

ILLINOIS POWER COMPANY



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U-10130

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

March 16, 1984

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: Response to Notice of Violation dated  
January 27, 1984, NRC IE Inspection Report  
Number 50-461/83-22

Dear Mr. Keppler:

This letter is in response to your Notice of Violation dated January 27, 1984, Inspection Report Number 50-461/83-22. Illinois Power Company's response to the three items of noncompliance is as follows:

1. The Notice of Violation states in part:

...the following examples of inadequate control of a special process were identified:

- a. A concrete wedge expansion anchor was welded to a pipe support plate.
- b. Wire was inserted in the holes of three concrete wedge expansion anchors.
- c. Numerous abandoned anchor holes were improperly patched.
- d. The anchor bolts and abandoned holes violated minimum space requirements.

I. Corrective Action Taken and the Results Achieved

A construction hold on concrete expansion anchor (CEA) installations was placed in effect on November 29, 1983. A Reinspection Plan was established to further investigate the extent of the problem. The construction hold was lifted on January 6, 1984, after the following actions were implemented:

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- a. In-process QC inspections and QC hold points were incorporated into procedure BAP 2.16, Concrete Expansion Anchor Work, and instruction QCI-105, Inspection/Concrete Expansion Anchor Installations. The prescribed inspections will verify that violations such as those cited are properly identified.
- b. CEA training to the revised procedure and instruction was presented to appropriate craft and inspection personnel. Unacceptable installation practices were also discussed in these training sessions.
- c. Only qualified crafts are permitted to install CEAs.

Further investigation of all known CEA installations performed by the specific craftsman identified additional examples of improper installations. Nonconformance Reports were written to document the conditions and to obtain resolution for each installation.

The NRC Region III was notified of a Potential 10CFR50.55(e) Deficiency 55-84-03 on January 11, 1984 on irregularities associated with CEA installation. An interim report on this issue was provided by letter to your office on February 14, 1984 (D. P. Hall to J. G. Keppler, U-10123). The need for further corrective action will be identified and controlled by Potential 10CFR50.55(e) Deficiency 55-84-03.

## II. Corrective Action to be Taken to Avoid Further Noncompliance

Corrective action to preclude recurrence of this noncompliance is provided by the construction program enhancements resulting from the November 1983 construction hold. Craft personnel are now required to complete a training program prior to installing CEAs. Also, procedures BAP 2.16 and QCI-105 were revised to require in-process QC inspection for CEA installations.

## III. Date When Full Compliance Will Be Achieved

Illinois Power Company is in compliance as of this date.

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### 2. The Notice of Violation states in part:

... two cracks in the steel containment liner dome weld seam were identified in writing to the Contractor and Licensee Quality Management as early as August 1983. The defects were identified on nonconformance reports on October 11, 1983. As of November 30, 1983, the defects had not been reported to NRC Region III.

# I. Corrective Action Taken and the Results Achieved

On July 28, 1983, a Potential 10CFR50.55(e) Deficiency referral of possible weld deficiencies on the containment dome liner was referred to Illinois Power Company for evaluation. The specific nature, location, and quantity of weld defects were not known at the time of the evaluation. Certain deficiencies included in the report were previously dispositioned "Use-As-Is" in accordance with the Nonconformance Report process. Based upon the lack of specific information with which to perform an evaluation of the significance of the weld defects, the referral was evaluated as not reportable under the provisions of 10CFR50.55(e). The referral was returned to the constructor with directions to continue investigating the issue and to resubmit the referral if warranted by the discovery of additional details.

During the months of August, September, and October 1983, an Illinois Power Company approved plan was implemented to further investigate the potential weld deficiencies. More details regarding the nature of the weld defects began to appear, including the existence of cracks. According to the plan, a nonconforming condition was to be documented on a Nonconformance Report after the condition was identified and evaluated. The evaluation was intended to prevent duplicate resolutions for conditions previously dispositioned by the subcontractor who performed the original work. Upon completion of all plan actions, the results would be subjected to a review for 10CFR50.55(e) reportability.

As a result of the actions taken in accordance with the plan for investigating the potential weld deficiencies, a Nonconformance Report was prepared on October 11, 1983 documenting the existence of cracks. The Nonconformance Report was progressing toward evaluation for 10CFR50.55(e) reportability when the NRC Inspector inquired into the status of the investigation. An informal review of the existing documentation was made, and the determination was again made that insufficient information was available to determine if a potentially significant deficiency existed. Additional research concluded on November 30, 1983 that a potentially significant deficiency existed. On December 1, 1983, Illinois Power Company notified the NRC Region III of a potentially reportable deficiency (55-83-10) in accordance with the provisions of 10CFR50.55(e).

To determine whether other reportable/potentially reportable conditions exist, a review of past issues determined not to be reportable under 10CFR50.55(e), due to lack of sufficient information, has been completed. No other cases were found.

## II. Corrective Action to be Taken to Avoid Further Noncompliance

Personnel knowledgeable in the existence of the cracks failed to document the nonconforming condition in a timely manner. Appropriate inspection personnel will be retrained in the requirement to document known nonconforming conditions in accordance with procedure BAP 1.0, Nonconformances. Also, licensee Quality Assurance personnel will receive training in the evaluation of referred conditions suspected of being reportable as required by 10CFR50.55(e). Training is scheduled for completion by March 30, 1984.

## III. Date When Full Compliance Will Be Achieved

Illinois Power Company will be in compliance by March 30, 1984.

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### 3. The Notice of Violation states in part:

... in July 1983, chewing gum or a similar substance was found smoothed over or sculptured in an area of porosity in a Containment Liner weld seam. Numerous other weld discontinuities were also identified at this time. As of November 21, 1983, the subject deficiencies had not been documented on a nonconformance report.

## I. Corrective Action Taken and the Results Achieved

The weld discontinuities in the containment liner weld seam were identified during an inspection performed July 20, 1983. A potential 10CFR50.55(e) referral was written rather than the required Nonconformance Reports. The referral was general in nature, and it was evaluated as not reportable based on a lack of specific details. A plan for conduct of further investigation of this issue was initiated in September 1983. Nonconformance Reports were issued on November 30, 1983 to document weld discontinuities found during the investigation to date.

The condition was reviewed by personnel from the constructor and Illinois Power Company, and opinions differed on whether the gum was coated on the exposed surface. Illinois Power Company subsequently contracted for laboratory analysis of the substance applied to the weld. Analysis identified the substance as chewing gum, and the analysis determined that the chewing gum was placed on the weld after application of a zinc primer coating.

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II. Corrective Action to be Taken to Avoid Further Noncompliance

Personnel involved with the identification of weld discontinuities in the containment liner weld seam failed to adhere to established procedures for documenting nonconforming conditions. Procedure BAP 1.0 requires that indeterminate conditions be documented by a Nonconformance Report. The referral of a potential 10CFR50.55(e) deficiency is not an allowable substitute for a Nonconformance Report. Appropriate inspection personnel will be retrained in the proper method of reporting nonconforming conditions. Training is scheduled for completion on March 30, 1984.

Laboratory analysis of the foreign substance on the weld determined that a coating had not been applied over the foreign substance. Further investigation of this issue is being performed in accordance with Potential 10CFR50.55(e) Deficiency 55-83-10.

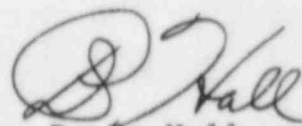
III. Date When Full Compliance Will Be Achieved

Illinois Power Company will be in compliance on March 30, 1984.

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

Sincerely yours,



D. P. Hall  
Vice President

JRS/lag

cc: Director, Office of I&E, US NRC, Washington, DC 20555  
NRC Resident Office  
Illinois Department of Nuclear Safety