

## NOTICE OF VIOLATION

Illinois Power Company  
Clinton Station

Docket No. 50-461  
License No. NPF-62

During an NRC inspection conducted on March 23-27, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50.59 (a)(1) "Changes, Tests and Experiments," requires, in part, that a licensee may make changes in the facility as described in the safety analysis report without prior Commission approval unless the change involves a change in the technical specification incorporated in the license or an unreviewed safety question.

10 CFR 50.59 (b)(1) requires, in part, that the licensee shall maintain records of changes in the facility and of changes in procedures made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

10 CFR 50.71(e), "Maintenance of Records, Making of Reports," requires, in part, that the licensee update the safety analysis report originally submitted as part of the application for the operating license to assure that the information included in the safety analysis report contains the latest material developed. The updated safety analysis shall be revised to include the effects of, in part, all safety evaluations performed by the licensee in support of conclusions that the changes did not involve an unreviewed safety question.

10 CFR 50.9(a), "Completeness and Accuracy of Information," requires, in part, that information provided to the NRC by a licensee or information required by regulation to be maintained by the licensee be complete and accurate in all material respects.

The Clinton Updated Safety Analysis Report (USAR) at Section 6.2.4.2, Revision 1, dated September 1989, describes the containment isolation system and states, in part, that each emergency core cooling system compartment contains leak detection devices with appropriate alarms. Section 6.2.4.2 further states: "Each compartment contains area temperature monitors which alarm in the control room, and RHR [residual heat removal] rooms A and B contain area radiation monitors which alarm in the control room. Should any leakage (e.g., from a valve shaft) be detected by these devices, the plant operator can shut down the effected ECCS [emergency core cooling system] system and isolate it."

Contrary to the above, the description of the facility in the USAR was not accurate in all material respects in that the USAR did not match the facility and the required safety evaluation was not adequately performed. Specifically, in November of 1996, the licensee identified a condition adverse to quality, in that a discrepancy existed between the as-built location of the radiation monitors for RHR rooms A and B and the location of the radiation monitors as described in Section 6.2.4.2 of the USAR. The licensee identified that a radiation monitor (1RIX-AR010) was located outside of RHR rooms A and B and that no radiation monitors were located within RHR rooms A and B, as specified in the USAR. On May 29, 1997, the licensee revised Section 6.2.4.2 of the USAR after an inadequate safety evaluation documented that an unreviewed

safety question did not exist. The evaluation was inadequate because it reviewed the discrepancy with respect to personnel radiation protection provisions and did not provide the basis for the determination that the absence of the area radiation monitors in the RHR rooms did not change the leak detection capabilities.

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

Pursuant to the provisions of 10 CFR 2.201, Illinois Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle  
this 22 day of April 1998