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**ILLINOIS  
POWER**

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WC-275-96  
September 12, 1996  
10CFR50.36

Docket No. 50-461

Mr. A. Bill Beach  
Regional Administrator  
USNRC - Region III  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Subject: Preliminary Assessment: Confirmatory  
Action Letter Dated September 11, 1996

Dear Mr. Beach,

In preparation for your visit to the Clinton facility, I wanted to identify to you our preliminary findings surrounding the most recent activities leading to the September 6, 1996 shutdown of Clinton Power Station.

It should be noted that our assessment is ongoing and these results are preliminary. Specific substantiation for each issue is not yet available, nor have the appropriate corrective actions been determined. However, the preliminary assessment results identified the following general issues which as a minimum will be included in our forthcoming corrective action plan.

- 1) We were not conservative in our operation of the unit. Lack of a conservative approach to procedure interpretation led to failure to comply with procedures.
- 2) An attitude that compliance with the Plant Technical Specifications and Procedural Content is sufficient detracted from our ability to view the overall impact of our actions.  
Management expectations on procedure use and compliance need to be reinforced.

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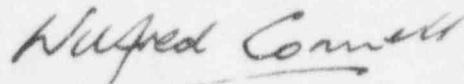
- 3) Our actions in analyzing/attempting to control the reactor coolant loss from the Reactor Recirculation Pump seal failure prior to shutting down was not the most conservative operation. After evaluating the conditions and decisions made, we overlooked several opportunities to make the conservative decision and shutdown the reactor.
- 4) Our lack of questioning attitude and predispositioned thinking contributed to our pursuit of leak isolation instead of a reactor shutdown.
- 5) We were tolerant of degraded systems (Reactor Recirculation Pump Seals, Leak Detection Instrumentation) that are important to reactor operation.

At this time, the Clinton Power Station (CPS) Nuclear Assessment Department (NAD) is establishing a thorough, detailed chronology of events that occurred during the isolation of the "B" Reactor Recirculation Loop. Concurrent with the establishment of the chronology NAD is analyzing the evolution to establish and evaluate the following:

- Decisions made and their basis
- Contingencies evaluated related to the decision and its consequences
- Equipment manipulations performed
- Instrument indications available at the time of the decision
- Management involvement and oversight during the event

We will continue to pursue and complete the assessment as previously committed and identified in your Confirmatory Action Letter dated September 11, 1996. The detailed results, findings, corrective actions and schedule will be provided prior to plant startup.

I look forward to discussing our preliminary findings in the near future.



Wilfred Connell  
Vice President

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