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June 12, 1997

Docket No. 50-461

Mr. A. Bill Beach
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: Initial Response to June 9, 1997 Confirmatory Action Letter Regarding
Condition of Protective Coatings in the Primary Containment and Drywell

Dear Mr. Beach:

In response to your Confirmatory Action Letter (CAL) dated June 9, 1997, this letter is submitted to inform you of the actions that Illinois Power (IP) is taking to address the condition of the protective coatings in the Clinton Power Station (CPS) primary containment and drywell.

A significant effort is currently underway to remove all protective coatings in the primary containment and drywell found to be loosely adhered, chipping, peeling, or blistering. IP is providing continuous shift coverage to remove the degraded coatings, and we are augmenting our staff with additional painters, carpenters, and laborers to ensure that we have adequate resources to meet the scheduled completion date. The most intensive protective coating removal activity is occurring on the complete circumference of the primary containment in a band from the 828' elevation to the 834' elevation. (This area surrounds the refueling floor and incurred surface damage during startup activities just prior to plant commercial operation. This region has the greatest extent of observable coating degradation due to improper surface preparation for coating repairs performed at that time.) In this area, all the coatings are being removed that have not been completely reworked within the past two years. A second 6' wide band (856' elevation to 862' elevation) above the polar crane is also being completely stripped and recoated.

In addition, coatings are also being removed in other areas of primary containment and in the drywell, where walkdowns are identifying degraded coatings. Appropriate measures (e.g., use of vacuum attachments, drop cloths, etc.) are being employed throughout the containment and drywell to contain the debris resulting from removal

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activities. Coatings are being reapplied to some of the areas where removal is taking place. Supervision is monitoring the effectiveness of the ongoing removal operations. Our current schedule shows that degraded coating removal will be completed on June 28, 1997.

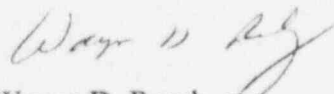
Additionally, a plan is being developed to provide a means of in-situ protective coating testing. This plan is currently undergoing technical and management review. Notwithstanding previous pull tests performed for a limited number of areas, the plan provides for extensive adhesion testing of protective coating surfaces in the primary containment and drywell. The proposed plan includes testing a minimum of 25 separate locations. Five separate "pull tests" will be performed in each of these areas (for a minimum of 125 separate pull tests). These test areas will be at various locations throughout the primary containment and the drywell, and will include originally coated areas, repaired areas, and areas adjacent to degraded coatings. Areas identified as degraded by this testing plan will have their coatings removed. The scope of the testing may be increased based on the results of the initial testing.

Following completion of the test plan and the removal of the loose, chipped, peeling, or blistered coatings, a detailed evaluation of the condition of the protective coatings in the primary containment and drywell will be performed, including the impact of allowing some of the areas to remain uncoated during the upcoming operating cycle. This evaluation will provide reasonable assurance that, based on the actions being taken to address the condition of the protective coatings in the primary containment and drywell, the as-left condition of the protective coatings will not render the ECCS suction strainers inoperable during a design basis event.

As noted in the CAL, IP's actions to address the coatings issue are in addition to the actions that have already been taken to control all foreign and/or flexible materials (signs, placards, etc.) in the containment and drywell. IP recognizes the potential for degraded coatings and other undesirable materials in the containment to collectively and adversely impact ECCS suction strainer performance (and thus ECCS operability). In light of the actions and controls that have now been established to control such materials, IP will assess whether operability of the ECCS may have been previously compromised.

In accordance with the CAL, a copy of IP's degraded coating evaluation, including a description of the coating removal activities and results of the test plan, will be forwarded to you as soon as it is finalized. We will be available to meet with you and your staff to discuss the results.

Sincerely yours,



Wayne D. Romb
Assistant Vice President

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cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
NRC Document Control Desk
Illinois Department of Nuclear Safety