



April 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: Amended Response to Notice of Violation dated
January 27, 1984, NRC IE Inspection Report
Number 50-461/83-22-02

Dear Mr. Keppler:

This letter is to provide an amended response to your Notice of Violation dated January 27, 1984, Inspection Report Number 50-461/83-22.

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.

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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 sufficient information was not 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 were retrained in the requirement to document known nonconforming conditions in accordance with procedure BAP 1.0, Nonconformances. Also, licensee Quality Assurance personnel received training in the evaluation of referred conditions suspected of being reportable as required by 10CFR50.55(e). The above training was completed on March 31, 1984.

Additionally, Illinois Power Quality Assurance Procedure QAP 116.04, "Reporting of Deficiencies per 10CFR50.55(e)", was revised on February 14, 1984, to incorporate timely evaluation of referred conditions to Illinois Power Company under the provisions of 10CFR50.55(e). The revision implemented a five (5) working day evaluation period of referred conditions for reportability. If at any time during the five (5) working day period the condition is

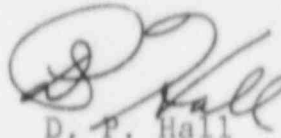
determined to be reportable/potentially reportable, the Nuclear Regulatory Commission will be promptly notified within 24 hours of the determination. If sufficient information is unavailable to determine the reportability of the condition at the end of the five (5) working day evaluation period, the condition will be considered potentially reportable, and the Nuclear Regulatory Commission shall be notified within 24 hours.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company was in compliance on March 31, 1984.

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

Sincerely yours,



D. P. Hall
Vice President

LCF/lag

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