

Central Files

September 29, 1978

Docket No. 50-461

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

Gentlemen:

Thank you for your letter dated August 31, 1978, informing us of the steps you have taken to correct the noncompliance identified in our letter dated August 4, 1978. We have no further questions regarding noncompliance items C, D, G, and H.

With regard to item A, we agree that ASME Section III, Division 2, does not include the requirement to limit mechanical splices to 25% in any horizontal plane, as stipulated in ACI 318-71, Appendix A. Your PSAR Section 3.8.1.2 (applicable codes and standards) references ACI 318-71, including Appendix A as well as ACI-ASME-359 (Section III, Division 2) for the containment. Therefore, we accept your response to this item and, during future inspections, we will utilize ASME Section III, Division 2 (1977) for our inspection criteria. Additionally, this item is no longer considered an item of noncompliance and will be deleted from our records.

In regard to item B, we are reviewing this matter with our Headquarters. Since your response references conversations between your site testing agency, U. S. Testing Company (USTCO) and NRC's Office of Inspection and Enforcement's Division of Reactor Construction Inspection (RCI), we have discussed this matter with the appropriate RCI personnel. Our discussions indicate that, while this matter was discussed between USTCO and RCI, no NRC position on this matter was taken, and the information contained in your response is incorrect. We will inform you of the NRC position on this matter at the conclusion of our reviews.

In regard to item E, we understand that the document used to record Cadweld repair and new welding of Cadwelds will be clearly annotated to indicate the type of activity being recorded. In addition, we understand that engineering evaluation of the inspection of welding performed relative to NCR's 834 and 1165 (identified as 1125 mistakenly in our letter) will be accomplished in lieu of the NDE inspection specified for new welds, while 1187 will be inspected as required on the original weld.

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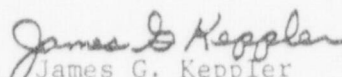
OFFICE	RIII	RIII	RIII	RIII	RIII	RIII
SURNAME	Vandel/Gallagher/Williams	Danielson/Spessaard/Hayes	Heisenman/Norelius	Keppler/m		
DATE	09-29-78	09-29-78	09-29-78	09-29-78	09-29-78	10-2-78

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In regard to item F, we intend to review, during subsequent inspections, the acceptability of the program controls utilized to verify gap dimensions, both before and after Cadweld firing. If the results of this review indicate that proper controls were established and implemented to preclude improper gaps, we will retract this item of noncompliance.

The contents of this letter were discussed with Mr. J. D. Geier, of your staff, by Mr. R. F. Heishman, of my staff, on September 28, 1978.

Sincerely,


James G. Keppler
Director

cc w/ltr dtd 8/31/78:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Mr. Dean Hansell, Office
of Attorney General

ILLINOIS POWER COMPANY

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500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

August 31, 1978

Mr. James Keppler
Director, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This is in response to your letter of August 4, 1978, which forwarded IE Inspection Report No. 50-461/78-05, detailing the findings of the NRC/RO III inspection conducted at Illinois Power Company's Clinton Power Station site on May 31 - June 2, 1978. The response to the infraction items contained in the report is described below and correlated directly to the sequential listing in Appendix A to your letter.

- A. Illinois Power has concluded that Item A of your report is not a matter of noncompliance. This conclusion is based on the fact that ACI 318-71, Appendix A, permits alternate methods of design. Consequently, S&L selected ASME Section III, Division 2 (1977) for this purpose. Although this results in a conservative design, it nonetheless permits the construction conditions which you observed, i.e., more than 50 percent of the bar splices may be in any horizontal plane.
- B. Applicable project specifications have been revised to omit ASTM E-329 requirements for tri-annual CCRL inspections. The site testing agency (USTCo.) has advised IP that, based on conversations with the NRC Division of Reactor Construction and Inspection, CCRL certification requirements in accordance with ACI 301 are inappropriate for CPS.
- C. (1) The cadweld manufacturer (ERICO) has advised IP that filler material "flashing" at the end of vertical cadweld splices does not affect the performance of the splice, provided other inspection criteria are met. Instruction and training has been given to emphasize proper packing at the ends of sleeves prior to firing. However, the associated inspection criteria have been modified to indicate the acceptability of flashing if it occurs.

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- C. (2) The porosity at the end of containment cadweld #1-DWV-39-1 is fine and widely dispersed. This is acceptable according to written information we have obtained from the cadweld manufacturer. Project specifications and inspections requirements have been modified to clarify acceptance criteria.
- D. (1) Baldwin Associates Liquid Penetrant Examination Procedure BTS 301.2 has been temporarily withdrawn until it is qualified for a lower temperature limit of 45°F and reissued. It has been verified that no PT examinations for the record were performed on permanent plant installations below 45°F.
- D. (2) Corrective action for this item was taken during your inspection. No further response is necessary.
- D. (3) NDE personnel certifications for Baldwin Associates and United States Testing Co. personnel performing non-destructive examinations at the CPS site have been amended to document their experience. Experience recorded is appropriate to the individuals' levels of qualification.
- E. (1) While the document used to record the additional welding on Type 'B' cadweld sleeves is entitled "Weld Repair Form", the work specified and recorded on this form is new welding performed per approved welding procedures. Use of this form is merely an administrative convenience to preclude issuance of complete new work packages for such work. The form properly records the new welds and will continue to be used.
- E. (2) Welds on Type 'B' sleeves of the nature addressed in your report are now being examined using the same NDE method as that used on the original weld. Welds on sleeves listed in NCRs 834, 1125, and 1187 have been examined in accordance with the engineer's disposition instructions and found acceptable.
- F. The gap between reinforcing bar ends noted during the IE inspection was associated with bars which had not been finally fitted prior to splicing. The work was incomplete and not ready for inspection. Final inspection of these bars was performed at the appropriate time, and they were found to be acceptable.
- G. Baldwin Associates Procedure 1.9 addresses the handling, preservation, and cleaning of stainless steel in general terms. Provisions of this procedure are applicable to stainless steel within containment. A nonconformance report (NCR) was originated to control the concrete contamination situation noted on the drywell wall during the IE inspection. This area has been cleaned, inspected, and the NCR properly dispositioned. Measures

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have been established to prevent future recurrences of similar conditions. These measures include use of temporary protective coverings to the extent possible and appropriate cleaning during the concrete pour process.

- H. The Type 'B' cadweld sleeves found to be improperly preserved during storage have been cleaned and recapped. Procedures have been established for periodic inspection of these sleeves in storage. Additionally, procedures assure proper cleanliness levels in these sleeves prior to splicing. Metal storage containers have been provided for cadwelding tools in the work areas and are in use.

It is believed that the foregoing adequately addresses each item of noncompliance conveyed in your report. I trust that this completes our corrective action to your satisfaction.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Gerstner" followed by a stylized flourish.

W. C. Gerstner
Executive Vice President

RSU/jh