



March 5, 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 17, 1984, NRC IE Inspection Report  
Number 50-461/83-23

Dear Mr. Keppler:

This letter is in response to your Notice of Violation dated January 17, 1984, Inspection Report Number 50-461/83-23. Illinois Power Company's response to the three items of noncompliance is as follows:

1. The Notice of Violation states in part:

.... Baldwin Associates Procedure BAP 3.3.2, "Cable Installation," was revised to negate the requirement for the inspection and acceptance of seismic Category I raceway prior to the installation of balance of plant cables.

I. Corrective Action Taken and the Results Achieved

Procedure BAP 3.3.2 was revised October 10, 1983, to facilitate the installation of balance of plant (BOP) cables. The procedure revision removed the requirement to perform internal inspection of the raceway while leaving in place the procedural provision that the pull route be complete, clean, and free from defects possibly injurious to the cable. Illinois Power Company issued a directive on October 27, 1983, establishing the project policy for installation of BOP cable. This directive was expanded and superseded on January 3, 1984. Procedure BAP 3.3.2 was revised January 5, 1984, to incorporate the directive requirements for installation of cable in seismic Category 1 cable tray.

Illinois Power Company reviewed cable pulling activities performed between October 10, 1983, and January 5, 1984. It has been determined that no BOP cable was installed in seismic Category 1 raceway during the period in question.

II. Corrective Action to be Taken to Avoid Further Noncompliance

Procedure BAP 3.3.2 was revised on January 5, 1984, to provide requirements for raceway acceptance prior to installation of BOP cables in seismic Category 1 raceway.

III. Date When Full Compliance Will be Achieved

Illinois Power Company is in compliance.

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2. The Notice of Violation states in part:

.... the disposition in response to Deviation Report Number 3239 was found to be inadequate in that it states "Written in error," when in fact it was a valid deviation. This response did not identify the cause, resolution, or the corrective action to prevent recurrence for the identified deviation.

I. Corrective Action Taken and the Results Achieved

Deviation Report 3239 was dispositioned in accordance with information received from the vendor's Quality Assurance representative. However, the acceptability of the as-found condition is not supported by objective evidence of a design engineering evaluation. To document the design engineering disposition, a Nonconformance Report was issued.

Other equipment of the same design was reviewed to identify similar conditions. One additional instance was found and documented on a Nonconformance Report.

II. Corrective Action to be Taken to Avoid Further Noncompliance

The Deviation Report method of documenting nonconforming conditions was cancelled on August 24, 1983. Procedure BAP 1.0, Nonconformances, was revised to encompass those conditions previously addressed by Deviation Reports. Provisions of BAP 1.0 exist for the review of conditions determined to be invalid (analogous to "written in error"). Invalid Nonconformance Reports include a justification statement and include an endorsement by the Illinois Power Quality Assurance organization. The document is closed, and the prescribed distribution is made.

Nonconforming conditions not yet closed before BAP 1.0 Rev. 11 was issued were evaluated. As a result of this

evaluation, new Nonconformance Reports were issued as necessary to ensure adequate disposition. BAP 1.0 controls the processing of all open Nonconformance Reports and Deviation Reports.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company was in full compliance on January 20, 1984.

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3.a The Notice of Violation states in part:

The licensee's contractor, Baldwin Associates, failed to document a known nonconforming condition relating to the degradation of the paint/coating in the upper oil reservoir of the thrust bearing housing of LPCS pump motor number 2E21-C001M, despite the fact that the vendor (General Electric Company) had begun analysis and resolution of this condition.

I. Corrective Action Taken and the Results Achieved

A Nonconformance Report was written on December 14, 1983 to document the identified condition. By review of the inspection history of other equipment of the same design, it has been determined that the condition had not previously occurred. However, routine annual inspections performed in February 1984 identified two (2) instances of coating deterioration since the last annual inspection. Further investigation identified a fourth occurrence. Nonconformance Reports have been written to document deteriorated coating in four (4) motors: 2-RHR, 1-HPCS, and 1-LPCS. Illinois Power Company is pursuing resolution of these conditions with General Electric, the responsible design organization.

II. Corrective Action to be Taken to Avoid Further Noncompliance

Materials control inspectors involved failed to adequately follow procedural requirements. The inspection procedure requires that indeterminate conditions as well as nonconformances be documented on a Nonconformance Report. Training to the procedure requirements was given to the materials control inspection personnel.

III. Date When Full Compliance Will Be Achieved

Illinois Power Company was in full compliance on January 11, 1984.

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

The licensee's contractor, Sargent and Lundy, failed to document an interaction problem in the South Cable Spreading Room concerning fire protection piping in direct contact with safety-related cable tray hanger E30-1003-04A-H18A. A contributing factor is that Sargent and Lundy had not performed an interaction analysis walkdown in this area for approximately 20 months. This is the fourth occurrence in the area of interaction problem identification.

#### I. Corrective Action Taken and the Results Achieved

Potential interactions are identified through periodic plant area walkdowns. Performance of the walkdowns in congested areas, such as the south cable spreading room, has not met the commitment frequency of every three months. Intermediate level managers on the engineering staffs for the licensee and Sargent & Lundy suspended interaction walkdowns because of such difficulties as interaction criteria too conservative, incomplete construction, and inadequate interaction team staffing. Senior management was not advised of the suspension, and the review of progress reports was not sufficiently detailed to identify this improper action. Appropriate management personnel have been counseled regarding the need to coordinate technical decisions with regulatory commitments. An interaction walkdown schedule will be implemented by April 1, 1984. Illinois Power Company senior management will be advised of interaction program progress through periodic reports.

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

A schedule for performing interaction walkdowns will be issued to support walkdowns of congested areas every three months. Interaction team staffing levels will be increased as necessary to meet this schedule. The schedule will be distributed to the appropriate personnel involved in the activity. A progress report against this schedule will be made on a periodic basis. After the schedule has been implemented, progress will be evaluated, including a determination by Illinois Power Company that the staff levels are appropriate to satisfy commitments.

Illinois Power Company has directed Sargent & Lundy to institute a commitment control program. The actions necessary for Sargent & Lundy to meet Illinois Power Company commitments will be tracked, and a periodic status report will be distributed to Illinois Power Company. The commitment control program was endorsed by Illinois Power Company on February 1, 1984.

March 5, 1984

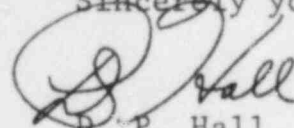
III. Date When Full Compliance Will Be Achieved

Illinois Power Company will be in full compliance by July 1, 1984, when one cycle of three month reviews is complete.

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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