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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 578, CLINTON, ILLINOIS 61727

October 18, 1985

Mr. J. G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to the Notice of Violation, dated September 4, 1985,
in I & E Inspection Report 50-461/85036

Dear Mr. Keppler:

This letter is in response to the September 4, 1985, letter identifying certain activities which appeared to be in noncompliance with NRC requirements. Attachment A provides Illinois Power Company's response to the Notice of Violation concerning sequencing of test steps in the Preoperational Test Program.

I trust that our response is satisfactory to ensure compliance with regulatory requirements.

Sincerely yours,

F. A. Spangenberg
Manager - Licensing
and Safety

JAB/kaf

Attachments

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
Director, Office of I&E, Washington, DC 20555
NRC Resident Inspector
Illinois Department of Nuclear Safety

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Attachment A
Illinois Power Company
Clinton Power Station

Subject: Preoperational Test Sequencing

The Notice of Violation states in part:

"... preoperational test procedure PTP-RI-01, 'Reactor Core Isolation Cooling,' was not of a type appropriate to the circumstances in that the procedure did not control the sequence of performing the test.

"... preoperational test procedure PTP-FC/SM-01, 'Fuel Pool Cooling and Cleanup/Suppression Pool Makeup,' was not accomplished in accordance with the procedure in that the sequence of performing the test was not controlled."

I. Corrective Actions Taken and Results Achieved

Illinois Power has reviewed the Startup Administrative Program and determined that adequate controls did not exist to ensure test step sequencing problems would be identified. Therefore, specific criteria has been added to the procedures which govern the preparation, review and conduct of test procedures and the review of test results. These criteria will ensure that any alternate test step sequences permitted by the procedure, or any alternate sequence actually performed are properly evaluated.

Illinois Power Startup will review PTP-FC/SM-01 and conduct a sample review of all completed PTPs and Final Safety Analysis Report (FSAR) Chapter 14 Acceptance Test Procedures (ATP). This review will be in accordance with Startup Administrative Procedure SAP-5, Test Procedure Results Review and Approval, which has been revised to include a review by the Lead Program Engineer for test step sequencing. The results of this review will be evaluated to determine if any testing step was invalidated by a subsequent test step. If any test is determined to be invalid, all completed PTPs and FSAR Chapter 14 ATPs will be reviewed.

II. Corrective Actions Taken to Prevent Recurrence

The Startup Administrative Program has been revised to include appropriate controls for test step sequencing. SAP-5, Test Procedure Results Review and Approval, has been revised to require the Lead Program Engineer's review of test results, including a review of actual test sequence. This review will ensure that test results for that test procedure are not invalidated by any alternate test sequence performed.

SAP-11, Conduct of Tests, has been revised to require the Test Director to evaluate sequence deviations to ensure that the test procedure is not invalidated, and require documentation of the actual test Section/Step/Substep sequence, when deviating from the numerical sequence listed in the procedure.

Attachment A
Illinois Power Company
Clinton Power Station

SAP-14, Test Procedure Development, has been revised, to require the Lead Program Engineer to review test procedures for proper test sequence. Both the planned sequence, and any alternate sequence(s) permitted by the procedure, shall be evaluated to ensure that the test procedure is not invalidated due to the sequencing of the test steps.

Administrative controls will be established to ensure that all PTPs and FSAR Chapter 14 ATPs, which are approved but have not been released for performance, are reviewed prior to release. This review will evaluate for any alternate test sequences which are permitted by the test procedure. Alternate sequences will be reviewed to ensure that they do not potentially invalidate the test results.

III Date By When Full Compliance Will Be Achieved

Illinois Power will be in full compliance by October 31, 1985.