

ILLINOIS POWER COMPANY



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

April 26, 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
February 21, 1984, NRC IE Inspection Report
Number 50-461/83-19

Dear Mr. Keppler:

This letter is in response to your Notice of Violation dated February 21, 1984, Inspection Report Number 50-461/83-19. Illinois Power Company's response to the two items of noncompliance is as follows:

1a. The Notice of Violation states in part:

. . . all Deviation Reports had not been dispositioned in accordance with Baldwin Associates Procedure BAP 1.0.1, Revision 2, Subparagraphs 3.4 and 6.2b.

I. Corrective Action Taken and the Results Achieved

The body of Inspection Report 50-461/83-19 identified several Deviation Reports (DR) which the inspector considered examples of the cited violation. Rather than identifying discrepant hardware, the DRs dealt with deficient documentation associated with particular installations. Each discrepant condition was evaluated, and a disposition was assigned that reworked the documentation to conform with established requirements. Dispositions such as these do not require review by the design organization; therefore, the licensee considers the dispositions to be in compliance with BAP 1.0.1, Sections 3.4 and 6.2.b. The licensee does not consider the use of a DR restricted to hardware conditions.

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II. Corrective Action to Be Taken to Avoid Further Noncompliance

The licensee has evaluated the dispositions described, and has concluded that the resolutions achieved are consistent with procedural controls and regulatory requirements. No further corrective action is considered necessary.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company is in compliance as of this date.

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1b. The Notice of Violation states in part:

. . . acceptance criteria had not been established for dispositioning Nonconformance Reports that identified non-hardware conditions adverse to quality.

I. Corrective Action Taken and the Results Achieved

The procedure applicable to dispositioning Nonconformance Reports (NCRs) is BAP 1.0, Nonconformances. Although this procedure did not specifically address non-hardware deficiencies, procedural controls did exist to assure adequate review of proposed dispositions. Procedure BQA-140, Quality Assurance NCR Review, Section 6.1, provided the criteria used by Baldwin Associates Quality Assurance engineers for reviewing NCRs to assure dispositions adequately resolve the cited nonconformances. However, additional clarifications are considered necessary and have been included in a revision to BAP 1.0.

II. Corrective Action to Be Taken to Avoid Further Noncompliance

Procedure BAP 1.0 was revised to provide for dispositions to non-hardware deficiencies. Actions to correct the deficiencies are assigned to the responsible personnel, and Baldwin Associates Quality & Technical Services is required to verify completion of the dispositions.

Further procedure revisions have consolidated the NCR review process. Procedure BQA-140 has been incorporated into BAP 1.0.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company was in compliance on February 27, 1984, when BAP 1.0, Revision 12, became effective.

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1c. The Notice of Violation states in part:

. . . the plan used to perform a sampling inspection of electrical supports was not formulated in accordance with standard practices of providing adequate justification for the sample size, selection process and acceptance criteria for reviewing results.

I. Corrective Action Taken and the Results Achieved

The sample plan in question was used as part of Corrective Action Request (CAR) 107. Review of the documentation for CAR 107 has confirmed that the sample plan is deficient in several aspects. A revised sample plan will be prepared and executed, providing adequate justification for the sample size, selection process and acceptance criteria for reviewing results.

II. Corrective Action to Be Taken to Avoid Further Noncompliance

Baldwin Associates will establish controls to ensure that persons responsible for preparation and approval of sample plans are adequately qualified.

A review will be performed to verify the adequacy of all sample plans used by Baldwin Associates and Illinois Power Company to accept work or materials for Clinton Power Station. Instances of inadequate sample plans will be documented on the proper nonconformance report form.

III. Date When Full Compliance Will Be Achieved

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

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2. The Notice of Violation states in part:

. . . corrective action was not adequate to substantiate the work of a former electrical Quality Control inspector.

I. Corrective Action Taken and the Results Achieved

The inadequate corrective action cited is in reference to CAR 107, the sample reinspection of a Quality Control inspector's work. After completion of the reinspection required by the sample plan, the results were evaluated for acceptability by a Baldwin Associates Quality Control Engineer. CAR 107 did not provide adequate criteria by which to evaluate the sample plan results. A revised sample plan will be prepared, providing adequate acceptance criteria for reviewing the results.

II. Corrective Action to Be Taken to Avoid Further Noncompliance

Baldwin Associates will establish controls to ensure that persons responsible for preparation and approval of sample plans are adequately qualified.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company will be in compliance by June 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