

MAY 12 1989

Docket No. 50-461

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

Gentlemen:

This refers to the special maintenance team inspection conducted by Mr. H. A. Walker and others of this office on January 23-26, February 27-28, and March 13 to April 7, 1989. This inspection covered activities at Clinton Power Station as authorized by NRC Operating License No. NPF-62. The inspection findings were discussed with you and others of your staff at the conclusion of the inspection.

The inspection was conducted to assess and evaluate your support and implementation of maintenance at the Clinton Power Station to assure that plant structures, systems, and components reliably perform on demand. Various activities were evaluated to determine if maintenance was accomplished, effective, and adequately assessed by your own quality verification process.

The enclosed copy of our inspection report identifies specific areas examined during the inspection. Within these areas, the inspection consisted of observation of maintenance activities, selective examination of procedures and representative records, and interviews with personnel. In an attempt to focus on those activities that are most risk significant, insights from a generic Boiling Water Reactor Probabilistic Risk Assessment Study, performed by the NRC, were used to select systems and components important to safety.

Overall, the inspection team concluded that maintenance at the Clinton Power Station appeared to be satisfactorily performed, effective, and assessed. The team identified strengths as well as weaknesses in the maintenance process. The executive summary highlights our inspection findings, and Sections 2.6 through 2.8 of the inspection report provide a more complete summary of the maintenance process.

Based on 1988 plant performance in the areas of reactor scrams, safety system actuations, forced outage rates, and plant availability, the team concluded that maintenance at Clinton was effective. Considerable improvement was noted compared to previous inspection findings in preventive maintenance and the maintenance of motor operated valves. The improvement was attributed to aggressive management involvement and the attitude of maintenance personnel.

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However, weaknesses were noted during this inspection; the most significant were: (1) failure to follow procedures during the performance of maintenance activities, which resulted, for example, in portions of post maintenance tests not being performed and use of documents that had not been reverified to ensure current revisions were used; (2) instances of inadequate systems engineering support of maintenance activities and knowledge of assigned systems; (3) failure to either evaluate or implement in a timely manner a number of vendor recommendations for inclusion in the PM program as evidenced by the deficiencies noted in diesel generator PMs and the 345 kV breakers issues; and (4) lack of engineering involvement causing potential for inadequate post maintenance testing. Although some actions were in progress to address these concerns, continued management attention will be required to ensure needed improvements.

During this inspection, certain of your activities appeared to be in violation of NRC requirements, as described in the enclosed Notice. The violation involved several examples of failures to follow procedures in performing maintenance activities. A written response is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

Hubert J. Miller, Director  
Division of Reactor Safety

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report  
No. 50-461/89003

See Attached Distribution

RIII  
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Walker/lms

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Jablonski  
ylo

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YES  
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Cooper  
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Grafer  
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Miller  
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cc w/enclosures:

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Engineering Department

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Commissioner Curtiss

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L. Larson, Project Manager,  
General Electric Company

Chairman of DeWitt County  
Illinois Department of

Nuclear Safety

D. Schopfer, Project Manager,  
Sargent & Lundy Engineers