October 25, 2001

Mr. Oliver D. Kingsley, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION
NRC INSPECTION REPORT 50-461/01-13(DRP)

Dear Mr. Kingsley:

On September 30, 2001, the NRC completed a safety inspection at your Clinton Power Station. The enclosed report documents the inspection findings which were discussed on October 1, 2001, with Mr. J. M. Heffley and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

Since September 11, 2001, the Clinton Power Station has assumed a heightened level of security based on a series of threat advisories issued by the NRC. Although the NRC is not aware of any specific threat against nuclear facilities, the heightened level of security was recommended for all nuclear power plants and is being maintained due to the uncertainty about the possibility of additional terrorist attacks. The steps recommended by the NRC include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with local law enforcement and military authorities, and limited access of personnel and vehicles to the site.

The NRC continues to interact with the Intelligence Community and to communicate information to the Clinton Power Station. In addition, the NRC has monitored maintenance and other activities which could relate to the site's security posture.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,

Original signed by
Christine A. Lipa

Christine A. Lipa, Chief
Branch 4
Division of Reactor Projects

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

Enclosure: Inspection Report No. 50-461/01-13(DRP)

cc w/encl: J. Heffley, Vice President
W. Bohlke, Senior Vice President
Nuclear Services
J. Cotton, Senior Vice President -
Operations Support
M. Pacilio, Plant Manager
K. Ainger, Director - Licensing
J. Skolds, Chief Operating Officer
C. Crane, Senior Vice President -
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J. Benjamin, Vice President - Licensing
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-461
License No:	NPF-62
Report No:	50-461/01-13(DRP)
Licensee:	AmerGen Energy Company, LLC
Facility:	Clinton Power Station
Location:	Route 54 West Clinton, IL 61727
Dates:	August 22 through September 30, 2001
Inspectors:	P. L. Louden, Senior Resident Inspector C. E. Brown, Resident Inspector M. W. Mitchell, Radiation Specialist B. C. Dickson, Resident Inspector, Dresden D. E. Zemel, Illinois Department of Nuclear Safety
Approved by:	Christine A. Lipa, Chief Branch 4 Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000461-01-13, on 08/22-09/30/2001, AmerGen Energy Company LLC, Clinton Power Station; integrated inspection report.

This report covers a 6-week routine inspection, conducted by resident and regional specialist inspectors. No findings of significance were identified during this inspection. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using IMC 0609, "Significance Determination Process" (SDP). The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at: http://www.nrc.gov/NRR/OVERSIGHT/index.html. Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violations.

A. Inspector Identified Findings

No findings of significance were identified.

B. Licensee Identified Findings

No findings of significance were identified.

Report Details

Summary of Plant Status

The plant was operated at essentially 100 percent power throughout the entire inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R04 Equipment Alignments (71111.04)

a. Inspection Scope

The inspectors reviewed piping and instrument diagrams, system procedures, training manuals, previously identified equipment deficiencies, condition reports, and vendor information as part of a partial system walkdown of high risk-importance safety systems during scheduled system maintenance outages on the opposite division or complementing system.

- Reactor core isolation cooling (RCIC) system was inspected during a planned maintenance outage on the high pressure core spray system.

- Residual heat removal (RHR) system “A” was inspected during a planned maintenance outage on the “B” and “C” trains of RHR.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors reviewed portions of the licensee’s Fire Protection Evaluation Report (FPER) and the Updated Safety Analysis Report (USAR) to verify consistency in the documented analysis with installed fire protection equipment at the station. To assess the control of transient combustibles and ignition sources, the material and operational condition of fire-protection systems and equipment, and the status of fire barriers, the inspectors walked down the following risk significant areas:

- Fire Zones CB-1g, General access for cable spreading rooms - elevation 762'-0''; CB-2, Division II cable spreading room - elevation 781'-0''; and CB-5, Division III switchgear room - elevation 781'-0''

- Fire Zones T-1h, Turbine auxiliaries hydrogen seal oil unit, motor-driven reactor feed pump, and area coolers - elevation 762'-0'' and T-1i, Turbine oil reservoir - elevation 766'-6'' Turbine lube oil storage room and general area

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification 71111.11

a. Inspection Scope

The inspectors reviewed the licensee's operator training program to evaluate operator performance in mitigating the consequences of a simulated event. The inspectors observed operator performance during a simulator training scenario for an unisolable feedwater system leak. The inspectors evaluated the following attributes of the activities:

- Communication clarity and formality
- Timeliness and appropriateness of crew actions
- Prioritization, interpretation, and verification of alarms
- Correct use and implementation of procedures
- Oversight and direction provided by the shift manager and control room supervisor

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the effectiveness of the licensee's maintenance efforts in implementing the maintenance rule (MR) requirements, including a review of scoping, goal-setting, performance monitoring, short-term and long-term corrective actions, and current equipment performance problems. These systems or component groups were selected based on their designation as risk significant under the MR, or their being in the increased monitoring (MR category (a)(1)) group. The systems/component groups were:

- Air operated valves
- Temperature sensing instrumentation (temperature module replacement project)
- Auxiliary power system

The inspectors also completed a full program review into MR system unavailability time assumptions versus the assumptions used in the individual plant examination (IPE) report.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors observed the licensee's risk assessment processes and considerations used to plan and schedule maintenance activities on safety-related structures, systems, and components particularly to ensure that maintenance risk and emergent work contingencies had been identified and resolved. The inspectors assessed the effectiveness of risk management activities for the following work activities or work weeks:

- Risk assessments conducted during emergent activities relative to Division II emergency diesel generator and emergency reserve auxiliary transformer (EDG/ERAT) control board hand switch replacement.

- Risk assessments for the contingency plan for emergent work activity to resolve 6.9 kilo-Volt unit auxiliary transformer and reserve auxiliary transformer (UAT and RAT) breaker issues for the "1B" electrical bus.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following operability determinations and evaluations affecting mitigating systems to determine whether operability was properly justified and the component or system remained available, such that no unrecognized risk increase had occurred.

- CR 76033, "Biological growth and corrosion products in EDG heat exchangers"

- Aggregate review of all open operability determinations which have been open greater than 90 days.

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds (71111.16)

a. Inspection Scope

The inspectors conducted a cumulative review of operator workarounds and challenges to identify any potential effect on the functionality of mitigating systems and to assess the cumulative impact that the workarounds and challenges may have on the operators' ability to effectively control the plant during abnormal and emergency operations.

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed and observed portions of the following post-maintenance testing (PMT) activities involving risk significant equipment to determine whether the activities were adequate to verify system operability and functional capability:

- Control rod drive pump "A" return to service PMT following planned maintenance
- Division I EDG air start system functional PMT following a planned maintenance system outage
- Return to service PMT conducted following an adjustment on the mechanism operated cell (MOC) switch in the UAT/RAT breaker on the "1B" 6.9 kilo-Volt electrical bus.

Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed portions of the following surveillance tests to determine whether risk significant systems and equipment were capable of performing their intended safety functions. The inspectors also assessed the operational readiness of the systems.

- High pressure core spray
- Division I EDG fuel oil transfer pump and generator surveillance
- Residual heat removal systems "B & C"

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed the following temporary modifications to determine whether the safety functions of important safety systems were affected.

- Temporary modification for installation of jumpers to support replacement of handswitch 1HS-AP-211A
- Temporary modification for reactor water cleanup system pump "C" flange leak repairs.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas (71121.01)

.1 Plant Walkdowns and Radiation Work Permit Reviews

a. Inspection Scope

The inspectors conducted walkdowns of radiologically significant areas (radiation and high radiation areas) to verify the adequacy of the licensee's radiological controls including surveys, postings and barricades. Specifically, the inspectors reviewed surveys and walked down radiologically significant areas located in the auxiliary, turbine, and reactor buildings to determine whether radiation work permit (RWP) prescribed radiological and engineering controls were in place and whether licensee surveys and postings were complete and accurate in accordance with 10 CFR Part 20 and the licensee's procedures. The inspectors also reviewed RWPs used to access these areas to verify that work instructions and controls had been adequately specified and that electronic pocket dosimeter set points were in conformity with survey indications.

b. Findings

No findings of significance were identified.

.2 Job-In-Progress Reviews

a. Inspection Scope

The inspectors observed the following high radiation area work activities and evaluated the licensee's use of radiological controls:

- inclined fuel transfer system (IFTS) pool diving
- spent resin transfer to a high integrity container

The inspectors reviewed radiological job requirements for the activities, attended a pre-job briefing for the resin transfer work, and observed job performance with respect to those requirements. The inspectors reviewed required surveys and radiation protection job coverage, including contamination controls, to verify that appropriate radiological controls were utilized and were consistent with the RWP. The inspectors also reviewed surveys and applicable postings and barricades to verify their accuracy. The inspectors observed radiation protection technician and worker performance at the IFTS Pool to determine if the technicians and workers were aware of the radiological conditions in their workplace and the RWP controls/limits and to verify that they performed adequately, given the level of radiological hazards present.

b. Findings

No findings of significance were identified.

2OS2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls (71121.02)

.1 Station Exposure History

a. Inspection Scope

The inspectors reviewed the station's collective exposure history for 2000 and year-to-date 2001. The inspectors performed the reviews to evaluate the licensee's ALARA program's strengths and weaknesses in relation to station goals and industry 3-year rolling exposure averages.

b. Findings

No findings of significance were identified.

.2 Job Site Inspections and ALARA Controls

a. Inspection Scope

The inspectors evaluated the licensee's use of ALARA controls for the work activities described in Section 2OS1.2. The inspectors reviewed ALARA plans for the resin transfer activity, observed radiation protection work activities associated with the RWP, and evaluated the licensee's use of engineering controls to achieve dose reductions. The inspectors also determined if workers were utilizing the low dose waiting areas during the IFTS pool diving activity and whether the first-line supervisor for the job ensured that the job was conducted in a dose efficient manner.

b. Findings

No findings of significance were identified.

.3 Radiological Work Planning

a. Inspection Scope

The inspectors reviewed the general ALARA planning procedures and the function of the ALARA coordinator to assure proper implementation of the site ALARA plan. The inspectors also assessed the integration of ALARA requirements into work packages to evaluate the effectiveness of the licensee's communication of radiological work controls to workers.

b. Findings

No findings of significance were identified.

.4 Identification and Resolution of Problems (71121.01 and 71121.02)

a. Inspection Scope

The inspectors evaluated the effectiveness of the licensee's self-assessment process to identify, characterize, and prioritize problems. The inspectors also reviewed selected year 2000 and 2001 observation reports and selected year 2001 condition reports (CRs) to assess overall problem identification and resolution capabilities in the radiation protection area specifically related to ALARA.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

To perform a periodic review of performance indicator (PI) data to determine its accuracy and completeness.

Cornerstone: Initiating Events

.1 Unplanned SCRAMS per 7000 Critical Hours

a. Inspection Scope

The inspectors verified the unplanned SCRAMS per 7000 critical hours PI data reported by the licensee from April 2000 through August 2001. This was accomplished, in part, through a review of plant operating report data, operations department log entries, licensee event reports (LERs) and discussions with licensee personnel.

b. Issues and Findings

No findings of significance were identified.

.2 SCRAMS with a Loss of Normal Heat Removal

a. Inspection Scope

The inspectors verified the SCRAMS with a loss of normal heat removal performance indicator data reported by the licensee for April 2000 through August 2001. This was accomplished, in part, through a review of operations department log entries and discussions with licensee personnel.

b. Issues and Findings

No findings of significance were identified.

Cornerstone: Mitigating Systems

.3 Safety System Unavailability, Emergency Diesel Generators and Reactor Core Isolation Cooling

a. Inspection Scope

The inspectors verified the safety system unavailability, emergency diesel generators (EDGs) and reactor core isolation cooling (RCIC) performance indicator (PI) data reported by the licensee from March 2000 through August 2001. This was accomplished, in part, through evaluating log entries pertaining to inoperability and unavailability times; reviewing system action requests, work orders, and surveillance tests; reviewing system maintenance rule data; and discussions with licensee personnel.

b. Issues and Findings

No findings of significance were identified.

Cornerstone: Occupational Radiation Safety

.4 Occupational Radiation Safety

a. Inspection Scope

The inspectors reviewed the licensee's assessment of its performance indicator for occupational radiation safety. Since no reportable elements were identified by the licensee for the last 2 months of 2000 or the 1st, 2nd, and 3rd quarters (to date) of 2001, the inspectors reviewed CRs to verify that there were no occurrences concerning the occupational radiation safety cornerstone.

b. Findings

No findings of significance were identified.

4OA3 Event Followup

a. Inspection Scope

(Closed) LER 50-461/2001-003: "Failure to Follow Procedure Due to Human Error Results in Incorrectly Lifting Leads, Causing Loss of Feedwater Level Signal, and Reactor Scram on High Vessel Water Level." On July 24, 2001, instrument maintenance technicians were performing a quarterly channel check on the "B" reactor feedwater level channel with the "A" reactor feedwater level channel in service. The technicians incorrectly performed a step in the procedure which led to an automatic reactor shutdown. This issue was previously dispositioned in NRC IR 50-461/2001010 as an NCV of T.S. 5.4.1.a and was entered into the licensee's corrective action program.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

.1 Exit Meeting

The inspectors presented the inspection results to Mr. J. M. Heffley and other members of licensee management at the conclusion of the inspection on October 1, 2001. The licensee acknowledged the findings were presented. No proprietary information was identified.

.2 Interim Exit Meetings Conducted

Senior Official at Exit:	J. M. Heffley, Vice President
Date:	September 13, 2001
Proprietary:	No
Subject:	Occupational Radiation Safety Program

Change to Inspection Findings: None

PARTIAL LIST OF PERSONS CONTACTED

Licensee

K. Baker, Design Engineering Manager
D. Basham, Acting Nuclear Oversight Manager
J. Heffley, Site Vice President
W. Iliff, Director - Regulatory Assurance Director
M. Pacilio, Plant Manager
J. Randich, Work Management Director
J. Sears, Radiation Protection Director
R. Svaleson, Operations Director
F. Tsakeres, Training Manager
J. Williams, Site Engineering Director

LIST OF ITEMS OPENED AND CLOSED

Opened

None.

Closed

50-461/2001-003:	LER	"Failure to Follow Procedure Due to Human Error Results in Incorrectly Lifting Leads, Causing Loss of Feedwater Level Signal, and Reactor Scram on High Vessel Water Level"

LIST OF ACRONYMS USED

ADAMS	Agency wide Documents Access and Management System
ALARA	As Low As Reasonable Achievable
AR	Action Request
CFR	Code of Federal Regulations
CR	Condition Report
EDG	Emergency Diesel Generator
EM	Electrical Maintenance
ERAT	Emergency Reserve Auxilary Transformer
ERO	Emergency Response Organization
EP	Emergency Preparedness
FPER	Fire Protection Evaluation Report
HPCS	High Pressure Core Spray
IFTS	Inclined Fuel Transfer System
IMC	Inspection Manual Chapter
IPE	Individual Plant Examination
LPCS	Low-Pressure Core Spray
LPCI	Low-Pressure Coolant Injection
LER	Licensee Event Report
MOC	Mechanism Operated Cell
MR	Maintenance Rule
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
PERR	Public Electronic Reading Room
PI	Performance Indicator
PM	Preventative Maintenance
PMT	Post-Maintenance Testing
RAT	Reserve Auxiliary Transformer
RCIC	Reactor Core Isolation Cooling
RG	Regulatory Guide
RHR	Residual Heat Removal
RT	Reactor Water Cleanup
RWP	Radiation Work Permit
SDP	Significance Determination Process
SET	Special Evaluation Team
SI	Special Inspection
SR	Surveillance Requirement
SRO	Senior Reactor Operator
SVC	Static VAR Controller
SX	Shutdown Service Water
TS	Technical Specification
UAT	Unit Auxiliary Transformer
USAR	Updated Safety Analysis Report

LIST OF DOCUMENTS REVIEWED

1R04 Equipment Alignments

CPS 9054.06	RCIC Discharge Header Filled and Flow Path Revision 25a Verification, and Flow Controller Checks
CPS 9052.04	LPCS/RHR A Discharge Header Filled and Flow Revision 26 Path Verification
USAR Section 5.4.6	Reactor Core Isolation Cooling
USAR Section 6.3.2.2.3	Low-Pressure Core Spray (LPCS) System
USAR Section 6.3.2.2.4	Low-Pressure Coolant Injection (LPCI) System
USAR Figure 6.3-4	Low Pressure Core Spray P&ID

1R05 Fire Protection

Fire Protection Evaluation Report (FPER),	Section 3.4, Control Building
FPER	Section 3.8, Turbine Building

1R11 Licensed Operator Requalification

CPS Licensed Operator Requalification Training Simulator Exercise Guide, SER0015-00, "Feedwater Leak With Back Flow," dated August 20, 2001

1R12 Maintenance Rule Implementation

CPS Plant Health Report, Second Quarter 2001

CPS Calculation of System and Component Importance Measures, dated August 2, 1999

1R13 Maintenance Risk Assessment and Emergent Work Evaluation

WO 352514	"1AP09EC Control Switch Exhibited Abnormal Binding When Attempting to Close 1B1 bus to ERAT"
	Plant Impact Screening for WO 352514, Replace 1HS-AP211A
WO 17388	When shutting 1B 6.9kV Main Breaker, Reserve Failed to Open"
	Contingency Plan 01-029 - for work on WO 17388

1R15 Operability Evaluations

1-99-01-162-OD ET4/ET14 Kirk key interlock not in compliance with USAR

2-01-06-289-OD Aged capacitors in Div-I and II governors

2-00-07-051-OD APRM B back plane circuit card edge connector pins were bent

2-00-12-116-OD IRM A increased leakage current

2-01-07-281-OD Broken bolt and cracked actuator flange

1R16 Operator Work-Arounds

5065-5G Secondary containment area maximum safe operating water level switches out of service for refurbishment per predefines.

0LIX-WX511 Quantum master level controller - level indication inoperable.

5014-1B High/low level condenser hot well - MCR indication is unreliable

1AP03E - ERAT SVC cooling water skid temperature regulating valve not functioning properly, requires manual control.

1G36-F046 leaks by requiring resin fill tank to be manually drained.

Ten SRVs leaking by

FC/FD [fuel pool cleaning/ holdup] does not go in to HOLD automatically

High noise level in MCR due to VC system flow

1B33-F067A/B reactor recirculation pump discharge valves leak by.

1CW004 warm water recirculation valve leaks by

1E51-F095 RCIC steam supply bypass valve leaks by requiring monitoring of drain pot cycling (every 15 minutes on August 26)

1R19 Post Maintenance Testing

CPS 3501.01 “High Voltage Auxiliary Power System” Revision 24b

1R22 Surveillance Testing

CPS 9051.01 “HPCS System Pump Operability” Revision 38b

CPS 9053.07 “RHR B/C Pumps and RHR B/C Water Leg Revision 43d Pump Operability,”

CPS 9080.01	"Diesel Generator 1A(B) Operability - Manual Revision 46c and Quick Start Operability"

1R23 Temporary Plant Modifications

Engineering Change	"Leak Repair of Suction Nozzle Flange on Revision 1 (EC) 331226"C" RT [reactor water cleanup] Pump,"
EC 331227	"Leak Sealing on Flange Near Strainer Revision 1 OG33-D301C on Line 1RT01DC,"
EC 332342	"Temporary Modification for Installation of Revision 0 Jumpers to Support Change out of Handswitch 1HS-AP-211A,"

20S1 Access Control to Radiologically Significant Areas

Station Procedures

RPIP 1008	Radiation Protection Key Control	Revision 3
RPIP 1106	Access Control Procedure	Revision 10
RPIP 1120	Posting Of Restricted Areas	Revision 16
RPIP 1135	RWP Coverage	Revision 11

Condition Reports

2-00-12-006-0	Items Identified During Review of Radioactive Shipment Files and Procedures
2-01-02-165-0	Affected Areas Not Posted for Radwaste Transfer
2-01-03-012-0	Inadequate RP Turnover Resulted in Improper Survey of Radwaste Shipment W01-004
2-01-04-035-0	Area Not Posted for Radwaste Transfer
2-01-04-189-0	Key Control Documentation Deficiencies Found During Self-Assessment
2-01-16-166-0	Cubicle Deposted From Radwaste Transfer While Transfer Appendix's Open for the Cubicle

2OS2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls

Station Procedures

CPS 7500.01	ALARA Job Reviews	Revision 7b
CPS 7500.05	Use and Control of Temporary Shielding	Revision 4
CPS 7500.09	ALARA Committee Charter	Revision 3a
Radiation Work Permits		
RWP Number 10000538	IFTS Pool Diving For Sensor Replacement 828' CT and 755' FB	Revision 0
RWP Number 06011016	Vendor Processing of Radwaste	Revision 02

Condition Reports

2-00-12-132-0	Radworker Performance Weakness
2-01-01-066-0	Inadequate Support of the ALARA Committee by Committee Members
2-01-01-147-0	Radiation Protection State of the Fleet Assessment

Reports

Clinton Power Station Radiation Protection Areas 2nd Quarter 2001	July 1, 2001
Clinton Power Station 2001 Collective Dose	September 10, 2001
Boiling Water Reactors BWR Collective Radiation Exposure Per Unit 3-Year Rolling Average 1998- Projected 2000 Values	September 10, 2001
Exelon Nuclear: Clinton Station Regulatory Assessment Performance Indicator R.OR.01: Occupational Exposure Control Effectiveness	Revision 3, August, 2001
Radiation Protection Department ALARA Self-Assessment Report Number: 2000-57	