

JUL 02 1985

Docket No. 50-461

Illinois Power Company  
ATTN: Mr. W. C. Gerstner  
Executive Vice President  
500 South 27th Street  
Decatur, IL 62525

References: 1. Letter, D.P. Hall to J.G. Keppler, U-0828, dated 3/29/85.  
2. Letter, J.G. Keppler to D.P. Hall, dated 4/11/85.  
3. Letter, D.P. Hall to J.G. Keppler, U-600008, dated 4/19/85.  
4. Letter, D.P. Hall to J.G. Keppler, U-600163, dated 6/14/85.

Gentlemen:

This letter is in reply to your requests to terminate overinspection of safety related large and small bore piping and supports, and overinspection of commodities based on pre-established acceptance criteria. We originally discussed these matters with you on October 25, 1984, as documented in our Inspection Report 461/84037.

In Reference 1, you provided us with information in response to matters that could not be resolved during the October meeting. In Reference 2, we asked you to answer questions about matters described in Reference 1, and you responded in Reference 3. During a meeting with you on April 22, 1985, documented in our Inspection Report 461/85024, it was determined that some of the data in Reference 3 was incorrect. In Reference 4, you updated the information and corrected the data from Reference 3.

Our review of your data and answers to our questions is completed. We have determined that previously identified items of noncompliance, unresolved items, and open items pertaining to piping and supports have been satisfactorily resolved, and we independently verified that as built conditions of piping and supports meet requirements of design drawings and specifications. Results of those RIII activities will be documented in Inspection Report 461/85026. Results of the NRC Construction Appraisal Team (CAT) inspection did not identify problems which indicate the over inspection program should continue in the area of safety related large and small bore piping and supports. Results of the CAT inspection will be documented in Inspection Report 461/85030. We have also reviewed nonconformance reports describing deficiencies found during overinspections that were evaluated by Sargent and Lundy as will be documented in Inspection Report 461/85027. Based on our review, we agree with S&L's conclusion that no safety significant problems have been identified during overinspection of large and small bore piping and piping supports (Open Item 461/84037-02). Our inspections and independent reviews give us reasonable assurance that piping and supports will perform satisfactorily in service. Based on the above, we concur in your request to terminate overinspection of

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safety related large and small bore piping, and piping supports. However, it is our understanding that overinspections of large and small bore piping and pipe supports will continue in Class D systems (Rad Waste and Fire Protection). If this understanding is not correct, please contact this office immediately.

We have also completed the review of your request to terminate overinspection of a commodity based on the generic pre-established criteria given in Reference 2 (Open Item 461/24037-03). We do not concur in that request for the following reasons:

1. Ten thousand attributes cannot be consistently or generically used as an acceptance criterion because plant systems, structures or components (commodities) have considerable variation in complexity and interdependency. In addition, specific inspection results either positive or negative cannot be directly applied to the total population of the commodity being considered for termination of overinspection.
2. Additional information, requested in Reference 2, was not provided for accepting small populations of a commodity, or accepting a commodity based on overinspecting five percent of its total population.

We will continue to review your requests for terminating overinspection of commodities on a case by case basis. Data and engineering analyses which support your conclusions should be submitted with each such request.

Thank you for cooperating with us in this matter. If you have any questions please contact R. F. Warnick (312-790-5575).

Sincerely,

Original signed by  
James G. Keppler

James G. Keppler  
Regional Administrator

cc DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Richard Hubbard  
Gary N. Wright, Manager  
Nuclear Facility Safety  
Jean Foy, Prairie Alliance  
Allen Samelson, Assistant  
Attorney General,  
Environmental Control Division  
H. S. Taylor, Quality Assurance  
Division

RIII

Jablonski/rl  
6/27/85

RIII

RFH for  
Gwynn  
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Berson  
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Warnick  
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RIIIA

Harrison  
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Nurelius  
7/2/85

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Davis  
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Keppler  
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