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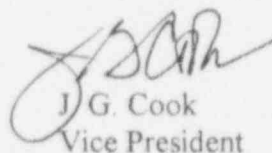
Subject: Reply to a Notice of Violation Contained in  
Inspection Report 50-461/94008 (DRP)

Dear Sir:

The attachment to this letter contains the Illinois Power (IP) response to the violation of Nuclear Regulatory Commission (NRC) requirements documented in NRC inspection report 50-461/94008(DRP). The notice of violation discusses the deliberate falsification of a quality verification inspector signature on a maintenance work request.

IP admits that the violation occurred as cited in the notice of violation. The attachment to this letter contains the response to the violation. IP shares the NRC's concerns about this issue and is confident that the response addresses those concerns.

Sincerely yours,



J. G. Cook  
Vice President

RSF/csm

Attachment

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

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**Response to Violation 461/94008-01(DRP)**

The Notice of Violation states in part:

"Title 10 of the *Code of Federal Regulations*, Part 50, Appendix B, Criterion V, requires activities affecting quality be prescribed by documented instructions and procedures and be accomplished in accordance with these instructions and procedures.

Licensee procedure CPS 1501.02, "Conduct of Maintenance," paragraph 2.2.9, requires that sign off of a QC (quality control) hold, witness, verification, or inspection point shall be done by Quality Verification personnel.

Contrary to the above, on January 18, 1994, the sign off of two QC witness points was not done by Quality Verification personnel. Specifically, the signature of a Quality Verification inspector was falsified by a maintenance foreman in job step 7B of maintenance work request D54383."

Background and Reason for the Violation

On January 28, 1994, a quality verification (QV) inspector was reviewing maintenance work request (MWR) D54383, a work document for correcting refrigerant leaks on the "A" control room heating, ventilating, and air conditioning system chiller. The QV inspector was performing a close-out review of the MWR as training to be qualified as a quality engineer (QE). While reviewing the MWR, the QV inspector noted a signature on a work step that appeared to be his signature. The signature was at a witness point for a QV parts verification inspection step and was dated January 18, 1994. The signature had been lined out, initialed and dated January 18, 1994. The initials for the lined out signature were illegible. The QV inspector did not recall signing the witness point and immediately suspected the signature was a forgery. The QV inspector immediately notified his supervisor of the suspected forgery. An independent investigator was obtained to head the initial investigation of the condition. To preserve the integrity of the confidential investigation, a condition report (CR) was not immediately initiated. CR 1-94-02-006 was initiated on February 3, 1994 to track the investigation and corrective actions.

On January 31 and February 1, 1994, the investigator interviewed several Illinois Power personnel involved with the work document. On February 1, 1994, during one of the interviews, the Mechanical Maintenance department foreman responsible for the close-out of MWR D54383 admitted that he deliberately falsified the QV witness point of the MWR by falsely imitating the QV inspector's signature on January 21, 1994 during the Maintenance close-out review. The foreman admitted that he forged the QV inspector's signature to fill in the blank work step so he could close the MWR. During the interview, the foreman related that he knew his actions were wrong and that he had second thoughts

about what he had done. The foreman further related that his second thoughts led him to line out the falsely imitated signature and date and to initial the line-out and date it January 18, 1994. The foreman told the investigator that he intentionally initialed the line-out so his initials would not be recognized. The foreman stated that at the time he falsified the witness point he believed it had been bypassed, a procedure violation. However, the foreman advised that he did not notify anyone of the situation or attempt to resolve it.

During further questioning of the foreman, he admitted to falsifying four QV inspector signatures on MWR D30666 while completing its close-out review in December 1993. The foreman admitted to falsely imitating QV inspector signatures at two QV witness points and two QV inspection points for work steps involving disassembly and inspection of the "A" reactor feed pump. The foreman again acknowledged during the interview that forging the signatures was wrong.

#### Corrective Steps Taken and Results Achieved

The Maintenance foreman's employment with Illinois Power was terminated on February 4, 1994.

MWRs D54383 and D30666 were reviewed by the Nuclear Assessment Department (NAD) to identify any adverse impact the forgeries may have caused to plant equipment. The review identified that the witness point falsified in MWR D54383 should have been marked as not applicable. The witness point required a verification of parts to be installed under the work step; however, no parts were installed at this work step. Therefore, a QV inspection was not required and the falsification had no adverse impact on the equipment.

A review of MWR D30666 established that QV inspections were required and had been completed for the falsified witness and inspection points, but the signature blocks had not been signed by the QV inspectors prior to the MWR's close-out review by the Maintenance foreman. Attachment 1 to MWR D30666 and several Quality Verification Inspection Reports for MWR D30666 activities contain information indicating that the QV inspections were completed with acceptable results. Therefore, the falsifications of QV witness and inspection points in MWR D30666 had no adverse impact on the equipment. NAD reviewed all MWRs completed between October 1, 1993 and February 10, 1994, which contained QV inspector signatures and were handled by the Mechanical Maintenance foreman. The review was performed to identify any falsified QV inspector signatures. This review included twenty-six MWRs and identified no additional instances of falsified QV inspector signatures.

In addition, NAD reviewed a sample of twenty-five MWRs completed between October 1, 1993, and February 10, 1994, which contained QV inspector signatures and were closed out by other Mechanical Maintenance foremen. This review identified no instances of falsified QV inspector signatures.

NAD interviewed Maintenance department foremen to determine if any had signed the name of another individual in a work document or if they knew of anyone who had done so. No instances of signature falsification were identified from these interviews.

Corrective Steps Taken to Avoid Further Violations

Clinton Power Station (CPS) management was concerned that this event was one of four in recent months involving the integrity of individuals. Although the events appeared to be unrelated, CPS management concluded that the integrity issue deserved further attention. Therefore, CPS management met with site managers and directors and reviewed the four events. As a result of this meeting, supervisors met with employees in small groups in March 1994 to review these events, to reemphasize the need for the highest degree of personal integrity and to reinforce the policy of no tolerance for falsifications. Management reviewed the feedback from these meetings and concluded that future events involving integrity issues should and will be better communicated to employees. Additionally, process improvement efforts are ongoing at CPS to eliminate repetitive tasks and unnecessary requirements that could promote complacency.

Date When Full Compliance Will Be Achieved

CPS is currently in full compliance with 10CFR50, Appendix B, Criterion V, and CPS procedure 1501.02 regarding this issue.