

ILLINOIS POWER COMPANY



1605-L
U-10061

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

May 31, 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. This initial notification was followed by one (1) interim report (IP letter U-10031, D. P. Hall to J. G. Keppler dated February 18, 1983, 1605-L). Our investigation of this matter continues, and this letter represents an interim report in accordance with 10CFR50.55(e).

Statement of Potentially Reportable Deficiency

Measuring and test equipment (M&TE) used at Clinton Power Station was calibrated by external sources that were not Quality Assurance (QA) approved by pre-award surveys 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 validity of calibrations performed by unqualified sources and the potential for impact on the quality of structures, systems, and components inspected and accepted using the affected M&TE.

Background

As a result of an Institute of Nuclear Power Operations (INPO) evaluation of Clinton Power Station, it was revealed that

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Baldwin Associates (IP Contractor) and Illinois Power Company were procuring calibration services from unapproved sources. A subsequent Illinois Power Quality Assurance (IPQA) surveillance revealed that the INPO evaluation findings also applied to activities being performed by U.S. Testing Company (CPS Testing Agency), since procurement of materials and services in support of U.S. Testing Company is accomplished by Illinois Power Company. Several subcontractors of Baldwin Associates are also affected by this problem since Baldwin Associates calibrates measuring and test equipment for the subcontractors.

Investigation Results

In order to determine the adequacy of calibration services provided in the past, an investigation plan 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 is completed and one-hundred-ninety-five (195) suppliers were identified.
2. Develop a matrix of M&TE versus calibration organizations and dates of calibration: This activity has been completed for the suppliers identified in 1. above. 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 suppliers, other utilities/organizations have been contacted to obtain results of surveys, audits, evaluations, and/or surveillances of suppliers used by Clinton Power Station. Calibration services suppliers have been contacted to obtain copies of their quality assurance programs for review by Illinois Power Quality Assurance. Additionally, Illinois Power and Baldwin Associates are conducting surveys in an effort to obtain qualified sources of calibration services.
4. Evaluate the adequacy of past calibration services performed: Several methods are being used to validate past calibrations. Surveys of the calibration services suppliers are being performed to verify that acceptable programs were in effect at the time the calibration services were rendered. Also, some primary reference standards are being sent out for calibration by a QA-qualified source, requesting "as-found" and "as-left" data (further analysis will be performed on those pieces of M&TE with unacceptable "as-found"

data). Evaluation of the use of the M&TE is also being done. It has been found, in some cases, that M&TE has not been used or put into service, or was not used for quality acceptance.

Evaluation performed to date has resulted in the validation of one-hundred-seventy-one (171) of the total one-hundred-ninety-five (195) suppliers of past calibration services. Fifteen (15) suppliers remain to be surveyed, and nine (9) suppliers require further evaluation at this time. Results of the investigation to date have been positive, and have shown that past calibrations were adequate.

An evaluation of IP/BA procurement program requirements that apply to this issue was also 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 certain procurement procedures utilized by Baldwin Associates and Illinois Power did not adequately address calibration services by external suppliers. Specifically, the 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 regarding "commercial grade" procurement.

Corrective Action (Interim)

The following actions have been taken to correct and prevent recurrence of the problems identified in this report:

1. The Illinois Power Quality Assurance Instruction for procurement document reviews has been revised and implemented to address the requirements for procurement of calibration services.
2. Baldwin Associates Quality Assurance procedures have been revised to address the requirements for procurement of calibration services.
3. Training has been provided to Illinois Power and Baldwin Associates Quality Assurance personnel on this subject.
4. In the future, only QA-qualified suppliers will be used for calibration of measuring and test equipment.

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Safety Implications/Significance

We are currently investigating the effects of this potential deficiency on the validity of past calibrations performed by unqualified sources. Considerable progress has been made in this effort, with twenty-four (24) (of a total 195) suppliers remaining to be evaluated. Until these evaluations are completed, a detailed analysis of the safety implications of this potential deficiency cannot be performed. Investigations completed to date have not identified any inadequacies in past calibration services for measuring and test equipment used at CPS.

It is anticipated that our investigation and analysis of this potentially reportable deficiency will be completed in approximately ninety (90) days. 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

REC/jf

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