

Illinois Power Company

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L30-83(08-31)-L

500 SOUTH 27TH STREET, P. O. BOX 511, DECATUR, ILLINOIS 62525-1805

Docket No. 50-461

August 31, 1983

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D.C. 20555

Attention: D. G. Eisenhower, Director

Subject: Schedule for Submittals in Response to NRC Generic
Letter 83-28

Gentlemen:

Reference: Letter, D. G. Eisenhower to All Licensees of Operating
Reactors et. al, "Required Actions Based on Generic
Implications of Salem ATWS Events (Generic Letter
83-28)," July 8, 1983

The reference letter requested the submittal of status, positions, plans, and schedules of licensee actions to resolve the issues raised in response to the Salem ATWS event. Further, addressees were requested to submit this information within 120 days from the date of Generic Letter 83-28 or request and justify a delay within 60 days of the Generic Letter 83-28 date. By this letter Illinois Power Company formally requests a delay in the submittal of positions, plans, and schedules for the Clinton Power Station until February 29, 1984. The current status of compliance with the reference letter is given in this request for delay. The justification for this delay is given below.

Justification for Delay

Illinois Power Company is an active member in the General Electric BWR Owners Group (BWROG). After the issue of Generic Letter 83-28 the BWROG established an ad hoc subcommittee to identify items within the letter that would be best addressed by the combined efforts of the BWROG members. This action was suggested by Generic Letter 83-28. Illinois Power Company participated in this subcommittee and will assist in its efforts. However, the items identified for study by the ad hoc subcommittee will not be presented as a formal proposal to the full BWROG membership until late October due to lead time required to develop detailed work scopes in each area.

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In addition to the BWROG effort, the possibility of establishing an INPO Nuclear Utility Task Action Committee is also being explored, and Illinois Power Company will attend its first meeting in September to obtain and evaluate information on its possible contribution to the ATWS response effort. It would be premature to develop a detailed response without the benefit of this input.

Illinois Power Company believes that the items identified in Generic Letter 83-28 demand careful and full consideration. Therefore, this request for delay is submitted to provide the time necessary to obtain and evaluate the BWROG and INPO NUTAC work scopes.

Current Status of Compliance

The Clinton Power Station is a GE BWR-6 design power plant with a rated output of 985 MWE. Unit 1 is approximately 80% complete and Unit 2 is indefinitely delayed. The scheduled fuel load date for Unit 1 is January 1986. Therefore, the status of compliance in each area varies.

Item 1.1 - A post trip analysis procedure has not been developed yet. However, one will be developed, and the required information for this item will be submitted by February 29, 1984. This will permit full consideration to be given to BWROG input for this procedure.

Item 1.2 - Several possible sources for post trip analysis data are incorporated into the Clinton Power Station design. These include strip chart recorders, the process computer sequence of events log, and the transient test system. These will be described in the report required by the Generic Letter 83-28. This report will be included in the information provided by February 29, 1984. This delay is necessary to include the recommendations of the BWROG for these systems.

Item 2.1 - All components required to function for reactor trip were identified as safety related in the original design drawings and documents issued for the Clinton Power Station by the Nuclear Steam Supply System vendor, General Electric Co. To respond to the Generic Letter 83-28 a review of these documents will be conducted in accordance with a schedule to be submitted by February 29, 1984. This will permit the evaluation of BWROG suggested methodology for this review.

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The current vendor information program conducted by Illinois Power Company is in accordance with established procedures. A program to actively seek supplemental information and documentation does not currently exist. The information submitted by February 29, 1984 will address the requirements in the reference letter, and will incorporate the suggestions of the BWROG for establishing a vendor information program.

Item 2.2 - The status of compliance for item 2.2 is consistent with the status of item 2.1 except that the architect engineer, Sargent and Lundy, made the initial determination of safety related classification for components not supplied by the NSSS vendor. Illinois Power Company is participating in the INPO sponsored Nuclear Utility Task Action Committee study of vendor information programs, and input from this committee will be included in the submittal of information for this item by February 29, 1984.

Item 3.1 - The Technical Specifications for the Clinton Power Station are currently under development. Maintenance procedures are in various phases of completion. It has been standard practice to evaluate vendor test recommendations in procedures when applicable as documented by the reference section of these procedures. Illinois Power Company will consider the BWROG methodology for conducting a review of procedures and include this in the required information by February 29, 1984.

Item 3.2 - The status of compliance for this item is consistent with the status of item 3.1. The information obtained from the BWROG and INPO NUTAC efforts will be considered in the development of the required information for this item, and this information will be submitted by February 29, 1984.

Item 4.1 - This is not applicable to boiling water reactors.

Item 4.2 - This is not applicable to boiling water reactors.

Item 4.3 - This is not applicable to boiling water reactors.

Item 4.4 - This is not applicable to boiling water reactors.

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Item 4.5 - The BWR-6 design provides for on-line testing of RPS components. However the positions and findings of the BWROG study in this area will be considered in the development of the required information which will be submitted by February 29, 1984.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. M. Nelson", is written over the typed name.

R. M. Nelson
Director - Licensing &
Configuration Management
Nuclear Station Engineering

RMN/lr

cc: H. Abelson, NRC Clinton Licensing Project Manager
H. H. Livermore, NRC Senior Resident Inspector
Illinois Department of Nuclear Safety