

ILLINOIS POWER COMPANY



500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

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Q37-81(12-16)-L

December 16, 1981

Mr. R.L. Spessard, Director
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 61037

Dear Mr. Spessard:

This is in response to your Notice of Violation and Inspection Report Number 50-461/81-24. Illinois Power Company's responses to the two violations identified are as follows:

1. Instructions, Procedures, and Drawings

The Notice of Violation states in part:

"Contrary to the above, procedures for an interaction analysis program were not implemented, in that, monthly identification tours and design engineering analysis were not being performed. Further, Quality Assurance notified Illinois Power management of failure to implement the program, and prompt corrective action had not been taken."

A. Corrective action taken and the results achieved:

On September 3, 1981, Illinois Power initiated the first interaction surveillance following Illinois Power NSED Procedure No. 26 and a set conservative interim interaction separation criteria. The first surveillance was completed on September 14, 1981 and resulted in a total of 54 items which were submitted to the Architect-Engineer for dispositioning. On October 30, 1981 the surveillances were resumed utilizing a revised set of interaction criteria from the A-E. An additional 18 items were submitted to the A-E for dispositioning. Based on the experience gained in performing these field surveys, we have concluded that we do not have adequate company field personnel to continue to perform this work. Therefore, the A-E has been directed to develop procedures and supply the necessary personnel to perform the surveillance work. The A-E personnel arrived on-site December 7, 1981 and are presently

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performing the surveillances under NSED Procedure No. 26. It is expected that the A-E will be carrying out the interaction program under their procedures by January 4, 1982. Illinois Power will continue to monitor the program through review of progress reports and periodic observations of their work.

B. Corrective action taken to avoid further noncompliance:

A comprehensive program has been established in the field and in S&L's offices to both perform the field surveys and to perform the interaction analyses involved in positioning potential interaction conditions. This will be an on going program until all installed work has been surveyed and evaluated.

C. Date when full compliance will be achieved:

Illinois Power is presently in full compliance with the regulatory requirements. Procedures are currently being prepared or are under revision to reflect the information contained in this letter. These procedures will be approved and implemented by January 4, 1982.

In addition to the violation cited in the Notice of Violation, The NRC requested that Illinois Power provide additional information in response to specific points identified in the transmittal letter. Illinois Power's response to these points is as follows:

1. NRC Request: Provide a detailed timetable to assure that all installed equipment (i.e. electrical, mechanical, HVAC, etc.) will be inspected/surveyed to verify that non-safety related installations do not pose a safety concern to safety related installations.

IP Response: A detailed timetable to assure that all installed equipment will be inspected for potential interaction is not available due to the continuous nature of Illinois Power's program. The inspections are performed on a plant area basis (e.g., the first surveillance covered the Unit 1 side of the Control Building Elevation 781' and all areas of the Auxiliary Building Elevation 707') until all areas having potential for interactions are covered and then the cycle is repeated. The initial cycle is expected to take approximately six (6) months. As construction work is completed within a given area, the need for further surveillance in that area is eliminated, and consequently the overall cycle time will decrease. The program will continue until no further potential exists for added interactions.

2. NRC Request: Provide information concerning a program to assure that timely inspections/surveys are performed as equipment installation progresses.

IP Response: As described in the response to this item of noncompliance, IP has established and implemented such a program. The Architect-Engineer has been assigned responsibility for the interaction surveillance/analysis program and presently has a staff on-site to perform the surveillance function. The surveys are performed on a repetitive, cyclic basis keyed to plant areas rather than to specific equipment installation activities.

3. NRC Request: Provide acceptance criteria relating to system interaction for all equipment previously installed.

IP Response: Except for the conservative interim criteria utilized for the initial inspections, the "acceptance criteria relating to system interaction for all equipment previously installed" is no different, on a generic basis, from the acceptance criteria for components yet to be installed. That is, there is only one set of criteria established for interaction separation and any situation that does not meet the criteria will be evaluated and dispositioned by the Architect-Engineer. The detailed criteria are a part of the A-E's project instruction for the field interaction surveillance work and are available on-site for the NRC's inspection. In general, the criteria can be summarized as follows:

- a. Minimum vertical separation between non-safety related piping and safety-related components is 1" plus the movement of variable supports where applicable.
- b. Minimum horizontal separation between non-safety related piping and safety-related components is specified on a subsystem basis and ranges from less than 1/4" to several inches.
- c. The minimum separation from non-safety related piping is also dependent on the physical location

of the potential interaction with respect to the type and location of the pipe supports, pipe routing, etc. (e.g., pipe movement near a support is smaller than it is at midspan).

- d. Relative size and/or mass of the objects of the potential interaction are taken into account (e.g., a one-inch diameter non-safety pipe will not damage a six-inch safety-related pipe).
- e. Non-safety related cable tray systems, conduit systems, and HVAC ductwork in the Seismic Category I buildings have been designed for dynamic loads except where specifically specified (e.g., office areas). These components do not pose an interaction problem and are not considered in the walkdowns except as noted in the next item.
- f. Any condition found by the interaction personnel which is not specifically covered by the criteria (or meets the criteria) and (but) is considered suspect, will be reported for evaluation and disposition.

Illinois Power has reviewed these criteria and considers them to be adequate for assuring the protection of plant components important to safety.

4. NRC Request: Provide documentation indicating that each item of safety-related equipment has been inspected to verify that nonsafety-related equipment will not interfere with safe plant operations during a postulated seismic event.

IP Response: Illinois Power's program identifies each area inspected, and documents those items which do not or may not meet the acceptance criteria. The documentation is repeated each time a survey is made.

5. NRC Request: Notify the Senior Resident NRC inspector of our plans concerning the disposition of discrepancies identified during the performance of this program.

IP Response: The program is in effect and is open to the Senior Resident Inspector's audit, review, and surveillance at any time. Copies of any document necessary for his work will be made available to him on an as-requested basis. IP will work directly with the Senior Resident Inspector to satisfy his needs.

2. Handling, Storage and Shipping

The Notice of Violation states in part:

"Contrary to the above, physical protection was not provided for installed Class 1E electrical cable 1DC03D, thereby resulting in damage from ongoing HVAC activity."

A. Corrective action taken and the results achieved:

Baldwin Associates Nonconformance Report (NCR) No. 5325 was written to document the damage to cable 1DC03D. Currently, this NCR is awaiting the disposition of the Architect-Engineer.

B. Corrective action taken to avoid further noncompliance:

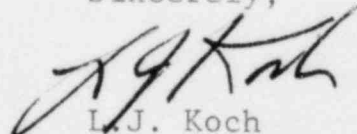
Training sessions were conducted for all affected personnel which delineated the responsibility for, and means of, cable protection. This training has been incorporated into an on-going training program to assure that the level of awareness on the part of craft personnel remains high.

C. Date when full compliance will be achieved:

Baldwin Associates and affected subcontractors are now in full compliance with procedural requirements.

I trust that our response is satisfactory to allow closure of these items. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,


L.J. Koch
Vice President

AJB/clh

cc: H.H. Livermore, Resident NRC Inspector
Director Quality Assurance