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L30-90(04-11)-LP
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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

April 11, 1990

Docket No. 50-461

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Clinton Power Station
Response to Generic Letter 90-01

Dear Sir:

This letter is in response to Generic Letter (GL) 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey". Illinois Power Company (IP) was one of the thirteen utilities selected to participate in the Regulatory Impact Survey conducted by the NRC. Since IP did participate in the onsite survey with the NRC team, we have not completed the survey form provided in the Generic Letter but are providing in the attachment to this letter a summary of the key points made during the survey meeting.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'F. A. Spangenberg, III'.
F. A. Spangenberg, III
Manager - Licensing and Safety

REL/krm

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety

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IP Discussion Topics from
NRC Regulatory Impact Survey November 6, 1989

SUPERVISOR/DIRECTOR/MANAGER TOPICS

1. The NRC conducts programmatic inspections (e.g., maintenance) during outages. This impacts utility resources and schedule.
2. Inconsistent regulatory interpretations between NRC inspectors and the different NRC regions.

Examples: - Equipment Qualification
 - Diesel Generator valid and invalid starts
 - If a plant is a problem plant, the
 interpretations seem to be more stringent
 - Support System Operability

Utilities must educate new inspectors about items previously acceptable with a past NRC inspector.

3. Unreasonable time expectations from NRC inspectors for a utility to respond to NRC requests for information or action. This impacts the utilities resources and priorities.
4. The NRC lacks trust in utility personnel.

Examples: - Degreed Shift Supervisors
 - Fitness for Duty requirements
 - Maintenance Rule. The NRC focuses on the
 process, not the results
 - Most restrictive Technical Specification

5. There may be too much NRC focus on specific areas, and a lack of recognition that utility resources are finite. This draws resources away from general attention to safety to address specific areas.

Examples: - Preparing for Equipment Qualification NRC
 inspectors
 - Electrical Panel verification effort

6. Untimely communication from the NRC of adverse industry information. The NRC publishes a NUREG quarterly which contains last years information. Some inspectors have a hidden agenda to catch the same problem at other plants.
7. NRC Notices, Bulletins, and Generic Letters are often unclear and need to be supplemented. This expends utility resources (e.g., IEB 88-10 "Molded Case Circuit Breakers", GL 89-19 "RPV Overfill").
8. The NRC Maintenance Rule is directed towards an area where utilities are already improving. This type of regulation discourages management initiative. The goal setting advocated by the proposed Maintenance Rule may be counterproductive to safety.

9. Generic Letter 89-10 "Safety Related Motor Operated Valve Testing and Surveillances" gives a schedule that is too aggressive. It is inflexible as to compliance and will not allow utilities to share information.
10. The NRC seems more interested in mandating generic changes/requirements rather than working with each utility to coordinate priorities and budgets and still be safe.
11. The Office of Investigation interface is very difficult and often very much after the fact.
12. Federal regulations are driving parts manufacturers out of the nuclear business.
13. The threshold for reporting an LER is too low. LERs give the public a bad perception of nuclear plants. Many LERs are administrative in nature and not nuclear incidents. If everything is important, then nothing is important.
14. The SALP process is being misused by the press. Conclusions are made that when a plant is not in the upper quartile, it must be a bad plant.
15. The NRC must recognize utility prudency concerns. Regulations stand up to prudency tests but Generic Letters and inspector requests do not. If the regulations are not prescriptive then inspectors should be less prescriptive. Utilities think long and hard before going to the NRC Region about unreasonable inspector requests.
16. What are the NRC and utility mutual goals? Utilities have a 5 year plan but do not always know what the NRC expects in the next 5 years. It is difficult to lay out a long range problem and thus "band-aid" fixes are used.

OPERATING CREW TOPICS

1. INPO and NRC Duplicate Inspections. Any finding by NRC or INPO will automatically be implemented at a utility whether it's a good or bad recommendation.
2. Outage Work - Because of NRC requirements, outage time is spent on commitments and preventive maintenance with little time left for corrective maintenance. The number of backlogged MWRs should not be a performance indicator. Utilities may be faced with rolling MWRs together to reduce numbers without fixing problems.
3. Degreed Operator Rule - Some operators have tried getting a degree while on shift work and it is too tough. The training operators get (e.g., Emergency Operating Procedures, Mitigating Core Damage, etc.) should fulfill some degree requirements.
4. SRO/RO Licenses - For a unit attendant (UA) to get a license on shift it takes a long time. A person may have done a task 1000 times as a UA on shift, but during license training he has to get OJT signatures again.
5. NRC Resident Inspectors - It is felt they have been average in overall knowledge of the plant and that they have adequate knowledge to do their job.
6. Technical Specifications - The BWR-6 system design makes for complicated Technical Specifications, but cross references help.
7. Emergency Plan - The Notification of Unusual Event (NOUE) category has an adverse effect on public reaction, but no help is called to the plant. Operators have 15 minute notification requirements and this interferes with dealing with the casualty.
8. Overall Regulation - Counselling an operator on an error does not seem to be enough anymore. There appears to be an administrative solution for every problem.