

ILLINOIS POWER COMPANY



1605-L

U-0490

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

May 27, 1982

Mr. James C. Keppler  
Director, Region III  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Deficiency 81-05

10 CFR 50.55(e)

Minimum Separation Requirements for  
Certain Components of the 4160V Switchgear

On October 2, 1981, Illinois Power verbally notified Mr. H.M. Wescott, NRC Region III, of a potential reportable deficiency per 10 CFR 50.55(e) concerning minimum separation requirements for certain components of the 4160V switchgear. This initial notification was followed by two interim reports: L.J. Koch letter to J. Keppler dated November 6, 1981 and W.C. Gerstner letter to J. Keppler dated February 26, 1982. Our investigation of the matter has not been completed, and this letter is an additional report to provide an update on our investigation.

During September, 1981, three nonconformance reports were written against the 4160V switchgear, addressing apparent violation of separation requirements between Class 1E and Non-Class 1E circuits inside certain switchgear cubicles. These violations were identified subsequent to termination of field cables and were found to exist in both current transformer circuits and control wiring circuits. This lack of physical separation in the installed switchgear prompted the investigation into several areas of potential deficiency, including design, construction procedures and controls, and QC training.

In the area of design, Sargent and Lundy (CPS Architect Engineer) was requested to review their design and procedures in meeting the requirements of the Clinton Power Station FSAR. This review determined that drawings for the subject 1E equipment did not meet separation requirements described in IEEE 384. However, Sargent and Lundy has performed an extensive technical analysis of the subject 1E equipment which demonstrated that the safety function of the class 1E

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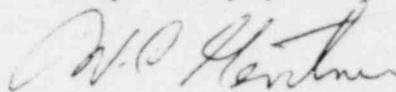
1E27

switchgear is not compromised. Sargent and Lundy also performed a 100% review of their wiring diagrams to determine if drawings for other equipment had been issued with violations of the Clinton Power Station FSAR. The results of their review show no other drawings required revision.

In the areas of construction procedures and controls and QC training, the investigation is continuing. Cable termination procedures are being reviewed and evaluated for separation/segregation controls in conjunction with an electrical stop work recovery program presently in progress at Clinton. This recovery program is described in Illinois Power's letter "Response to NRC Confirmation of Action Letter" (W.C. Gerstner to J. Keppler letter U-0468, dtd. April 21, 1982.)

We anticipate that we will need an extension of approximately ninety (90) days to complete our evaluation of cable termination procedures, provide a determination of reportability of this potential deficiency, and to file the final report.

Very truly yours,



W.C. Gerstner  
Executive Vice President

cc: H.H. Livermore, NRC Resident Inspector  
Director, Office of I&E, Washington, D.C.  
Illinois Department of Nuclear Safety  
Director-Quality Assurance