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ILLINOIS POWER COMPANY

U-0135
Q37-80(03-26)-0

500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

March 26, 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 February 26, 1980, which included a Notice of Violation and Inspection Report No. 40-461/80-02. Illinois Power Company's response for the two items of noncompliance cited is as follows:

1. Document Control

The notice of infraction states, in part:

Contrary to the above, licensee failed to provide measures for obsolete or superseded documents against inadvertent use, in that a superseded Calibration Instruction No. 009, Revision dated March 8, 1979, had not been replaced in BA QA Manual Copy No. 4.

The subject calibration instruction was attached to a procedure and it was present in the QA Manual as a reference document only. To correct this singular problem, the obsolete instruction has been replaced by the current revision (Revision 3). Also, to prevent recurrence of this type of problem, a general notice has been sent to holders of controlled documents reminding them of the importance of prompt replacement of obsolete material, even though it is being used only for reference purposes. Most important, however, and as confirmed by the NRC inspector, Revision 3 was being used at its proper point of application--the calibration laboratory. Therefore, we are assured that equipment was being properly calibrated.

We wish to avoid the possibly misleading impression that our contractor, Baldwin Associates, has not provided adequate measures for controlling obsolete or superseded documents. On the contrary, Baldwin Associates Procedure 2.0, "Document Control," describes their control procedure, and the efficacy of this procedure has been demonstrated extensively.

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2. Nonconformance Control

The notice of infraction states, in part:

Contrary to the above, the licensee did not take prompt corrective action to preclude repetition of nonconformances, in that an excessive number of NCRs were allowed to occur prior to taking corrective action such as CARs Nos. 048, 042, and 040.

We disagree with this finding. Each of the NCRs cited in the inspection report has been reexamined for promptness of corrective action and significance. We find that the NCRs were given appropriate formal corrective action in a timely manner. We also believe that to the extent that they were significant, suitable measures to prevent recurrence were taken.

The inspector's statement, "excessive number of NCRs," may be caused by the philosophy which we apply to the Clinton non-conformances reporting system. We intentionally use a very broad scope NCR system which certainly causes a large number of NCRs but which also has the advantage of providing a single control system for all nonconforming conditions irrespective of their significance or cause. As a result, it is necessary to carefully evaluate each NCR in any group which may appear to have similarity. The number of NCRs, even in a single category, is not necessarily a measure of, or even related to, the effectiveness or timeliness of the corrective action system.

To clarify the procedure being used, a space for a "statement of corrective action" is being added on the NCR form. This will give better visibility to the consideration which is given to corrective action, as well as its timeliness and its appropriateness. This change will result in a modification to Baldwin Associates' Procedure 1.0, "Nonconformances," and should be effective by April 15, 1980.

We do not intend or expect this change to affect the basic philosophy of our NCR system, and we will continue to use this system as a broad design and work control mechanism for the Clinton Station.

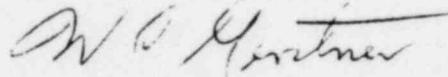
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I trust that the above actions constitute an acceptable response and, when fully implemented, will satisfactorily complete our corrective action.

Sincerely,



W. C. Gerstner
Executive Vice President

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cc: CPS/DRC-Microfilm, T-29