



June 28, 1983

Docket No. 50-461

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

Subject: Response to Notice of Violation dated May 16, 1983,  
NRC IE Inspection Report 83-02

Dear Mr. Keppler:

This letter is in response to your Notice of Violation dated May 16, 1983, Inspection Report Number 50-461/83-02. Illinois Power Company's response to the Notice of Violation is as follows:

The Notice of Violation states in part:

... a program for inspection of activities affecting quality was not properly executed as demonstrated by NRC findings which had not been identified by the licensee. Examples are:

1. Hanger E28-1003-03A-H15, the as-built drawing indicated that detail DV-23 was used to install the #2 horizontal to vertical connection while the traveler indicates that detail DV-23A was used to make this connection.
2. Hanger E28-1000-03A-H12, the traveler documentation package was signed-off as being acceptable by the licensee. The records package was not complete in that the history prior to as-building this hanger was missing. This situation was also identified for hangers E28-1000-03A-H13, E30-1003-01A-H68, E30-1003-01B-H1, E30-1003-02A-H18, and E30-1003-02A-H31. Also, the as-built drawing [for hanger E28-1000-03A-H12] indicated that detail DV-9 was used to install the cable tray attachments while the traveler indicates that detail DV-8A(H) was used.
3. Hanger E28-1400-R8, Deficiency Report (DR) 3614 was missing from the traveler package and was not referenced on the traveler as required by procedures.

JUL - 1 1983

4. Hanger E30-1003-01A-H68, Nonconformance Report (NCR) 7933 was missing from the traveler package and was not referenced on the traveler as required by procedures.
5. Hanger E30-1003-02A-H18, the as-built drawing indicates that detail DV-8 was used for connection #2 and detail DV-43 was used for connection #3. The attachment traveler indicates that detail DV-8 was utilized for both connections.
6. Hanger E05-1038-RH2, a review of DR 2243 indicates that the disposition had not been implemented. The heat number on the inspection checklist had not been corrected in accordance with the DR disposition.
7. Hanger E26-1003-01A-H8, the as-built drawing indicates that detail DV-53A was used to make the attachment connections. The attachment traveler indicates that a DV-9 detail was utilized to make the connection.

I. Corrective Action Taken and the Results Achieved

1. The Notice of Violation has identified a problem with the construction history of certain electrical hangers. The earliest generation of electrical hanger travelers was superseded, and the required information was transcribed onto the revised format. However, the superseded travelers were not filed as quality records. A plan of action was formulated by Baldwin Associates (constructor) to generate a more complete historical record. This plan included the following actions:
  - a. All superseded electrical hanger travelers identified by a search of the site were transmitted to the Document Records Center (DRC) for storage.
  - b. An inventory was made of all first and second generation electrical tray hanger travelers in the DRC.
  - c. A cross reference computer file was established to provide ready access to construction history.

Subsequent surveillance by the licensee has determined that the above system is adequate to locate historical data.
2. Tray Attachment Travelers and as-built drawings (Electrical Hanger Drawings) may indicate different design detail designations because of differing scopes of work. The tray attachment detail and the horizontal-to-vertical connection detail are subparts of the more inclusive hanger drawing design detail.

The procedural requirements of Baldwin Associates Procedure BAP 3.3.11, Cable Tray Attachment Installation caused confusion. Therefore, BAP 3.3.11 has been revised to delete references to design details (e.g. DV-8, DV-9) and replaces them with references to the Electrical Hanger Drawing (EHD). The scope of work for the tray attachment installation continues to be indicated on the EHD and Quality Control continues to inspect the same scope of work. The procedure change should correct confusion concerning which design detail, or part of a design detail, refers to either the tray attachment or the horizontal-to-vertical connection.

A review of the specific examples cited in the inspection report has resulted in the following action.

- a. Hanger E28-1003-03A-H15 - Licensee review has raised the question whether the disagreement is with horizontal or horizontal-to-vertical connection. If the reference is to #2 horizontal, then the as-built drawing and the attachment traveler both indicate that a DV-23A was used. If the reference is to #2 horizontal-to-vertical connection, then the as-built drawing indicates a DV-23 was used and the attachment traveler indicates a DV-23A was used. Design drawings in this situation require use of the tray attachment portion of a DV-23A.
- b. Hanger E28-1000-03A-H12 - Licensee review revealed that neither the traveler nor the EHD indicate that a DV-9 attachment detail was used. The DV-8A(H) is shown on both documents.
- c. Hanger E30-1003-02A-H18 - DV-43 is an alternate detail which replaces all horizontal-to-vertical hardware. The tray connection remains DV-8 when DV-43 is involved. The EHD is correct in reflecting DV-43 as horizontal-to-vertical connection detail. The Tray Attachment Traveler is correct in indicating DV-8 as Tray Attachment detail.
- d. Hanger E26-1003-01A-H8 - Detail DV-53A calls for Tray Attachment to be done per Detail DV-8. Detail DV-8 permits the substitution of Detail DV-9 in place of the "Z-Clip". Installation does conform to design even though DV-53A is noted as the horizontal-to-vertical connection and DV-9 is noted as the Tray Attachment detail.

June 28, 1983

3. Two instances were identified which appear to be examples of documentation missing from the traveler packages. Review of the specific documents revealed the following:
  - a. Hanger E28-1400-R8 - DR 3614 was closed "in process" and, per procedure, it is not included in the traveler package. The DR is included in the DR file.
  - b. Hanger E30-1003-01A-H68 - NCR 7933 was superseded by NCR 7986, which was included in the traveler package. Per procedure, traveler copies of superseded NCRs are not issued or included in the traveler, but are included in the NCR file.
4. DR 2243, applicable to hanger E05-1038-RH2, required that the heat number be corrected on the inspection checklist. The DR directed that the incorrect heat number be lined through and the correct heat number entered. The actual change was made by writing the omitted prefix to the heat number as it appeared on the inspection checklist. DR 2243 was closed, having had the disposition properly implemented.

II. Corrective Action to be Taken to Avoid Further Noncompliance

1. First and second generation travelers have been retrieved from the construction offices and placed in the DRC. These travelers have been indexed to the present travelers (third generation) permitting retrieval of historical information.
2. Procedural clarification has been made to remove the confusing practice of recording attachment type on the hanger traveler. Specific identification will continue to be afforded by reference to the detail number from the EHD.
3. No further corrective action is required.
4. No further corrective action is required.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company was in full compliance as of May 25, 1983.

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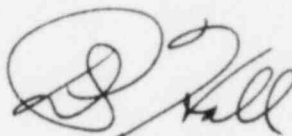
Mr. J. G. Keppler  
NRC Region III

- 5 -

June 28, 1983

I trust that our response is satisfactory to allow closure of the item of noncompliance identified in the Notice of Violation.

Sincerely yours,



D. P. Hall  
Vice President

REC/lf

cc: W. S. Little (Chief Engineering Branch 2, Region III)  
Director, Office of I&E, Washington, D.C. 20555  
NRC Resident Inspector  
Illinois Department of Nuclear Safety  
IP Manager-Quality Assurance