



July 6, 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: 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. Nuclear Regulatory Commission, 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 General Electric Company (CPS NSSS Supplier) Field Deviation Disposition Requests (FDDRs) and Field Disposition Instructions (FDIs). This initial notification was followed by one (1) interim report (Ref: IP letter U-10041, 1605-L, D. P. Hall to J. G. Keppler, dated March 22, 1983). Our investigation has determined that this concern represents a reportable deficiency per 10CFR50.55(e). This letter represents an interim report in accordance with 10CFR50.55(e)(3) and provides an updated status of our investigation and corrective actions.

Statement of Reportable Deficiency

Document control of some design change documents did not ensure that drawings properly identified all outstanding changes. General Electric FDDRs and FDIs received at the Clinton site were not always properly "posted" or identified as outstanding against affected General Electric (G.E.) drawings.

Background

An Illinois Power quality assurance surveillance was conducted in February, 1983, of the IP Startup organization and resulted in two (2) findings regarding document control practices. One finding identified a lack of implementation of a section of Baldwin Associates (BA) (CPS Constructor) procedure 1.10, "Control of G.E. Items/Material/ Activities affected by FDDRs/FDIs". The procedure requires Baldwin Associates Document Control Center to post FDDRs and FDIs as "outstanding" against

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the affected drawings until the G.E. drawing is revised to incorporate the FDDR/FDI. Contrary to this, the FDDR/FDI was sometimes deleted as outstanding against the affected document when the physical work associated with the FDDR/FDI was completed.

The second finding identified a deficiency concerning FDDRs/FDIs that affect Sargent & Lundy (S&L) (CPS Architect/Engineer) schematic and wiring diagrams (E-02 and E-03 series drawings). It was identified that procedures did not require postings of FDDRs/FDIs against affected S&L schematic and wiring diagrams. Therefore, changes to design drawings were not being distributed and used at the locations where the prescribed activities are performed.

Investigation Results

An investigation of this issue was performed and is summarized below:

1. The present practice of performing construction work changes as a result of FDDRs and FDIs is through the use of controlled revisions to the work traveler (package of instructions and drawings required to explain and perform the work). The construction work resulting from the FDDR/FDIs has progressed correctly and in a controlled manner under the direction of a G.E. site representative. Therefore, this 10CFR50.55(e) deficiency concerns the documentation changes to affected file documents and the potential use of these documents for startup testing.
2. BA's practices for posting FDDRs and FDIs against G.E. drawings were evaluated. It was determined that the posting was deleted on completion of the field work specified by the FDDR/FDI. This resulted in a situation where some drawings erroneously reflected the pre-modified design conditions and work control travelers reflected the hardware in the post-modified configuration.
3. A review of IP Startup document control procedures revealed that the mechanics of posting design change documents to G.E. drawings were unclear and did not assure that all unincorporated design change documents were known and evaluated at the time of testing. However, there is no impact on testing at this time since preoperational tests have not yet been performed.
4. The posting of FDDRs and FDIs against S&L design drawings was evaluated. It was confirmed that FDDRs and FDIs were not being posted to these drawings. G.E. design change documents will not be posted directly to S&L drawings, but an S&L design change document will be used to effect the posting of S&L drawings.

5. The investigation determined the main causes contributing to the occurrence were:
 - document control instructions for handling FDDRs/FDIs were not, in all cases, sufficiently detailed,
 - training of personnel in the use and inter-relationship of various G.E. documents was not adequate,
 - administrative support staffing of the document control center was not adequate to support planning and development work.

This problem was found to be unique to the handling of G.E. design changes. BA's design change methods for all other drawings used on CPS were reviewed and found to be adequately controlled by procedures.

Corrective Action

The following actions have been or will be taken to correct this deficiency and to prevent recurrence:

1. Baldwin Associates is revising procedures and instructions to incorporate revised methods of posting design changes. BA will then perform a complete review of G.E. drawings to ensure that the current design change status is indicated.
2. Illinois Power Startup is revising procedures and instructions to clarify how design change documents shall be received, reviewed, and issued in a controlled manner.
3. Upon completion of procedural/instruction revisions, training will be performed for affected Illinois Power and Baldwin Associates personnel on processing of FDDRs/FDIs and in the use/interrelationship of the various G.E. documents.
4. The FDDRs and FDIs that have not yet been incorporated into S&L design drawings have been identified. S&L will issue Field Engineering Change Notices (FECNs) for posting against their design drawings, until the changes are incorporated.
5. Illinois Power has established improved methods to identify the incorporation of G.E. design changes into affected drawings and provide status information regarding superseded drawings.

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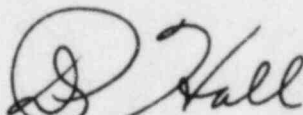
6. Additional staff personnel will be assigned to the Baldwin Associates Document Control Center for the purpose of planning and development work.

Safety Implications/Significance

Investigation of the FDDR/FDI posting problem found that the inadequate document control practices did not have an adverse impact on construction work or testing activities at this time. However, certain drawings did not reflect the approved design changes and the potential exists that future tests and test evaluations may not have accounted for the effects of the design changes. Had this occurred, it could be postulated that design change errors would not be identified during testing, which may affect the safety of operations of Clinton Power Station. Although this assumes several unlikely events, this deficiency is considered significant, and reportable under 10CFR50.55(e).

Illinois Power's corrective action implementation is continuing. Approximately ninety (90) days will be necessary to file a final report on this issue. We trust that this interim report provides you sufficient background information to perform a general assessment of this potentially reportable deficiency, and adequately describes our overall approach to resolve the issue.

Sincerely yours,



D. P. Hall
Vice President

REC/ldf

cc: Manager-Quality Assurance
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Illinois Department of Nuclear Safety
INPO Records Center