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ILLINOIS POWER COMPANY

Docket No. 50-461



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

July 17, 1984

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
Independent Design Review (IDR) Program Plan

Dear Mr. Schwencer:

By letter of July 10, 1984, Bechtel Power Corporation submitted a proposed Independent Design Review Program Plan simultaneously to the Nuclear Regulatory Commission (NRC) and Illinois Power (IP).

The IP review of the Plan identified several improvements which are being incorporated by Bechtel as described in the attached letter from J. D. Geier to C. W. Dick, dated July 17, 1984. Bechtel is expected to complete incorporating these changes and to resubmit the revision by July 20, 1984.

It is hereby requested that the NRC review and approval of the Plan be conducted in accordance with our discussions during the public meeting of June 28, 1984.

Illinois Power will respond promptly to NRC comments to assure an early acceptance of the Program Plan. If you have any further questions in this regard, please telephone either me or J. D. Geier.

Sincerely yours,

D. P. Hall
Vice President

DPH/DIH/eft

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PDR ADDCK 05000461
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Attachment

cc: Regional Administrator, Region III, USNRC
NRC Resident Office
NRC Clinton Licensing Project Manager
Illinois Department of Nuclear Safety
J. L. Milhoan, Office of I&E, USNRC
R. J. Goddard, Esq., NRC Office of Executive Legal Director
A. Samelson, Esq., Illinois Assistant Attorney General
J. Foy, Prairie Alliance
R. Hubbard, MHB Technical Associates
G. L. Parkinson, Bechtel Power Corporation

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ILLINOIS POWER COMPANY



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

July 17, 1984

Mr. Charles W. Dick
Bechtel Power Corporation
Fifty Beale Street
P. O. Box 3965
San Francisco, California 94119

Subject: Clinton Independent Design Review (IDR) Program Plan

Dear Mr. Dick:

We have reviewed the IDR Program Plan (Rev. 0) transmitted by G. L. Parkinson's letter of July 10, 1984.

The Program Plan is generally acceptable, but should be supplemented and clarified in accordance with the attached list.

Please review the contents of the attached list and incorporate them in a revision of the Program Plan.

We will request the Nuclear Regulatory Commission's (NRC) approval of the revised Program Plan. In order that the NRC may be able to complete its review of the Program Plan and act on it promptly, we would appreciate receiving the revised Program Plan by July 20, 1984.

If you have any questions concerning our request, please let me know.

Sincerely yours,

J. D. Geier
Assistant to Vice President

JDG/eft

Attachment

cc: J. G. Keppler, NRC Region III Administrator
J. L. Milhoan, NRC Office of Inspection and Enforcement
B. L. Siegel, NRC Clinton Licensing Project Manager
R. J. Goddard, Esq., NRC Office of Executive Legal Director
A. Samelson, Esq., Illinois Assistant Attorney General
J. Foy, Prairie Alliance
R. Hubbard, MHB Technical Associates

Requested Clarifications and Modifications

- (1) At the meeting on June 28, 1984, the NRC indicated that its recent Integrated Design Inspection (IDI) for the River Bend Nuclear Station resulted in some findings with respect to the design work of Reactor Controls Incorporated (RCI). Please expand the IDR to include consideration of whether the findings have any relationship to RCI's work at Clinton, and, if so, whether such findings have been appropriately taken into account at Clinton.
- (2) Page 3 of the Program Plan (including footnotes 1, 2 and 3) and Appendix A refer to the original versions of the Independence Criteria, Protocol, Personnel Questionnaire and Agreement Concerning IDR. Please update the Program Plan and Appendix A by:
 - (a) Replacing the Protocol in Appendix A with an updated version that substitutes "Director, Division of Licensing, Office of Nuclear Reactor Regulation" for "Regional Administrator," wherever that term appears.
 - (b) Modifying page 3 of the Program Plan (including footnote 1) to refer to the Independence Criteria provided in Enclosure 2 of the letter from the NRC dated June 22, 1984.
 - (c) Confirming that the Personnel Questionnaire and the Agreement Concerning IDR will be modified to reflect the foregoing Independence Criteria.
- (3) At the top of page 5, the Program Plan identifies a number of aspects of the design of each system that will be covered by the review. Please confirm that the review will also cover the fluid system aspects of the design of the system (see page 1 of Attachment 2 of May 31, 1984, letter).
- (4) Please state clearly that the reviews to be performed under the Program Plan will be broad enough for Bechtel to reach meaningful conclusions regarding the overall design of Clinton and that Bechtel will promptly inform IP and NRC if, at any time during the IDR, it determines that accomplishing that objective requires expansion of the reviews.

- (5) Please include confirmation that the horizontal review will determine the adequacy of consideration in the Clinton design process of the root causes of findings from the review of S&L design at other projects and from previous reviews at Clinton by IP and others (see page 1 of Attachment 2 of May 31, 1984, letter). This confirmation should provide additional information concerning how this objective of the horizontal review will be achieved.
- (6) Page 9 of the Program Plan indicates that in Bechtel's identification of licensing commitments its source will be the FSAR, responses to NRC questions and other documents identified by IP. Please clarify that the source of commitments will include the SER and supplements thereto, as well as any other documents which Bechtel determines to be relevant. (See page 1 of May 31, 1984 letter and page 1 of Attachment 2 to letter.)