

ILLINOIS POWER COMPANY



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

April 27, 1984

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 10CFR50.55(e) Deficiency 55-84-07
Use of GE Non-Site Specific Design
Specifications for CPS Application

Dear Mr. Keppler:

On March 28, 1984, Illinois Power notified Mr. F. Jablonski, US NRC, Region III (Ref: IP memorandum Y-20510, dated March 28, 1984) of a potentially reportable deficiency under the provisions of 10CFR50.55(e) pertaining to the possible use of General Electric generic versus plant specific design specifications in developing preoperational test procedures in use at CPS.

Our investigation of this issue is progressing, and this letter is submitted as an interim report in accordance with the requirements of 10CFR50.55(e).

Statement of Potentially Reportable Deficiency

Illinois Power Plant Operations identified a problem in determining specific General Electric design specifications applicable to CPS. Illinois Power Startup staff use GE design specifications as a basis in writing CPS preoperational test procedures. Use of GE documents not directly approved for CPS may have resulted in incomplete preoperational test procedures.

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Background

Illinois Power Plant Operations issued a Condition Report (I-83-03-067) on March 23, 1984, indicating that a problem may exist with the use of GE generic document 22A3899, "Control Rod Drive System Fast Scram," as a basis for writing a preoperational test procedure, whereas document 22A5395, specific to CPS, should have been used. A GE reference listing of documents (CDCS) was used to determine applicable design specifications as a basis for the test procedures.

Investigation Results/Corrective Action

Illinois Power has prepared and is implementing an investigation plan to determine the extent of this problem at CPS. The investigation plan includes:

1. A report will be prepared by General Electric outlining the specific listing and means to determine the correct documents and instruction manuals applicable to CPS.
2. Procedures used by CPS staff to identify the correct controlled GE documents and instruction manuals, applicable to CPS, will be reviewed to uncover any ambiguities in the selection of controlled documents for use in writing testing and other procedures.
3. Documentation control used for other than GE equipment will be reviewed for similar problems in selecting controlled information.

We are reviewing this issue for any possible adverse impact on the safety of operation of the Clinton Power Station and potential reportability, as a breakdown in a QA Program, or deficiency in final design under the provisions of 10CFR50.55(e).

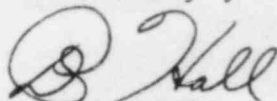
The full scope and root cause of this issue have not yet been identified, such that a determination of remedial and generic corrective action can be made. A review of procedural documents is currently in progress, and identified deficiencies will be corrected.

Safety Implications/Significance

Illinois Power's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is evaluated. Approximately ninety (90) days will be required to complete the investigation, determine reportability, and file a final report on this potentially reportable deficiency.

We trust that this interim report provides sufficient information to perform a general assessment of this potential deficiency and adequately describes our overall approach to resolve this problem.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "D. P. Hall". The signature is fluid and cursive, with the first name "D." and last name "Hall" clearly distinguishable.

D. P. Hall
Vice President

RLC/lag

cc: NRC Resident Office
Director, Office of I&E, US NRC, Washington, DC 20555
Illinois Department of Nuclear Safety
INPO Records Center