

ILLINOIS POWER COMPANY



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

August 23, 1985

Docket No. 50-461

Director of Nuclear Reactor Regulations
Attn: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

PRIORITY ROUTING	
First	Second
RA	RC
DHA	EIC
URS	SGA
CRSS	HL
ORNA	OL
	OJ
	PAO

FILE _____

Subject: Clinton Power Station
Safety Related Instrument Tubing
Program Clarification

Dear Mr. Butler:

In response to the telephone conversation (July 23, 1985) between D. Wilson, P. Raysircar and C. T. Gentile of Illinois Power Company (IP) with B. Kirkwood of the Nuclear Regulatory Commission, Mechanical Branch, Attachment A of IP's letter on Safety Related Instrument Tubing Program, dated July 18, 1985 (U-600183), has been revised as attached. The revisions are indicated by a vertical line in the right hand margin. Additionally, the responses to Mr. Kirkwood's specific questions are as follows:

1. Question: Does this program include compression fittings?

Answer: No.

2. Question: Does this program utilize any Powerstrut, Unistrut, or Superstrut materials? If so, is it purchased and installed per a 10CFR50 Appendix B QA program?

Answer: Powerstrut materials have not been used in the fabrication of instrumentation supports. Superstrut materials were used but were subsequently replaced with Unistrut. Unistrut materials have been used and the procurement and installation of the materials are in accordance with 10CFR50 Appendix B. Please note that material traceability concerns, regarding Superstrut and Unistrut, were addressed in IP's Potential 10CFR50.55(e) Deficiency 55-84-02 (Ref. Letter U-600192 dated July 9, 1985, from D. P. Hall to J. G. Keppler).

3. Question: Does IP intend to use this program on tubing greater than 1/2 inch?

8509030445 850822
PDR ADOCK 05000461
A PDR

AUG 27 1985

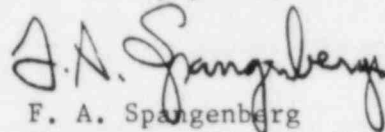
Answer: No. The proposed program applies to tubing one-half inch or less in diameter.

4. Question: Is Code Case N-127 being utilized at the Clinton Power Station?

Answer: No. At present IP has not approved usage of Code Case N-127.

If you have any question regarding this letter, please feel free to contact our licensing staff directly. Thank you for your prompt response to our original submittal.

Sincerely yours,



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

TLR/kaf

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

SAFETY CLASS 2 AND 3

INSTRUMENT TUBING REQUIREMENTS

	PRESENT PROGRAM (ASME III - 1974/S74)	PROPOSED PROGRAM (SAFETY CLASS T)*
1. Organization	Required.	Same as present program.
2. Training	Required.	Same as present program.
3. Design Specifications	Pressure boundary Integrity for SSE and dead loads, thermal.	Same as present program.
4. Engineering, Design, and Document Control	10CFR50, Appendix B.	Same as present program.
5. Procurement Control	ASME-approved suppliers, CMTR and/or C or C.	Same, except no N-stamp required.
6. Receiving, Inspection, Identification, Storage, and Handling Control	Physical Inspection and review of documentation, ANSI storage and material identification.	Same as present program.
7. Fabrication and Installation Control	Control Drawing Package, BA/Q&TS and ANI review of weld data sheets and established hold-points, material traceability.	Same as present program except no mandatory holdpoints; no third party documentation review; no individual packages per drawing; normal Category I Inspection Report is required (Att. B and C).
8. Weld and Brazing Control	ASME III Procedures - Weld data package each weld; ASME IX welders.	Same as present program. (Att. B and C).
9. Bolted and Other Mechanical Joints	No special bolted joints. Document special connection torque on Inspection Report.	No special bolted joints; mechanical fittings installed to manufacturer's requirements, documented on Inspection Reports.
10. Heat Treatment and Special Operations and Repairs	Not Applicable.	Not applicable.

* Safety Class T is the new CPS designation for the above proposed program.

SAFETY CLASS 2 AND 3

INSTRUMENT TUBING REQUIREMENTS

	PRESENT PROGRAM (ASME III - 1974/S74)	PROPOSED PROGRAM (SAFETY CLASS T)*
11. Fabrication and Installation Inspection	BA/Q&TS, ANI, ASME acceptance, material traceability required each piece to specific material, heat and lot number.	Same, except limited third party surveillance; Category I material marking or exclusive purchase of Category I material, controlled to point of use (Att. B and C).
12. Nondestructive Testing	Radiographic testing, liquid penetrant or magnetic particle for Class 2. Visual examination for class 3.	Same as present program. (Att. B and C).
13. Nonconformances	Nonconformance Reports (NCR).	Same as present program.
14. Control of Measuring and Test Equipment	Required.	Same as present program.
15. Authorized Nuclear Inspector and Code Certification	N-stamp.	Not Applicable.
16. Construction Quality Assurance Audit Program	IP, ASME, ANI, BA.	BA, IP.
17. Company Quality Assurance and Control Manual	BA/Q&TS Program Manual IP ASME III Control Manual.	BA/QA Program Manual.
18. Final Documentation	As-built data package BA/Q&TS-ANI Certification.	Documented on Inspection Reports, BA/Q&TS acceptance.
19. Certificate Holder (Installation Subcontractor)	Required.	Same as present program.
20. Pressure Testing	1.5 times design pressure for Hydrostatic, 1.25 times design pressure for Pneumatic BA/Q&TS-ANI to witness.	Same as present program, except limited third party surveillance. (Att. C).
21. IPs' Responsibilities When Owners' Designee	Prepare code data forms N5, N3, ANI Witness N-stamp.	Not Applicable.

* Safety Class T is the CPS designation for the above proposed program.

SAFETY CLASS 2 AND 3

INSTRUMENT TUBING REQUIREMENTS

	PRESENT PROGRAM (ASME III - 1974/S74)	PROPOSED PROGRAM (SAFETY CLASS T)*
22. IP Operations under the ASME Section XI	Governs repair of components.	Not Applicable.
23. Exhibits	Numerous Forms.	Inspection Reports.

* Safety Class T is the CPS designation for the above proposed program.