

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/85035(DRS)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Nuclear Power Station, Unit 1

Inspection At: Clinton Site, Clinton, IL

Inspection Conducted: July 8-12, 15-18, 22-25, 1985

Inspectors: *R. N. Sutphin*
R. N. Sutphin

8/15/85
Date

R. A. Westberg
R. A. Westberg

8/15/85
Date

Approved By: *F. C. Hawkins*
F. C. Hawkins, Chief
Quality Assurance Programs Section

8/15/85
Date

Inspection Summary

Inspection on July 8-12, 15-18, 22-25, 1985 (Report No. 50-461/85035(DRS))

Areas Inspected: Routine, unannounced inspection by two regional inspectors of licensee action on previous inspection findings, audits, safety committee activity, tests and experiments. The inspection involved a total of 96 inspector-hours on site and 2 inspector-hours offsite.

Results: Of the four areas inspected, no violations or deviations were identified. Of the eight previous findings reviewed, four were closed.

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DETAILS

1. Persons Contacted

Illinois Power Company

- *J. Perry, Manager, Nuclear Program Coordination
- *J. Greene, Manager of Startup
- *W. Connell, Manager, Quality Assurance
- *E. Kant, Assistant Manager, NSED
 - F. Spangenberg, Director, Nuclear Licensing
- *N. Williams, Director, Support Services
 - H. Lane, Director, Design Engineering
- *G. Bell, Director, Construction & Procurement QA
- *K. Patterson, Director, Nuclear Purchasing
- *R. Richey, Assistant Power Plant Manager-Maintenance
- *P. Raysircar, Assistant Director-Design Engineering, NSED
 - D. Holtzcher, Director, Nuclear Safety & Engineering Analysis
 - R. Bhat, Supervisor, HVAC and Fire Protection, NSED
- *J. Palchak, Supervisor, Configuration and Compliance Control Department (CCCD)
 - J. Friend, Audit Supervisor
 - R. Schaller, Supervisor-Technical Plant Staff
 - J. Puzauskas, Supervisor, Procurement QA
 - D. Schweickert, Staff Engineer, CCCD
- *K. Baker, Staff Engineer, Licensing
 - J. Swearingen, Assistant Records Supervisor
 - S. Crownover, Assistant Records Supervisor
 - W. Clark, Assistant C&I Supervisor
 - L. Lease, Assistant C&I Supervisor
 - K. Roys, Jr., Secretary to Nuclear Review and Audit Group (NRAG)
 - R. Kerestes, Fire Protection Project Management
- *J. Brownell, Staff Specialist - Licensing
 - C. Driskell, Station QA Specialist

Soyland/Wipco

- *J. Greenwood, Manager, Power Supply

US NRC

- *P. Gwynn, Chief, Reactor Projects Section 1B

*Denotes those in attendance at the exit interview on July 25, 1985.

Other personnel were contacted as a matter of routine during the inspection.

2. Action on Previous Inspection Findings

- a. (Open) Open Item (461/85016-01): Master Equipment List (MEL) - Review by NRC for inclusion of safety-related items. The licensee has not completed the compilation of the MEL. Additional effort is underway to further define the items, components, parts, and materials for inclusion on the list. This item will remain open until the licensee completes the MEL and initiates its implementation.
- b. (Closed) Open Item (461/85016-02): Development and definition of an Independent Safety Engineering Group (ISEG) program. The licensee has released the charter for the ISEG, assigned personnel, developed procedures and instructions for ISEG operations, conducted three meetings, prepared minutes, established a records system, and initiated implementation of all of the ISEG program requirements which were committed to in the FSAR. The inspector was satisfied that this item had been adequately addressed by the licensee.
- c. (Closed) Open Item (461/85016-04): Objective evidence of accuracy ratios between reference standards and M&TE. The licensee had developed a Calibration Accuracy Worksheet for the calculation, recording, and approval of accuracy ratios. The inspector was satisfied that the licensee now has objective evidence of the accuracy ratios between their reference standards and M&TE.
- d. (Closed) Open Item (461/85016-05): Traceability of primary reference standards to nationally recognized standards, such as the National Bureau of Standards (NBS). The licensee has established time intervals for the periodic reverification of reference standard accuracy. The inspector was satisfied that the licensee has satisfactorily addressed this issue.
- e. (Open) Open Item (461/85016-06): All required records have not been identified and provided for in the Records Classification Code List (RCCL). The licensee had initiated a review of record commitments in the FSAR, Technical Specifications and other program documents, and is updating the RCCL. The items previously identified by the inspector as missing from the RCCL had been added; however, the licensee's review program was still in process. The inspector will conduct a final inspection of the records program when the licensee has completed their review.
- f. (Open) Unresolved Item (461/85016-07): Record storage facility may not meet present commitment for a four hour fire rating. The licensee had initiated a detailed review of the available design and construction information on the records storage facility (central file vault) and was preparing a report on the qualification of the vault to the requirements of ANSI N45.2.9 (Regulatory Guide 1.88) and National Fire Protection Association (NFPA) Standard Number 232. A preliminary draft of their evaluation to NFPA No. 232 was presented to the inspector at the conclusion of this inspection. The licensee indicated that they intended to request a change to their commitment through an amendment to the FSAR. This item will remain unresolved pending NRR review of the FSAR amendment.

- g. (Open) Open Item (461/85023-01): The design change control program was not fully developed and implemented to support plant operations. The licensee had initiated work to develop their design change control program for operations, and this effort is continuing. This item will remain open pending the completion of the program and its implementation.
- h. (Closed) Open Item (461/85023-03): Review of licensee's procurement classification system, their approach to standard boilerplate statements of procurement program requirements for suppliers, and provisions for references to ASME Code Section XI. The licensee has completed and implemented the procedures addressing the classification system, standard boilerplate statements, and forms that provide verification of ASME Code requirements when applicable. The inspector is satisfied that licensee has satisfactorily addressed the identified items of concern.

3. Program Areas Inspected

a. Audits

The inspector verified that a quality assurance program relative to audit activities had been implemented and was in conformance with the operational QA Program; the Technical Specifications; 10 CFR 50, Appendix B; and ANSI N18.7-1976.

(1) Documents Reviewed

- (a) Illinois Power Company Nuclear Policy Statement, NPS No. 1, "Quality Assurance", Revision 1.
- (b) Clinton Power Station Final Safety Analysis Report, Chapter 17.2, Section 17.2.18, "Audits", Amendment 33.
- (c) Illinois Power Operational Quality Assurance Manual, Chapter 18, "Audits", Revision 11.
- (d) QAP 118.01, "Quality Assurance Audit Program", Revision 6.

(2) Audits Reviewed

- (a) No. Q38-85-04, Maintenance
- (b) No. Q38-85-04, Procurement QA

(3) Inspection Results

The inspector reviewed the 1985 audit schedule and verified that the areas to be audited and the audit frequencies were consistent with the licensee's commitments to ANSI 18.7-1976 and Technical Specification Section 6.5.2.8, "Audits".

To assess the implementation of the program, the inspector selected two completed audits and verified the following: audit checklists were used which covered the audit area designated in the schedule; auditors were independent of the activity which they audited; findings identified during the audit were resolved or were being carried as open items in the tracking system; audited organization had responded in writing to the findings; distribution of the audit reports and responses to the findings were consistent with the program requirements; and the use of technical experts as auditors was appropriate.

b. Safety Committee Activity

The inspector verified that the off-site safety review committee had been established and was functioning in conformance with Technical Specification requirements. The following aspects of the Nuclear Review and Audit Group (NRAG) charter were reviewed during this inspection: assigned responsibilities; membership makeup and qualifications; designation of alternate members; requirements for committee quorum; meeting frequency; distribution and maintenance of minutes and records; interfaces with onsite review groups; and followup action to resolve identified deficiencies.

(1) Documents Reviewed

- (a) "Nuclear Review and Audit Group Charter", Revision 0.
- (b) NRAGP No. 100-1, "Preparation, Issuance, and Revision of Clinton Nuclear Review and Audit Group Procedures", Revision 1.
- (c) NRAGP No. 110-1, "Administrative Practices", Revision 0.
- (d) NRAGP No. 200-1, "Review Procedure for NRAG Members and Alternates", Revision 0.
- (e) Clinton Nuclear Power Station Technical Specifications, Section 6.5, "Review and Audit", Draft.
- (f) CNP 1.09, "Nuclear Safety Reviews", Revision 0.

(2) Results of Inspection

To determine that the NRAG was accomplishing its activities in accordance with the charter, the inspector reviewed the meeting minutes for the first five NRAG meetings. These minutes covered a time period from October 1984 to present.

The NRAG was found to be meeting its charter with one exception: the meeting minutes documented the review of only 3 of 15 IP internal audits performed during 1985. This item was discussed with the NRAG secretary who indicated that a scheduling problem had been recognized and that a proposed change to the meeting

agenda was in progress. Pending further review, this matter is considered open (461/85035-01).

c. Tests and Experiments

The inspector reviewed the program for control of special reactor tests and experiments to verify conformance with the FSAR; draft Technical Specifications; 10 CFR Part 50.59; 10 CFR 50, Appendix B; and ANSI N18.7-1976.

(1) Documents Reviewed

- (a) CPS No. 1005.06, "Conduct of 10 CFR 50.59 Reviews", Revision 1.
- (b) CPS No. 1005.01, "Preparation, Review, and Approval of Station Procedures and Documents", Revision 13.
- (c) CPS No. QAP 1011.015, "Test Programs and Control", Revision 2.

(2) Results of Inspection

The inspector's review indicated that the program contained all the necessary elements for control of tests and experiments. However, the inspector was concerned because the program appeared cumbersome: it employed nine procedures to describe the activities of the NRAG, FRG, technical staff, licensing staff, and six plant departments relative to tests and experiments. Pending further review of program implementation, this matter is considered open (461/85035-02).

No violations or deviations were identified.

4. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. Open items disclosed during the inspection are discussed in Section 3.b.(2) and 3.c.(2).

5. Exit Interview

The inspectors met with licensee representatives (denoted in the Persons Contacted paragraph) at Clinton on July 25, 1985. The inspectors summarized the scope and findings of the inspection. The probable contents of the report were discussed with licensee personnel and no proprietary information was identified.