

U- 600080
L42-85(07-16)-L
1A.120

ILLINOIS POWER COMPANY



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

July 16, 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 Response to Notice of Violation Dated March 20, 1985, NRC I&E Inspection Report Number 50-461/85-13

Dear Mr. Keppler:

This letter provides a revised response to the March 20, 1985, Notice of Violation concerning the inadequate disposition of construction nonconforming conditions. The revised response concerns Section I.1 of Attachment A to our letter, W. Connell to J. G. Keppler, U-10264, dated April 3, 1985. Specifically, this revised response is related to dispositioning Nonconformance Reports numbered 65850 and 65905. Please refer to Attachment A of this letter for details of the revised response.

I trust that our revised response is satisfactory to insure compliance with regulatory requirements.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "F. A. Spangenberg".

F. A. Spangenberg
Director - Nuclear Licensing
and Configuration
Nuclear Station Engineering

REC/lab

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
Director, Office of I&E, USNRC, Washington, DC 20555
NRC Resident Office
Illinois Department of Nuclear Safety

B507260321 B50716
PDR ADDCK 05000461
G PDR

JUL 17 1985

IEOI

11

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

SUBJECT: Inadequate Dispositioning of Nonconforming Conditions,
 Revised Response

REFERENCE: Illinois Power Company (IP) Letter, W. Connell to J. G.
 Keppler, U-10264, Dated April 3, 1985

The Notice of Violation states in part:

...the NSED disposition in response to BA Field Verification Nonconformance Report No. 65790 was found to be inadequate in that the disposition states, "Use-as-is, Type B" (written in error), when in fact it was a valid nonconforming condition. This disposition did not identify the cause, resolution, or the corrective action to prevent recurrence of the identified deficiency.

I. Corrective Actions Taken and Results Achieved

NRC IE Inspection Report 50-461/85-13 lists four examples of this item of noncompliance: Nonconformance Reports (NCRs) 65790, 65850, 65905, and 65994. In each instance the responsible engineer failed to provide sufficient justification for the disposition assigned. The engineer did not review the condition as it existed in the field, but rather, the engineer relied upon a memorandum from Baldwin Associates Field Verification Supervisor. The memorandum stated that the NCRs were written in error. No justification was included with the memorandum. Illinois Power Company reviewed the NCRs with the following results:

1. The original response in the referenced letter did not provide an accurate description of the processing of these nonconformance reports. The following is a revised response to that portion of the notice of violation related to NCRs 65850 and 65905:
 - ° NCR 65850. The original traveler package, EC-C2789, had been completed and vaulted on June 8, 1984. On August 8, 1984, a supplemental traveler was issued to hanger traveler E22-1012-DET.30-11 to remove the conduit support. This work required the removal of the conduit strap. The Baldwin Associates Field Verification (BAFV) inspector was performing inspection activities to the original traveler, EC-C2789, unaware that a supplement had been issued. The inspector identified two (2) deficiencies on NCR 65850. Item 1 documented the improper identification marking on the conduit. Item 2 noted the conduit strap was not installed.

ATTACHMENT A CONT'D

The NCR was dispositioned "Use-as-is, Type B" for both items, but no justification was documented to support the concurrence of the disposition as required by NSED Procedure D.7, "Handling Clinton Power Station Nonconformance Reports".

Item 1 was documented as a result of a misunderstanding of the specification requirements by the inspector. Item 2 was a result of work being performed to the supplemental traveler which required the removal and re-installation of the conduit strap. Although the "Use-as-is, Type B" disposition is correct for the condition documented, the NCR was not processed in accordance with project procedures.

- ° NCR 65905 - The original traveler package, EC-C2626, had been completed and vaulted on April 18, 1984. This NCR was written October 10, 1984, to document the improper identification marking on the conduit. This was a result of a misunderstanding of the specification requirements by the BAFV inspector. The NCR was dispositioned "Use-as-is, Type B", but no justification was documented to support the concurrence of the disposition as required by NSED Procedure D.7. Although the "Use-as-is, Type B" disposition is correct for the condition documented, the NCR was not processed in accordance with project procedures.
- 2. NCR 65790 was closed without adequate resolution of the non-conforming condition. NCR 28094 supersedes NCR 65790, and it was dispositioned in accordance with established procedural controls.

NCR 65790 was incorrectly dispositioned by the responsible engineer. A review of this individual's work, beginning in November 1984, was performed. The review encompassed 126 NCRs of which 27 represent conditions similar to that described by NCR 65790. No additional examples of inadequate disposition were identified.

- 3. NCR 65994 was written with reference to the wrong drawing detail. Although the NCR was written against a drawing detail that is predominately applicable to the installation being inspected, there is another approved drawing detail which includes design characteristics for this particular installation. This drawing detail was identified by the responsible engineer while dispositioning the NCR. The installation was compared to this drawing detail and found to conform to the design requirements. A disposition of "nonhardware" is appropriate for the condition described because the deficiency does not affect permanent plant hardware. Further corrective action for nonhardware conditions is prescribed by Baldwin Associates procedures.

ATTACHMENT A CONT'D

II. Corrective Action to be Taken to Prevent Recurrence

Training was conducted on March 5, 1985 to stress that proper justification must be available as part of the record for each NCR disposition. An additional supervisory review of the NCR disposition review form further assures that sufficient justification exists for each NCR.

1. Concurrent with the NRC inspection, Illinois Power Company was processing a revision to Nuclear Station Engineering procedure D.7, Handling Clinton Power Station Nonconformance Reports. Revision 6 was issued February 28, 1985. Training to the revised procedure, presented March 5, 1985, was expanded to address the related NRC concerns and to emphasize the adequate assignment of NCR dispositions. The conditions cited by the NRC were used as examples.
2. The incorrect disposition of NCR 65790 was discussed with the responsible engineer, and a letter was issued to reinforce the counseling provided. Investigation has determined that the example of inadequate disposition is an isolated instance. Additional corrective action is not considered necessary.
3. NCR 65994 was correctly dispositioned as nonhardware. Established procedural requirements will achieve adequate corrective action for the nonhardware condition.

The NRC inspector recommended that corrective action include a review of the procedural controls for clarity and for consistency between organizations. Nuclear Station Engineering procedure D.7, Baldwin Associates procedure BAP 1.0, Nonconformances, and Sargent & Lundy procedure PI-CP-003, Processing a Baldwin Associates Field Change Request or Nonconformance Report, were reviewed and found to be adequate and consistent. No further corrective action is necessary.

III. Date When Full Compliance Will be Achieved

Illinois Power Company was in full compliance by February 28, 1985.