



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

JUN 7 1989

Docket No. 50-461

Illinois Power Company  
ATTN: Mr. W. C. Gerstner  
Executive Vice President  
500 South 27th Street  
Decatur, IL 62525

SUBJECT: CONFIRMATORY ACTION LETTER NO. CAL-RIII-89-005

Gentlemen:

On January 7, 1989, the removal of the dryer assembly from the reactor vessel was interrupted at Clinton Power Station when an unanticipated radiation monitor interlock was activated during the removal process. The interlock prevented upward movement of the dryer assembly for about 5 minutes until the polar crane operator bypassed the interlock to continue the removal process. Contractor personnel were unaware of the interlock and its functions. They overrode the interlock in violation of procedures and failed to communicate the event to the Control Room. On January 8, 1989, the contractors removed the moisture separator from the reactor vessel while again overriding the radiation monitor interlock on the polar crane. On January 28, 1989, an incorrect fuel bundle was removed from the reactor core and placed in the refueling pool upender before the error was identified by refueling operators. On January 31, 1989, a startup neutron source was dropped onto the reactor core while removing it from the reactor.

As a result of the above described events all refueling operations were suspended and CAL-RIII-89-005 was issued on February 1, 1989. Items which Illinois Power (IP) agreed to perform as a result of CAL-RIII-89-005 included the following:

1. Develop an action plan to recover the dropped source and assess any damage to the startup neutron source, the fuel bundles in the vicinity of the dropped source, the top bundle support plate, and any other in-vessel components that may have been impacted by the dropped component.
2. Conduct a management critique of the events and evaluate the effectiveness of root cause determination and the adequacy and implementation of the corrective actions to prevent recurrence. This should include, but not be limited to:
  - a. A review of the adequacy and effectiveness of initial pre-refueling and post-event training of contractor and IP personnel regarding refueling operations.

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- b. A review of the adequacy and effectiveness of procedures, communications, and contractor controls associated with refueling operations.
  - c. Review current refueling problems and events against problems and events encountered during your initial core load and where commonalities exist, explain why your past corrective action was ineffective in preventing recurrence.
3. Within 30 days provide NRC Region III with a formal report regarding your site procedures involving the control of contractors performing safety-related activities for adequacy of content, communications and associated training.
4. Within 30 days of the conclusion of your refueling activities, submit to NRC Region III a formal report of all significant events that occurred during the refueling to include root cause determination and corrective action taken to prevent recurrence.

Further, you were directed to obtain concurrence from the Region III Regional Administrator prior to resumption of refueling activities. You developed an action plan for Item 1 and recovered the dropped source on February 3, 1989. On February 10, 1989, in a management meeting with Region III officials at the Region III offices and in a letter of the same date, you provided the results of your management critique of the events. The Region III Regional Administrator concurred with your resumption of refueling activities on February 15, 1989, after your completion of corrective actions identified through the IP management critique of the events.

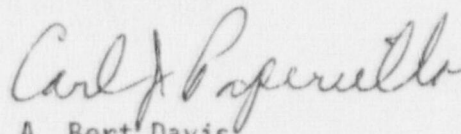
Your March 20, 1989, letter detailed your review of site procedures involving the control of contractors performing safety related activities. Your review concluded that site procedures incorporate appropriate detail, clarity and training to insure the adequate control of contractors. Our review of your report determined that site procedures adequately control contractors in safety-related activities and CAL-RIII-89-005 Action Item No. 3 is considered satisfied.

Your April 14, 1989 letter addressed CAL-RIII-89-005 Action Item No. 4. We reviewed your report regarding significant events which occurred during refueling. The report detailed corrective actions taken in response to five events included in your February 10, 1989 response to the NRC and five other refueling-related events. Action Item No. 4 is considered closed.

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We consider all CAL-RIII-89-005 Action Items appropriately resolved. The corrective actions initiated in response to the CAL should facilitate improvement in safe refueling activities at Clinton Power Station. Therefore, I hereby terminate this Confirmatory Action Letter.

Sincerely,



A. Bert Davis  
Regional Administrator

cc: D. P. Hall, Vice President  
J. S. Perry, Assistant  
Vice President  
R. D. Freeman, Manager,  
Nuclear Station  
Engineering Department  
DCD/DCB (RIDS)  
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Richard Hubbard  
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