

ILLINOIS POWER COMPANY



1605-L  
U-10160

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

June 13, 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: Potential 10CFR50.55(e) Deficiency 55-84-01  
Design Change Control (NCRs/FCRs)

Dear Mr. Keppler:

On January 11, 1984, Illinois Power Company notified Mr. R. C. Knop, NRC Region III, (ref: IPC memorandum Y-18979 dated January 11, 1984) of a potentially reportable deficiency per 10CFR50.55(e) concerning the control of field design changes at Clinton Power Station (CPS). This initial notification was followed by one (1) interim report (ref: IPC letter U-10126, D. P. Hall to J. G. Keppler dated February 21, 1984). Our investigation of this issue is continuing, and this letter represents an interim report in accordance with the requirements of 10CFR50.55(e).

#### Statement of Potentially Reportable Deficiency

Potential problems have been identified with the coordination and control of field-initiated design changes between Sargent & Lundy (CPS Architect/Engineer) and Baldwin Associates (CPS Constructor). The problems pertain to the revision of Field Change Requests (FCRs) and Nonconformance Reports (NCRs), their incorporation into affected design documents, and the identification of all directly affected documents on the FCRs/NCRs. An investigation and evaluation of this issue is being performed to determine the extent of this problem, affect on installed hardware, and significance on the safety of operation of CPS.

#### Background/Investigation Results/Corrective Action

As a result of Illinois Power Company Quality Assurance audits, findings were written to document problems identified in the area of control of field design changes for CPS. The

8406220238 840613  
PDR ADOCK 05000461  
S PDR

JUN 18 1984

IE27  
110

findings concerned procedural requirements defining the design change interface between the CPS Architect/Engineer and CPS Constructor. The specific nature of the concerns includes the following:

1. FCRs were identified that were not posted against or incorporated into all referenced design drawings. This inhibits verification of document status within the Constructor's document control system.
2. FCRs were revised and incorporated into design drawings without noting the FCR revision number on the design drawings. This inhibits verification that the FCR revision was incorporated into the design drawing.
3. The Constructor's procedures for processing revisions to FCRs did not allow revision after the specific work completion and work document closure. As a result, revised FCRs and NCRs must be reviewed to ensure that the documentation and/or hardware changes were accomplished.

An investigation plan was prepared and implemented by Illinois Power Company (IPC) to investigate the above concerns. The plan included: 1) a review of FCRs/NCRs issued prior to December 1, 1983, to assure that the directly affected documents associated with the field design change have been properly identified, 2) review of requests for revision to FCRs/NCRs to ensure that hardware installations were performed, where required, and agree with the latest plant design. Procedures used by affected organizations for the control of field design changes are being reviewed for consistency and interfacing adequacy. The methods for controlling revisions to other types of design change documents, such as Field Engineering Change Notices (FECNs), are also being evaluated for adequacy.

To date, approximately 25,000 FCRs/NCRs have been reviewed to identify directly affected design documents. Additional affected design documents were identified for approximately 50% of the 25,000 FCR/NCR's that were reviewed. The newly identified affected documents are primarily due to the past practice of listing on the FCR/NCR, only those affected documents that would be posted and incorporated. Current procedures require all affected documents to be identified and listed on the FCR/NCR, indicating incorporation/non-incorporation. The newly identified affected design documents may not be posted or incorporated into the design document, but will be entered into the IPC computer data base for traceability. The IPC computer data base will be utilized to maintain up-to-date information on the latest revision and incorporation status of each FCR/NCR for document control interfacing between S&L, BA, and IPC. The data base will be utilized by the Constructor to verify installation conformance to the latest revision of documents affecting design.

A review has been performed of all S&L letters issued from July, 1981 to September, 1983, pertaining to request for revision to FCR/NCR's. Of the 1,550 change documents identified by this review, approximately 250 require documentation/field verification that affected installations conform to the latest plant design. New FCR/NCR's were generated to ensure completion of action, where required, by the documents reviewed.

The practice of revising FCR/NCRs was discontinued by Baldwin Associates. Procedural changes are being developed to provide adequate guidance for correcting the disposition of a FCR/NCR which is determined to be incorrect, inadequate or incomplete.

The methods for controlling changes to other engineering-construction interface documents, such as ECNs, FECNs, and ECPs, are being evaluated to verify that they are satisfactorily controlled.

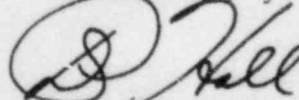
The scope and root cause of these concerns have not yet been identified, such that a determination of complete remedial and generic corrective action can be made. However, all FCRs/NCRs issued in the future will have the directly affected documents listed in the IP computer data base, along with the status of incorporation.

#### Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is evaluated. It is anticipated that approximately ninety (90) days will be necessary to complete our investigation and to file a final report on this issue.

We trust that this interim report provides you sufficient background information to perform a general assessment of this potentially reportable deficiency and adequately describes our overall approach to resolve the issue.

Sincerely yours,



D. P. Hall  
Vice President

RLC/cah(NRC)

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