



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

Public
IE-01

September 29, 1997

EA 97-133

Mr. John G. Cook
Senior Vice President
Clinton Power Station
Illinois Power Company
Mail Code V-275
P. O. Box 678
Clinton, IL 61727

SUBJECT: NRC INSPECTION REPORT NO. 50-461/97007(DRP)

Dear Mr. Cook:

On August 11, 1997, the NRC completed a special safety inspection of the circumstances surrounding an event on March 9, 1997. The event involved operator actions that deviated from Clinton Power Station (CPS) procedures during surveillance testing. The enclosed report presents the results of that inspection.

This inspection identified additional issues relative to the findings from Inspection Report 50-461/96015 regarding deficiencies in CPS' administrative procedure governing procedure adherence. This inspection also identified additional examples where the deficiencies led directly to operators failing to follow procedures. NRC regulations and CPS' Technical Specifications require activities affecting quality be prescribed by procedures which are implemented as written, or are changed following appropriate review and approval. CPS' administrative procedure governing procedure adherence was not consistent with these requirements. Specifically the CPS procedure allowed nonperformance of procedure steps without the necessary reviews and approvals.

Inspection Report 50-461/96015 identified two apparent violations. The apparent violation identified in this inspection is considered a further example of the original issue. The apparent violations are of significant regulatory concern because performance of work in accordance with procedures provides the mechanism by which activities are planned and controlled to achieve expected and desired results. This report identified two additional examples of work not performed as planned because of CPS' procedure adherence policy; five examples were identified in Inspection Report 50-461/96015.

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The circumstances surrounding the apparent violations for this and the 96015 inspection, were discussed with you and members of your staff at exit meetings on May 22 and August 11, 1997. During these discussions, you acknowledged the circumstances surrounding the apparent violations and described corrective actions taken to address them. These actions included: (1) development and implementation of a more appropriate procedure governing procedure adherence on April 1, 1997; (2) training sessions on the new procedure adherence policy for all plant staff who perform activities important to safety; and (3) initiation of an ongoing program to monitor procedure adherence at your facility. These corrective actions are documented in NRC Inspection Reports 50-461/97006, 97011, and 97012. The apparent violation in this report, in combination with the apparent violations from Inspection Report 50-461/96015, are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600.

During the August 11, 1997, telephone conversation with Mr. Frederick Brown, NRC Project Engineer, you indicated that a predecisional enforcement conference would not be necessary for the apparent violations identified in Inspection Report 50-461/96015 and this report because of our common understanding of the facts and corrective actions taken regarding the apparent violations. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the current examples of the apparent violation is required at this time.

In addition to the apparent violations discussed above, an additional violation of NRC requirements was identified. The NRC inspectors identified that the fuel pool cooling system operating procedure was inadequate. Specifically, performance of the procedure led to overfilling the spent fuel pool, significantly distracting the operating crew attention from an in-progress surveillance test. The disruption resulted in sufficient time passing that the operators thought they needed to violate a CPS procedure in order to maintain safety related systems in an operable condition.

The violation associated with the spent fuel pool activity is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violation are described in detail in the enclosed report. In addition, a second violation regarding an inadequate high pressure core spray system surveillance procedure, described in Inspection Report 50-461/96015, is also cited in the enclosed Notice. Please note that you are required to respond to this letter for the two violations and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement actions are necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

/s/ J. A. Grobe

John A. Grobe, Acting Director
Division of Reactor Safety

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

Enclosures: 1. Notice of Violation
2. Inspection Report
No. 50-461/97007(DRP)

cc w/encs: W. D. Romberg, Assistant
Vice President
P. Yocum, Plant Manager
Clinton Power Station
R. Phares, Manager-Nuclear Assessment
J. Sipek, Director - Licensing
Nathan Schloss, Economist
Office of the Attorney General
G. Stramback, Regulatory Licensing
Services Project Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
Chairman, Illinois Commerce Commission

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