

ILLINOIS POWER COMPANY



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

March 22, 1983

Docket No. 50-461

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

Subject: Potential Deficiency 83-04, 10CFR50.55(e)  
Document Control of Design Change Documents

Dear Mr. Keppler:

On February 15, 1983, Illinois Power Company verbally notified Mr. F. Jablonski, U.S. NRC Region III (Ref: IP memorandum Y-14166, 1605-L, dated February 15, 1983) of a potentially reportable deficiency per 10CFR50.55(e) concerning document control of Field Deviation Disposition Requests (FDDR's) and Field Disposition Instructions (FDIs) as issued by General Electric Company for field changes. Our investigation of this matter continues, and this letter represents an interim report in accordance with 10CFR50.55(e)(3) for this potentially reportable deficiency.

Statement of Potentially Reportable Deficiency

Quality assurance surveillance activities identified that document control of design change documents was not adequate to ensure that drawings properly identified all applicable outstanding changes. Specifically, Field Deviation Disposition Requests (FDDR's) and Field Disposition Instructions (FDIs) received at the Clinton site were not being properly "posted" or identified as outstanding against affected Sargent and Lundy (S&L) and General Electric (GE) drawings. This problem could potentially result in inconsistencies between design drawings released to the field and the as-built equipment.

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Background/Investigation Results

An Illinois Power quality assurance surveillance was conducted in early February, 1983, of the IP Startup organization and its control of design documents related to the Power Generation Control Complex (PGCC). As a result of the surveillance, two programmatic deficiencies regarding document control practices were identified as findings. Finding C-83-016 identified a lack of implementation of a section of Baldwin Associates procedure 1.10, "Control of GE Items / Material / Activities affected by FDDR / FDI". The procedure requires Baldwin Associates Document Control to post FDDRs and FDIs as "outstanding" against the affected drawings until the General Electric drawing is revised to incorporate the FDDR/FDI. Baldwin Associates document control personnel, however, were found to delete the FDDR/FDI as outstanding against the affected document when the work associated with the FDDR/FDI is completed.

The second finding, C-82-017, identified a deficiency concerning FDDR/FDIs that affect Sargent & Lundy (S&L) schematic and wiring diagrams (E-02 and E-03 series drawings). The finding identified that there are no procedural requirements to post FDDR/FDIs against affected S&L schematic and wiring diagrams until a subsequent revision to the S&L drawing incorporates the FDDR/FDIs.

The findings were assessed by Illinois Power Quality Assurance as being potentially reportable under the provisions of 10CFR50.55(e) and were reported to the NRC as such on February 15, 1983.

An investigation committee formed of members from various site organizations has been organized to report on the circumstances surrounding the potentially reportable deficiency. A written plan which details the scope of the investigation has been prepared. The investigation which is currently being conducted will address both the specific and generic impacts of the identified deficiencies together with remedial and generic corrective action.

Since the major concern of the quality assurance surveillance dealt with posting of design change documents (FDDRs and FDIs) to drawings, immediate action was taken by Baldwin Associates document control personnel to ensure compliance with BAP 1.10, "Control of GE Items/Materials/Activities affected by FDDR/FDIs." FDDR/FDIs site control logs and files were reviewed to identify those that were closed (i.e., the associated work has been completed). As a result of the review, 467 closed FDDR/FDIs were reissued for posting in the field. A review of drawings is being performed to check for incorporation of the closed FDDR/FDIs. In conjunction with this, a status report is being developed that will indicate the status of incorporation of FDDR/FDIs and the affected drawings.

Illinois Power has evaluated the program for implementing field design changes (FDDR/FDI's) on GE equipment. The present practice of performing construction work changes, as a result of FDDRs and FDI's, on the GE equipment is through the use of controlled revisions to the work traveler (package of instructions and drawings required to explain and perform the work). The physical change work has progressed correctly in a controlled manner. Therefore, this potential 10CFR50.55(e) deficiency deals with the posting of changes to affected file documents.

#### Corrective Action

Remedial corrective action is being taken to ensure that GE drawings held on site reflect applicable FDDR/FDI's that have not been incorporated through revision of the drawings. The committee and engineering personnel are currently evaluating alternatives for handling of S&L drawings which are "overlays" of the GE drawings and subsequently are issued to the field.

Future effort will include an evaluation of generic effects and application of corrective action.

#### Safety Implication/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is presented for review. It is anticipated that approximately ninety (90) days will be necessary to complete our investigation and to file a final report on the matter.

We trust this interim letter provides you sufficient background information to perform a general assessment of this potentially reportable deficiency and adequately describes our overall approach at resolving this problem.

Sincerely yours,



D. P. Hall  
Vice President

AJB/RDW/ch

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