

NOTICE OF VIOLATION

Illinois Power Company
Clinton Power Station

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

As a result of the inspection conducted on January 27, 1989, through March 16, 1989, and in accordance with the 10 CFR Part 2, Appendix C - General Policy and Procedure for NRC Enforcement Actions (1987), the following violations were identified:

1. Technical Specification (TS) 6.8.3 required that temporary changes to procedures of specification 6.8.1 may be made provided:
 - a. The intent of the original procedure is not altered;
 - b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator (SRO) license on the unit affected; and
 - c. The change is documented, reviewed in accordance with 6.5.1.6 and 6.5.3 as appropriate, and approved by the Manager - Clinton Power Station or the responsible manager within 14 days of implementation.

Among the procedures specified in 6.8.1 are surveillance and test procedures on safety related equipment and startup procedures for safety related systems. The reviews specified in 6.5.1.6 and 6.5.3 included screening for unreviewed safety questions, independent technical review, and Facility Review Group review.

Contrary to the above, Administrative Procedure CPS No. 1052.01, "Conduct of System Lineups," Revision 1, Step 8.3.2.3, stated that prior to any lineup, the Shift/Assistant Shift Supervisor or department supervisor shall review the lineup and change any required positions as required to meet plant conditions. In addition, Surveillance Procedure CPS No. 9861.02, "Local Leak Rate Testing Requirements," Revision 33, "Note" prior to Step 8.2.2, stated that changes to valve lineup sheets may be made, due to plant conditions which cannot affect the acceptance criteria, at the test director's discretion, as approved by the Shift/Assistant Shift Supervisor. Neither CPS No. 1052.01 nor CPS No. 9861.02 contained any requirements for such temporary changes to approved operating or test procedures to be reviewed and approved in accordance with TS 6.8.3. The inspectors' reviews indicated that the provisions of the two procedures which allowed changes to be made without review by two members of unit management staff, at least one of whom holds an SRO license, and subsequent plant manager review had been implemented on numerous occasions for safety related systems. Specifically, on March 6, 1989, the licensee discovered that a valve lineup change to the Local Leak Rate Test procedure was made without meeting TS 6.8.3 which resulted in a breach of secondary containment integrity.

This is a Severity Level IV violation (Supplement I) (50-461/89008-07(DRP)).

2. 10 CFR 50, Appendix B, Criterion V required, in part, that activities affecting quality be prescribed by documented procedures of a type appropriate to the circumstances and be accomplished in accordance with those procedures.

Contrary to the above:

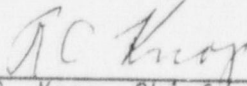
- a. On February 3, 1989, failure of the Supervisor, Control and Instrumentation, to follow Administrative Procedure CPS No. 1011.02 for the restoration from a terminated surveillance resulted in an unanticipated automatic Engineered Safety Feature (ESF) actuation of containment isolation valves for instrument air.
- b. On February 3, 1989, failure to prescribe an adequate procedure for conducting Surveillance Procedure CPS No. 9432.23 resulted in an unanticipated automatic ESF actuation of a containment isolation valve for shutdown cooling and the loss of water level over the reactor vessel resulting in a Technical Specification violation.
- c. On February 6, 1989, failure to prescribe an adequate procedure for restoring from an electrical outage per Operating Procedure CPS No. 3507.01 resulted in an unanticipated automatic ESF actuation of one train of the Standby Gas Treatment System.
- d. On March 16, 1989, failure to follow the prescribed procedure in Administrative Procedure CPS No. 1014.01 for specifying the order for clearing a safety tagout resulted in a spill of approximately 800 gallons of reactor coolant into the containment.

This is a Severity Level IV violation (Supplement I) (50-461/89008-09(DRP)).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

APR 12 1989

Dated


Richard C. Knop, Chief
Reactor Projects Branch 3