

Certified By

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ILLINOIS POWER COMPANY

0981-L

U-0496

500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

June 4, 1982

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

50-461/81-15

Dear Mr. Keppler,

This is in response to your Notice of Violation and Inspection Report Number 50-461/81-15. Illinois Power Company's response to the items of noncompliance cited are as follows:

1. The Notice of Violation states in part:

"Contrary to the above, activities affecting quality were not accomplished under suitably controlled conditions in that QC inspectors signed statements to the effect that, among other things, (1) answers to the certification examination were provided prior to and during the examination, and (2) incorrect answers were allowed to be corrected."

With regard to Item 1 of the Notice of Violation, Illinois Power Company's response is as follows:

I. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

The following actions were taken to ensure adequate controlled conditions during the certification examining of QC inspectors:

- a. The Quality Control Training Manual was rewritten to strengthen the training and qualification program and to provide greater clarification regarding qualification requirements.
- b. A test data bank of questions for Quality Control inspectors has been developed. The question bank is secured at all times to maintain confidentiality. Prior to administering a test the Senior QC Discipline Engineer selects, at random, the questions to be included on the test. This process ensures that each test is unique for each individual. After selection of the test question cards, the test is prepared and is sealed in an envelope by the Quality Control Manager. The

envelope is then locked in a cabinet until the actual test is conducted. At the time of the test, the sealed envelope is opened by the QC Training person proctoring the testing function. Presently, a representative from Illinois Power Quality Assurance Department is monitoring the QC Testing activity to verify that testing is accomplished under controlled conditions.

- c. The Baldwin Associates QC Department has made physical changes to the building arrangement which has in turn improved the training and testing process. Certification examinations are no longer conducted in open office areas. The testing is conducted in a private room, with only the individual being tested, the test proctor, and the test monitor present.
- d. The process of grading examinations with the person being tested present has been changed. When the individual has completed the test, he is asked to leave the room during grading. The room is closed and a sign is posted "Do Not Enter" until grading is completed. Upon completion of grading, the test is forwarded to the Senior QC Discipline Engineer who reviews the test and discusses the incorrect answers with the individual who took the test. The test is then filed in the individual's file in a locked cabinet.

II. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The strengthened controls discussed above and the increased monitoring of Quality Control testing activities by independent observers will preclude this condition from recurring.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Actions taken to achieve full compliance were complete on June 1, 1982.

2. Example A The Notice of Violation states in part:

"Contrary to the above, in some cases, Nonconformance Reports are prepared by initiators in draft form and not on a Nonconformance Report. The nonconformance or suspected nonconformance is then documented on a Nonconformance Report at the discretion of personnel other than the initiator."

With regard to Item 2 Example A of the Notice of Violation, Illinois Power Company's response is as follows:

I. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Baldwin Associates Procedure BAP 1.0, "Nonconformances" has been revised to insure that nonconformances are identified, documented and processed in a controlled manner. The current program requires Baldwin Associates Engineering, Quality Control, or Technical Services personnel to initiate the proper paper work (Nonconformance Report (NCR)) to report the nonconformance. Furthermore, the Nonconformance Report originator obtains a NCR number from Project Engineering prior to the NCR receiving any reviews by QC or Engineering personnel. This ensures that the NCR will be processed, since the program does not allow the voiding of Nonconformance Reports. The distribution list for NCRs has been changed to require that the originator of the NCR receive a copy of the NCR at initial distribution and after disposition of the NCR. This provides assurance to the originator that nonconformances reported have been properly processed.

These changes will ensure that nonconforming conditions will be documented and processed in a controlled manner.

II. CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

Baldwin Associates has conducted training sessions on the new requirements of documenting and processing of Nonconformance Reports. This training was presented to Quality Control, Technical Services, and Engineering personnel. Furthermore, a meeting was conducted by Mr. L.J. Koch, Illinois Power Vice President with Quality Control and Technical Services personnel to discuss management's interest and concern on the NCR matter. The main thrust of this meeting was to reiterate to Quality personnel that they had full support from upper management.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Actions taken to achieve full compliance were complete on June 1, 1982.

2. Example B The Notice of Violation states in part:

"Contrary to the above, activities affecting quality were not accomplished in accordance with prescribed instructions, in that the electrical fabrication shop was not inspected daily. Specifically, from February through June, 1981, only seven daily inspections of the electrical fabrication shop were made."

With regard to Item 2 Example B of the Notice of Violation, Illinois Power Company's response is as follows:

I. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Baldwin Associates Quality and Technical Services Department personnel performed an evaluation to determine if the work loads in this area were sufficient to require daily inspections. Due to the load work in the Electrical Fabrication area, the procedural requirements were changed to reflect random inspection. The procedure governing these inspections, QCI-401, Raceway Hanger/Support Fabrication/Installation Inspection, further stipulates that these random inspections must be performed a minimum of twice a week. These random inspections will provide adequate inspection coverage in the Electrical Fabrication area.

To verify that inspections are being performed in accordance with requirements, Baldwin Associates Quality Assurance personnel reviewed Inspection Reports for the Electrical Fabrication Shops for the period of January 1 - March 31, 1982. The results of this review indicated that inspections are being performed at least twice a week.

II. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCES

Baldwin Associates Quality Control Department conducted training sessions for Electrical QC inspectors which covered the requirements for performing inspections of the Electrical Fabrication shop.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Corrective action taken to achieve full compliance were complete on June 1, 1982.

3. The Notice of Violation states in part:

"Contrary to the above, Nonconformance Report No. 4055 was dispositioned "use-as-is" and closed (without reinspection to determine that the cable for radiation monitoring equipment had been enclosed in conduit) rather than being dispositioned "rework" and being reinspected before being closed."

With regard to Item 3 of the Notice of Violation, Illinois Power Company's response is as follows:

I. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

Nonconformance Report No. 4055 was revised and re-opened to require Quality Control verification that subject cables were enclosed in conduit. This inspection was completed on July 3, 1981, and documented on Inspection Report No. 3715, which is attached to NCR No. 4055. The results of this inspection indicated that subject cables were enclosed in conduit. The NCR was then re-closed based upon QC inspection results.

II. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Baldwin Associates Quality Assurance reviewed an additional fifty (50) Nonconformance Reports which were dispositioned by Sargent and Lundy as use-as-is to determine if similar conditions existed. These NCRs were selected at random and no instances of the condition as reported in the Notice of Violation were found. Baldwin Associates Procedure BAP 1.0 is being revised to clarify use of use-as-is dispositions. The revised procedure will require reinspection for use-as-is dispositions similar to NCR No. 4055.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Baldwin Associates will be in full compliance with the revised procedure requirements on or before July 15, 1982.

4. The Notice of Violation states in part:

"Contrary to the above, measures were not properly established to preclude inadvertent bypassing of inspections, in that, anchor bolts and straps used to hang electrical conduit were torqued to prescribed values and painted green to indicate that they had been inspected and accepted prior to installing the conduit which requires loosening the anchor bolts without benefit of re-torquing and re-inspection."

With regard to Item 4 of the Notice of Violation, Illinois Power Company's response is as follows:

I. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED

To ensure that all completed expansion anchor bolt installations are satisfactorily inspected, Baldwin Associates has revised Procedures BAP 2.16, "Concrete Expansion Anchor Work", BAP 3.3.1, "Exposed Conduit Installation", and BAP 3.3.6, "Electrical Raceway Support Installation". These procedures now require

re-torquing and re-inspection of concrete anchors if the nut is loosened for any reason. The re-inspection of the concrete anchors will be documented on the applicable final inspection form (JV-688, Electrical Hanger Inspection; JV-550, Anchor Bolt Installation Inspection; or JV-489/JV-776, Conduit Inspection Package). We are confident that the procedural requirement now in place will preclude the inadvertent bypassing of inspections on anchor bolts which have been loosened after initial torquing and inspection.

II. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Baldwin Associates has conducted extensive training sessions on the new requirements concerning re-torquing and re-inspection of concrete anchors which are loosened after initial torquing and inspection were complete. This training was presented to Baldwin Associates Engineering, Quality Control, Quality Assurance and craft personnel.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Actions taken to achieve full compliance were complete on June 1, 1982.

New
Subject

In regards to your concern, expressed in cover letter to Report No. 50-461/81-15, as to the adequacy of the work inspected, prior to the retesting on May 2-4, 1981, Illinois Power Company's response is as follows:

An evaluation was performed by Illinois Power Company and Baldwin Associates to determine the areas of completed and inspected work that could possibly be affected by the questionable Quality Control Inspector Certifications. This evaluation resulted in a determination that a re-inspection program was required in the area of electrical hangers and PGCC floor sections.

The reinspection of the electrical hangers was accomplished using a sample plan developed by the Baldwin Associates Quality Control Manager. The reinspection was completed on September 9, 1981. The results of these reinspections provided no indication of inspection deficiencies that would degrade the Quality Control Program for acceptance of electrical hangers during the period of time in question. The results of the evaluation were reviewed by Illinois Power Company Quality Assurance. The results of this review were satisfactory, however, there was a statistical disparity with respect to reinspection

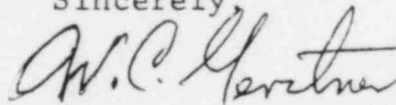
percentages. As a result, Baldwin Associates Quality Control performed additional reinspections. The subsequent reinspections did not reveal any inspection deficiencies that would degradate the Quality Control Inspection program.

During August 17, 1981 to August 20, 1981, an independent verification of 100% of the PGCC floor sections was performed by an ad hoc task force which was composed of representatives from IP Quality Assurance, IP Plant Staff Compliance, IP Start-up and IP Nuclear Station Engineering Departments. Prior to performing the evaluation each participant in the verification effort attended a training program conducted by IP Start-up. The results of the verification revealed one (1) cable not routed correctly and not discovered by BA Quality Control during the inspection process. Since this represents one case in approximately 4000, this represents an error by the inspector rather than an indication of lack of qualification or knowledge. This cable was subsequently rerouted to correct the problem.

Based upon actions taken, we have concluded that the adequacy of the work inspected by Baldwin Associates Quality Control Electrical Inspectors, prior to the retesting on May 2-4, 1981, was adequate.

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

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