



March 7, 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

| PRINCIPAL STAFF | | | |
|-----------------|-----|-------|--|
| RA | has | DPRP | |
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| A/RA | | DRMSP | |
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| SGA | | ML | |
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Subject: Proposed Modifications to Prerequisites for
Pulling Class 1E Cable

- Reference: 1) Letter J. G. Keppler to W. C. Gerstner, dated
July 22, 1983
- 2) D. P. Hall memo dated January 3, 1984

Dear Mr. Keppler:

Prerequisites for pulling class 1E cable were established in Reference 1 and further defined by Illinois Power in Reference 2 (attached). The purpose of this letter is to modify certain prerequisites established in Reference 2.

Illinois Power is confident that these modifications will maintain the quality of the final product and achieve the advantages outlined below. Further, Illinois Power has increased confidence in our ability to control the electrical construction work, as evidenced by management changes, procedural enhancements, the significant reduction in reject rates of electrical hangers, and the lifting of Stop Work Orders associated with pulling class 1E cable.

Reference 1 established the following prerequisites, "...before safety related cable is pulled, the electrical raceway system involved will be inspected and all nonconforming conditions corrected in accordance with your established Level III scheduling system." Reference 2 implemented the prerequisite in the following manner. Prior to any class 1E cable pull:

- A. Cable tray in the pull path is field inspected and accepted by Baldwin Associates Quality & Technical Services (BA Q&TS).
- B. Cable tray attachments in the pull path are field inspected and accepted by BA Q&TS.

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- C. Cable tray hangers shall be BA Q&TS field inspected and accepted. This is accomplished when a hanger is field accepted for the first time by BA Q&TS.

Illinois Power is proposing the following modifications to the program established by Reference 2 for your concurrence. Prior to any Class 1E cable pull:

- A. Cable tray in the pull path is field inspected and accepted by BA Q&TS.
- B. Cable tray attachments in the pull path are field inspected and accepted by BA Q&TS.
- C. An engineering evaluation will be performed on cable tray hangers in the pull path to assure that the tray is adequately supported and that any future work on the hangers will not damage the pulled cable. This evaluation will be documented.

Cable tray hangers will be reworked and reinspected on an area basis by a dedicated team of Field Engineers and Quality and Technical Services Inspectors. Any nonconformances will be documented, dispositioned and reworked and the travelers submitted for final review and vaulting. Progress will be documented on a weekly basis and be visible for review.

Certain advantages will be realized by performing the cable tray hanger traveler reviews, reinspection, and rework on an area basis instead of the present method in support of turnover packages. These advantages are:

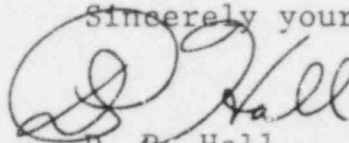
- A. More efficient use will be made of all quality and engineering manpower. Work will be concentrated in one localized area rather than working isolated hangers in all areas of the plant. This will allow intensified quality surveillances and will concentrate resources on cable tray hanger completion.
- B. More efficient operation and clearer priorities for the final review effort will result in travelers moving rapidly through the final review cycle and into the records vault.
- C. Rework being performed at a single point in time will allow cables to be protected in an entire area, minimizing the possibility of cable damage. Further, the approach allows more efficient quality surveillance of the operation.

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- D. Scaffolding can remain in place for BA Field Verification and IP Overinspection which results in enhanced utilization of manpower.

I trust this information is sufficient to allow an adequate evaluation by your staff and subsequent concurrence. Should you require additional information on this matter, please contact Illinois Power.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'D. P. Hall', is written over the typed name.

D. P. Hall
Vice President

LCF/lag

Attachment

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

ATTACHMENT I

January 3, 1984

J. H. MacKinnon, V-650
W. Connell, V-905
L. Osborne, V-900

INSTALLATION OF CABLE IN SEISMIC CATEGORY I CABLE TRAY

Prior to installing balance of plant (BOP) and Class 1E cable in seismic Category I cable trays, the raceway system shall meet the following requirements:

I. BOP Cable

- A. Cable tray in the pull path is field inspected and accepted by BA Q&TS.
- B. Cable tray attachments in the pull path are field inspected and accepted by BA Q&TS.
- C. BA engineering will perform an evaluation of cable tray hangers in the pull path to assure that the tray is adequately supported and that any future work on the hangers will not damage the pulled cable. This evaluation shall be documented.

II. Class 1E Cable

- A. Cable tray in the pull path is field inspected and accepted by BA Q&TS.
- B. Cable tray attachments in the pull path are field inspected and accepted by BA Q&TS.
- C. Cable tray hangers shall be BA Q&TS field inspected and accepted. This is accomplished when a hanger is field accepted, for the first time, by BA Q&TS.

III. Statusing

- A. The status of all trays, attachments, and hangers associated with both BOP and Class 1E cable pull paths shall be documented by Baldwin Associates Resident Engineering prior to the cable pull. The BA Project Manager shall review this status and confirm that the necessary prerequisites have been completed to pull cable.
- B. BA Q&TS shall conduct surveillances as required to assure that randomly selected items defined in III.A are correct.

January 3, 1984

IV. Outstanding Issues

The cable tray hanger reinspection program which IP committed to perform and was acknowledged in the NRC letter dated August 26, 1983, will be performed, but will not be a prerequisite for pulling BOP or Class 1E cable. Cable tray hangers shall be final accepted prior to turning over an area to IP.

Other issues which do not require resolution prior to pulling cable include:

- A. Reinspection and rework of auxiliary steel, which is necessary to assure compliance with the AISC Code.
- B. Potential reinspection and rework of shop welds performed by Burndy Husky on cable tray hangers and components.
- C. Reinspection and rework of tray hanger welds necessary to resolve CAR 117.
- D. Rework resulting from potential material traceability.

Any future issues will be incorporated into the cable tray hanger reinspection plan, if practical, or addressed with separate plans and schedules.


V. Plans

Plans for resolving specific issues listed in Section IV will be developed by 1/06/84. These plans shall be approved by BA QA and IP QA management.

VI. Definition

Field acceptance by BA Q&TS means that all nonconforming items have been dispositioned and corrected, except for those items whose correction is associated with one of the outstanding issues identified in Part IV of this memorandum.

The elements of this letter shall be incorporated into the appropriate BA Procedures and Instructions prior to pulling BOP or Class 1E Cable.


D. P. Hall

WC/REC/lag

cc: J. E. Loomis, V-650
W. J. Harrington, V-500
H. H. Livermore, USNRC, V-690