

May 5, 1997

EA 97-132

Mr. W. Connell
Vice President
Clinton Power Station
Illinois Power Company
Mail Code V-275
P.O. Box 67C
Clinton, IL 61727

SUBJECT: NRC ENGINEERING AND TECHNICAL SUPPORT (E&TS) AND STARTUP
READINESS INSPECTION REPORT 50-461/97003(DRS) AND NOTICE OF
VIOLATION

Dear Mr. Connell:

On March 7, 1997, the NRC completed an inspection at your Clinton reactor facility. The enclosed report presents the results of that inspection.

The areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of a selective examination of design documents, procedures and representative records, interviews with personnel, observations of activities in progress and review of Clinton Startup Readiness Action Plan implementation. The purpose of the inspection was to determine whether activities authorized by your license were conducted safely and in accordance with NRC requirements.

The team determined that significant problems existed in several engineering and maintenance related technical areas and practices. Examples included: inadequate engineering and maintenance practices in maintaining 480V, 4.16kV and 6.9kV electrical breakers in good operating condition; failure to follow procedures and a 10 CFR 50.59 safety evaluation process that was not, in all cases, effective in ensuring proper safety evaluations were performed. Additionally, we found weaknesses in your modification and design control process, post-modification and surveillance testing program, trending of equipment and system performance, tracking of industry information, engineering prioritization of work and work control, self-assessments, engineering related audits and operability evaluations. Oversight of the above engineering activities was considered weak.

Because of these problems, we are concerned with both the short and long term operability of the breakers discussed above. The team was particularly concerned that 480V, 4.16kV and 6.9kV breakers were neither adequately maintained nor were breaker related problems always documented on condition reports, trended, and evaluated by

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engineering for potential common mode failures such as the hardened grease found in various breakers. These problems represent significant deficiencies in the execution of some engineering and maintenance activities. Your close and immediate attention to these problems is warranted.

Based on the results of this inspection, four violations of NRC requirements were identified. These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In addition, two apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. One apparent violation involved failure to take prompt and appropriate corrective action to address recurring examples of hard/hardening grease in 480V, 4.16kV and 6.9kV electrical breakers. This resulted in the binding of various breaker components and the failures of safety-related and critical non-safety-related breakers to operate during testing and on demand. The second apparent violation involved failure to establish adequate measures to ensure that only approved and authorized lubricants and cleaning compounds were used to clean and lubricate electrical breaker components. Consequently, unapproved and non-standard lubricants and cleaning compounds were used on the breakers which may have contributed to hardened grease in the breaker components.

Accordingly, no Notice of Violation is presently being issued for the inspection findings in the two apparent violations being considered for escalated enforcement action. In addition, please be advised that the number and characterization of the apparent violations described in the enclosed inspection report may change as a result of NRC review.

An open pre-decisional enforcement conference to discuss these apparent violations has been scheduled for Thursday, May 15, 1997, at 1:00 p.m. The decision to hold a pre-decisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violations sooner, corrective actions, significance of the issues, and the need for lasting and effective corrective actions. In particular, we expect you to address any extenuating circumstances that led to the breaker and lubrication problems depicted in the apparent violations noted above and your short and long term corrective actions planned and accomplished to address these concerns.

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In addition, this is an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspectives on: (1) the severity of the violations; (2) the application of the factors that the NRC considers when it determines the amount of the civil penalty that may be assessed in accordance with Section VI B.2 of the Enforcement Policy; and (3) any other application of the Enforcement Policy to this case, including exercise of discretion in accordance with Section VII.

Following the conference, you will be advised in separate correspondence of the results of our deliberations on the apparent violations. Therefore, no response regarding these apparent violations is required at this time.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, its enclosures, and your response to this letter will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/s/ Cynthia D. Pederson (for)

James L. Caldwell, Director
Division of Reactor Projects

Docket No. 50-461
License No. NPF-62

Enclosures: 1. Notice of Violation
2. Inspection Report 50-461/97003(DRS)

See Attached Distribution

SEE ATTACHED CONCURRENCES

DOCUMENT NAME: G:\DRS\CL197003.DRS

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DATE	04/5/97		04/ /97		04/ /97		04/ /97		05/5/97	

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cc w/encls: W. D. Romberg, Assistant Vice President
P. Yocum, Plant Manager, Clinton Power Station
R. Phares, Manager, Nuclear Assessment
P. J. Telthorst, Director - Licensing
Nathan Schloss, Economist,
Office of the Attorney General
K. K. Berry, Licensing Services Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
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NAME	Folevits/kjc	<input checked="" type="checkbox"/>	Ring/Gardner	<input checked="" type="checkbox"/>	Wright	Clayton	Caldwell
DATE	04/29/97		04/30/97		04/ /97	04/ /97	04/ /97

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