

DmB

SEP 13 1985

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

Gentlemen:

- References:
1. Letter, D. P. Hall to J. G. Keppler, U-600197, dated 7/26/85.
 2. Letter, D. P. Hall to J. G. Keppler, U-600211, dated 8/6/85.
 3. Letter, D. P. Hall to J. G. Keppler, U-600215, dated 8/12/85.
 4. Letter, J. G. Keppler to D. P. Hall, dated 8/30/85.
 5. Letter, D. P. Hall to J. G. Keppler, U-600244, dated 9/6/85.

This letter is in reply to your letter of September 6, 1985 (reference 5), in which you proposed suspending overinspection program activities for electrical hangers; HVAC duct and duct supports; and cable tray, conduit, cable, and cable terminations (references 1 through 3, respectively). Region III has reviewed your proposal, and has concluded that you may proceed with the proposed suspension at your risk, pending NRC receipt and review of requested additional data. This conclusion is based on the following:

- Inspection of a random sampling of electrical raceway hangers disclosed that the hangers inspected were in an acceptable condition and that the welding was of acceptable quality. These inspection results support your conclusions concerning the quality of safety related electrical hangers at Clinton Power Station. (See Inspection Report Nos. 50-461/84010, 84029, 84043, 85002, 85013, 85022, 85030, 85041, 85042, and 85049).
- Inspection of a random sampling of HVAC duct and HVAC duct supports and in-process inspection of HVAC installation and inspection activities disclosed that the duct and duct supports inspected were in an acceptable condition and that the welding was of acceptable quality. These inspection results support your conclusions concerning the quality of safety related HVAC duct and supports. (See Inspection Report Nos. 50-461/85010, 85030, and 85049).
- Inspection of a sampling of as built cable tray, conduit, cable, and cable terminations disclosed that the cable tray, conduit, cables and cable terminations inspected were in an acceptable condition. These inspection results support your conclusions concerning the quality of safety related cable tray, conduit, cables, and cable terminations. (See Inspection Report Nos. 50-461/84010, 84029, 84032, 84043, 85002, 85013, 85022, 85030, 85041, and 85042).

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Inspection of the evaluation and disposition of nonconformance reports and engineering evaluations of their safety significance performed by Sargent and Lundy related to electrical hangers, HVAC duct and HVAC duct supports, cable tray, conduit, cable, and cable terminations disclosed that the Overinspection Program was functioning properly. These inspection results support your conclusions regarding the safety significance of the deficiencies identified by the Overinspection Program. (See Inspection Report Nos. 50-461/84029, 84032, 84043, 85013, 85022, 85027, and 85044).

Inspections by resident and regional based inspectors of the implementation of the Overinspection Program (BA Field Verification and IP Overinspection) during the past eleven months have not disclosed any significant problems. (See Inspection Report Nos. 50-461/84028, 84029, 84041, 84043, 85005, 85012, 85013, 85015, 85021, 85022, 85027, 85030, 85031, 85042, and 85044).

After considering the results of our inspections to date, as summarized above, Region III has determined that the following information is required to support our review of your Overinspection Program termination requests:

1. To enable Region III to determine if any new trends or types of discrepancies have been discovered, provide 1985 data to update Tables D-2, Number of Attributes Inspected by Type of Major Commodity, and D-3, Nonconforming Attributes by Commodity, of your "Results of Quality Programs for Construction of Clinton Power Station" dated April 1985.
2. To enable Region III to determine if the sample inspected is sufficiently large to be representative of the entire population, provide actual (in place of estimated) data for the percent of commodities inspected and the percent defective similar to the data provided in the attachment to reference 5.
3. To enable Region III to assess the significance of the nonconformances identified in 1985, provide the results of safety significance evaluations for those nonconformances identified after December 31, 1984 and categorized as B (B1 and B2) or C as in references 1 through 3. You need not provide these results for nonconformances which would not have been identified as discrepant under the new Visual Weld Acceptance Criteria (VWAC) issued by the Nuclear Construction Issues Group, which is now the governing document for visual weld acceptance criteria at Clinton Power Station.
4. To enable Region III to determine that a sufficient sample of both conduit and cable tray supports have been overinspected, provide an approximate percentage of cable tray supports and conduit supports in the total population of overinspected electrical raceway hangers.

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This revision to our information request of August 30, 1985 (reference 4), was verbally discussed between Mr. J. Karr of your staff and the resident inspector on September 11, 1985.

If you have any questions please contact R. F. Warnick at (312-790-5575).

Sincerely,

"Original Signed by James G. Keppler"

James G. Keppler
Regional Administrator

cc: DMB/Document Control Desk (RIDS)
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