

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/85059(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: November 12 through 15, 1985

Inspector:

R. A. Westberg
R. A. Westberg

12/3/85
Date

F. C. Hawkins

F. C. Hawkins, Chief
Quality Assurance Programs Section

12/3/85
Date

Inspection Summary

Inspection on November 12 through 15, 1985 (Report No. 50-461/85059(DRS))

Areas Inspected: Routine, unannounced inspection by one regional inspector of licensee action on previous inspection findings; preoperational test records; and surveillance testing and calibration control. The inspection involved a total of 26 inspector-hours onsite.

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

DETAILS

1. Persons Contacted

Illinois Power Company

- *D. P. Hall, Vice President
- *J. W. Wilson, Plant Manager
- J. F. Palchak, Supervisor, Support Services
- *F. A. Spangenberg, Manager, Licensing and Safety
- J. H. Greene, Manager, Startup
- *E. J. Corrigan, Director, Quality Engineering and Verification
- R. F. Campbell, Director, Quality Systems and Audits
- *K. A. Baker, Acting Supervisor, I&E Interface
- *F. L. Chevalier, Supervisor, Operations Support
- *W. Connor, Manager, Quality Assurance
- *J. S. Perry, Manager, Nuclear Program Coordination
- *J. Greenwood, Manager, Power Supply, Soyland/WIPCo
- *J. Miller, Director, Startup Programs
- *H. E. Daniels Jr., Project Manager
- *D. C. Shelton, Manager, Nuclear Safety and Engineering Analysis

USNRC

- *T. P. Gwynn, Chief, Reactor Projects Section 1B
- *P. Hilarid, Resident Inspector

*Denotes those attending the exit interview on November 15, 1985.

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

2. Action on Previous Inspection Findings

- a. (Closed) Oper. Item (461/85016-01): Master Equipment List (MEL) - review by NRC for inclusion of safety-related items. The inspector reviewed Procedure N.O., "Master Equipment List", Revision 0, that was issued for use on August 13, 1985. This procedure describes the MEL and the basic steps for data entry. As of October 15, 1985, the MEL program was sixty percent complete with 57,500 out of 60,000 entries completed. The Power Plant Maintenance Planning System (PPMPS) which uses the MEL is now operational, since each of the data entries filled in at least the 12 specific fields needed to declare a record active. The filling in of the remaining fields constitutes the forty percent remaining to be completed. The inspector was satisfied that the licensee had made sufficient progress to warrant closing this item.

- b. (Closed) Unresolved Item (461/84002-02): Travelers No. E30-1003-02A-H16 and No. E28-1000-03A-H14 were found to have insufficient justification for material traceability of angle iron. The licensee documented this loss of material traceability for electrical supports on Corrective Action Request (CAR) No. 073, Nonconformance Report (NCR) No. 23422, and 10 CFR 50.55(e) Report No. 84-02. A sampling program was developed and implemented which utilized MIL-STD-414 and a population of electrical hangers with traceability problems. A total of 169 samples were tested and the results of the tests provided assurance that the materials used in the electrical installations were capable of meeting the design requirements and could be used as is. The inspector agreed with this determination and had no further concerns.
- c. (Open) Unresolved Item (461/84002-04): Generic Resolutions (GRs) No. 7, Revision 1, and No. 22, Revision 0, were not adequately supported by documented justifications. The inspector reviewed the documentation supporting GR No. 7, GR No. 11 (which superseded GR No. 22), CAR No. 073, NCR No. 23422, and the third party review of GRs by Dennis Millican and Associates Inc. Pending review of the resolution of the discrepancies identified by the Millican report, this item will remain open.
- d. (Closed) Open Item (461/85023-04): NRC to review provisions and implementation of four levels of storage and provisions for special receipt inspection and testing. The inspector verified that the licensee had implemented B, C, and D storage levels as defined by ANSI N45.2.2. No Level A storage had been implemented because no materials requiring Level A storage had been procured. When Level A storage is required, Procedure No. 1513.01, Paragraph 8.2.1.1 and Procedure No. CPS 1013.01S, Paragraph 8.2.1 provide the requirements in accordance with the ANSI standard. Further, the licensee has prepared a plan for upgrading an existing Level B storage area to Level A storage, if required. The inspector reviewed this plan and was satisfied that this item had been adequately addressed.

To date, one item (Swagelok tube fittings) has required a special receipt inspection and supplemental testing in order to dedicate the item for safety-related use. The inspector reviewed the plan for procurement and acceptance of Swagelok tube fittings and had no concerns.

- e. (Open) Open Item (461/85035-01): Nuclear Review and Audit Group (NRAG) not meeting its charter with respect to audits. Discussions with the NRAG secretary indicated that the NRAG had reviewed 15 out of the 35 audits performed in 1985. Pending further progress, this item will remain open.
- f. (Open) Open Item (461/85035-02): Program for control of tests and experiments is cumbersome. The inspector's review indicated that the program was still in revision. Pending further progress, this item will remain open.

3. Preoperational Test Records

The inspector verified that the licensee's controls for records generated during the preoperational test program had been adequately implemented.

a. Documents Reviewed

- (1) SAI-4, "Document and Records Control", Revision 10.
- (2) SAP-5, "Test Procedure Results Review and Approval", Revision 8.
- (3) SAP-11, "Conduct of Tests", Revision 8.
- (4) "Master Procedure Index", October 31, 1985.
- (5) "Startup Subsystem Phase II Dates", November 6, 1985.
- (6) Clinton FSAR, Table i4.2-5, "Acceptance Tests", Amendment 27.

b. Inspection Results

The inspector reviewed the Record Class Code List (RCCL) and verified that file locations and retention periods had been established for the records generated during preoperational testing.

- (1) The Startup Document Center (SDC) was inspected and the following were observed:
 - (a) Working copies of preoperational test procedures were stored in locked file cabinets.
 - (b) The file cabinets had one hour fire ratings per the Clinton FSAR, Section 1.8 commitment to Regulatory Guide 1.88.
 - (c) Access control required visitors to be escorted.
 - (d) Personnel authorized to enter the SDC were documented on an access list that was posted at the entrance to the SDC.
- (2) The central records file was inspected and the following were observed:
 - (a) Preoperational testing records were stored in the records vault.
 - (b) The following records were requested and found to be complete and readily retrievable.

1. Acceptance Test No. ATP-TW-01, "Filtered Water".

2. Preoperational Test No. PTP-HC-02, "Fuel Handling Building Crane".
 3. Preoperational Test No. PTP-FW-02, "Feedwater".
 4. Preoperational Test No. PTP-DC-01, "D.C. Power Distribution - Battery Charger 1A".
 5. Preoperational Test No. PTP-LP-01, "Low Pressure Core Spray".
 6. Qualification packages for three startup personnel.
- (c) Access control required visitors to sign in and out. Visitor badges were issued.
- (d) Authorized personnel were documented on an access list.

No violations or deviations were identified.

4. Surveillance Testing and Calibration Control

During the July 25, 1985, exit meeting for Inspection No. 50-461/85035(DRS), the inspector asked Illinois Power Company to provide a commitment date for completion of the surveillance testing control procedure revision and issuance of the surveillance testing schedule. Illinois Power responded in writing in an August 14, 1985, letter to the Region III Administrator giving October 1, 1985, as the completion date. On November 13, 1985, the inspector was informed that there had been personnel changes and that the surveillance testing procedures and the schedule were still in the process of major revisions. Three of the four administrative control procedures were presented as drafts and the inspector reviewed them for general content; however, an assessment of the adequacy of the program was not possible because the procedures were neither approved nor implemented.

The inspector was concerned that the licensee had missed their commitment date. At the exit meeting on November 15, 1985, the inspector expressed his concerns regarding the surveillance testing program and the need to implement it 90 days prior to fuel load. Based on the licensee's comments during the meeting, it was apparent that there may be a misunderstanding regarding the operational quality assurance program and when it is required to be implemented.

The Clinton FSAR, Section 17.2 states that the operational quality assurance program shall be implemented 90 days prior to fuel load. Although activities such as design changes, tests and experiments, safety review committee, and surveillance testing are not required until after fuel load, the administrative control procedures for these activities

are part of the operational quality assurance program. To assess the status and adequacy of the operations quality assurance program and its implementation to support readiness for issuance of an operating license, the required procedures must be approved and implemented. Pending NRC review of the administrative control procedures for surveillance testing and the surveillance schedule, this matter is considered open (461/85059-01).

5. 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 4.

6. Exit Interview

The inspector met with licensee representatives (denoted in the Persons Contacted paragraph) at Clinton on November 15, 1985. The inspector 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.