

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/85037(DRP)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company  
500 South 27th Street  
Decatur, IL 62525

Facility Name: Clinton Power Station, Unit 1

Inspection At: Clinton Site, Clinton, IL

Inspection Conducted: July 10-12, 1985

Inspector: *F. J. Jablonski*  
F. J. Jablonski

*8-6-85*  
Date

Approved By: *W. L. Stoner*  
for R. F. Warnick, Chief  
Reactor Projects Branch 1

*8-8-85*  
Date

Inspection Summary

Inspection on July 10-12, 1985 (Report No. 50-461/85037(DRP))

Areas Inspected: Routine, unannounced inspection concerning allegations and resolution of open items. The inspection involved a total of 20 inspector-hours onsite by one inspector.

Results: No items of noncompliance were identified. No items significant to plant safety were identified.

8508150176 850812  
PDR ADOCK 05000461  
Q PDR

## DETAILS

### 1. Persons Contacted

#### Illinois Power (IP)

- \*D. Hall, Vice President
- \*W. Connell, Manager of QA
- \*H. Daniels, Project Manager
- \*J. Loomis, Construction Manager
- \*J. Perry, Manager of Nuclear Programs
- \*F. Spangenberg, Director of Nuclear Licensing
- \*J. Sprague, Licensing Project Specialist
- \*R. Weber, Supervisor of Quality Systems

#### Baldwin Associates (BA)

- \*L. Osborne, Manager of Quality and Technical Services
- \*J. Thompson, Supervising Quality Engineer

Other personnel were contacted during the inspection as a matter of routine.

\*Designates those who attended the exit meeting on July 12, 1985.

### 2. Followup on Open Items (92701)

(Closed) Open Item (461/84037-03): Criteria for termination of over-inspection not defined. During the management meeting held in October 1984 between IP and RIII, IP proposed the termination of piping and mechanical supports from the ongoing overinspection program. During the meeting it was stated by RIII overinspection was intended by IP to be a continuing activity. IP had never defined the criteria for terminating overinspection of any commodity. IP responded to RIII with criteria, data, and answers to RIII questions. RIII reviewed IP's input and concluded in a letter to IP on July 2, 1985, that the pre-established criteria proposed by IP was not suitable for terminating overinspection of a commodity on a generic basis. RIII agreed to review termination of commodities on a case by case basis. Other documentation relevant to this matter includes IP letters U-0828 dated March 29, 1985; U-600008 dated April 19, 1985; U-600163 dated June 14, 1985; and RIII letter dated April 11, 1985.

This matter is closed.

The inspector reviewed other open items and Part 21 reports; however, the documentation was not complete or otherwise ready for closure.

### 3. Followup on Allegations (99014)

(Closed) Allegation (RIV-83-A-0072) (#100): Qualification screening for MATSCO was inadequate and personnel were sent to sites before their qualifications were verified. This allegation was previously discussed

in reports 461/84040 and 461/85018. During the previous inspection it was unclear to the inspector how MATSCO subcontractor personnel could have their previous employment and education records verified by meeting the requirements of (sic) NRC Rules 73.56 and ANSI/ANS 3.3. Verification of employment and education is necessary to meet certification requirements of ANSI N45.2.6. It was also unclear to the inspector if MATSCO was an approved vendor (provider of testing services). During this inspection it was learned by the inspector that MATSCO does not have to be an approved vendor because IP qualifies and certifies testing personnel to an IP procedure. IP startup acceptance procedure SAP-7 requires that education and work experience of testing personnel be verified by a background check performed by IP or a subcontractor organization. IP dispatched a person to the MATSCO main office to verify that the MATSCO personnel on site had background checks completed. It was verified by IP that 17 of 18 MATSCO Clinton site personnel had been verified in accordance with Multi-Amp procedure MHR-105 "Security Screening of MATSCO Field Personnel". The eighteenth person's high school education could not be verified for a three month period and his GED could not be located from the school which granted it more than 20 years ago. The person has since retaken the GED test and successfully passed. The inspector selected three of the seventeen records, which are now on site, and determined that an independent subcontractor to MATSCO had verified those education and experience backgrounds.

This matter is closed.

(Closed) Allegation (RIII-84-A-0189) (#111): An anonymous note was delivered to the Clinton site resident inspector's office on December 20, 1984. The note read "To whom it may concern: Some people still care about the work they do and still care about safety. These people are tired of being intimidated by upper management. Signed: a concerned but scared BA employee". The note had three attachments including BA memorandum PHS-45-84, page 1 of Sargent & Lundy Form 30-B, and page 2-12b of Sargent & Lundy specification K-2882. Those documents indicated that the person was probably employed in the BA drafting department.

RIII notified IP of the allegation by letter dated April 2, 1985, and requested IP to make necessary audits and reviews to determine the validity of the allegation. IP notified RIII by letter on June 12, 1985, that their review was completed and the results were ready for RIII's review. Results of RIII's review are documented below.

The inspector noted that the allegation was simultaneously received by IPQA and SAFETEAM. IPQA did not conduct an extensive investigation; however, SAFETEAM did. The scope of the SAFETEAM investigation was broader than stated in the above allegation; however, specific SAFETEAM concerns appeared to be directly related to the allegation. The specific items were SAFETEAM Concerns 11535-A, 11749-A, and 11749-C, which are included as Enclosure 1 to this report. The inspector reviewed the concerns and verified that drafting supervisory personnel had been interviewed by SAFETEAM. SAFETEAM confirmed that the purpose of the memorandum was to avoid excessive review time of previously reviewed work. The inspector also verified that drafting personnel were interviewed by SAFETEAM to determine if they had been forced or pressured

(intimidated) to sign drawings which they had not adequately reviewed. None of those persons interviewed by SAFETEAM stated that they had been forced or pressured to sign drawings which had not been adequately reviewed.

IP documented the results of their investigation in memorandum Q-03516, R. E. Campbell to D. P. Hall, dated June 10, 1985, which is included in Enclosure 1 to this report. Based on the review of the SAFETEAM investigation the inspector concurs in IP's conclusion to close this matter because the anonymous allegation was not specific in nature and the SAFETEAM's investigation showed that personnel in the BA drafting department had not been intimidated.

This matter is closed.

(Closed) Allegation (RIII-84-A-0196-07) (#113): There is and will continue to be the vaulting of BA safety related piping and mechanical documentation with major technical deficiencies that do not comply with code, specification, or procedural requirements.

This allegation was originally inspected and closed out in Inspection Report 461/85008 wherein it was concluded that safety related documentation was being placed in the vault without major technical deficiencies. That conclusion was based on information provided by BA identified as attachments 1 and 2 to Inspection Report 461/85008. RIII received a letter from the allexer on March 11, 1985, wherein the allexer challenged the technical merits of BA's evaluations of his concerns. RIII notified IP of the new allegation by letter dated May 7, 1985. IP was requested to have BA resolve the technical issues and then review and approve BA's work. IP notified RIII by letter on June 26, 1985, that their review and approval was completed and the results were ready for RIII's review. Results of RIII's review are documented below.

The inspector reviewed the results of BA's technical review and IP's review and approval of BA's efforts as documented in Enclosure 2 to this report. There were no substantive changes to BA's original position on the technical issues raised by the allexer. All of the changes made to the revised response were minor. The Document Review Group (DRG) has identified over 130,000 documentation deficiencies, that is, nonconformance with a code, standard or procedure. IP has determined that none of the deficiencies, including those which were hardware related, would have had a detrimental effect on the health and safety of the public even if the deficiencies were not corrected. NRC inspections, including those conducted independent of Region III, have not found any significant deficiencies with piping and mechanical installations. Results of those independent inspections are documented in Inspection Reports 50-461/84035 (Independent Measurements - Nondestructive Testing of Welds), 50-461/84039 (Independent Design Review), and 50-461/85030 (Construction Appraisal Team). There is no reason for Region III to believe that piping and mechanical components and systems will not satisfactorily perform their intended safety function because of deficient documentation. It is therefore concluded that the original conclusion documented in Inspection Report 50-461/85008 is unchanged; safety-related documentation is being placed in the vault without major technical deficiencies.

Enclosure 2 is comprised of:

Memorandum to IP file from R. Weber dated July 12, 1985 (Technical Review)

Memorandum Q-00046 to L. Osborne from W. Connell dated June 21, 1985 (Review and Approval of NRC Identified Technical Issues)

Letter LWO#23985 to W. Connell from L. Osborne dated June 4, 1985 (DRG Allegations - Response to NRC - Clarification and Resolutions)

Letter LWO#23085 to W. Connell from L. Osborne dated May 29, 1985 (DRG Allegations - Response to NRC)

Matrix of Concerns and Responses

This matter is closed.

4. Exit Meeting (93702)

The inspector met with licensee representatives (denoted in the Persons Contacted paragraph) at Clinton on June 12, 1985. The inspector summarized the scope and findings of the inspection and discussed the quality of open items and Part 21 reports presented for closure. The probable contents of the report were discussed with licensee personnel and no proprietary information was identified.

Enclosure 1

Reference of Allegation RIII-84-A-0189

Enclosure 2

Reference for Allegation RIII-A-0196-07

Q-03516

June 10, 1985

TO: D. P. Hall, V-275  
Vice President

FROM: R. E. Campbell, V-923 *R. E. Campbell*  
Director - Quality Systems & Audits

SUBJECT: Anonymous Allegation

On April 2, 1985, the USNRC, in a letter from Mr. C. E. Norelius to Mr. W. C. Gerstner, forwarded to Illinois Power Company an anonymous allegation. The NRC letter described the allegation as follows:

"To Whom It May Concern:

Some people still care about the work they do and still care about safety. These people are tired of being intimidated by your management."

Reference: 1. BA Memorandum PHS-45-84  
2. S&L Form 30-B, Section 1.3  
3. S&L Specification K-2882, Section bl.414

Upon receipt of the NRC letter, IP Quality Assurance initiated a review of the issue. Our initial review revealed that IPQA and SAFETEAM had received the same anonymous allegations on or about December 20, 1984. Due to the nature of the allegation, in that no specific concern is stated nor is there any stated concerns identified in the three (3) references, an extensive investigation was not conducted by IPQA. However, SAFETEAM informed IPQA that a recent concernee had raised a concern with the BA Memorandum PHS-45-84 and that this may be related. Subsequently, IPQA's investigation focused on a detailed review of the SAFETEAM investigation and response.

ENC. I pp 1-8  
Alleg. RIII-84-A-0189

The conclusions of the IPQA review are as follows:

- The anonymous allegation is too general and could not be substantiated.
- Of the concerns received by SAFETEAM, only one item related to one of the reference documents was substantiated.
- This matter should be closed based on the SAFETEAM investigation and response.

The documents supporting the SAFETEAM investigation and IPQA review are contained in the attached binder.

REC/jsp

Attachment

cc: W. Connell, V-923 (w/o attachment)

ILLINOIS POWER COMPANY



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

Dear Concern No. 11535:

You took the opportunity for a Clinton Power Station Safety Concern Review and shared your concern with the Clinton Power Station SAFETeam. We looked into your concern and here is what we have found. In keeping with our promise to do our best to preserve confidentiality, we are using the concern number of your interview to address this letter. The computer produced your name and address, so only myself, the interviewer and the SAFETeam secretary can match your concerns with your name.

Concern No. 11535-A states: "Baldwin Associates (BA) isometrics are not receiving an adequate review, and that people are being forced to sign isometrics without reviewing them."

SAFETeam performed a very indepth investigation into this concern. Numerous people, including those mentioned in your concern, were interviewed in trying to find out if anyone had been pressured or forced into signing isometrics that they felt should not be signed.

BA's Lead Design Review Engineer was interviewed and he said that he had never been pressured or forced to sign any isometric that had not received what he felt was an adequate review.

Baldwin Associate's (BA) Senior Field Engineer, Piping, was also interviewed and he also said that he had never been pressured or forced to sign isometrics before they had received an adequate review.

Separate interviews were conducted with BA's Assistant Resident Engineer and BA's Manager-TPRF/Design Review/DELS and both stated that they had never forced or pressured anyone into signing isometrics.

BA's Resident Engineer and BA's Manager-TPRF/Design Review/DELS were also asked about isometrics not receiving an adequate review by the Design Review Engineers. Both individuals said that the majority of isometrics did not require an indepth review

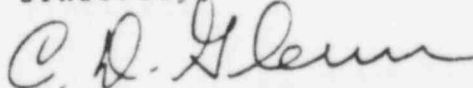
by Design Review Engineers because of the review performed by the draftsman and the review of the checker. BA's Assistant Resident Engineer said that unless the isometric was extremely difficult he only wanted a cursory review from the Design Review Engineers.

During the investigation, SAFETEM found out that Procedure BAP 1.18 "Drawing Preparation" was being revised. SAFETEM reviewed the procedure and realized that it was not definitive in specifying requirements and also did not reference BA Form JV-1365 (4/84) which is utilized during the isometric review. SAFETEM brought this to the attention of Mr. R. Campbell (IP-QA) who said he would have someone in his review group look at the revision and make sure that the procedure is adequate prior to being approved.

In reviewing isometric RH-958 rev-3, which was mentioned in your concern, no FCR's were referenced. Revision 3 was made on 11/8/84 per "K" drawing and BA review. Revision 4 was made on 11/13/84 per FCR's 30126 and 28593 and NCR 23739. FCR 28593 was written requesting a welding detail for an end closure plate and FCR 30126 was written concerning spec break differences which were resolved by Sargent & Lundy.

Thanks for sharing your concern with us. Your interest in helping Illinois Power Company assure that Clinton Power Station operates safely and reliably is appreciated. Should you have any further questions about your concern or any other concerns you wish to share, please write me at the above address or call Clinton Power Station SAFETEM. The toll free telephone numbers for the SAFETEM are 1-800-637-9231 if you are in Illinois and 1-800-637-9232 if you are outside Illinois. You will reach our answering machine so please leave your concern number and telephone number so we can get back to you.

Sincerely,



C. D. Glenn  
Director, SAFETEM

cc: Concern No. 11535-A  
STGT#00291

No 11749

Date

12-18-84

Type

☒ Yes☐ No

1 Concern: Employee being forced to quit

Department Involved: BA Resident Engineering Design/Drafting Review

Persons Involved: [REDACTED] (BA Resident Engineering Design / Drafting Review), Pete Seidel (BA Resident Engineering Design/Drafting Review Supervisor), John Devine (BA Resident Engineering Design / Drafting Review Supervisor).

When Problem Occurred: December 17, 1984

Data: Interviewee expressed concern that [REDACTED] was forced to quit on December 17, 1984 because he was taking too long in checking all the dimensions of the isometric drawings. [REDACTED] was called in first to Pete Seidel's office and then a second time to John Devine's office and was told that he was just suppose to check items that had been revised. [REDACTED] felt that the whole isometric needed to be checked because mistakes had been found on the dimensions and comments in the past. He was told, "Either do it our way or get out." [REDACTED] quit on December 1984 because of this. On December 18, 1984, a memo (see attachment A) from Pete Seidel was sent to all Design Review / Drafting Personnel stating that they were only to review / check revised work and that if a more extensive review is warranted, it should be brought to Seidel or Steve Walsh for evaluation. The memo stated "Failure to comply with this directive will result in disciplinary action." Interviewee feels that the reviewers/checkers should have the option of checking the isometrics fully if they

(NAME REMOVED TO PROTECT IDENTITY)

Jon R. Hunt

· feel it needs to be checked without having to have supervisory approval.

DATE: January 7, 1985  
STGT# 00393

TO: T. Kubiak  
Coordinator, SAFETEAM

(NAME REMOVED TO PROTECT IDENTITY)

FROM: W. Breeden  
Investigator, SAFETEAM

SUBJECT: SAFETEAM Concern No. 11749-A

In talking with the concernee and showing him a copy of the letter written by Mr. Seidel concerning [REDACTED] and his reason for leaving, the concernee stated that he really did not have a concern. The concernee stated that [REDACTED] was a friend of his and when he quit it really upset him (concernee) and he just needed someone to talk to.

DATE: January 7, 1985  
STGT# 00416

TO: C. D. Glenn  
Director, SAFETEM

FROM: W. Breeden  
Investigator, SAFETEM

SUBJECT: Response to SAFETEM Concern No. 11749-C

Concern No. 11749-C states: "Baldwin Associates (BA) drafting personnel have been instructed by supervision to incorporate the Sargent & Lundy (S&L) comments associated with BA isometrics without verifying the validity of the comments."

SAFETEM interviewed the BA Drafting Supervisor and five (5) drafting people, responsible for reviewing, checking, and incorporating S&L comments onto the BA isometrics. The Drafting Supervisor said he had not instructed his people that the S&L comments were not to be checked. The five (5) drafting people said that they had never been told not to check S&L comments.

If you could supply SAFETEM with additional information or specific facts in this area, SAFETEM will re-open the investigation and pursue your concern.

July 12, 1985

TO: File

FROM: Roger D. Weber  
Supervisor - Quality Systems

*Roger D. Weber*

This memo is to document conversation held between C. E. Calhoun, IP, and myself regarding the technical review of allegations made by [REDACTED]. C. E. Calhoun stated that a review of technical issues was performed by qualified Illinois Power Quality Assurance personnel in the Record Review Group. This review generated several technical points of a minor nature. These questions were later investigated and answered. This review resulted in no technical issues that required further investigation.

RDW/jsp

(NAME REMOVED TO PROTECT IDENTITY)

Enclosure 2 pp. 1-27  
Alleg. R III-84-0196-07

1A.210  
Q-00046

June 21, 1985

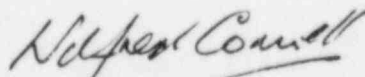
TO: L. W. Osborne, V-900  
Manager - Quality & Technical Services

Review and Approval  
of  
NRC Identified Technical Issues

REFERENCES: 1. L. W. Osborne letter to W. Connell,  
LWO #23085, dated May 29, 1985  
2. L. W. Osborne letter to W. Connell,  
LWO #23985, dated June 4, 1985

Illinois Power Quality Assurance has reviewed your response, contained in Reference 1, and the resolution to our comments, contained in Reference 2, associated with the subject issue.

As a result of this review, the Baldwin Associates resolution to these issues is approved by Illinois Power Quality Assurance.



Wilfred Connell  
Manager - Quality Assurance

CEC/jsp

cc: D. P. Hall, V-275  
R. E. Campbell, V-923



## BALDWIN ASSOCIATES

A JOINT VENTURE OF  
FRUIN-COLNOM CORPORATION      McCARTIN-McAULIFFE MECHANICAL CONTRACTOR, INC.  
KELSO-BURNETT COMPANY      POWER SYSTEMS, INC.  
1211 EAST TOWER ROAD, SCHAMBURG, ILLINOIS 60172 LWO#23985

June 4, 1985

**REPLY TO:**

**P. O. BOX 306  
CLINTON, ILL. 61727  
PHONE: 217 937-1111**

Mr. W. Connell  
Manager of Quality Assurance  
Illinois Power Company  
Clinton Power Station  
Clinton, IL 61727

Dear Mr. Connell:

Subject: DRG Allegations - Response to NRC - Clarification and Resolutions

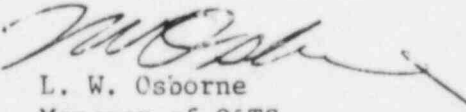
Reference: Letter LWO#23085, dated 5-29-85, Osborne to Connell

Baldwin Associates has reviewed the comments to the referenced letter and our response is enclosed as Attachment #1.

If any additional information is required, please contact me.

Very truly yours,

BALDWIN ASSOCIATES

  
L. W. Osborne  
Manager of Q&TS

LWO/JW/mac

Attachment (1)

cc: QE Correspondence  
Q&TS Correspondence

ATTACHMENT #1

IPQA Comments

Item 3 - Last paragraph difficult to follow  
"The evaluation does conflict with QA Manual."

Item 6 - Fifth paragraph first line  
"Paragraph 5 of what".

Item 7 - Note "Could not find 4 of the orifices  
they must still be in the field."

Item 12 - "If subsequent procedure revisions  
were made to BAP 2.10 and BAP 2.6 what is the  
impact on the equipment (pipe stands) installed  
prior to these changes."

Item 13 - Second paragraph, second sentence  
"Where are these special evaluations."

Item 13 - Fourth paragraph "rewrite needed -  
all QA/QC personnel have the right to identify  
problems."

Item 13 - "Put back the closing sentence in the  
draft but leave out reference to NRC."

BA Resolution

Replace last paragraph with: "Design Specification K-2882  
classified Aug. D as non-safety related, subjected to the quality  
requirements referenced in Section 113. Although the drawings  
indicated non-safety, through BAs traveler program all work  
received the necessary minimum quality controls."

Change to read: "It is assumed in Paragraph 5, Item 6 of the  
Reference 2 enclosure letter that . . ."

Brian Weaver provided Mike Winter a complete explanation with  
appropriate records (resolved).

Add note after last sentence of second paragraph "Note: There is no  
impact on pipestand installations prior to the deletion of  
references to BAP 2.6. Pipestands were fabricated in accordance  
with BAP 2.14 and installed and inspected in accordance with BAP  
2.10."

At the suggestion of IP the last two sentences have been deleted  
and replaced with: "The Nonconformance Program (BAP 1.0) has  
undergone extensive reviews and revisions and continues to be  
under close scrutiny to assure NCRs are properly initiated,  
reviewed, dispositioned and implemented."

Add the following sentence to the paragraph: "As a further note,  
all QA/QC personnel have the right to identify problems."

Add the following as the last paragraph: "The Clinton Power  
Station is being constructed in accordance with Codes, Standards  
and Specifications with an approved Quality Program to monitor  
activities. When nonconformities and/or problems arise they are  
handled with dispatch and resolved on a timely basis. CPS is a  
quality project."



## BALDWIN ASSOCIATES

A JOINT VENTURE OF  
FRUIN-COLNON CORPORATION      McCARTIN-McAULIFFE MECHANICAL CONTRACTOR, INC.  
KELSO-BURNETT COMPANY      POWER SYSTEMS, INC.  
1211 EAST TOWER ROAD, SCHAUMBURG, ILLINOIS 60172 LWO#23085

May 29, 1985

**REPLY TO:**

**P. O. BOX 306  
CLINTON, ILL. 61727  
PHONE: 217 937-1111**

Mr. W. Connell  
Manager of Quality Assurance  
Illinois Power Company  
Clinton Power Station  
Clinton, IL 61727

Dear Mr. Connell:

Subject: DRG Allegations - Response to NRC

Reference: 1. Letter #CA-1276-85, dated 2-25-85, Anderson to Osborne  
2. Letter Docket #50-461, dated 5-7-85, Norelius (NRC) to Gerstner (includes enclosure letter dated 3-7-85)

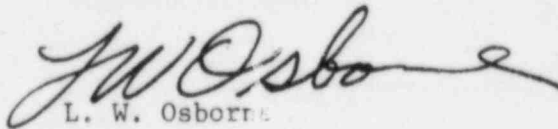
Baldwin Associates has reviewed Reference 2 with enclosure letter dated 3-7-85, and stands by the earlier evaluations and decisions presented in Reference 1.

The enclosed attachments (1 through 13), identified with the items in the Reference 2 enclosure letter, are provided as clarifications and supplements.

If any additional information is required, please contact me.

Very truly yours,

BALDWIN ASSOCIATES

  
L. W. Osborne  
Manager of Q&TS

LWO/DSS/JW/mac

Attachments (13)

cc: QE Correspondence  
Q&TS Correspondence

ATTACHMENT #1

Item 1

Disposition in Reference 1 is acceptable by Reference 2 enclosure letter.

ATTACHMENT #2

Item 2

Disposition in Reference 1 is acceptable by Reference 2 enclosure letter.

ATTACHMENT #3

Item 3

Reference 2 enclosure letter is in disagreement with Reference 1; the following supplement to Reference 1 is provided:

The evaluation provided in Reference #1 does not contradict the BA QA Manual, Section 0, Page 3, Paragraph 1. This paragraph fully states: "For the purposes of this QA Manual, Augmented D/Fire Protection Pressure Boundary items, materials, or services shall be considered "safety related" with the exception of Sections 8, 9, 12 and 13 for Fire Protection and Sections 8 and 12 for Augmented D. The program described herein requires systems that are planned to document and verify activities that will provide evidence of adequate quality that is in compliance with the ASME Code, Regulatory and Technical Standards requirements, Design Specifications for the code classes specified, and the FSAR, as a minimum."

The BA QA Manual is the basic governing document that describes the QA Program. This manual has been prepared in accordance with the provisions of Section III, Division 1, 1974 Edition, Summer 74 Addenda of the ASME Boiler and Pressure Code, and with the requirements set forth in Title 10, Code of Federal Regulations, Part 50 - Appendix B and various ANSI Standards.

The S&L K-Specs do not relieve BA from following the QA Manual; they do, however, specify the QA requirements for various classifications of hardware which effectively determine those portions of the QA Manual that are applicable. For instance, the BA QA Manual, Section 9C, provides controls for performance of nondestructive testing. If based on Code and design specifications, NDE is not required, then Section 9C of the QA Manual obviously does not apply.

In response to the DEL Item concerning purge not being verified, the following is provided.

The Aug. D piping in question, as specified by Design Specification K-2882, paragraph 117.2 shall be fabricated, erected, examined and tested in accordance with ANSI B31.1; 1973 Edition, Summer 1974 Addenda. The requirement for inspection of the welds is a visual inspection for all sizes and thicknesses. Procedure BAP 3.6.5 (formerly BTS-405) "Visual Inspection of Weldments" states: "In cases where only a weld complete inspection is required, the in-process inspection shall be made on a random basis." It is therefore concluded that the BA QA Manual has been adhered to.

In response to the item concerning Non-Safety D-only being indicated on the design drawing; the following is provided.

Design Specification K-2882 classifies Augmented D as non-safety. The non-safety designation on the drawing is, therefore, appropriate since the drawing is an element of the design.

ATTACHMENT #4

Item 4

Reference 2 enclosure letter indicates "No comment" but at the same time the following is listed:

"Concern:

That BAs final document review program is set up in such a way as to mask suspected noncompliances rather than to 'document' and 'resolve' them."

To clarify this issue the following definition of final QA (DRG) review is provided from BAP 2.1.1, Section 2.2:

2.2 FINAL QA (DRG) REVIEW - A program established to examine all ASME, Safety related, Fire Protection, and Augmented D records for the purpose of verifying they are complete, in compliance to code, standards, specifications and procedures and are, therefore, acceptable as a quality record prior to transfer to Illinois Power Company.

The DRG program is only a part of the total effort required to verify the quality of CPS. The determination of acceptable quality is made by a review of many functions beginning with design and continuing through final acceptance by Quality Control. The Document Review and Field Verification programs have been implemented to provide verification that the other elements of the program functioned properly. There is no intent to mask noncompliances in the DRG. The definition of Final QA (DRG) Review describes the review as an examination of records to verify that the records are complete and acceptable. The quality of the hardware cannot be evaluated through this single element of documentation review. The documentation review does however verify that the program has been complied with by reviewing the records for proper signoffs, records traceability, etc.

ATTACHMENT #5

Item 5

Disposition in Reference 1 is acceptable by Reference 2 enclosure letter.  
The concern expressed in Item 4 appears again here in Item 5 as a reference.  
Refer to Attachment 4, Item 4, for an explanation.

ATTACHMENT #6

Item 6

Reference 2 enclosure letter is in disagreement with Reference 1.

The response for item 6 as provided in Reference 1 has been reviewed again and remains acceptable. However, since the time of the initial response, stand alone NCR copies are no longer inserted into the travelers.

In response to Item 6 as discussed in Reference 2 enclosure letter, the following is provided.

The requirements of an NCR disposition with exception of stand alone NCRs, are incorporated into a traveler. Stand alone NCRs by procedure act as a traveler for those minor nonconformances described in the procedure.

It is assumed in paragraph 5 that the subject is stand-alone NCRs and not traveler NCRs. Taking this into account, the travelers may be closed and any necessary additional work accomplished on a Stand-Alone NCR. The final stand-alone NCR then will be reviewed. Additionally, all ASME NCRs (including stand-alone NCRs) receive two reviews by the ANI. The first review is accomplished prior to disposition implementation, the second review is after completion of work. Therefore, the ANI is involved prior to DRG review.

In these cases where travelers are closed, and Stand-Alone NCRs exist, the ANI has the option of reviewing the associated traveler.

Additionally, NCRs 17399 and 26969 along with the supporting documentation were reviewed and found to be satisfactory.

In response to the concerns associated with NCR 70620, the following is provided.

NCR 70620 reported that ID numbers were incorrect on headfitting LMC-45. The NCR referenced two travelers MS-3-D which is a hanger traveler and MS-3-B which is a piping traveler. The travelers were appropriately reviewed by the DRG and the piping traveler reviewed by the ANI. Hanger travelers are not reviewed by the ANI as per the 1974 ASME Code. NCR 70620, as a stand-alone NCR, was reviewed by the ANI on 1-29-85. The processing of these travelers and the NCR is in compliance with the review program.

ATTACHMENT #7

Item 7

Disposition in Reference 1 is questioned in Reference 2 enclosure letter. The following supplement is provided.

NCR 70270 addresses 31 orifice plates. Twenty five of these were removed, retagged per BAP 2.23 and PO C-16149 had a rider issued to downgrade 25 orifice plates. The six remaining orifice plates were dispositioned use-as-is per ECN 4543. The six orifice plates are identified as: OFE-VC008, OFE-VC108, 1E21-N552, 1E02N564, 1E51-N599 and 1E12-N556.

In response to the concern relating to the use of a later code edition the following is provided.

Sub-subarticle NA-1140, paragraph (g) of ASME Section III, Subsection NA, 1974 Edition states: "Caution is advised when using Addenda or Cases that are less restrictive than former requirements without having assurance that they are acceptable to the enforcement authorities having jurisdiction at the nuclear plant site." The 1974 edition does not address code rules concerning orifice plates. The guidance provided by the 1980 edition of the ASME Code, as provided in ECN-4543, provided clarification with respect to orifice plates. It has been determined that based on NA-1140, that the later edition (1980) is not less restrictive than the former requirements presented in the 1974 edition. Therefore, acceptance by the jurisdictional authorities is not required in this case.

ATTACHMENT #8

Item 8

Disposition in Reference 1 is acceptable in Reference 2 enclosure letter, but there is a concern, i.e., "Ref. NA-4000, certification holder responsibilities regarding subcontractors QA program and implementation thereof (Audits)."

BA conducted the following surveys and surveillances with NDT Consultants, a subcontractor performing counterbore examinations:

Manufacturer Survey	5-25-83	
Supplier QA Activity Report	6-6-83	ES-038
Supplier Program Surveillance	6-25-83	EPS-008
Supplier Program Surveillance	7-10-83	EPS-010
Supplier Program Surveillance	7-23-83	EPS-012
Supplier Program Surveillance	8-10-83	EPS-016
Site Surveillance Report	1-28-84	S-805
On-Site QA Activity Report	2-19-84	C-41734.1

Quality Survey and Surveillance of Subcontractors plant, equipment and personnel are properly administered within program requirements.

ATTACHMENT #9

Item 9

Reference 1 did not list an Item 9 (response number not used by Reference 2 enclosure letter).

ATTACHMENT #10

Item 10

Reference 2 enclosure letter is in disagreement with Reference 1.

The response provided for item 10 in Reference 1 above was re-reviewed and found acceptable. The alternate WPS (N-1-1-BS) that was utilized does not require the use of an inert gas purge. Therefore, no traveler entry is required. The disposition to NCR 70715 was evaluated and found acceptable. The disposition did not address the issue of purge requirements, as no purge requirement exists. (Reference WPS-N-1-1-BS and Specification K-2882, Article 304.3).

Item 10(D) of Reference 2 Enclosure letter has apparently confused the requirement for a shielding gas versus an inert gas purge.

ATTACHMENT #11

Item 11

Reference 2 enclosure letter is in disagreement with Reference 1.

The response for item 11 provided in Reference 1 was re-reviewed and found acceptable. Welder qualification records for F. D. Short (F#191) were on file in the Document Records Center. (Reference attached Welder Qualification Record for S. D. Short, Attachments 11-1, 11-2 and 11-3).

QW-484 MANUFACTURER'S RECORD OF WELDER OR WELDING OPERATOR QUALIFICATION TESTS  
(See QW-301, Section IX, 1974 ASME Boiler and Pressure Vessel Code)

56X

Welder Name S. D. Short CLOCK NO. 9-2883 Stamp No. (F) 191  
Welding Process GTAW Type MANUAL  
In accordance with Welding Procedure Specification (WPS) N-1-1-B-S  
Backing (QW-402) NONE  
Material (QW-403) Spec. SA-106 to SA-106 of P No. 1 to P No. 1  
Thickness Range 1/16" - .688" Dia. Range OVER 1"  
Filler Metal (QW-404) Spec. No. 5.18 F No. 6  
Other NA  
Position (QW-405) 6G - 2" sch. 160 (.344)  
(1G, 2G, 6G)  
Electrical Characteristics (QW-409) Current DC Polarity STRAIGHT  
Weld Progression (QW-410) VERTICAL UPHILL

## FOR INFORMATION ONLY

Filler Metal Diameter and Trade Name Flux for Submerged Arc or Gas for Inert Gas Shielded Arc  
LINDE E-70S-2 - 3/32" - 1/8" Welding

## GUIDED BEND TEST RESULTS QW-462.2(a), QW-462.3(a), QW-462.3(b)

Type and Figure No.	Result	Type and Figure No.	Result
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Radiographic Results: For alternative qualification of groove welds by radiography in accordance with QW-304 and QW-305 ACCEPTABLE

Test Conducted by BALDWIN ASSOCIATES Laboratory-Test No. WT 5156  
per

## FILLET WELD TEST RESULTS (See QW-462.4(a), QW-462.4(b))

DRC

REFERENCE COPY

Fracture Test   
(Describe the location, nature and size of any crack or tearing of the specimen)

Length and Per Cent of Defects  inches  %

Macro Test-Fusion

Appearance-Fillet Size  in. X  in. Convexity or Concavity  in.

Test Conducted by  Laboratory-Test No.   
per

We certify that the statements in this record are correct and that the test welds were prepared, welded and tested in accordance with the requirements of Sections IX of the ASME code.

DATE OF EMPLOYMENT 3/27/84 Signed BALDWIN ASSOCIATES

Date 3/29/84 By Victor W. Thomas (Organization)

(Detail of record of tests are illustrative only and may be modified to conform to the type and number of tests required by the Code.) 17

NOTE: Any essential variables in addition to those above shall be recorded.

TRANSMITTAL # TSA 1491

This WQR qualifies for all WPS's requiring SMAW and F4 filler material within the essential variables.

TSA <sup>1491</sup> ~~918~~ 11/13/84

**QW-484 MANUFACTURER'S RECORD OF WELDER OR WELDING OPERATOR QUALIFICATION TESTS**  
(See QW-301, Section IX, 1974 ASME Boiler and Pressure Vessel Code) **BTSF-050**

(20X)

Welder Name S. D. Short Check No. 9-2883 Stamp No. (F)191  
Welding Process SMAW Type MANUAL  
In accordance with Welding Procedure Specification (WPS) N-1-1-A-11  
Backing (QW-402) Yes  
Material (QW-403) Spec. SA106B to SA106B of P No. 1 to P No. 1  
Thickness Range 3/16" - Unlimited Dia. Range 2 7/8 and over  
Filler Metal (QW-404) Spec. No. 5.1 F No. 4  
Other None  
Position (QW-405) 6G-6" XX STG Pipe (0.864)  
(1G, 2G, 6G)  
Electrical Characteristics (QW-409) Current D. C. Polarity REVERSE  
Weld Progression (QW-410) Vertical-Uphill & Stringers

**FOR INFORMATION ONLY**

Filler Metal Diameter and Trade Name Flux for Submerged Arc or Gas for Inert Gas Shielded Arc  
E7018, 3/32, 1/8, 5/32 Welding Manual

**GUIDED BEND TEST RESULTS QW-462.2(a), QW-462.3(a), QW-462.3(b)**

Type and Figure No.	Result	Type and Figure No.	Result
NA	NA	NA	NA
NA	NA	NA	NA

Radiographic Results For alternative qualification of groove welds by radiography in accordance with QW-304 and QW-305 Acceptable

Test Conducted by Baldwin Associates Laboratory-Test No. WT-5165  
per N/A

TRANSMITTAL # TSA-1791 11/13/84  
DRC

**FILLET WELD TEST RESULTS (See QW-462.4(a), QW-462.4(b))**

REFERENCE COPY

Fracture Test \_\_\_\_\_  
(Describe the location, nature and size of any crack or tearing of the specimen)

Length and Per Cent of Defects \_\_\_\_\_ inches \_\_\_\_\_ %

Macro Test-Fusion \_\_\_\_\_

Appearance-Fillet Size \_\_\_\_\_ in. X \_\_\_\_\_ in. Convexity or Concavity \_\_\_\_\_ in.

Test Conducted by \_\_\_\_\_ Laboratory-Test No. \_\_\_\_\_  
per \_\_\_\_\_

We certify that the statements in this record are correct and that the test welds were prepared, welded and tested in accordance with the requirements of Sections IX of the ASME code.

Date of employment 3-27-84 Signed BALDWIN ASSOCIATES  
Date 3-30-84 By Victor W. Thompson (Organization)

(Detail of record of tests are illustrative only and may be modified to conform to the type and number of tests required by the Code.) 19

NOTE: Any essential variables in addition to those above shall be recorded.

ATTACHMENT #12

Item 12

Reference 2 enclosure letter requested evaluation in addition to that provided in Reference 1.

The response to Item 12 provided in Reference 1 was re-reviewed and determined to be acceptable. However, since the time of that response, subsequent procedure revisions were made to BAP 2.10 - Equipment Installation and BAP 2.6 - Instrumentation. BAP 2.10 was revised to address traveler numbering and location verifications for pipe stands and all references to pipestands have been removed from BAP 2.6.

Baldwin Associates concludes that the installation of pipestands is performed in accordance with BAP 2.10.

ATTACHMENT #13

Item 13

The following is provided as a response to the "Notes" and "Summation" section of Reference 2 enclosure letter.

NCR 17399 has a correct disposition. Subsequent NCRs were written to further justify and clarify the disposition however those NCRs did not change the bottom line disposition on NCR 17399. Several special evaluations have been conducted on the Nonconformance Program (BAP 1.0). The results of these evaluations conclude that NCRs are properly initiated, dispositioned, reviewed and implemented.

The final documentation processed through the Document Review Group is an actual and accurate reflection of the status and quality of the hardware in the field. Over 130,000 Document Exception List items have been identified by the DRG. They have been evaluated and it has been determined that none of the potential hardware-related nonconformances resulting from the record reviews are safety-significant. That is, if the nonconforming conditions were left unidentified by the Record Verification Program, no adverse effect on plant safety would have resulted.

It is true that the reviewers are required to follow the prescribed review program and checklists. However, the quality of the hardware is not in question as a result of this program because the review program is a supplement to the QA program which among other aspects, involves first line QC and QA audits. Determination of the actual quality of hardware and supporting documentation is made by first line inspection.

It is recognized that the documentation is not perfect. However, since the evaluation of the 130,000 DEI items revealed that none represented a safety significant problem, there is adequate confidence in the acceptability of the CPS Construction QA Records.

740  
#

Original Concern	Original Response (CA-1276-85 Anderson to Osborne)	New Concern (NCR Letter, Dated May 7, 1985)	BA Response to New Concern Including Resolution of IPQA Comments	BA Response to IP Comments (LWO #23985)	Original BA Position Change
Item 1: NCR 17399 Preht/Int Pass Temp. not ver- ified	NCR 27309 addresses	Resolved (Ltr. REP to LWO 2/28/85)	None required.	None required.	-NO-
Item 2: DEL H051296 a. Res. #3(QC) Cover Bolt Torque - No Documentation	K-2841/ BAP 2.10, Att. 5 These bolts only required snug tight	Accept at stated CA-1276-85, Att. #2, Item 2	None required.	None required.	-NO-
b. Res. #5 (PE) No traveler requirement to maintain trace- ability of manway bolts & nuts (orig- inal material re- inst. or new nuts/- bolts)	Tank hold down brac- ket assembly incl. all thread studs/- nuts wired to cover- verified by QE/- System Engr. No torque or material verification re- quired.	Accept as stated CA-1276-85, Att. #2, Item 2	None required.	None required.	-NO-
Item 3: DEL F045001 Res. #1 (TS) Purge not ver- ified (H/P deleted 12-28-81)	CR 13 R/2 Res. A Aug D requires only final visual. De- termined after traveler prepara- tion, H/P deleted. CR13 R/2 Res. AYC	Contradicts BAQA manual for Aug D/Safety-related. Allegation of ques- tions controlling documents for site K-Specs, GRs. ASME '74, 10CFR50 & PSAR/FSAK regarding Aug D? BAQAM im- poses Sect 9 - Purge was required.	Replace last ¶: K-2882 classified Aug D as non-safety related, subject to quality requirements of Sec. 113. BA <i>l.f.c.</i> traveler <i>program</i> all work rec'd necessary minimum QC - even though draw- ing indicated non- safety.	Last two (2) ¶ - difficult to follow & the BAQE eval- uation does conflict with BAQAM. The term "Aug D, non- safety work" is the issue.	a. No - But the original position (CR 13) was expanded to include BAQAM & S&L K-Spec require- ments for Aug D

22

<u>Original Concern</u>	<u>Original Response (CA-1276-85 Anderson to Osborne)</u>	<u>New Concern (NCR Letter, Dated May 7, 1985)</u>	<u>BA Response to New Concern Including Resolution of IPQA Comments</u>	<u>BA Response to IP Comments (LWO #23985)</u>	<u>Original BA Position Change</u>
Item 3 (Continued): RES #2 (PE) Dwg. non-safety, U-only (BAP 2.26, Aug D, safety related) (IOCFR 50, App. B, Criterion III)	K-2882, Sec. 113, Aug D is non-safety related.				
Item 4: NCR 70488 - Do not agree with disposi- tion.	Base material on traveler incorrect - WPS specified incor- rect. WPS used N-1-1-N & N-1-1-A-Y name variables. NCR states and corrects this.	No comment - con- cern: BA/DRG pro- gram to <u>mask</u> sus- pected noncompli- ances rather than "document & re- solve". Ref: Item 5, evaluation, rep letter of position 1-13-85, NCR 17399 resolution.	None required.	None required.	No - But definition of BA/DRG & other existing verifica- tion activities were provided. NCR 17399 & supporting docu- mentation reviewed & acceptable.
23 Where does it state NCR dispo beyond scope of DRG?	NCR dispo evalua- tion/accept is be- yond DRG scope. Not proceduralized. PAD & stand alone NCRs reviewed by DRG per review checklist - GB for presence & completeness of back-up documenta- tion to support NCR closure. Traveler NCR dispos not re- viewed by DRG.				

<u>Original Concern</u>	<u>Original Response (CA-1276-85 Anderson to Osborne)</u>	<u>New Concern (NCR Letter, Dated May 7, 1985)</u>	<u>BA Response to New Concern Including Resolution of IPQA Comments</u>	<u>BA Response to IP Comments (LWO #23985)</u>	<u>Original BA Position Change</u>
Item 5: DEL E044218 #1 Insufficient instr. & documentation to indicate scope of rework activities	NCR should not have been stand alone. BAP 1.0 R/14, Chg. B requires all documentation necessary to support NCR dispo be attached. Copy of completed NCR will be placed in traveler.	Accept evaluation as stated concern: Ref. Item 4 - definition of total verification program provided.	None	None	-NO-
Item 6: DEL IO 54895, RES #1: Can't close out traveler with NCR which requires QA/DRG final review.	NCR 70620 was identified Stand Alone. Work will be documented and attached to NCR. Separate DRG review of NCR to checklist GBC. NCR copy in traveler before ANI review.	Disagree: NCR 70620 refers to hgr. traveler MS-3-D; disp refers to piping traveler, MS-3-B. Both travelers finalized by DRG 2-1-85. MS-3-B does not contain copy of NCR 70620.	Insert reference as noted.	IP request one minor clarification of a ref.	No - however BAP 1.0 revised, stand alone NCR copies are not put in traveler. NCR 70620 ANI reviewed 1-29-85, ANI review associated travelers at his option.
Item 7: DEL B045658 #7 & 2: NCR 70234, Blk 18, item 3, not complied with - no traceability CMTR to orifice plates.	NCR 70234 states this item cannot be complied with; NCR 70270 generated - downgraded all but 4 plates to Class D. These 4 accepted per ECN 4543.	Evaluation questionable - ECN 4543 invokes NCA-1273, S '80. Cannot verify. BA can invoke NCA-1273. QC/IR 84-292 identifies orifice plates in field - contradicts with plates identified on ECN-4543.	BA provided IP a complete explanation with appropriate records (resolved).	IP could not find 4 of the plates - "must still be in field".	No - Explained code requirement for use of later code edition.

<u>Original Concern</u>	<u>Original Response (CA-1276-85 Anderson to Osborne)</u>	<u>New Concern (NCR Letter, Dated May 7, 1985)</u>	<u>BA Response to New Concern Including Resolution of IPQA Comments</u>	<u>BA Response to IP Comments (LWO #23985)</u>	<u>Original BA Position Change</u>
Item 8: DEL F043263 #3(TS): Counterbore reports - Calibration due date not recorded. (BAP 2.5)	BAP 2.5 not applicable, subcontractor (NDT Cons.) records verify calibration. See 50.55e, 55-83-02.	Accept as stated. Concern: Ref. NA-4000 Cert. Holder resp. for subcontractors QA program (audits).	None required.	No IP comments.	No - BA provided listing of surveys, etc., of NDT Consultant.
Item 10 (Was Item 9): DEL C024627 #3 & 4 (TS): WPS N-1-l-BA-M violated, alternate WPS entry made after weld complete, no purge as required.	NCR 70715 identified WPS entry after weld complete. NCR 70715 reviewed by QE NRG and closed 2-6-85.	Disagree (Ref. Traveler RT-27). DEL Item 3 still valid, resolution unacceptable. NCR dispo unacceptable as written - purge requirement not addressed.	None required.	No IP comments.	No - NCR dispo did not address purge - no purge required.
Item 11: DEL ZZ40781 #3: Welder not certified to GTAW F*191, S.D. Short, for welding on 8-23-84.	S.D. Short through qualification & use of process was qualified GTAW through 10-19-84.	Authenticated records for this welder could not be found on file.	None required.	No IP comment.	No - copies of welder qualification records have been provided.

Original Concern	Original Response (CA-1276-85 Anderson to Osborne)	New Concern (NCR Letter, Dated May 7, 1985)	BA Response to New Concern Including Resolution of IPQA Comments	BA Response to IP Comments (LWO #23985)	Original BA Position Change
Item 12: Traveler ISPS-RT032-56 (Cont. Bldg.) Instr. Pipe Stand, S-I, Inst. & Welding: Reference procedures not applicable to scope of work. JV-522(QC) improper inspection criteria; no surveyors verification of location (BAP 2.6); JV-339 initiates use of improper final QA review checklist (MAG vs. IDC)	BA/RE classified instrument pipe stands as equipment - use BAP 2.10 for installation. No surveyor verification required. JV-522 covers necessary inspection attributes. DRG checklist MAF is satisfactory for final review.	Request NRC to evaluate intent of RG 129 & 10CFR50, V with respect to BAP 2.6 as related to traveler.	Clarification added for procedure applicability to fabrication/-installation.	What is impact on equipment - (pipe-stands) installed prior to revisions of BAP 2.10 and 2.6.	-NO-

Original  
Concern

Item 13:

Notes & Summation

- a. Validity of all vaulted "No exception" NCRs.  
b. Reviewer cannot render an "accurate" assessment of the quality of the documentation versus actual hardware.  
c. Prescribed review program & checklists leaves quality of hardware in question.  
d. Quality of CPS in question - "actual status" of hardware.

Original Response  
(CA-1276-85 Anderson  
to Osborne)

Determination of the quality of hardware and supporting documentation is made by first line inspection. The final documentation reviewed by DRG is an accurate reflection of field hardware. Over 130,000 DEL items have been evaluated and none of the potential hardware-related nonconformances resulting from the record reviews are safety-significant.

New Concern (NCR  
Letter,  
Dated May 7, 1985)

None - the Notes & Summation were primarily to the NRC by this individual.

BA Response to New  
Concern Including  
Resolution of IPQA  
Comments

IP comments incorporated.

BA Response to IP  
Comments  
(LWO #23985)

Put back closing statement in the draft, but leave out reference to NRC. 3rd ¶ rewrite needed - all QA/QC personnel have right to identify problems.

Original BA  
Position Change

N/A - this item is Notes & Summation and did not receive any initial BA evaluation or response.