

ILLINOIS POWER COMPANY



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500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

Docket No. 50-461

December 21, 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Clinton Power Station Unit 1  
Regulatory Guides 1.58 and 1.146

Dear Mr. Schwencer:

This is in response to the request for additional information in your letter of November 15, 1983 regarding commitments to the subject regulatory guides.

The attachment provides the revised Illinois Power Company positions on compliance to Regulatory Guides 1.58 and 1.146. Should you have any questions concerning this material, we would be pleased to discuss them with you.

Sincerely yours,

J. D. Geier  
Manager  
Nuclear Station Engineering

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Attachment

cc: G. A. Harrison, NRC Clinton Licensing Project Manager  
NRC Resident Office  
Illinois Department of Nuclear Safety

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1. ANSI N45.2.23 (1978)  
Regulatory Guide 1.146, Rev. 0 (August, 1980)

Position

The Illinois Power Company Quality Assurance Program is presently in full compliance with ANSI N45.2.23 (1978) and Regulatory Guide 1.146 as committed to in the Clinton Power Station FSAR (Section 1.8, page 1.8-153a, Amendment 14, March 1982).

CPS-FSAR page 1.8-153a will be revised at the earliest amendment opportunity to delete the clarification note which committed IP to full implementation 90 days prior to fuel load.

Commitment Change

Compliance to ANSI N45.2.23 (1978) and Regulatory Guide 1.146 as clarified in the FSAR is changed from 90 days prior to fuel load to December 15, 1983.

2. ANSI N45.2.6 (1978)  
Regulatory Guide 1.58, Rev. 1 (September 1980)

Position

The Illinois Power Company Quality Assurance Program is in full compliance with ANSI N45.2.6 (1978) and Regulatory Guide 1.58 (Rev. 1) as described in the Clinton Power Station FSAR (Section 1.8 pages 1.8-64 and 1.8-64a, Amendment 14, March 1982).

All personnel certified to ANSI N45.2.6, Levels I, II and III hold a high school education or a GED equivalent of a high school diploma. Regulatory Guide 1.58, Position C.6, contains an NRC position that if no alternative to the education and experience requirements of Position C.6 is provided, recommendations of the ANSI Standard will be followed.

The IP Quality Program has not deviated from the ANSI Standard recommendation for education levels in certifying personnel to ANSI N45.2.6 (1978).

IP will retain the option to deviate from the ANSI standard recommendation for experience levels as an option to Position C.6 of Regulatory Guide 1.58. Experience deviations will be granted in incidences where education, technical experience, test results or past performance justifies a deviation approval. Experience deviations will only be approved by department/organization Managers or designees with the IP Manager - QA being advised of all experience deviations authorized at CPS.

CPS-FSAR pages 1.8-64 and 1.8-64a will be revised at the earliest amendment opportunity to delete the clarification note which committed IP to full implementation 90 days prior to fuel load and to revise the exception to position C.6.

#### Commitment Change

Compliance to ANSI N45.2.6 (1978) and Regulatory Guide 1.58 (Rev. 1) as clarified in the FSAR is changed from 90 days prior to fuel load to December 15, 1983.

The exception to position C.6 will be revised as follows to establish an alternate position to the recommended experience levels of ANSI N45.2.6 (1978).

#### Exception to Paragraph C.6

The experience recommendations specified in Section 3.5 of the ANSI standard will not be treated as absolute when other factors provide assurance that a person can competently perform a particular task. Candidates may be qualified using other factors such as education background, technical experience and satisfactory completion of performance or capability testing in lieu of the recommended experience requirements. Proficiency and capability testing programs are formally documented and the qualification certifications identify the basis for qualifications. Experience waivers will be approved by department/organization managers/designee. The Quality Assurance organization is advised when qualification waivers are approved in lieu of the recommended experience requirements.