



JEOT
DCB

Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-5623
Fax 217 935-4632

John G. Cook
Vice President

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Docket No. 50-461

Mr. J. B. Martin
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: Revised Corrective Action for the Notice of Violation in
Inspection Report 50-461/89003, Dated May 12, 1989

Dear Mr. Martin:

This letter revises a corrective action Illinois Power (IP) provided in letter U-601497, dated July 21, 1989, regarding the process of ensuring that maintenance work packages contain current revisions of controlled documents.

Background

A notice of violation contained in NRC inspection report 50-461/89003, identified that reference documents in three work packages had not been verified every 14 days as required by Nuclear Planning and Support procedure NP&S 2.51, "Document Control Procedure." The cause of the violation was determined to be a conflict between procedure NP&S 2.51 and plant administrative procedure CPS 1029.01, "Preparation and Routing of Maintenance Work Documents." Procedure CPS 1029.01 did not contain the 14-day verification requirement but instead required a verification of reference document revision status prior to work package issue and at completion of the work package. The out-of-date reference documents had no impact on the work associated with the three work packages.

One of the initial Illinois Power (IP) corrective actions for this issue (reference IP letter U-601464, dated 6/14/89) was to delete the requirement to verify reference documents are current every 14 days and instead follow the process contained in procedure CPS 1029.01. However, the NRC was concerned that the process contained in procedure CPS 1029.01 was inconsistent with Criterion VI of 10CFR50, Appendix B, because it did not ensure the use of up-to-date documents. Initially, the NRC was unaware and IP failed to point out that procedure CPS 1029.01 contained a requirement to periodically review work packages which are active for more than 30 days to ensure

reference documents are up-to-date. Notwithstanding, IP revised the corrective action for the notice of violation (reference IP letter U-601497, dated 7/21/89) to require a verification, every 14 days, that reference documents contained in Maintenance Work Request and Preventive Maintenance work packages are the current revision.

IP has reviewed this current process for avoiding the use of outdated reference documents in maintenance work activities and has concluded that the current process consumes considerable resources with negligible benefits; therefore, IP is changing the process. IP is confident that the change will have no adverse impact on plant safety or equipment operability.

The Current Process

As work is planned, the Maintenance planner reviews the revision status of all reference documents using the Design Status System (DSS) database. Following completion of planning, the work package is sent to the field for work or filed until needed in the field. However, if filed, prior to sending the work package to the field, the Maintenance planner reviews the reference documents to ensure that their revision status has been verified within the previous 14 days. Once the work package is in the field, Maintenance personnel review the reference documents prior to beginning work to ensure that the revision status of the reference documents has been verified to be current within the previous 14 days. Thereafter, the revision status is verified to be current once every 14 days, using the DSS database, until work is complete. When all work required by the work document has been completed, Maintenance reviews the revision status of reference documents using the DSS database. Any changes in document revision status are reviewed for impact on the completed work and any identified impacts receive an appropriate disposition. This review may occur prior to releasing the work to Operations but is required to be performed before closure of the work documentation.

The New Process

Prior to sending planned work packages to the field for work, the Maintenance planner reviews the status of all reference documents using the DSS database to ensure they are the current revision. Once the work package is in the field, Maintenance personnel ensure that the revision status of reference documents has been verified to be current within the previous 45 days. Thereafter, the revision status is verified to be current once every 45 days, using the DSS database, until work is complete. When all work required by the work document has been completed, Maintenance will review the revision status of reference documents using the DSS database. Any changes in document revision status will be reviewed for impact on the completed work and any identified impacts will receive an appropriate disposition prior to releasing the work to Operations.

Rationale for Change

Two major changes between the old and new processes will occur. The first change is the frequency of verifying that the work package has the current revision of reference documents; the frequency will be changed from 14 days to 45 days. The second change is that, once work begins, the equipment affected by the work package will not be considered operable until after the work is complete and the reference documents in the work package are verified to be current or are evaluated as acceptable for the use.

The first change has been determined appropriate on the following bases:

- Maintenance personnel are normally aware of reference document changes such as design documents and procedures. Most design document changes are driven from the field, so the field is normally aware of the change and its impact on the work activity. In fact, in most cases the design change is the reason for the existence of the work package. Likewise, most procedure changes that affect a work package are revised by a Procedure for Deviation Request (PDR) and are driven by the field. Additionally, many procedure revisions affecting Maintenance activities require training of key Maintenance personnel prior to implementation of the revised procedure, providing another method of informing field personnel about procedure changes.
- Through discussions over the past year with personnel from other operating nuclear power plants, IP has found that licensees verify reference document revision status at various frequencies including some greater than 14 days.
- All reference documents in the work package will be verified current prior to restoring equipment to an operable status. Documents found out-of-date will be evaluated for impact on completed work and will receive an appropriate disposition.

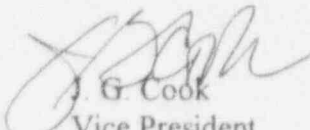
The second change is acceptable because it applies more rigid requirements than the current process applies.

The following procedures will be revised to include the 45-day verification requirement: administrative procedures CPS 1005.03, "Control Distribution and Statusing of Station Procedures and Documents," CPS 1029.01, CPS 1501.02, "Conduct of Maintenance," NP&S 2.51, and Records Management System Standard 4.01, "Standard for the Receipt, Control, Distribution and Maintenance of Controlled Documents." Administrative procedure CPS 1501.02 will also be revised to require the review of reference document revision status prior to restoring equipment to an operable status. These revisions are expected to be complete and implemented by November 15, 1994.

Members of the Clinton Power Station staff have discussed the changes to the process for avoiding the use of outdated reference documents with Messrs. F. L. Brush and H. B. Clayton of your staff.

IP is confident that this change will ensure continued compliance with the intent of Criterion VI of 10CFR50, Appendix B, in avoiding the use of out-of-date documents during Maintenance work activities while permitting a more efficient application of resources.

Sincerely yours,



J. G. Cook
Vice President

RSF/csm

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Illinois Department of Nuclear Safety