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U-0438  
Q37-82(03-16)-L  
March 16, 1982

Mr. R. L. Spessard, Director  
Division of Resident and Project Inspection  
US Nuclear Regulatory Commission  
Glen Ellyn, IL 61037

Dear Mr. Spessard,

This is a supplement to our December 16, 1981, letter dealing with NRC Inspection Report 50-461/81-24. We have further evaluated our response dealing with Criteria V, Instructions, Procedures, and Drawings and conclude that additional, amplifying information is appropriate.

#### Surveillance Scheduling Considerations

The scheduling of building areas to be covered is based on area availability (e.g. concrete forms removed, craft congestion, etc.), completeness of installation, and engineering analysis requirements (e.g. the need to follow items through contiguous areas). The first surveillance of an area is normally scheduled for the 50 percent installation point, with buildings having the highest percentage completion given highest priority. Area availability and installation status are determined by field inspections and the engineering judgement of the A/E engineer in charge of the interaction program. A general schedule (by building) is projected several months in advance and a more detailed (by building elevation and area) schedule is issued within a week of the start of the surveillances in that building. These schedules are utilized as general guidelines only, and are subject to change by the engineer-in-charge based on plant conditions. These schedules are available for the use of the Senior NRC Resident Inspector. The engineer in charge of the interaction program can be contacted for the latest schedule information.

#### Applicable Procedure

The interaction program is being implemented through Sargent & Lundy Engineers Project Instruction PI-CP-034.

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### "Dynamic" Loads--Definition

The criteria established for the interaction clearance requirements are based on "dynamic" loads. The term "dynamic" includes seismic loads and suppression pool loads.

### Clearance Criteria for "Other" Potential Interaction Sources

Clearance of less than one (1) inch between safety-related items and other items (e.g. electrical equipment, hangers, raceway, HVAC duct and hangers, etc.) which are not otherwise covered by specific clearance requirements, are presently being documented and dispositioned by the A/E. This criteria is being refined by the A/E through more detailed analysis.

### Program Controls

In addition to a form used for documenting and dispositioning each potential interaction report (PIR), three (3) control logs are maintained to ensure all areas and PIRs are addressed (and, also, to avoid repetitive reporting). One log records the inspection activity by area and lists the date(s) of inspection, the PIR number, and the initials of the inspector(s). Another log records the PIRs by area and includes a short description of each PIR, the date submitted for dispositioning, and the current status. The third log is equivalent to the second log except it is organized by PIR number for ease of cross referencing.

Each PIR has a permanent file pouch with all back-up documentation, calculations, etc., which is stored in an on-site, fire-proof cabinet. Duplicate copies of the field resolved PIRs are sent to the A/E's home offices for review/approval. More complicated PIRs will be analyzed and dispositioned by the home office, with dispositions transmitted to the site interaction team.

PIRs that are found acceptable "as-is" will be closed out based on the supporting documentation. Those requiring hardware changes (e.g. re-routing, addition of restraints, barriers, etc.) will remain open until the modifications are installed (verified by the contractor and the Interaction team). Such hardware changes will be initiated by the issuance of a design document (e.g. drawing revision) for safety-related items and by direction to the Contractor for non-safety items.

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The A/E's procedure (PI-CP-034) is presently undergoing revision to reflect the requirement for maintaining the program controls described above. This revision will be completed by April 15, 1982. The clearance criteria for "other" potential interaction sources has been promulgated to the responsible personnel and will be incorporated into the A/E's procedures when final criteria have been determined.

I trust that this additional information will allow closure of this item. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Gerstner".

W. C. Gerstner  
Executive Vice President

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