briefings of all Shift Supervisors on the drain down, its causes and their responsibility for ensuring that operational tasks are performed in a diligent and attentive manner; (3) performance of a personal critique by individuals involved in the event in which they acknowledged their role and errors during the event; (4) provision of the fact finding and cause analysis to each Shift Supervisor; and (5) disciplinary action for the operator and supervisory personnel involved in the drain down. Additional actions are under consideration.

On September 11, 1997, site management met to review these events and to determine what actions should be taken to prevent their recurrence. In general, the events shared several common characteristics:

1. They reflected lack of sufficient attention to an important part of the task at hand by the individuals performing the work.
2. Use of error prevention techniques such as self-checking would likely have prevented the problem.
3. Field observation and oversight by supervisory and management personnel was not sufficient to identify or prevent the problem before the error was made.

Our activities during the stand down were designed to address each of these problems. Meetings were held between department management and supervisors to establish and/or reinforce common expectations on what must be done to improve human performance. These include:

- Management will provide the necessary support/resources to supervisors so they have time to do their job.
- Management and supervisors will actively promote lateral integration -- communication and cooperation between groups.
- Supervision will spend substantial time in the work area interacting with workers in a constructive way to improve safety, radiological practices, work quality, and cleanliness.
- Management and supervisors will have an ongoing personal commitment to these expectations and will hold each other accountable.

These meetings were followed by discussions of the events that led to the stand down and these expectations between supervisors and the personnel in their groups. During these meetings, the specific actions that each group would take to improve human performance were also discussed. In particular, input was sought from group members on ways to improve.

On September 16, 1997, the Senior Vice President-CPS and the Manager-CPS met with managers, directors, and supervisors. The events leading to the stand down and the results of a common cause analysis of these events were described and discussed. The following specific steps were directed during this meeting:

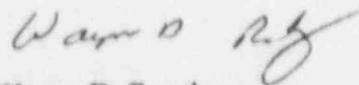
- Managers, directors, and supervisors will be required to spend more time in the field observing and overseeing work activities and reinforcing expectations.
- Use of the STAR (Stop, Think, Act, Review) self-check technique will be reinforced by managers, directors, and supervisors.
- Managers, directors, and supervisors will coach personnel on their performance and hold them personally accountable for meeting expectations. (CPS supervisors are currently going through Management Action Response Checklist (MARC) training to help them in supervisory skills.)
- Supervisors are directed to communicate with more senior management when problems are encountered that require more support or resources.

To ensure follow-up on these actions and monitor their success, senior site management and supervisors will hold periodic meetings at which progress in addressing human performance problems will be discussed. At these meetings, the implementation of these actions and performance measures that indicate their effectiveness will be reviewed. Also, any continuing areas of weakness and need for additional action will be identified. These meetings are currently being held weekly and will continue weekly until we are satisfied that human performance shows clear positive trend. Supervisors will be expected to share the results of these meetings with their groups and implement further follow-up actions determined to be necessary.

Based upon the completion of the above actions, the stand down was lifted on September 16, 1997 and work was resumed.

Please call me should you require any further information or wish to discuss these matters further.

Very Truly Yours,



Wayne D. Romberg  
Assistant Vice President

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