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ILLINOIS POWER COMPANY



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

October 11, 1985

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

Subject: Response to the Notice of Violation, dated August 30, 1985,
in Inspection Report 50-451/85026

Dear Mr. Keppler:

This letter is in response to the Notice of Violation in NRC Inspection Report 50-461/85026, dated August 30, 1985. Attachment A contains the corrective actions that have been taken to resolve this NRC concern related to the use of Interoffice Memorandums in lieu of Nonconformance Reports.

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

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'F. A. Spangenberg'.

F. A. Spangenberg
Manager - Licensing
and Safety

KAB/kaf

Attachments

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
Director, Office of I&E, 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: Use of Interoffice Memos to Document
Nonconforming Conditions

The Notice of Violation states that contrary to the requirements of 10CFR50, Appendix B, Criterion XV, Baldwin Associates (BA) Resident Engineering Traveler Preparation and Review Group (TPRG) was found to be bypassing the BA Nonconformance Report (NCR) program at final traveler review, by identifying and documenting nonconforming conditions on an Interoffice Memorandum (IOM) in lieu of an NCR.

I. Corrective Action Taken and Results Achieved

This item had also been previously identified to Illinois Power by a concerned employee. As a result, Baldwin Associates (BA) initiated a Corrective Action Report (CAR No. 246) on May 14, 1985, to resolve this concern.

BA Quality Engineering identified a total of 1677 IOMs that had been issued to correct problems in the field or for return of travelers to TPRG. During the review and evaluation, the 1677 IOMs were segregated into six (6) categories with corrective actions taken as follows:

1. 113 IOMs were issued for hardware related issues. Evaluation of these memos showed that 21 IOMs identified hardware related nonconforming conditions; NCR No. 35862 was issued to resolve these problems. The remaining 92 IOMs were written to initiate actions which were not related to nonconforming conditions; therefore, issuance of an NCR or correction of travelers was not required.
2. 113 IOMs were issued to correct non-hardware related nonconforming conditions. NCR No. 33663 was issued to resolve these problems.
3. 50 IOMs identified that travelers had missing Tech Service (TS) signatures, missing NDE reports, or were requests from engineering for inspections to clarify concerns. These types of deficiencies do not require the initiation of a nonconformance report.

BA Procedure 2.14, "Fabrication/Installation of Items, Systems and Components", requires travelers to be final reviewed by TPRG, TS and Quality Control (QC). Final review of travelers would identify and correct these types of deficiencies. In addition, BA Document Review Group (DRG) performs a review of travelers prior to vaulting which would also identify and correct these types of deficiencies.

4. 233 IOMs identified that travelers had missing QC signatures, inspections, forms, etc.

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These problems would be identified and corrected by the mechanisms discussed in item three.

5. 32 IOMs requested that travelers be returned to Field Engineering. The memos do not indicate why the travelers were to be returned to Field Engineering. Based on the review of these memos, there is no indication that a problem exists which would require issuance of an NCR or correction of the travelers.
6. The remaining 1136 IOMs consisted of statements that do not identify a concern/deficiency. These IOMs only reference a traveler number or a generic statement that says, "Sent back at Field Request." Based on the review of these memos, there is no indication that a problem exists which would require issuance of an NCR or correction of the travelers.

II. Corrective Action to be Taken to Avoid Further Noncompliance

The cause of this deficiency was determined to be BA Resident Engineering misinterpretation of procedural requirements (BA Procedure 1.0) for documenting nonconformances identified during final traveler review. To resolve this, BA has revised applicable procedures to assure that problems identified during the TPRG review will be documented on form JV-808, "Traveler Return Checklist", or on an NCR when required by BA Procedure 1.0, "Nonconformances". Training will be provided for TPRG personnel to BA Procedure 1.0 and applicable procedures for the use of the JV-808 forms. This training will be completed by October 25, 1985.

III. Date When Full Compliance Will be Achieved

Illinois Power will be in full compliance on October 25, 1985.