

ILLINOIS POWER COMPANY



1605-L
U-10031

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

February 18, 1983

Docket No. 50-461

Mr. James G. Keppler
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Potential Deficiency 83-01
10CFR50.55(e)
Qualification of Calibration Services Suppliers

Dear Mr. Keppler:

On January 13, 1983, Illinois Power verbally notified Mr. Frank Jablonski, NRC Region III, (Ref: IP memorandum Y-14089 dated January 13, 1983, 1605-L) of a potentially reportable deficiency under 10CFR50.55(e) concerning the qualification of calibration services suppliers. Our investigation of this matter continues, and this letter represents an interim report in accordance with 10CFR50.55(e)(3) on this potentially reportable deficiency.

Statement of Potentially Reportable Deficiency

Measuring and test equipment (M&TE) used at Clinton Power Station was calibrated, in some cases, by external sources that were not QA approved by pre-award evaluations or post-award audits. As a result, the validity of the calibrations performed by these sources is indeterminate. An investigation is being performed to determine the scope of this problem, the validity of calibration performed by unqualified sources and the potential for impact on the quality of structures, systems, and components inspected and accepted using the affected measuring and test equipment.

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Background

As a result of an Institute of Nuclear Power Operations (INPO) evaluation of Clinton Power Station, it was revealed that Baldwin Associates (IP Contractor) and Illinois Power Company were procuring calibration services from unapproved sources (i.e. suppliers that have not been QA-qualified by pre-award evaluations or post award audits). A subsequent Illinois Power Quality Assurance (IPQA) surveillance (Y-14316) revealed that the INPO evaluation findings also applied to activities being performed by U.S. Testing Company (CPS Testing Agency), in as much as procurement of materials and services in support of U.S. Testing Company is accomplished by Illinois Power Company. The results of the INPO evaluation and the IPQA surveillance culminated in the initiation of this investigation under 10CFR50.55(e).

Investigation Results (Interim)

In order to determine the scope of this problem and the adequacy of calibration services provided in the past, an investigation plan has been established and is being implemented. This plan includes the following activities:

1. Review purchase orders and/or calibration certificates to identify calibration services suppliers used by Clinton Power Station: This activity has been completed for M&TE used by U.S. Testing Company and Illinois Power, and is in process for quality acceptance tools used by Baldwin Associates (BA). This activity thus far has identified 126 suppliers of calibration services.
2. Develop a matrix of M&TE versus calibration organizations and dates of calibration: This activity has been completed for the 126 suppliers identified in 1. above, and will be updated as additional suppliers are identified. The purpose of this matrix is to catalogue the suppliers of calibration services and associated M&TE, and to track the status of actions being taken to validate previously performed calibrations.
3. Obtain QA qualified sources of calibration services: In order to establish the qualifications of calibration sources, other utilities/organizations are being contacted to obtain results of the audits, evaluations, and/or surveillances of suppliers used by Clinton Power Station. Calibration services suppliers are being contacted to obtain copies of their quality assurance

programs for review by Illinois Power Quality Assurance. Additionally, Illinois Power and Baldwin Associates are scheduling and conducting pre - award surveys in an effort to obtain qualified sources of calibration services.

4. Evaluate the adequacy of past calibration services performed: As QA-qualified suppliers become available, primary reference standards not previously calibrated by a QA-qualified source will be sent out for re-calibration, requesting "as-found" and "as-left" data. Use-history analysis will be performed on those pieces of M&TE with unacceptable "as-found" data. This analysis will be used to determine additional action necessary on a case-by-case basis.

Although progress is being made in these activities, it is anticipated that the actions described above will not be complete until June 1, 1983. The need to cease the performance of acceptance testing and inspection using the affected M&TE was evaluated and determined not to be necessary during the evaluation/investigation period. During this period, M&TE used for acceptance testing at CPS will be identified and traceable to the work through inspection reports and test data sheets. Unacceptable M&TE identified and used during the evaluation period will be analyzed as described in item 4, above.

An evaluation/determination of IP/BA quality program requirements that apply to this issue was performed to determine the adequacy of the programs in meeting regulatory requirements and the requirements of the Clinton Power Station PSAR/FSAR. This review found that the procurement procedures utilized by Baldwin Associates and Illinois Power did not adequately address calibration services by external suppliers. More specifically, procedures did not require the imposition of quality assurance program requirements in procurement documents for the control of calibration of M&TE, nor did they require source evaluations of suppliers performing the calibration services. This problem was caused by a misinterpretation of regulatory requirements with regard to "commercial grade" procurement, in that procurement of calibration services was believed to be commercial grade.

In order to prevent recurrence of this problem, Illinois Power has begun to include applicable quality assurance program requirements in procurement documents for the calibration of measuring and test equipment by calibration services suppliers. This action also includes procurement in support of U.S. Testing Company activities. Training has been provided to Illinois Power Quality Assurance personnel on February 10, 1982 on this subject. Additionally, Illinois Power Quality Assurance Instruction QAI-404.01 "Procurement Document Review", is presently being

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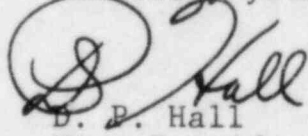
revised to address the requirements for imposing applicable quality assurance program requirements in procurement documents for calibration of M&TE. Baldwin Associates has also instructed their Quality Assurance personnel to include applicable quality assurance program requirements in procurement documents for calibration of M&TE. Further, Baldwin Associates has discontinued the processing of procurement documents for calibration services until QA-qualified sources have been obtained. Procurement procedures are being reviewed and will be revised as necessary to assure compliance with regulatory and SAR requirements.

Safety Implications/Significance

We are currently investigating the effects of this potential deficiency on the validity of calibration performed by unqualified sources, and evaluating the potential impact on the quality of structures, systems, and components inspected and accepted using the affected measuring and test equipment. Until these aspects of the investigation are completed, a detailed analysis of the safety implications of this potential deficiency cannot be performed.

It is anticipated that our investigation and analysis of this potentially reportable deficiency will be completed by June 1, 1983, at which time a final report on this matter can be provided. We trust that this interim letter provides sufficient information to perform a general assessment of this potential deficiency, and adequately describes our overall approach to resolve the problem.

Sincerely yours,



D. P. Hall
Vice President

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