ILLINOIS POWER COMPANY



500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

September 19, 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 August 20, 1980, which included a Notice of Violation and Inspection Report Number 50-461/80-14. The one item of noncompliance cited in this report states in part:

"Contrary to the above, the licensee failed to follow procedures and instructions in the implementation of welding requirements of the control rod drive housing to the reactor vessel bottom head penetration, in that, Reactor Controls Incorporated (RCI), Process Requirements Sheet for Reactor Pressure Vessel Internals Installation Work, Weld Number 32, required a mock-up weld using WPS 34/34-OTS-1 1G/2F position. The Performance Qualification Records of mock-up Number WMU-32 indicated that six of the nine welders performed the mock-up using the 1G/1F position."

Investigation of this matter has shown it to be a case of documentation errors. The CRD housing weld is actually 2F for the fillet portion of the weld and 3G for the groove portion of the weld. All Reactor Controls Incorporated (RCI) welders performing CRD housing welds had been qualified in the 6G position (automatically qualifying them in the 3G position), and had performed additional qualification to Mock-up Procedure WMU-32. The latter fulfilled the requirement for the 2F, restricted access, position qualification. Therefore, the welders performing CRD housing welds were fully qualified, however, RCI records did not reflect the proper qualifications.

Specific corrective action is being taken to revise the Process Requirement Sheet and individual Performance Qualification Records to reflect the proper requirements and actual qualifications. These records will be corrected by October 1, 1980.

To avoid recurrence of this type of documentation error, cognizant RCI personnel have been instructed on the requirement for accurately determining qualification requirements and recording them.

I trust that the above actions constitute an acceptable response and will satisfactorily complete our Corrective Action.

Sincerely,

L/J. Koch Vice President

cc: CPS/DRC Microfilm T-29
Director - IP Quality Assurance
H. H. Livermore, NRC Resident Inspector