

ILLINOIS POWER COMPANY



U-600244

L41-85(09-06)-L

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

September 6, 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: Illinois Power (IP) Company
Overinspection Program Termination

Dear Mr. Keppler:

IP letters U-600197 dated July 26, 1985; U-600211 dated August 6, 1985; and U-600215 dated August 12, 1985; from D. P. Hall to J. G. Keppler, submitted Illinois Power (IP) Company requests for NRC concurrence to remove additional commodities from the Overinspection Program. These letters requested and provided the technical basis for NRC concurrence to remove electrical hangers, HVAC duct and duct supports, and cable tray, conduit, cable and cable terminations, respectively, from the IP Overinspection Program.

Your letter of August 30, 1985, advised IP that the NRC is presently unable to concur with IP's requests for termination, and that additional information would be required before NRC could concur.

As indicated to NRC Region III during an August 21, 1985, telephone conversation, IP is willing to provide additional information to support the requests. Preparation of this information is now on-going, will require completion of engineering evaluations of the safety significance of nonconformances identified by the Overinspection Program through July 31, 1985, and will take about six weeks of intensive effort. IP continues to believe that the information previously submitted is sufficient to support termination and that the additional information is not necessary for a decision. In particular, IP believes that there is a basis for addressing each of the NRC reasons for withholding concurrence identified in your August 30, 1985, letter, as follows:

1. NRC REASON: Inspection data for electrical hangers and HVAC items does not include the 1985 data; therefore, we cannot determine if any new trends or types of discrepancies have been discovered.

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IP RESPONSE: The 1985 reinspection data and estimated nonconformance rates by attribute attached to this letter indicate no new trends. No new types of discrepancies have been discovered.

2. NRC REASON: The quantity of items inspected is low. Our understanding of the Overinspection Program was that Illinois Power would verify the quality of approximately 20% of work performed prior to July 20, 1982. We are unable to determine if the sample presented is representative of the entire population.

IP RESPONSE: The quantity of items reinspected is sufficient and sufficiently representative of the entire population to give high confidence in the quality of CPS construction. The Overinspection Program Plan committed to an approved sampling plan for work prior to and after July 26, 1982, and did not commit to a fixed percentage of work to be reinspected. The 1985 data attached provides additional confirmation that the quantity of inspections is sufficient to justify termination.

3. NRC REASON: The rate of items with nonconformance per item inspected is high; therefore, more information concerning the types of discrepancies discovered and their significance is required.

IP RESPONSE: IP does not believe that the rate of nonconformances per item is a meaningful basis for decision. The rate of nonconformances by attribute and the safety significance of those nonconformances are the meaningful and appropriate bases for decision. The engineering evaluations performed in support of our request, which we understand have now been reviewed to the NRC's satisfaction, show no safety significant nonconformances and provide a technically sound basis for termination of the Overinspection Program.

4. NRC REASON: Cable tray and conduit hanger inspection data are not separated and it is unclear if your commitments have been met.

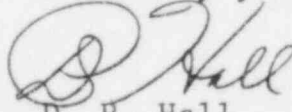
IP RESPONSE: The scope of Overinspection Program Plan defined electrical hangers as a commodity to be reinspected. IP believes that it has met its commitments to the Program Plan. Conduit and tray hangers are designed, fabricated and installed to the same engineering codes and specifications. The installation process (including the welding procedures used), the personnel performing the work and the attributes reinspected for conduit and tray hangers are essentially the same. The attributes used to measure the

quality of construction are also essentially the same for both conduit and tray hangers. Thus, separation of the data from these commodities would not yield additional meaningful information for decision.

IP believes that the additional data attached, the information previously submitted, and the above responses all provide a basis for high confidence that the Overinspection Program can be terminated for the commodities that are the subjects of all pending requests. Therefore, as indicated in your letter of August 30, 1985, and based upon the information provided above, IP proposes suspending the program for those commodities at its own risk. IP is confident that, consistent with past experience, further information resulting from the additional reinspections and engineering evaluations would only confirm the conclusions already reached by IP regarding the quality of construction of Clinton Power Station.

In closing, IP notes that NRC Region III is continuing to inspect and verify the as-built conditions of the subject commodities and that it has undertaken a review of the nonconformances and engineering evaluations already completed in support of IP's pending requests for termination. IP hopes that, upon NRC's review of the results of these on-going activities and the matters submitted by IP herein, the base of information deemed necessary for NRC's decision can be narrowed, and our requests can be expeditiously considered. If that should occur, we would appreciate being promptly advised so that we can redirect the now on-going engineering evaluation efforts to support a prompt decision.

Sincerely yours,



D. P. Hall
Vice President

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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

STATUS OF IP OVERINSPECTION PROGRAM

August 23, 1985

	Estimated Percent Inspected		Estimated Percent Defective (By Attribute)	
	Field Verification	Overinspection	Field Verification	Overinspection
Electrical Hangers	19	5	2	1
HVAC Duct	30	46	1	1
HVAC Supports	36	40	1	1
Cable Tray	62	20	1	1
Conduit	31	1	1	1
Cable	62	16	2	1
Cable Terminations	42	13	1	1