

# ILLINOIS POWER

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JSP-0907-90

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Docket No. 50-461

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

Subject: Revision to the Implementation Plans for the  
Clinton Power Station 1990 Initiatives

Dear Sir:

The purpose of this letter is to inform the NRC of revisions to the implementation plans for the Clinton Power Station (CPS) 1990 Initiatives for improving the Corrective Action Program effectiveness and reducing the corrective maintenance backlog.

One step in the plan to implement the Initiative to improve the effectiveness of the Corrective Action Program included establishment of a Corrective Action Task Force (CATF) to review a specified scope of closed corrective action documents. The CATF completed this review and issued a listing of the lessons learned during their review. Several actions were taken to enhance the Corrective Action Program in response to these lessons learned. These actions included: strengthening "ownership" of Condition Report (CR) resolutions, strengthening CR action tracking and reporting and performing verification of effectiveness on select closed CRs. In addition to these efforts, IP management determined that creation of an interdepartmental team would be the most effective approach to further strengthen the Corrective Action Program. To accomplish this, management developed a three-phase plan.

Phase one of the plan, which has been implemented, included establishment of a Project Manager to coordinate the plan implementation and establishment of a Corrective Action Review Board (CARB). The CARB is currently comprised of management representatives from key departments including Plant Staff and Engineering. The CARB reviews CRs as they are initiated and reviews the root cause and corrective action plans for significant CRs. The CARB review of new CRs includes a review of the adequacy of problem definition, immediate actions, assignment and due date.

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Phase two of the plan will be implemented in 1991 and will begin following completion of the second Refueling Outage (RF-2). Phase two will include revising the CR format, reviewing the CR corrective action verification process, reviewing the "ownership" of CRs, evaluating incorporation of audit findings and Requests for Corrective Action into the CR system, evaluating the need for additional root cause analysis methods and evaluating the concept of designating specific personnel to perform root cause analyses.

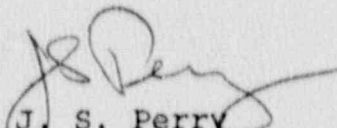
Phase three of the plan involves enhancing the corrective action tracking system at CPS and will be implemented in 1992.

Additionally, a review of the use of the Centralized Commitment Tracking (CCT) System for tracking CR actions has been performed. As a result of this review, it was determined that the existing systems for tracking modifications/field alterations and Maintenance Work Requests (MWRs) are adequate to ensure that work is properly scheduled, tracked and completed. Therefore, the CCT system is no longer being utilized for duplicate tracking of these actions.

The plan for implementation of the 1990 Initiative to reduce the backlog of corrective maintenance MWRs included a goal of reducing the backlog to 750 MWRs (approximately a three-month backlog) by the end of 1990. Significant progress has been made toward reducing the backlog; prior to entering RF-2 on October 14, 1990, the backlog was reduced to just under 1000 corrective maintenance MWRs (total of outage and non-outage work). However, due to redirection of resources to support forced outage and extended planned outage work in 1990, the projection for achieving the three-month backlog goal is now April, 1991.

Illinois Power Company (IP) is continuing to focus on the 1990 Initiatives to enhance performance at CPS. The Initiatives will be reevaluated by management and revised as necessary for 1991.

Sincerely yours,

  
J. S. Perry  
Vice President

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