

ILLINOIS POWER COMPANY



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

February 18, 1983

Docket No. 50-461

Mr. James G. Keppler  
Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

SUBJECT: Potential Deficiency 83-03  
10CFR50.55(e)  
Certification of Startup Test Personnel

Dear Mr. Keppler:

On January 14, 1983, Illinois Power verbally notified Mr. D. Hayes, NRC (Region III) of a potentially reportable deficiency concerning the certification of startup test personnel. An investigation of the matter has been performed and has determined that the matter is not reportable under the provisions of 10CFR50.55(e). This letter provides a final report of the matter in accordance with 10CFR50.55(e)(3).

#### Background

As a result of a discussion between Illinois Power Startup and Quality Assurance personnel, it was determined that a particular individual assigned to perform an upcoming retest of certain class 1E protective relays was not certified to perform the test in accordance with Startup Administrative Procedure SAP-7 "Qualification and Certification of Test Personnel". SAP-7 provides the minimum qualification/certification requirements for Startup personnel who direct or supervise the conduct of Startup test activities as well as those who perform these activities. Concerned that the non-certified individual may have performed testing previously, Startup personnel conducted a review of test results associated with the original tests performed on the relays. This review revealed that this individual had performed tests on both non 1E and 1E protective relays. Although this individual was qualified and experienced to perform the tests, he lacked the Startup Certification required by SAP-7. A CPS

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Condition Report No. 1-83-01-029 dated January 13, 1983, was initiated to document the problem and resulted in the initiation of the investigation under 10CFR50.55(e). The basis for initiating the investigation was that the validity of tests performed by personnel not certified in accordance with applicable Startup procedures was indeterminate.

### Investigation Results

To determine the scope of this problem and resultant effects on previously performed tests, a review of records of testing activities performed under Startup Group cognizance, either complete or in process as of January 19, 1983, was performed, and included safety related, fire protection related, augmented D/radwaste, and non safety-related testing. The review evaluated the certifications of personnel performing the test and separated the results into the categories below. No further action was taken on those test records that indicated that the personnel who performed the tests and evaluated the results were properly certified in accordance with SAP-7. Those records which indicated the test activity was performed by individuals not certified per SAP-7 were separated into three (3) categories sharing common characteristics and were further evaluated to determine acceptability. Each category is defined and the results of the evaluation in each category are tabulated as follows:

#### Category I

The test activity was performed by technicians or electricians not certified to SAP-7, but were certified in accordance with Plant Staff Procedure OAP-1502.04S. The test results were evaluated, when required, by personnel certified to SAP-7. The breakdown in this category is as follows:

A.	Non-Safety Related	5395 test records
B.	Safety Related	274 test records
C.	Fire Protection Related	42 test records
D.	Augmented D/Radwaste	73 test records

The 5784 test records that fall under this category were evaluated as acceptable based on:

1. The technicians and electricians were certified at the time the test was performed in accordance with OAP-1502.04S, which implements the requirements of

ANSI/ASME N45.2.6-1978 and is endorsed by Regulatory Guide 1.58 and committed to in the CPS FSAR section 1.8.

2. Startup personnel certified in accordance with SAP-7 performed an evaluation of the test results and found them acceptable.
3. The technicians and electricians were under supervision of Startup test personnel certified in accordance with SAP-7.

#### Category II

The test activity was performed by non certified personnel. The test results were evaluated by personnel certified to SAP-7. The breakdown in this category is as follows.

A. Non-Safety Related	1278 test records
B. Safety Related	42 test records
C. Fire Protection Related	0 test records
D. Augmented D/Radwaste	5 test records

The test records that fall under this category were evaluated as acceptable based on:

1. The 1278 test records under the non-nuclear safety related subset are non-nuclear safety related by design, and review showed no significant interaction with safety related equipment.
2. The components represented in the 42 test records under the nuclear safety related subset, and the 5 test records under the Aug D. subset were satisfactorily retested using qualified personnel, establishing that the as-tested condition of the component was acceptable.
3. Startup test personnel certified in accordance with SAP-7 performed an evaluation of the test results and found them acceptable.
4. The technicians and electricians were under the supervision of Startup personnel certified in accordance with SAP-7.

Category III

The test activity was performed and/or evaluated by non certified test personnel. The breakdown in this category is as follows:

A.	Non-Safety Related	44 test results
B.	Safety Related	0 test results
C.	Fire Protection Related	0 test results
D.	Augmented D/Radwaste	0 test results

The forty four (44) test records that fall under this category are considered acceptable based on:

1. These components/systems are non-nuclear safety related by design, and review showed no significant interaction with safety related equipment.
2. These tests were performed early in the test program. The systems have been successfully placed in operation or have undergone further testing at the system level

In addition to the reviews of Startup test records, a review of various documents, which define requirements for the certification of Startup test personnel, was performed to assure that all documents were consistent and reflect regulatory requirements and commitments. This review included the CPS FSAR and commitments to Regulatory Guides 1.8 (ANSI/ANS-3.1-1978) and 1.58 (ANSI/ASME N45.2.6-1978), Startup Administration Procedures SAP-7, "Qualification and Certification of Test Personnel", SAP-5 "Test Procedure Results Evaluation & Approval", SAP-11 "Conduct of Tests", OAP-1502.04S "Qualification and Certification of Personnel for Inspection, Testing and Examination", and other associated documents. This review found that the procedures did not clearly and consistently delineate the qualifications and certification requirements for technicians and electricians who perform testing functions under the Startup program, and is considered to be the root cause of this problem.

Corrective Action

Although this problem was found not to be reportable under the provision of 10CFR50.55(e), several problems were uncovered with regard to the Startup program for the certification of test personnel which require corrective action. Actions taken to correct and prevent this problem from recurring are as follows:



1. Retesting of the forty seven (47) quality related (safety related, fire protection, augmented D) category II components has been performed by properly certified personnel.
2. Training was conducted by the Supervisor-Startup on January 14, 1983, to discuss Condition Report 1-83-01-029 and to clarify the qualification and certification requirements for individuals who perform testing under the Startup Program.
3. Startup Administrative Notice SAN 3-83 was issued January 26, 1983 to endorse Plant Staff Procedure OAP-1502.04S for qualification and certification of Maintenance Department technicians and electricians.
4. Startup Administrative Procedure SAP-7 will be revised to identify the qualification and certification requirements for technicians and electricians who perform startup test activities.
5. Startup Administrative Procedure SAP-5 will be revised to clarify Startup's intent relative to the evaluation of test records that are prerequisites to preoperational tests.
6. Startup Administrative Procedure SAP-11 will be revised to clarify its reference to SAP-7 relative to the certification requirements for technicians and electricians.

Corrective actions 4, 5, and 6 above will be complete by April 30, 1983.

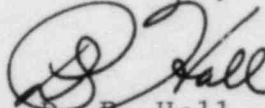
#### Safety Implications/Significance

This investigation reveals a deficiency in the implementation of the requirements of 10CFR50 Appendix B, Criterion XI, Test Control, with regard to the certification of test personnel. The results of this investigation, however, indicate that there has been no impact on testing activities or system operation to date. As this condition has no adverse safety implications and is considered to be non-significant, it is not considered to be reportable under the provisions of 10CFR50.55(e). However, corrective actions are being taken to resolve procedural deficiencies which led to this problem and to prevent further recurrences of this nature.

February 18, 1983

This letter is hereby submitted as a final report in accordance with 10CFR50.55(e), and I trust that it is sufficient for analysis and evaluation of the problem and corrective action.

Yours very truly,

A handwritten signature in dark ink, appearing to read 'D. P. Hall', is written over the typed name.

D. P. Hall  
Vice President

cc: NRC Resident Inspector  
Manager-Quality Assurance  
Director-Office of I&E, USNRC Washington DC 20555  
Illinois Department of Nuclear Safety