

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/86076(DRS)

Docket No. 50-461

License No. NPF-55

Licensee: Illinois Power Company  
500 South 27th Street  
Decatur, IL 62525

Facility Name: Clinton Power Station, Unit 1

Inspection At: Clinton Site, Clinton, Illinois

Inspection Conducted: December 15-18, 1986, and January 26-30, 1987

Inspector: *F. J. Jablonski*  
H. A. Walker

2-18-87  
Date

Approved By: *F. J. Jablonski*  
F. J. Jablonski, Chief  
Quality Assurance Programs Section

2-18-87  
Date

Inspection Summary

Inspection on December 15-18, 1986 and January 26-30, 1987 (Report No. 461/86076(DRS))

Areas Inspected: Routine unannounced inspection by one region based inspector of QA for the Startup Testing Program, Procurement Control and Corrective Action. The inspection was conducted in accordance with Inspection Procedures No. 35501, 35701, 35746 and 92720.

Results: No violations or deviations were identified; however, there were three unresolved items identified in the area of corrective action.

## DETAILS

### 1. Persons Contacted

- \*K. Baker, Supervisor, Inspection and Enforcement Interface
- \*T. Camilleri, Director, Nuclear Projects
- \*J. Cook, Assistant Plant Manager
- \*E. Corrigan, Director, Quality Engineering and Verification
- \*J. Fertic, Director, Quality Surveillance and Audits
- \*J. Greenwood, Manager, Power Supply
- \*D. Holtzsch, Director Nuclear Safety
- \*E. Kant, Assistant Manager, Nuclear Station Engineering Department
- \*H. Lane, Manager, Scheduling and Outage Utilization
- \*J. Palchak, Supervisor, Plant Support Services
- \*K. Patterson, Director, Nuclear Purchasing
- \*G. Warnick, Special Projects

\*Indicates those attending the exit meeting January 30, 1987.

Other individuals were contacted as a matter of course during the inspection.

### 2. Areas Inspected

This inspection was conducted to verify compliance with regulatory requirements and operational QA program commitments. Efforts were also made to determine management involvement in and support for quality; the approach to corrective action; and responsiveness to NRC concerns. The inspection was performed by reviewing applicable procedures and records, conducting personnel interviews and observing work activities. The inspection results are documented in the following sections.

#### a. Quality Assurance for the Startup Testing Program (35501B)

The inspector reviewed QA audit and surveillance activities covering startup testing. Procedures QAP-188.01, "Quality Assurance Audit Program," Revision 0, and QAP-118.05, "Quality Assurance Surveillance Program," Revision 12, were reviewed by the inspector and determined to be acceptable. Audit and surveillance schedules, and records were reviewed by the inspector to verify proper procedure implementation. The records review and discussions by the inspector with licensee personnel indicated that the surveillance procedure was being properly implemented and surveillance coverage of startup testing was adequate.

- (1) In reviewing implementation of the audit program during the December portion of the inspection, the inspector noted that no audits of startup testing had been performed even though the low power operating license had been issued on September 29,

1986. The inspector was informed that a scheduled audit of refueling activities was cancelled because of extensive coverage of those activities by QA, surveillance, and QC inspection personnel. Prior to completion of the inspection in January 1987, the inspector noted that Audit Q 38-85-72 of startup testing activities was conducted December 29-31, 1986. Records of this audit were reviewed by the inspector and determined to be acceptable. The inspector reviewed draft copies of three additional audits of startup testing that were scheduled to be performed prior to completion of startup testing. QA audit coverage now appears to be adequate and the inspector has no further concerns in this area.

- (2) Records of four recent audits of testing activities were reviewed by the inspector to verify proper audit performance. Certification records for three lead auditors were also reviewed. During the review of records for Audit Q 38-86-52, the inspector noted that two findings made during the audit were documented on condition reports (CRs) rather than QA audit finding reports as required by QAP-118.01. Prior to completion of the inspection in January 1987, a letter was issued by the Director of Quality Services and Audits directing that the practice of using CRs to document audit findings be discontinued. A training session for QA auditors was conducted to ensure that all auditors had been properly informed of procedural requirements. The inspector has no further concerns in this area.

No violations or deviations were identified in this area.

b. Procurement Control (35746B)

The inspector reviewed the methods used by the licensee to select, evaluate, and qualify suppliers for procurement of safety-related items and services. QAP-118.04, "Quality Assurance Supplier Audit Program," Revision 2, and QAP-404.01 "Procurement Document Review and Approval," Revision 1, were reviewed by the inspector and determined to be acceptable. A Qualified Supplier List (QSL) provides a listing of those suppliers who were qualified to supply safety-related parts or services. Procurement personnel use the QSL to select suppliers for purchasing of safety-related equipment, material, or services. Quarterly issues of the QSL had change notifications, as required, if a supplier's status changed. Audits and evaluations of suppliers were made prior to placement on the QSL. Suppliers on the QSL will be reevaluated annually and re-audited every three years. Yearly evaluations will include a review of supplier performance during the past year and a review of changes to the supplier's QA program. Evaluations do not normally involve contact with the supplier. There were four methods of fulfilling the three year supplier audit requirement as follows:

- Performance of the required audit by licensee QA personnel.
- Performance of the required audit by or in coordination with a cooperating midwestern nuclear utility.
- Performance of the required audit by an approved contractor who provides auditing services.
- Fulfillment of the required audit utilizing CASE audits.

The inspector reviewed a computerized listing of qualified suppliers that included audit and evaluation due dates as well as completion dates. Supplier audits and evaluations were performed as scheduled.

No violations or deviations were identified.

c. Corrective Action (92702B)

The inspector reviewed Chapter 16, "Corrective Actions," of the Clinton Power Station QA Manual, Revision 2. The corrective action program described was acceptable. Corporate nuclear procedure LNP-3.02, "Corrective Action," Revision 2, was also reviewed. During this review, the inspector noted that some portions of the procedure applied only to construction. Licensee personnel stated that the procedure was currently being revised to address operations related items only. This is an open item pending review of the revised procedure during a future inspection (461/86076-01).

- (1) The inspector reviewed Audit Q 38-86-50 conducted September 8-23, 1986, by QA about the corrective action program. The audit appeared to be adequate; six audit findings of minor significance were noted.
- (2) The inspector reviewed QAP-116.08, "Project Trend Analysis Program," Revision 8 with advanced Change Notices 1, 2, and 3, and determined it to be acceptable. This procedure described the trend program used by QA to trend condition reports, nonconforming material reports, and audit findings. Maintenance work requests were trended separately by engineering. The QA trend program appeared to be acceptable.

The procedure required that a monthly trend report be issued to IP management and, that a letter be issued to the supervisor responsible for corrective action when an adverse trend was noted. The inspector reviewed trend reports issued for November and December of 1986. In the November report, the inspector noted what appeared to be an adverse trend in instrumentation problems. Instrumentation problems had increased from 6 in August to 40 in November. Licensee personnel provided some reasons for the increase in problems in this area; however, it is still not clear that this condition was not an adverse trend. Since the low power operating license was issued in

September, changing conditions might affect the number of incidents noted; however, this matter of determining adverse trends is unresolved pending review during a subsequent inspection (461/86076-02).

- (3) Fifteen condition reports (CRs) were reviewed for timely and effective corrective action. Fourteen were acceptable; one CR, 1-86-09-234 written by QA, indicated that 80 procedures had incorrect class codes which controlled routing of procedures for review. No action was taken by the licensee to address the problem. The CR was closed based on a statement that "the responsible department head was responsible for designating the class code; he had done so for the 80 procedures in question and therefore, the CR should not have been written." The closure statement was totally unresponsive to the apparent condition. The inspector did not have time to verify that safety-related procedures were included. This item is unresolved pending further review during a subsequent inspection (461/86076-03).
- (4) In reviewing the methods used to ensure that conditions adverse to quality were promptly corrected, the inspector noted that a system was in place to provide notification to management when required actions on CRs were overdue. A followup letter from the Station Manager, dated December 28, 1986, was sent to four department heads about overdue CR actions. A reply was requested by to provide the status and management actions to resolve the overdue CR actions by January 15, 1987. As of January 30, 1987, a reply had not been received from two of the department heads and there was no information made available to the inspector indicating that action had been taken to ensure prompt action on the CRs. The inspector did not determine if action had been taken by the two departments that failed to respond. This item is unresolved pending review during a subsequent inspection (461/86076-04).

For those areas inspected, management involvement and support for quality was evident in establishment and implementation of an adequate QA audit program for start-up testing. Management responsiveness to NRC concerns was noted in conducting and scheduling audits in the area of start-up testing. The licensee's management approach to trend analyses and corrective action was not strong. The areas of timely and accurate response to matters requiring corrective action were most notably in need of management attention.

There were no violations or deviations; however, three unresolved items were identified.

### 3. Unresolved Items

Unresolved items are matters that require more information to determine whether they are acceptable items, violations, or deviations. Unresolved items identified during the inspection are included in Paragraph 2.c.(2), (3), and (4).

4. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or the licensee or both. An open item disclosed during this inspection is presented in Paragraph 2.c.

5. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) on January 30, 1987, and summarized the purpose, scope, and findings of the inspection. This inspector discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.