

ILLINOIS POWER COMPANY



0982-L

U-0507

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

June 22, 1982

Mr. James G. Keppler
Director, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 61037

Dear Mr. Keppler:

This is in response to your letter to Mr. W.C. Gerstner, dated June 10, 1982, regarding certain concerns you had with our response to Confirmation of Action Letter dated January 27, 1982.

With reference to your letter, "...Baldwin Associates Surveillance Reports should be reviewed for nonconforming items not previously identified on an NCR/DR and initiate an NCR/DR on these items".

- Baldwin Associates Quality Assurance will perform a review of Baldwin Associates Surveillance Reports to determine if nonconforming conditions were identified that were not processed on an NCR/DR. NCRs/DRs will be initiated for any nonconforming conditions identified during this review.

With reference to your letter, "...you expect to have a nonconformance program for use during the startup and operating phase by July 1, 1982. We believe that common prudence would dictate that this program be implemented at the earliest possible time. You should also consider increasing the scope of this program to address nonconformances during the construction and testing phases in accordance with Chapter 15, paragraph A.2; Division of Responsibility, of the Clinton Power Station Quality Assurance Manual".

- Illinois Power fully intends to implement the nonconformance program at the earliest possible date. The July 1, 1982 date provided in our response was an estimated date for the completion of program development. The Management Guides and procedures for this program will be approved and issued by July 1, 1982. Training of project personnel will begin upon issuance of procedures and will be completed by July 15, 1982. Materials necessary to implement program, such as, Hold Tags, etc., have been identified and are being purchased. These materials should be received by August 15, 1982. During the interim period of implementing this program, Illinois Power intends to use present Baldwin Associates and Illinois Power Plant Staff programs for reporting nonconformances. We will

JUN 29 1982

accomplish this by identifying nonconforming conditions on Condition Reports for items or equipment under the jurisdiction of either Illinois Power Startup or Plant Staff. For nonconformances identified on items or equipment under Baldwin Associates jurisdiction, Baldwin Associates Project Engineering or Quality and Technical Services will initiate a Baldwin Associates Nonconformance Report. We will continue to aggressively expedite the implementation of our nonconformance program.

- The nonconformance program presently under development by Illinois Power Company does address nonconformances identified during the testing phase at Clinton Power Station. Nonconformances identified during the construction phase are controlled under existing programs. The present Baldwin Associates Nonconformance Program allows anyone in the Illinois Power organization to identify nonconforming conditions during the construction phase at Clinton Power Station and initiate a NCR. Similarly, the Illinois Power Nonconformance Program allows anyone in the contractor/sub-contractor organization to identify a nonconforming condition and initiate a Condition Report.

With reference to your letter, "...we understand that Baldwin Associates QA will review and approve the first 25 of a series of NSSS, Mechanical and Electrical Equipment travelers to ensure correct format and content, and that they will do further periodic surveillance to ensure that results are consistent".

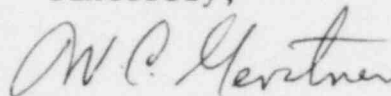
- Baldwin Associates Quality Assurance Department will review the first 25 of a series of NSSS, Mechanical and Electrical Equipment travelers for correct format and content. Baldwin Associates Quality Assurance will include in their Surveillance Schedule periodic surveillances of these types of travelers to ensure that results are consistent.

With reference to your letter, "...Illinois Power QA will conduct periodic and frequent surveillances of the traveler program to ensure that the format, content, and usage is correct".

- Illinois Power QA Surveillances of the traveler program are scheduled on a quarterly basis. These surveillances include documented reviews of travelers used in the Piping, Mechanical, Electrical and NSSS disciplines. This quarterly surveillance concept is supplemented by our Notification Point Program, which includes surveillance of specific activities and the associated travelers; the use of frequent routine surveillances of in-process activities and the associated travelers; and, scheduled audits of the traveler program. These activities ensure that traveler format, content, and usage is correct.

I trust that this response satisfactorily addresses the concerns of the Nuclear Regulatory Commission.

Sincerely,



W. C. Gerstner
Executive Vice President

cc: NRC Resident Inspector
Director-Quality Assurance
Illinois Department of Nuclear Safety
Director, Office of I & E, USNRC, Washington, DC 20555