

ILLINOIS POWER COMPANY



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U-10267
CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

April 19, 1985

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: Revised Commitments for Maintaining Electrical Hanger Drawings

Dear Mr. Keppler:

This letter is in reference to prior commitments made by Illinois Power Company relative to electrical raceway support deficiencies identified in an NRC IE Inspection Report and identified as a 10CFR50.55(e) deficiency. Attachment A provides the details for the revised commitment to Notice of Violation, dated April 21, 1981, NRC IE Inspection Report 50-461/81-05, failure to control as-built electrical hanger drawings. Attachment B provides the details for the revised commitment to the Illinois Power Company Final Report U-0307, dated November 10, 1981, 10CFR50.55(e) Deficiency 80-09, inadequate construction control of electrical raceway hanger installation.

I trust that our clarifications are satisfactory to maintain compliance with regulatory requirements.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'W. Connell'.

W. Connell
Manager - Quality Assurance

JRS/lr (NRC1)

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

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ATTACHMENT A

Illinois Power Company
Clinton Power Station
Docket No. 50-461

Subject: NRC IE Inspection Report 50-461/81-05, Failure to
Control As-Built Electrical Hanger Drawings

The violation identified by the NRC inspector was:

...the licensee failed to provide quality assurance controls over the preparation, review, and approval of "As-Built" electrical hanger drawings....For example:

- b. No program was established to ensure that approved "As-Built" design parameters would be implemented into the base design documents. As a result, the use of an alternate hanger detail contrary to that specified in the base design criteria was approved.

The violation was documented by NRC IE Inspection Report Number 50-461/81-05, dated April 21, 1981. Illinois Power Company letter U-0244, dated June 11, 1981, responded to the item of noncompliance. Paragraph 9(a) of letter U-0244 stated that Electrical Hanger Drawings (EHD) would be submitted to Sargent & Lundy by Baldwin Associates for review and status. Recent procedural changes necessitate clarifying this statement.

Baldwin Associates controls the generation of an EHD in accordance with procedure BAP 3.3.6, Electrical Raceway Support Installation. Design details provided by Sargent & Lundy are assembled onto an EHD which is reviewed and status assigned by Sargent & Lundy prior to beginning installation. Subsequent changes to the EHD may cause the drawing to be redlined to show the change. Baldwin Associates will redraft the EHD in order to maintain clarity. Resubmittal to Sargent & Lundy is not required because the changes being incorporated for clarity are approved design changes. The EHD continues to represent an approved design configuration.

ATTACHMENT B

Illinois Power Company
Clinton Power Station
Docket No. 50-461

Subject: 10CFR50.55(e) Deficiency 80-09, Inadequate Construction
Control of Electrical Raceway Hanger Installation

The Statement of Reportable Deficiency, Illinois Power Company Final Report U-0307, 10CFR50.55(e) Deficiency 80-09, states in part:

...electrical raceway hangers were found to be in non-conformance with approved current revision design documents.

Corrective action to Deficiency 80-09 was summarized in Illinois Power Company Final Report U-0307, dated November 10, 1981. Controls were enhanced to "facilitate the accurate documentation of constructed hanger details" while maintaining adherence to approved design. Recent procedural changes have revised the method of implementing this commitment. This clarification addresses the procedural controls used to ensure adherence to the approved design established by Sargent & Lundy.

Baldwin Associates controls the generation of EHDs in accordance with procedure BAP 3.3.6, Electrical Raceway Support Installation. Design details provided by Sargent & Lundy are assembled onto an EHD which is reviewed and status assigned by Sargent & Lundy prior to beginning installation. Subsequent changes to the EHD may cause the drawing to be redlined by the Baldwin Associates Resident Engineer to show the change. Baldwin Associates will redraft the EHD in order to maintain clarity. The redrafted EHD is reviewed and controlled as prescribed by procedure BAP 3.3.6. Resubmittal to Sargent & Lundy is not necessary as the redrafting activity serves only to incorporate previously approved changes.