

ILLINOIS POWER COMPANY

U-0143

Q37-80(05-22)-6

500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

May 22, 1980

Mr. Gaston Fiorelli, Chief
Reactor Construction and
Engineering Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

This is in response to your letter dated April 25, 1980, which included a Notice of Violation and Inspection Report No. 50-461/80-04. Illinois Power Company's response for the one item of noncompliance cited is as follows:

1. Design Control
The notice of infraction states, in part:
 - "a. The licensee failed to assure that Sargent and Lundy, the Architect Engineer (AE), provided adequate instructions as to the number of holes in the 4.1 KV switchgear which should be welded to the embedded angle iron.
 - b. The licensee failed to assure that the AE correctly translated the PSAR requirements stated in paragraph 3.8.5.2 by specifying the AWS D1.1-72 code for welding and inspection in the drawings/instructions."

The Sargent and Lundy design drawing, which provides detail instructions for switchgear installation, will be revised to identify the specific holes in the 480V switchgear to be welded to embedded angle iron. This drawing revision will also change the weld type to a type compatible or equivalent with the manufacturer's recommendations and in compliance with the welding standards of AWS D1.1-72. Issuance of the drawing revision is expected by June 10, 1980.

To avoid further noncompliances of a similar nature, all drawings which provide detail instructions for installation of major class 1E electrical equipment (4.1KV/6.9KV switchgear and 480V motor control centers) are being reviewed by the architect engineer to provide assurance that the technical details are correct and comply with PSAR commitments. This review is in addition to the routine second party review performed for all design documents.

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Mr. Gaston Fiorelli

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It is anticipated that all action regarding this item of non-compliance will be completed no later than July 1, 1980.

Illinois Power acknowledges the unresolved item noted on page 11 of Report No. 50-461/80-04, but would like to clarify the position stated in the April 3, 1980 meeting at NRC Headquarters in Bethesda.

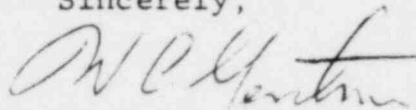
In direct response to a request by Mr. Reinmuth to make some statement concerning the Clinton SRV's, the IP representative present offered the following:

A definitive position on acceptance of the valves cannot be made at this time, because full evaluation of radiographs and other supporting documentation is not complete. After an initial review of all film for 20 valves, it was found that approximately 25% of all radiographs did not meet code requirements for film quality. It was further stated that this review had not been conducted to evaluate the film for rejectable defects (i.e., defects in the castings) however, none had been noted. In direct response to a question by the DIKKERS representative concerning readability of the film which did not meet code requirements, it was stated that some of the film was considered to be readable, however, 2 to 4 film per valve were completely illegible due to extreme over or under exposure. It was also stated that other evidence existed which may provide the necessary assurance that the valves are suitable for use to perform their intended design function.

As a statement of current position on the safety relief valves for Clinton; it is not Illinois Power's intent to install or use these valves unless the question of nonconforming radiographs is satisfactorily resolved with NRR.

I trust that the above paragraphs when fully implemented will be acceptable in meeting our commitments to the regulations.

Sincerely,



W. C. Gerstner
Executive Vice President

AJB/jh

cc: CPS/DRC/Microfilm