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Wilfred Connell
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U-602732

WC-173-97
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Docket No. 50-461

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

Subject: Correction to Response to Notices of Violation
Contained in Inspection Report 50-461/96009

Dear Sir or Madam:

Due to an administrative error, the Letter of Response to the Notices of Violation contained in NRC Inspection Report 50-461/96009 (Illinois Power letter U-602725 dated April 9, 1997) has a missing sentence in Attachment 8 on page 2 of 2.

Attached is the corrected Attachment 8. A correction was made in the paragraph under Corrective Steps Taken to Prevent Further Violations.

Sincerely yours,

Wilfred Connell
Vice President

BGS/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 50-461/96009-10

Notice of Violation States:

"Technical Specification 5.4.1.b requires, in part, that written procedures shall be established, implemented, and maintained covering the emergency operating procedures (EOPs) required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1.

Contrary to the above, on November 16, 1996, it was identified that EOP-8, "Secondary Containment Control," was not properly maintained in that it contained errors in Table U that had not been corrected."

Background and Reason for Violation

Emergency Operating Procedure(EOP)-8 "Secondary Containment Control" has several Entry Conditions, one of which is Area Radiation above maximum normal limits as specified in Table U. This table specifies the locations of the detectors that are monitored, the method of monitoring, the maximum normal limit of four to five time the routine survey results, and the maximum safe limit of 25 R/hour for areas requiring access and 400 R/hour for areas not requiring access. Some of the methods of monitoring listed are Area Radiation/Process Radiation (AR/PR monitors). However, some of the monitors are listed incorrectly. The RHR Equipment Room A is listed as being monitored by 1RIX-AR010 address 009. However, this monitor is located outside RHR Equipment Room B not A. Furthermore, the monitor itself is labeled incorrectly as RHR Equipment Room A when in fact it is outside RHR Equipment Room B. The RHR Equipment Room B is listed as being monitored by 1RIX-AR011 address 010. However, 1RIX-AR011 is located outside the RHR Equipment Room A not B. In addition, 1RIX-AR011 has been inoperable since May 2, 1996, due to spurious high alarms. A Maintenance Work Request has been generated to correct the spurious high alarm condition and is scheduled to work June 1997. The Control Rod Drive service area is listed as being monitored by 1RIX-AR018 address 017. However, this monitor has been removed from the system.

Corrective Steps That Have Been Taken and the Results Achieved

There was no necessary immediate action since there was no impact on operational response since the discrepancy was identified during a review by the Radiation Protection Shift Supervisor. The operators rely on Radiation Protection to provide local radiation readings.

Corrective Steps Taken to Prevent Further Violations

The monitors do not provide the function that the EOP-8 states. A review of the Updated Safety Analysis Report (USAR) reveal in part that section 6.2.4.2, "Containment Isolation System - System Design", which states: "...each compartment contains area temperature monitors which alarm in the control room, and RHR Rooms A and B contain area radiation monitors which alarm in the control room.....". Since the USAR description is not physically possible with the design of the AR/PR system, the USAR was updated to reflect actual plant design. The monitors do not provide the function that the EOP-8 states.

Given the current plant design and capabilities of these monitors, the continued use of these instruments on the EOP-8 flowchart is evaluated to be a misapplication of the monitoring equipment for the intended EOP actions. However, these monitors still provide a valid function as addressed in plant radiation protection procedure 4979.02 "Abnormal High Area Radiation Levels". Procedure CPS 4979.02 provides the necessary triggers to initiate surveys of the areas, and to refer to and enter the EOPs as appropriate. To alleviate further confusion, these monitors were removed from the EOP-8 Table U.

An engineering change notice was initiated to provide proper labels for the monitors.

Date When Full Compliance Will Be Achieved

Illinois Power Emergency Operating Procedures are now in full compliance with the Updated Safety Analysis Report with respect to the area radiation monitors located outside RHR rooms A and B and the Control Rod Drive Rebuild room.