

ILLINOIS POWER COMPANY



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

April 3, 1985

Docket No. 50-461

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

Subject: Response to Notice of Violation dated March 20, 1985,
NRC IE Inspection Report Number 50-461/85-13

Dear Mr. Keppler:

This letter is in response to the March 20, 1985 Notice of Violation concerning the inadequate disposition of construction nonconforming conditions. Please refer to Attachment A for the details of the response.

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

Sincerely yours,

W. Connell
Manager - Quality Assurance

JRS/lr (LCF)

Attachment

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: Inadequate Disposition of Nonconforming Conditions

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. Illinois Power Company has reviewed the four NCRs with the following results:

1. NCRs 65850 and 65905 were incorrectly dispositioned in that adequate justifications were not provided for "use-as-is, Type B." The justification did not explain the reason for the determination that the NCRs were written in error. Further investigation has substantiated the use-as-is, Type B dispositions for both NCRs. NCRs 65850 and 65905 were written against installation still under construction. Inspection by Baldwin Associates Field Verification was in fact premature. The conditions documented were completed in the normal course of construction, subsequent to the NRC inspection.
2. NCR 65790 was closed without adequate resolution of the nonconforming condition. NCR 28094 supersedes NCR 65790, and it will be 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 cited by the NRC inspector. No additional examples of inadequate disposition were identified.

ATTACHMENT A
(continued)

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.

II. Corrective Action to be Taken to Prevent Recurrence

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.

ATTACHMENT A
(continued)

III. Date When Full Compliance Will be Achieved

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