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U-602727

WC-165-97

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Docket No. 50-461

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Reply to Notice of Violation Contained  
in Inspection Report 50-461/97002

Dear Sir or Madam:

The attachments to this letter contain the Illinois Power (IP) response to the violation of Nuclear Regulatory Commission (NRC) requirements documented in NRC Inspection Report 50-461/97002. IP admits this violation occurred. The violation describes a failure to maintain the backup meteorological tower operational as required by the CPS Emergency Plan.

Attachment A of this letter contains the response to this violation. IP is confident that this response addresses the concern identified by this violation.

Sincerely yours,

Wilfred Connell  
Vice President

MRS/krk

Attachments

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

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## **Response to Notice of Violation 50-461/97002-01**

The Notice of Violation states in part:

"The Clinton Power Station Emergency Plan, Revision 10, section 3.0 Emergency Response Facilities and Equipment, Paragraph 3.2.3, "Meteorological Monitoring System," states "A backup meteorological tower is located at the CPS site and is instrumented at the 33 foot (10 meter) level. The meteorological parameters measured are wind speed and wind direction. Sigma Theta is calculated from the changes in wind direction. All three of these variables are available in the Technical Support Center and are read from a line printer."

Contrary to the above, a Condition Report (1-94-10-002) dated September 30, 1994, and issued October 3, 1994, indicated that the backup meteorological tower wind speed and wind direction sensors were inoperable. This condition had not been corrected. The wind speed and wind direction sensors have been unavailable since October 1994."

### Background and Reason for Violation

On September 28, 1994, Operations Department personnel identified that the backup meteorological tower was inoperable and initiated maintenance work request (MWR) D58160. On September 30, 1994 maintenance planning wrote condition report 1-94-10-002 to document that there had been repetitive failures of the backup meteorological tower and that engineering needed to address the cause of the repetitive failure. The resolution to this condition report was extended several times. In February 1995, the maintenance planner that was assigned the task of planning MWR D58160 questioned the system engineer on the status of condition report 1-94-10-002. The system engineer responded that the repair activities associated with the backup meteorological tower should be deferred, as it was probable that the backup meteorological tower would be abandoned within the next six months. The system engineer did not understand that requirements contained in the Clinton Power Station Emergency Plan were license commitments and are required to be maintained. Also, the system engineer did not realize approval of the Nuclear Regulatory Commission was required for a change to the CPS Emergency Plan.

The system engineer contacted the emergency planning group on February 24, 1995, and discussed the abandonment of the backup meteorological tower. The emergency planning group responded that the Clinton Power Station (CPS) Emergency Plan was being updated and a change to remove the backup meteorological tower could be included in that change. On June 24, 1995, the Nuclear Review and Audit Group (NRAG) reviewed the change to the CPS Emergency Plan and decided that deletion of the backup meteorological tower from the CPS Emergency Plan was not appropriate until it could be shown that the primary meteorological tower had adequate reliability. The resolution to condition report 1-94-10-002 was again extended and MWR D58160 was not worked

because maintenance was waiting for the resolution to the condition report. During 1996 the primary meteorological tower achieved a 94.7% data recovery.

The reason for this violation was the lack of awareness by Engineering, Maintenance Planning, and Operations that the CPS Emergency Plan description of available equipment constituted a licensing basis requirement that the equipment was to be maintained operable.

#### Corrective Steps Taken and Results Achieved

MWR D58160 to repair the backup meteorological tower is in progress but is not yet complete. Plans are to have the backup meteorological tower operational by May 9, 1997.

#### Corrective Steps to Avoid To Avoid Further Violations

Appropriate personnel in Engineering, Maintenance Planning, and Operations Departments will be briefed that items described in the CPS Emergency Plan constitute a licensing basis requirement and must be complied with unless the plan is changed to no longer require those items. Also, a note will be placed in the Master Equipment List for each equipment identification number associated with the backup meteorological tower, which maintenance planners use as a reference when planning MWRs, to state that this equipment is part of the CPS Emergency Plan and as such is required to be maintained. These actions will be complete by May 31, 1997.

#### Date When Full Compliance Will Be Achieved

Illinois Power will be in full compliance with the CPS Emergency Plan paragraph 3.2.2 "Meteorological Monitoring System" in regards to the backup meteorological tower on May 9, 1997.

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bcc: P. D. Yocum, T-31A  
S. Holt, T-31J (CR 1-97-03-123)  
NRAG Secretary, V-852

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Technical Validators

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2. N/A

\* Associated Corrective Action Document CR 1-97-03-123