

ILLINOIS POWER COMPANY



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

Docket No. 50-461

May 3, 1985

Mr. James G. Keppler
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Illinois Power Company Responses to Illinois Attorney
General Questions and Comments Concerning Overin-
spection Program

Dear Mr. Keppler:

Enclosed for your information are Illinois Power Company (IP) responses to the questions and comments submitted to the Nuclear Regulatory Commission (NRC), Region III by the Illinois Attorney General (IAG) concerning: 1) IP's February 1985 Report entitled "Results of Quality Programs for Construction of Clinton Power Station", (Results Report); and 2) IP's March 29, 1985 letters U-0828 and U-0827 concerning termination of the Over-inspection Program for piping and mechanical supports and Over-inspection Program implementing procedure revision, respectively.

Enclosure 1 contains IP's responses on those matters within its purview to IAG questions and comments forwarded by the IAG's letter (Allen Samelson to J. G. Keppler), dated April 12, 1985 and concerning IP's Results Report. Enclosure 2 and 3 contain IP's responses, on those matters within its purview, to the IAG questions and comments forwarded by the MHB Technical Associates letter (Richard B. Hubbard to Robert F. Warnick), dated April 18, 1985 and concerning IP's letter U-0828 and U-0827, respectively.

If you or your staff have any questions concerning the enclosed responses, please contact Mr. Frank Spangenberg of my staff.

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G PDR

Sincerely yours,

D. P. Hall
Vice President

JEK/jsp

Attachments

cc: Director, Office of I&E, USNRC, Washington, D.C. 20555
B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety
Allen Samelson, Assistant Attorney General, State of
Illinois

ATTACHMENT 1

IP RESPONSES TO

ILLINOIS ATTORNEY GENERAL APRIL 12, 1985

COMMENTS AND QUESTIONS

In what follows, each Illinois Attorney General April 12, 1985 comment and/or question is quoted and IP's response is provided:

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ATTORNEY GENERAL COMMENT 1: (pp. ES-3, ES-8, ES-9, and III-1 and III-2)

IP concluded that its reinspections "have not revealed any nonconformances which have safety-significance" where a safety-significant nonconformance is defined as a condition which "even if the nonconformance were to have remained unidentified by the Overinspection Program, it would not have resulted in a loss of capability of a structure, system, or component to perform its intended safety function." In contrast, the QA criteria of Appendix B to 10 CFR Part 50 establishes a different standard for providing reasonable assurance that Clinton can be operated without endangering the public health and safety. Thus, Appendix B provides that IP shall establish and execute a quality assurance program comprised of "all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or a component will perform satisfactorily in service." First, how does the "adequate confidence" standard provided by compliance with the 18 criteria of Appendix B compare with the "safety-significant" nonconformance standard proposed by IP? Second, which of the two standards is the appropriate NRC threshold for developing the "reasonable assurance" required by the NRC prior to its issuing an operating license? (Also, see D. P. Hall letter of February 13, 1985 which states that the purpose of the IP report is to demonstrate that there is reasonable assurance regarding the as-built condition of Clinton).

IP RESPONSE TO COMMENT 1:

- a. The adequate confidence standard is specified by 10CFR50, Appendix B, for the CPS QA Program.
- b. The "safety significant" nonconformance standard was defined and specified by IP for the particular

purpose of the engineering evaluation performed by S&L and reported in the February, 1985 Report, entitled "Results of Quality Programs for Construction of Clinton Power Station" (Results Report), and the April 1985 report entitled "Update to Results of Quality Programs for Construction of Clinton Power Station" (Updated Results Report).

- c. The Overinspection Program is a supplement to and not a substitute for the normal QA Program.
- d. The results of the Overinspection Program confirm that the normal CPS QA Program provides adequate confidence within the meaning of 10CFR50, Appendix B. See Results Report and Updated Results Report.
- e. The CPS QA Program, the entire set of programs and actions described in the February, 1985 Results Report, and the actions taken by IP to meet all applicable regulatory requirements for CPS design, construction and operation provide the requisite reasonable assurance for issuance of an operating license.

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ATTORNEY GENERAL COMMENT 2: (p. ES-7 and pp. IV-24 to IV-27)

Does the NRC plan to verify the adequacy and timeliness of IP's commitment "to include computer-assisted trending of conditions adverse to quality, analyses of individual conditions to identify root causes, and notification to senior management of the results of trend analyses?" How often are the results of trend analyses provided to senior management? (p. IV-27)

IP RESPONSE TO COMMENT 2:

- a. Question addressed to NRC.
- b. The results of trend analyses are provided to IP senior management on a monthly basis.

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ATTORNEY GENERAL COMMENT 3: (pp. ES-7 and IV-23)

What were the results of IP's verification of "existing inspector certifications"? Were any corrective actions initiated? Does the NRC plan to review the IP findings, and if so, when and to what extent?

IP RESPONSE TO COMMENT 3:

- a. IP's verification of "existing inspector certifications" is discussed in more detail in the IP August 1984 report entitled "Quality Improvements and Confirmatory Actions" (QICA Report), page 39. Actual qualification and certification were determined to be acceptable. See NRC Inspection Reports 82-18 and 84-02.
- b. Corrective actions taken by IP are described in the QICA Report, page 39.
- c. Question addressed to NRC. However, NRC has already reviewed and closed this matter. See NRC Inspection Reports 82-18 and 84-02.

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ATTORNEY GENERAL COMMENT 4: (p. IV-2)

To what extent were previously installed and accepted large bore pipe supports reinspected using the new procedure?

IP RESPONSE TO COMMENT 4:

- a. The Overinspection Program resulted in re-inspections of pipe supports. The results are presented in the IP February 1985 Results Report, the IP March 29, 1985, letter from D. P. Hall to J. G. Keppler (U-0828), and the IP April 1985 Updated Results Report.

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ATTORNEY GENERAL COMMENT 5: (p. IV-6)

Has the NRC verified the adequacy of the fracture mechanics/crack propagation analysis performed by S&I of the potential flaws identified in the drywell refueling bellows?

IP RESPONSE TO COMMENT 5:

- a. NRC concurred in lifting the Stop Work Action (SWA) on 5/19/83. See Results Report, Tables IV-1 and Figure IV-1, and Appendix C.

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ATTORNEY GENERAL COMMENT 6: (pp. IV-7 and IV-8)

To what extent were previously accepted spare and replacement parts reinspected to assure that PSAR and FSAR commitments were met?

IP RESPONSE TO COMMENT 6:

- a. Reinspections were not considered necessary. The actions described at pages IV-7 - IV-8 of the Results Report were sufficient.
- b. NRC concurred in lifting the SWA on 4/26/83 and 5/19/83. See Results Report Table IV-1 and Figure IV-1, and Appendix C.

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ATTORNEY GENERAL COMMENT 7: (pp. III-4 and IV-17)

IP relies upon the "extensive programmatic improvements" described in "Summary of Quality Improvements and Confirmatory Actions (QICA)" for Clinton which was submitted to the NRC on August 30, 1984. How does the NRC plan to systematically evaluate the scope, implementation, and timeliness of all the QICA actions?

IP RESPONSE TO COMMENT 7:

- a. Question addressed to NRC. However, NRC has been well aware of the actions in question and has conducted more than 100 inspections at the site since 1981-1982. See Results Report, Appendix K, pages K-23 thru K-51 and subsequent NRC Inspection Reports in 1984 and 1985.

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ATTORNEY GENERAL COMMENT 8: (p. IV-30)

To what extent does IP's QA program include surveillances and audits of the technical adequacy of design and construction features as opposed to reviews of compliance with procedural attributes? For example, the Overinspection Program addresses the adequacy of some of the construction attributes. However, the IP audits set forth in Appendices B and L seem to be largely limited to a review of deviations from procedural requirements.

IP RESPONSE TO COMMENT 8:

- a. The technical adequacy of the CPS design was confirmed by the Independent Design Review (IDR).
- b. The technical adequacy of CPS construction has been assured by the CPS QA Program and confirmed by the programs and actions described in the February Results Report and April Updated Results Report.

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ATTORNEY GENERAL COMMENT 9: (p. V-1)

Does the NRC plan to conduct an independent assessment of S&L's "engineering evaluation of the safety-significance of the nonconformances identified by the program"? If so, when and to what extent?

IP RESPONSE TO COMMENT 9:

- a. Question addressed to NRC.

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ATTORNEY GENERAL COMMENT 10: (p. V-1)

Does the NRC plan to conduct an independent assessment of IP's "quantitative analyses of the results of the Overinspection Program"? If so, when and to what extent?

IP RESPONSE TO COMMENT 10:

- a. Question addressed to NRC.

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ATTORNEY GENERAL COMMENT 11: (pp. V-5 and V-21)

Does the NRC approve of IP's acceptance quality level for critical attributes (i.e., "95% confidence exists that at least 95% of the critical attributes in the entire lot under investigation are conforming")? Where is the NRC's review of the preceding acceptance criteria documented? What attributes do IP and the NRC consider to be "critical attributes"?

IP RESPONSE TO COMMENT 11:

- a. Question addressed to NRC. However, the NRC concurred in the IP Overinspection Program Plan in December of 1983, which is the source of this criterion. See Results Report, page V-1.

- b. Over 90% of the attributes inspected in the OI program are designated critical. The individual checklists identify the attributes in this respect.

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ATTORNEY GENERAL COMMENT 12: (p. V-8)

The Overinspection Program appears generally limited to safety-related items. Will the NRC require IP to conduct an Overinspection Program for structures, systems, and components "important to safety" but not "safety-related" as defined by GDC-1 of Appendix A to Part 50? Note: IP acknowledges that it expects that such items will "contain proportionally more nonconformances than the safety-related structures, systems, and components."

IP RESPONSE TO COMMENT 12:

- a. The Overinspection Program and its associated scope (safety-related, fire protection, and Aug D [rad-waste]) were the subject of NRC concurrence in December 1983. See Results Report, page V-1.
- b. IP does not use the term "important to safety" in connection with the OI Program. The quote is out of context. The quote relates to Aug D (radwaste) and fire protection because the QA program was applied to these systems after installation. See Results Report, page V-8 and Appendix D, Part E.

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ATTORNEY GENERAL COMMENT 13: (p. V-12 and Appendix D, Part D)

Since "S&L was unable to determine the precise impact of these nonconformances on the affected items because the items had been reworked and the NCRs did not contain sufficient information to permit performance of detailed engineering calculations", how could S&L determine the extent of the nonconformance in order to draw a conclusion regarding the significance? What is the technical justification for not accounting for "two individual nonconformances"?

IP RESPONSE TO COMMENT 13:

- a. IP did evaluate the safety significance of the two nonconformances. A calculation could not be performed for the nonconforming condition so a worst case analysis was done that assumed the item

to fail. The two nonconformances were accounted for. See Results Report, Appendix D, Part D, pages D-24--25.

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ATTORNEY GENERAL COMMENT 14: (p. V-12)

What are the root causes within the QA program that enabled the nonconforming conditions cited herein to remain undetected by the normal QA/QC measures (i.e., weld size, undercut, arc strike, etc.)? Doesn't the reported nonconformance rate, and the root causes of the nonconformances, suggest that the approximately 95% of the construction attributes not addressed by the samples included in the Overinspection Program should be reinspected in whole or in part?

IP RESPONSE TO COMMENT 14:

- a. Root causes were addressed in connection with the Stop Work Action's and their respective Recovery Programs. See Results Report, Pages IV-1--16.
- b. No.
- c. NRC concurred in lifting the SWA's. See Results Report, Table IV-1.
- d. The OI Program confirms the quality of CPS construction. See Results Report, Chapter V, and Updated Results Report, Chapter V. The OI Program also provides a basis from which conclusions can be drawn regarding the quality of construction for the categories of items that have not been inspected under the Overinspection Program. See Results Report, Chapter V C.5. and Updated Results Report, Chapter V C.5.

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ATTORNEY GENERAL COMMENT 15: (p. V-20)

Does the NRC plan to review the crack propagation analyses and acceptance criteria utilized by S&L to accept welds with cracks? For such cracked welds, is additional strain gage-monitoring or leak detection appropriate? Why were the cracks not originally detected by the QA/QC inspections?

IP RESPONSE TO COMMENT 15:

- a. Question addressed to NRC.

- b. All cracked welds were reworked.
- c. The S&L analysis was done on the hypothetical assumption that the cracks remained undetected. See Results Report, Pages V-10--11 and Appendix D, Part B.8.
- d. It is not possible to determine the exact cause at this time. All cracks were analyzed by S&L and none were found to be safety significant. IP is reinspecting 100% of accessible structural steel. See Results Report, Appendix D, Part B.8 and page V-24.

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ATTORNEY GENERAL COMMENT 16: (p. V-22)

Are there practical non-destructive techniques for examining the conformance of the inaccessible structural steel members? Has S&L conducted an engineering evaluation of inaccessible structural steel members assuming "that the conformance rate for structural attributes is 92.3%" which is consistent with the rate developed for the field verification of accessible members (also, see p. V-29 regarding the validity of this assumption)?

IP RESPONSE TO COMMENT 16:

- a. No. There are no practical NDT techniques.
- b. Yes. Given the results of S&L engineering evaluations, no adverse safety impact is associated with inaccessible structural steel. See Results Report, Appendix D, Part B.8 and Chapter V C.5.

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ATTORNEY GENERAL COMMENT 17: (pp. V-25 and V-27)

What are the root causes within the QA program which resulted in an "84.4% field verification conformance rate" for mechanical equipment and a "conformance rate for new electrical equipment. . . (of) 84.6%"? What corrective actions are or will be initiated to remedy these conditions?

IP RESPONSE TO COMMENT 17:

- a. New data (12-31-84), from the Updated Results Report, Table V-4, shows:

Electrical Equipment - 93.1%
Mechanical Equipment - 93.8%

- b. The Overinspection Program will be continued for these commodities pending further data and evaluation. See Updated Results Report, pages V-25--26.
- c. The electrical equipment SWA and Recovery Program addressed all root causes for electrical equipment and described the appropriate corrective action. See Results Report, Table IV-1 and Appendix C, page C-12.

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ATTORNEY GENERAL COMMENT 18: (p. V-28)

Doesn't IP's justification herein for not looking at civil work fail to support its conclusion? For example, since the events leading to the series of Stop Work Orders in 1982 demonstrated that the overall quality of construction was unacceptable, that conclusion is applicable to civil construction since BA performed both the civil work and most of the remaining construction work at Clinton.

IP RESPONSE TO COMMENT 18:

- a. The problems resulting in the SWO's were essentially programmatic in nature and related to matters such as backlogs of inspection activities and documentation deficiencies.
- b. The OI Program shows that overall hardware quality in the areas subject to the SWO's is, in fact, acceptable. See Results Report, Chapter V and Updated Results Report, Chapter V.
- c. The programmatic problems in the areas of the SWO's were not experienced in civil work. Moreover, since the overall quality of CPS construction has been demonstrated to be acceptable there is no basis to conclude that the quality of the civil work is unacceptable.
- d. SALP-1, 2, and 3 rated Civil areas as adequate. SALP-4 did not rate Civil areas because there was very little Civil work still in progress. SALP-1 stated that the noncompliance history for Civil

activities appeared to be average when compared with other facilities at approximately the same stage of completion.

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ATTORNEY GENERAL COMMENT 19: (p. VI-4)

Since the disposition of the 587 NCRs in the Records Review resulted in over 25% (19 + 129) of the 587 nonconformance being reworked, doesn't this result suggest that expanded record verification reviews are appropriate?

IP RESPONSE TO COMMENT 19:

- a. No. Rework does not necessarily mean a hardware problem.
- b. More importantly, there are no safety significant nonconformances resulting from the Record Verification Program. See Results Report, Chapter VI and Updated Results Report, Chapter VI.

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ATTORNEY GENERAL COMMENT 20: (p. VI-5)

Does the NRC plan to conduct an independent assessment of S&L's engineering evaluation of the 171 NCRs documenting nonconforming conditions developed in the Records Verification? If so, when and to what extent?

IP RESPONSE TO COMMENT 20:

- a. Question addressed to NRC.

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ATTORNEY GENERAL COMMENT 21: (p. VII-3)

IP acknowledges that "questions have been generated" as a result of reviewing the material control procedures. First, when will these questions be resolved? Second, how does the NRC plan to review these areas now being resolved?

IP RESPONSE TO COMMENT 21:

- a. They have not been resolved. They will be resolved by May 31, 1985.
- b. Question addressed to NRC.

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ATTORNEY GENERAL COMMENT 22: (p. VII-20)

How does IP plan to document the results of the stress reconciliation walkdowns conducted in response to the requirements of NRC/IE Bulletin 79-14?

IP RESPONSE TO COMMENT 22:

- a. As-built packages are reviewed by S&L and GE and the results are documented in the individual system stress reports. See Results Report, pages VII-20-21.

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ATTORNEY GENERAL COMMENT 23: (pp. VII-21 to VII-24)

Why was no hardware reinspected or retested retrospectively in response to the deficiencies identified in the Management Corrective Action Program (MCAP)? Also, see Table VII-3.

IP RESPONSE TO COMMENT 23:

- a. The corrective actions taken were appropriate in light of the particular nature of the problems identified. No need for reinspection or retest was disclosed.

ATTACHMENT 2

IP RESPONSE TO ILLINOIS ATTORNEY GENERAL'S
APRIL 18, 1985, COMMENTS AND QUESTIONS CONCERNING
IMPLEMENTATION OF ILLINOIS POWER COMPANY OVERINSPECTION PROGRAM
IP LETTER U-0827 DATED 3/29/85

The Illinois Attorney General's comments and questions and IP's response to each are as follows:

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IAG QUESTION 1: (p.1, para. 2) Are all samples selected in a random fashion? If non random or judgement samples are ever utilized, describe the extent and purpose of such sampling. Are items in the population ever excluded from the lot being sampled (i.e. inaccessible, etc.) If items are excluded, describe the extent of such practices.

IP RESPONSE TO IAG QUESTION 1:
All samples are selected randomly using either a computerized random number generator or random number tables.

Exclusion of items from samples can occur for the reason stated in IP's February 1985 Report entitled "Results of Quality Progress for Construction of Clinton Power Station" (Results Report), Chapter V, Paragraph C.5, Part d, "Inaccessible Items". Exclusion of inaccessible items from samples does not affect IP's conclusions regarding the quality of CPS construction for the reasons stated therein.

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IAG QUESTION 2: (p.1, para. 4) Describe the nonconforming attributes which IP defines as "superficial and insignificant" which have resulted in reinspections.

IP RESPONSE TO IAG QUESTION 2: Examples of these types of nonconforming attributes include cosmetic arc strikes, weld spatter, minor cases of surface slag and undercut on welds, minor documentation errors, etc.

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IAG QUESTION 3: (p.2, Acceptable Lots) Does IP intend that the 95/5 acceptance criteria apply to the lot or to a subpopulation consisting of specific attributes? What is IP's proposed definition of a "significant" nonconforming condition?

IP RESPONSE TO IAG QUESTION 3:
The 95/5 Acceptance Quality Level applies to the lot. IP has not proposed a definition of "significant" in the context of the Overinspection Program other than the

definition of "safety significant" which appears in the Results Report, Chapter V paragraph B. For acceptable lots this definition applies.

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IAG QUESTION 4: (p. 2, Rejectable Lots) Will S&L or GE be technically responsible for all evaluations resulting in "repair" or "use-as-is" decisions and for all decisions to conduct further reinspections? (Also, see p. 7 of I&E Report 85-08).

IP RESPONSE TO IAG QUESTION 4:

This question confused the dispositioning of NCR's with the engineering evaluations of the safety significance of nonconforming conditions under the overinspection program. The responsibilities for evaluation of rejectable lots will be as described in IP's letter U-600007 of April 19, 1985, which responded to the NRC's April 11, 1985, letter, Enclosure 1, questions b., c., and d. The responsibilities for dispositioning NCRs is described in the same IP letter in response to NRC question g.

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IAG QUESTION 5: (p. 2, paras. 1 and 2) Proposed revisions to the Overinspection Program should be provided by IP to the NRC for approval, and to the Attorney General for comment, prior to being implemented.

IP RESPONSE TO IAG QUESTION 5:

The proposed revisions do not constitute a change to the Overinspection Program Plan. The revised implementing procedures will be provided to NRC, Region III for information and the IAG will be provided a copy.

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IAG QUESTION 6: (p. 2, para. 3) The Overinspection Program should provide assurance that the Clinton Plant is constructed in accordance with applicable design drawings and quality specifications. All nonconformances should be reviewed in the context of the preceding criteria rather than "according to their significance to plant safety." What is the IP definition of "significance to plant safety"?

IP RESPONSE TO IAG QUESTION 6:

The Quality Assurance program for CPS provides assurance that the plant is constructed in accordance with design requirements. The Overinspection Program was to have (and has) confirmed this. This question also appears to confuse the dispositioning of NCRs with the engineering evaluations of NCRs for safety significance under the Overinspection

Program. The distinction between these two activities is explained in IP's response to NRC's April 11, 1985, letter, Enclosure 1, Question g.

The IP definition of "significance to plant safety" in the context of the Overinspection Program is contained in the Results Report, Chapter V, Paragraph B.

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IAG QUESTION 7: (General) How does IP plan to address the root cause(s) within the BA QA/QC program which allowed the nonconformances to requirements to remain undetected prior to the Overinspection? The preceding element of corrective action appears to be missing from the IP presentation.

IP RESPONSE TO IAG QUESTION 7:

The root causes were determined and corrective actions taken as part of the IP Recovery Programs prior to lifting the associated stop work actions. The root causes and corrective actions and the programmatic improvements made by IP related to this question are fully described in the Results Report, Chapter IV.

ATTACHMENT 3

IP RESPONSE TO ILLINOIS ATTORNEY GENERAL'S
APRIL 18, 1985 COMMENTS AND QUESTIONS CONCERNING
PROPOSED CHANGES IN THE IP OVERINSPECTION PROGRAM
IP LETTER U-0828 DATED 3/29/85

The Illinois Attorney General's comments and questions and IP's response to each are as follows:

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IAG QUESTION 1: (p.1, paragraph 2) What is the "safety significance of the problems identified to date" for piping and mechanical supports in terms of the critical, major, or minor nonconforming conditions in accordance with IP's established classification of characteristics acceptance criteria (Ref IP CNP 3.02; BA BAP 1.0). Also, see NRC I&E Report 85-08 at p. 11.

IP RESPONSE TO QUESTION 1:
Qualitative information concerning the significance of nonconformances is provided in IP's Response to NRC Question A.3, Enclosure 2 to NRC's April 11, 1985, letter. All Overinspection Program NCRs were classified as minor (classification 3) as defined in CNP 3.02 and BAP 1.0.

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IAG QUESTION 2: (p. 2, paragraph 2) Why were important to safety, but not safety related, piping and mechanical supports excluded from the Overinspection Program? Isn't such an exclusion contrary to the QA/QC requirements of GDC-1 of Appendix A to 10 CFR Part 50? Also, see Harold Denton's 11/20/81 memorandum to all NRR personnel regarding "Standard Definitions For Commonly-Used Safety Classification Terms" which is Attachment A.

IP RESPONSE TO QUESTION 2:
IP does not use the term important to safety in connection with the Overinspection Program. The scope of the Overinspection Program (safety related, fire protection and augmented class D [Radwaste]) was concurred in by the NRC in December, 1983. See the Results Report, Page V-1 and IP's Response to Question 12 of the IAG's April 12, 1985, questions on the Results Report.

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IAG QUESTION 3: (Attachment I, paragraph III C and Attachment 2 and 3) The acceptance criteria for reinspections should be based on conformance with applicable design drawings and quality specifications consistent with the original inspection/testing acceptance criteria. Further,

the reinspection should be sufficient to demonstrate with "high confidence" that all critical characteristics, as defined by IP, are in accordance with acceptance criteria. Finally, the "loss of capability" standard proposed by IP is not an appropriate standard for determining the time to terminate the reinspections for a commodity since it is not the proper measure of the effectiveness of the QA/QA program. (See first sentence of this paragraph).

IP RESPONSE TO QUESTION 3:

The acceptance criteria for Overinspection Program re-inspections are consistent with applicable design requirements. The IP definition of a critical characteristic is hypothetical and is based upon the possible consequences of a nonconforming attribute (i.e. large crack, severe undercut, extreme mislocation of mechanical supports, etc.). Minor variances from these criteria do not affect plant safety. The question confuses disposition of nonconformances under the normal IPQA Program with the engineering evaluation of nonconformances within the context of the Overinspection Program. The engineering evaluations for "Loss of Capability" conducted on NCRs were done as part of the Overinspection Program as reported in the Results Report and the Updated Results Report. The Overinspection Program is not a substitute for the normal QA program. It confirms the quality assured by the normal program.

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IAG QUESTION 4: (Attachment 2, paragraph B) What are the nonconformance categories which "on their face have little or no impact on the integrity of an item"? Identify any of these categories classified by IP as critical or major characteristics.

IP RESPONSE TO QUESTION 4:

This question appears to use "nonconformance categories" to mean a type of nonconforming inspection attribute. If this is the case, IP classifies inspection attributes as critical or non-critical, not critical or major. The connection between "nonconformance category" and IP's classification as "critical or major" is not appropriate. A "nonconformance category" or type of nonconforming inspection attribute may be significant or not depending on the degree of nonconformance (i.e. superficial vs deep arc strike, small area of surface slag vs large quantity of slag in a weld volume, small surface crack at end of an intermittent weld vs a crack in a weld that could propagate into base metal, etc.). Therefore, a specific nonconforming condition in any "nonconformance category" might be classified as critical or major depending on the severity of the physical condition. No Overinspection Program NCRs were classified as either critical or major. Examples of conditions which IP referred to as having little or no

impact include cosmetic arc strikes, weld spatter, minor cases of surface slag, minor cases of undercut, minor documentation errors, etc.

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IAG QUESTION 5: (Attachment 2, Paragraph B) What are the nonconformance categories which "do not adversely affect the function of an item because of the inherent conservatism of the design for the item"? Identify any of these categories classified by IP as critical or major characteristics.

IP RESPONSE TO QUESTION 5:

Examples of the nonconforming conditions referred in this question include loose hardware, tolerance violations, weld concavity, undersized welds, etc. The question of "critical or major characteristics" is addressed in IP's response to IAG question 4, above.

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IAG QUESTION 6: (Attachment II, paragraph B) Will S&L or GE be technically responsible for all evaluations resulting in "repair" or "use-as-is" decisions? Will records for such decisions be retained for review by the NRC? Also see, NRC Standard Review Plan, NUREG-0800, Revision 2, July 1981, paragraph 7B3, page 17.1 - 16, which is Attachment B.

IP RESPONSE TO QUESTION 6:

See response to IAG question 4 regarding IP letter U-0827 in Attachment 2 to this letter. The role of S&L and IP in the process for dispositioning NCRs is explained in IP's Response to the NRC letter of April 11, 1985, Enclosure 1, Question g. NCRs, including their dispositions are retained and are available for NRC review.

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IAG QUESTION 7: (Attachment 2, paragraph B) Has the NRC independently verified the adequacy of the dispositions of reinspection nonconformances? Also see the observations of deficiencies in dispositions cited in I&E Report 85-13 at pages 5 to 10.

IP RESPONSE TO QUESTION 7:

Question addressed to NRC.

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IAG QUESTION 8: (Attachment 2, paragraph B 1) Are "lack of fusion" discontinuities dispositioned in accordance with applicable codes and standards? Also, see I&E Report 84-36 at page 3.

IP RESPONSE TO QUESTION 8:

Yes. See also, the response to Question 7 above.

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IAG QUESTION 9: (Attachment 2, paragraph B 2) The acceptance criteria for pipe supports cited (i.e. "to preclude failure of the support" or "to cause any piping support to fail") appears to be less conservative than the original acceptance criteria. Have design margins been maintained during the disposition of nonconformances?

IP RESPONSE TO QUESTION 9:

See the response to Question 7 above. Design margin impacts for the OI Program engineering evaluations are provided in IP's Response to NRC's Question A.3 in Enclosure 2 of the April 11, 1985, NRC letter.

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IAG QUESTION 10: (Attachment 2, paragraph B 2) Justify why it is appropriate to rely on subsequent inspections to detect installation nonconformances? The IP proposal, as set forth in the preceding appears to represent an over-reliance on final inspections.

IP RESPONSE TO QUESTION 10:

The reliance on final inspections is justified for the purposes of the OI Program engineering evaluations. See IP's Response to NRC Question C1., in Enclosure 2 of NRC's April 11, 1985, letter.

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IAG QUESTION 11: (Attachment 3, Table 3.1) Why do the field verification nonconformance rates for large and small bore pipes in Table 3.1 (i.e. 1.7% and 0.9% differ so substantially from the nonconformance by IP (i.e. 10.5% and 4.9% at page 10). Also, why are the "attributes inspected" smaller now than in October 1984, for large and small bore piping?

IP RESPONSE TO QUESTION 11:

In both cases, the attributes inspected data presented in October included augmented class D (radwaste) and fire protection. The data presented subsequently do not, since IP's March 29, 1985 submittals address safety related items only.