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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

October 18, 1985

Mr. J. G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to the Notice of Violation, dated September 4, 1985,
in I & E Inspection Report 50-461/85042

Dear Mr. Keppler:

This letter is in response to the September 4, 1985, letter identifying certain activities which appeared to be in noncompliance with NRC requirements. Attachment A provides Illinois Power Company's response to incomplete dispositions provided by PI-CP-034.

I trust that our response is satisfactory to ensure compliance with regulatory requirements.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'F. A. Spangenberg'.
F. A. Spangenberg
Manager - Licensing
and Safety

JAB/kaf

Attachments

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
Director, Office of I&E, Washington, DC 20555
T. P. Gwynn, Chief - Projects Section 1B, NRC Resident Office
Illinois Department of Nuclear Safety

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Attachment A
Illinois Power Company
Clinton Power Station

Subject: Interaction Analysis

The Notice of Violation states in part:

"... Sargent & Lundy (S&L) Procedure PI-CP-034, revision 4, Interaction Analysis, was not adequate to provide controls for potential interactions involving electrical separation violations and (although other non-proceduralized controls were in place) was not followed by S&L personnel performing analysis of electrical separation interactions as follows:

- ° The Potential Interaction Report did not have a block to indicate assignment of electrical separation reports;
- ° Electrical Separation Interaction Reports dispositioned "use-as-is" were closed out without reference to applicable calculations;
- ° There wasn't a provision for dispositioning Potential Interaction Reports by electrical analysis;
- ° The procedure did not address the use of a Potential Interaction Report to document multiple interactions requiring differing dispositions."

I. Corrective Actions Taken and Results Achieved

Illinois Power and their Architect/Engineer Sargent & Lundy (S&L) conducted a review of dispositioned Potential Interaction Reports (PIRs). This review has concluded that the cited examples were isolated incidents. However, the cited incidents have been evaluated and documented.

II. Corrective Actions Taken to Prevent Recurrence

Illinois Power has revised Nuclear Station Engineering Department (NSED) Instruction ME-2, Interaction Analysis Program, via an advance procedure change #5, to provide for Electrical Project Engineering Division (EPED) assignment and analysis description. Also, S&L has issued revision #5 to procedure PI-CP-034, to address EPED assignment, analysis description, and multiple interaction dispositions.

III. Date By When Full Compliance Will Be Achieved

Illinois Power is in full compliance.