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ILLINOIS POWER COMPANY



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

December 6, 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: 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 non-site specific design specifications in developing preoperational test procedures in use at Clinton Power Station (CPS). This initial notification was followed by two (2) interim reports (Ref: IP Letter U-10149, D. P. Hall to J. G. Keppler, dated April 27, 1984; and IP letter U-10195, D. P. Hall to J. G. Keppler, dated August 17, 1984). Illinois Power's investigation of the above issue is complete and has determined that the issue represents a reportable deficiency under the provisions of 10CFR50.55(e). This letter is submitted as a final report regarding this potentially reportable deficiency. Attachment A provides the details of our investigation.

We trust that this final report provides sufficient background information to perform a general assessment of this reportable deficiency, and adequately describes our overall approach to resolve the issue.

Sincerely yours,

D. P. Hall
Vice President

RLC/cbs (NRC)
Attachment

cc: NRC Resident Office, V-690
Director - Office of I&E, USNRC, Washington, DC 20555
Illinois Department of Nuclear Safety
INPO Records Center

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ATTACHMENT A

Illinois Power Company
Clinton Power Station

Docket No. 50-461

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

Final Report

Statement of 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 applicable for CPS may have resulted in incomplete preoperational test procedures. We have reviewed this concern for possible adverse impact on the safety of operation of CPS.

Background

Illinois Power Plant Operations issued a Condition Report (1-83-03-067) 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 (PTP-RD-01), whereas document 22A5395, specific to CPS, should have been used. A GE reference listing of documents, Customer Document Control System (CDCS), was used by the preparer of the test procedure to determine applicable design specifications as a basis for the test procedures. A review of the test procedure by Illinois Power Nuclear Station Engineering Department (NSED) identified an error in that the reference document, was not noted in the GE Master Parts List (MPL). The condition report pertains to the selection of the proper source of information as used by CPS startup in selecting applicable documents for writing test procedures.

Investigation Results

Illinois Power prepared and implemented an investigation plan to determine the extent of this problem at CPS. The investigation included:

1. A report was issued by General Electric outlining the specific listing and means to determine the correct documents and instruction manuals applicable to CPS.

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2. Procedures used by CPS staff to identify the correct controlled GE documents and instruction manuals, applicable to CPS, were reviewed. Ambiguities in the selection of controlled documents for use in writing testing and other procedures were identified.
3. Documentation control used for other than GE equipment was reviewed for similar problems in selecting controlled information.

Our investigation has determined that the primary root cause of the problem stems from some CPS personnel not being fully cognizant of the use of the MPL as the correct method for determining GE documents that are specific to CPS.

The GE Manual - Engineering Documentation Systems, provides direction on how to use the GE documentation system. The manual states that following issuance, the Master Parts List (MPL) becomes the principal working document for the CPS project, with respect to hardware and software to be provided by GE. The MPL is the top tier controlled document that references lower tier documents. The MPL must be used to determine which documents are applicable to CPS. The GE Engineering Information System (EIS) lists the latest revision of all documents directly applicable to CPS and those identified as references on these documents.

The CDCS, by contrast, is a listing of the latest revision of each document transmitted to CPS from GE, regardless of the specific applicability to CPS. The CDCS functions to provide an ongoing transmittal log of GE transmitted documents. The CDCS listing has been compared against the EIS listing and GE advised IP on January 16, 1984 (IP-2185), of those documents not applicable to CPS. Sargent & Lundy Engineers have revised their Foreign Document Report to note this status. GE will periodically perform this comparison at IP's request.

Test procedures are initiated by the IP Startup group. Preoperational Phase Test Procedures to verify operational performance of equipment are submitted to NSED for review in accordance with NSED Procedure D.10-Test Procedure Review and Approval. NSED reviews for adequacy and completeness of the references used to prepare the test procedure and considers criteria such as system design, purchase specification, applicable prints, drawings, data sheets etc. The test procedure is approved by the Startup Group after resolution of review comments, this approval does not constitute approval to perform the test. "Test Release" assures that before approval is given to commence testing, the previously issued test procedure has been evaluated again by Startup for system scoping or design change revisions to references, etc.

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Illinois Power's Startup Group has reviewed 536 test procedures for possible use of improper references. This review identified 93 procedures with GE document references which were questionable. Of these 93 procedures, 25 have been released for test. Startup has reviewed all 25 procedures, only two of which pertain to safety related systems. One (1) of these documents references a possible incorrect design specification, however, subsequent review and evaluation has determined that no impact on safety exists. The second procedure was corrected to delete information not applicable to the equipment and to update with latest drawing revisions, neither of which have an impact on safety. The remaining 68 test procedures (including PTP-RD-01) will be given a final review and revised if necessary prior to "Test Release". This approach is appropriate since the referenced GE documents may change prior to "Test Release".

A review was conducted by NSED to ensure that a similar concern does not exist for documentation provided by other vendors, and used in writing Startup preoperational test procedures. The conclusion of this review indicated that the existing S&L and BA document status reporting systems, available on site, are sufficient to ensure that the appropriate revisions of site specific documents are used at CPS.

Corrective Action

To preclude the possibility of incorrect documents being used for writing of preoperational procedures, the following corrective actions have been taken:

1. Training

NSED, Startup, and Plant Staff have provided training on the proper use of GE documentation. Emphasis has been placed on assuring that all personnel are aware that the MPL is the master document to be used in determining applicable GE documents, and the CDCS is merely a transmittal log of the latest revision of each document sent to CPS by GE. The CDCS cannot be used to determine if a document is applicable to Clinton.

NSED - All training complete.

Startup - All training complete.

Plant Staff - All training complete except as follows:

Operations - due 12/21/84.

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2. Departmental Procedures

To ensure proper consideration is given to using the MPL when preparing procedures, the following procedures have been revised to specifically state that, "the MPL should be used to determine appropriate GE documents".

- a. NSED Procedure D.10, "Test Procedure Review and Approval", Revision 2, Attachment D.10-3.
 - b. NSED Procedure D.25, "Test Procedure and Approval for Plant Modifications", Revision 1, Attachment D.25-1.
 - c. Startup Procedures SAP-14, "Test Procedure Development", Revision 2, Section 6.1.5.6 (TR-7).
 - d. Startup Procedure SAP-15, "Test Release", Revision 0, Section 6.3.2.3 (TR-3).
 - e. Operations Procedure OAP 1005.01, "Preparation, Review, and Approval of Station Procedures and Documents", Rev. 12, Paragraph 8.1.2.9.12.
3. A review of all test procedures was performed to assure that the correct references were used. The test procedures will be revised where appropriate to correct identified discrepancies prior to fuel load.
4. An EIS terminal has been provided for use by the Startup and Plant Operations Groups in addition to the existing terminal in the GE Construction Office. The EIS terminal provides on-line computer capability for determining the latest revision to GE documents.
5. The Startup and Operations Libraries have been provided with a controlled copy of the MPL for use in determining applicable GE documents.

Safety Implications/Significance

Investigation of this issue is complete. Illinois Power Company has reviewed and evaluated the findings of this investigation and determined that there was a breakdown in the program for identifying the correct documents to use as a basis in writing preoperational test procedures. A number of test procedures were approved for testing using incorrect design information. Had this condition remained uncorrected it could have adversely affected the safety of operation of CPS in that the design performance specifications would not have been properly verified. Therefore this issue is considered to be reportable under the provisions of 10CFR50.55(e).