

DMB

DEC 16 1985

Docket No. 50-461

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

Reference: Letter, D. P. Hall to J. G. Keppler, U-600318 dated
November 15, 1985

Gentlemen:

This letter is in reply to your letter of November 15, 1985, in which you proposed changes to your Record Verification Program. Your letter stated that you believe there is adequate basis to terminate the Record Verification Program for all categories of records covered by the program with two exceptions: Electrical Equipment (old work) and Miscellaneous Non-Travelers (old work). Your letter specifically requested that we perform a prompt review of your proposal and provide comments prior to your termination of the program.

We have completed our review of your proposal and our comments are enclosed.

We noted that attachment 2 to your letter specifically requested that Region III concur in the termination of the Record Verification Program. We cannot concur in your proposed actions at this time. Our inspection activities related to your QA Record Program have assumed up to now that IP would complete the Record Verification Program based on your commitment to review "All (100%) safety-related, fire protection, and augmented class D system QA records for acceptability" (reference Records Verification Program, Section 2.1 Scope). For that reason, our inspection in this area has been limited to review of the Records Verification Program, review of personnel qualifications, review of Records Verification Program implementation, and a limited review of early program results (document exception lists and generic resolutions). Our inspections were documented in inspection reports 50-461/83008, 83016, 84002, 84015, 84017, 84040, 85003, 85018, 85041, 85059, and various other inspection reports which address allegations related to your records and your Record Verification Program. At this time, there are two unresolved items and one violation concerning the adequacy of Clinton Power Station records and the record verification program. Additional inspection of the Record Verification Program results and the implementation of your normal Clinton Power Station QA Records Program will be required.

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We will be prepared to perform the necessary inspections during January 1986.

Thank you for cooperating with us in this matter. 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

Enclosure: Comments Concerning
Proposal to Terminate the IP
Records Verification Program

cc w/enclosure:
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Richard Hubbard
Gary N. Wright, Manager
Nuclear Facility Safety
Jean Foy, Prairie Alliance
Mark Jason, Assistant
Attorney General,
Environmental Control Division
H. S. Taylor, Quality Assurance
Division

RIII
RFW
Warnick/rl
12/12/85

yes
RIII
Hawkins
12/12/85

yes
RIII
Norelius
12/12/85

RIII
Reyes
12/12/85

RIII
Papernello
12/12/85

yes
RIII
Davis
12/13/85

yes
RIII
Keppler
12/14/85

ENCLOSURE

COMMENTS CONCERNING PROPOSAL TO TERMINATE THE IP RECORDS
VERIFICATION PROGRAM

1. As you know, quality assurance records furnish documentary evidence of the quality of items and of activities affecting quality. Those QA records you have designated lifetime records are categorized by ANSI N45.2.9 as being records which would be of significant value in demonstrating capability for safe operation; would be of significant value in maintaining, reworking, repairing, replacing, or modifying an item; would be of significant value in determining the cause of an accident or malfunction of an item; and those which provide baseline data for inservice inspection. Those QA records you have designated non-permanent are categorized by ANSI N45.2.9 as records of no significant value except as evidence that the activity was properly performed. We found no indication in your submittal or its referenced Results Reports that your evaluation of the Record Verification Program results considered the significance of the record or the potential impact of record deficiencies (document exceptions) on your ability to safely operate, maintain, and modify the Clinton Power Station.
2. The termination criteria used to support this proposal were very similar to the criteria proposed for termination of the Overinspection Program. However, we believe there is a fundamental difference between the purpose of the Record Verification Program and the purpose of the Overinspection Program which causes us to question the applicability of the criteria used. In particular, criteria B and C of attachment 2 to your letter may not provide a sufficient basis to judge the adequacy of program results to support the proposed termination.

With regard to criterion B, the criterion relates to the number of deficient attributes identified for a record commodity. However, the number of deficient attributes cannot be directly related to the number of deficient records; not all commodity attributes are of equal importance when judging the acceptability of the records (acceptability as defined in your program); and not all records are of equal importance with respect to plant operational safety. Thus we believe that a quantitative analysis, by itself, is an inappropriate basis to judge record adequacy.

With regard to criterion C, the criterion relates to safety-significant nonconformances with generic implications. This criterion excludes the majority of record deficiencies identified under the Record Verification Program (i.e., DELs) which seems to presuppose their insignificance to plant safety; no justification is provided for this.

3. We understand that the records categorized as "NEW WORK" in Tables 2.1 and 2.2 of attachment 2 to your letter had been subjected to all portions of your normal QA Program except IP receipt inspection prior to

performance of Record Verification reviews; nevertheless, significant numbers of deficient records attributes and some nonconforming hardware were identified during verification of those records. IP has not reported the significance of the record deficiencies identified or the number of affected records. We believe that IP should certify that the normal QA Program can and will identify significant record deficiencies prior to termination of the Record Verification Program.