



IMMEDIATE ACTION LETTER

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TIC

March 5, 1981

Docket No. 50-461
Docket No. 50-462

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



Gentlemen:

This refers to discussions conducted during the period February 20 and 27, 1981, at the Clinton site between Messrs. G. M. Brashear, J. S. Spencer, M. C. Hollon and other members of your organization and D. W. Hayes and other members of this office regarding our further examination of the design, fabrication, installation and inspection of seismic Category I supports and restraints. This Immediate Action Letter also refers to and supersedes our Immediate Action Letter dated February 18, 1981, and updates and documents in more detail the corrective measures taken or to be taken concerning these activities.

We understand you have taken or plan to take the following actions:

1. Concerning Design of Large Bore Pipe Supports
 - a. Sargent & Lundy (S&L) will not release the 64 seismic supports presently on "Hold" per S&L Engineering Change Notice (ECN) 2071 dated February 20, 1981, and the 176 seismic supports previously on "Hold" per S&L ECN 844 dated October 11, 1978, and ECN 908 dated December 4, 1978, for fabrication prior to the design calculation approval by S&L.
 - b. No seismic supports will be fabricated or installed prior to the performance, review and approval of design calculations by authorized personnel.
2. Concerning Installation and Inspection of Large Bore Pipe Supports
 - a. You have stopped the subject activities since February 13, 1981, per Baldwin Associates inter-office memorandum JEF-63-81.

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- b. You have revised and upgraded your program to control installation of pipe hangers and have proposed initiation of a two part trial installation and inspection program described in Baldwin Associates inter-office memorandum JEF-68-81. This office has concurred in your trial program with the exception that we understand only 15 new and 15 old hangers are to be selected for installation and inspection in the second part of the trial program. The 15 new hangers will comply with item 1 above.
 - c. This office will review the results of your trial program before concurring in any further lifting of the Stop Work Order for hanger installation, rework, modification, or inspection.
3. Concerning Installation and Inspection of Pipe Penetration Assemblies
- a. The present nonconforming conditions relating to the reactor water cleanup process and guard pipes, including zero clearance, and possible compressive forces between the process pipe and seismic guides will be evaluated by S&L. The causes of the nonconforming conditions will also be evaluated and it will be determined if inadequate construction and QC inspection measures contributed to the nonconforming conditions and if similar conditions exist on other installed pipe penetration assemblies.
 - b. No further work on any pipe penetration assemblies will take place prior to the S&L determination of the effects and causes of the nonconforming conditions discussed in item 3a above which are documented on NCR 4151 dated March 2, 1981.
 - c. This office is to concur in your evaluation discussed in item 3a above, including evaluation of the existing conditions of other installed pipe penetration assemblies, prior to your decision to resume work activities in this area.
4. Concerning Electrical Cable Raceway Supports
- a. Procedures have been or will be developed and approved for:
 - (1) IPC preparation and review of "As Built" drawings.
 - (2) S&L review and evaluation of "As Built" drawings to determine if they meet design requirements.
 - b. Completed IPC "As Built" drawings which have not yet been transmitted to S&L will be reviewed and corrected as required per the procedure developed in accordance with item 4a(1) above.

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- c. IPC "As Built" drawings which have been previously transmitted to S&L are to be re-reviewed per the procedure developed in accordance with item 4a(2) above to ensure:
 - (1) There are no conflicting dimensions or dimensions with indeterminate orientation and
 - (2) "As Built" design parameters are implemented in the base design documents for each "As Built" drawing prior to transmittal of the drawing from S&L to the Clinton site.
- d. "As Built" drawings which have been given a status by S&L and which have been transmitted to the Clinton site and which do not comply with items 4c(1) and/or 4c(2) above are to be corrected and returned to S&L as appropriate.

5. Concerning QA Audit and/or Surveillance Plans

QA audit and/or surveillance plans are to be developed on a priority basis in order to periodically assess the adequacy and effectiveness of the revised program for the design, fabrication, installation and inspection of seismic Category I supports and restraints. These audit/surveillance plans are to be implemented starting with the trial program discussed under item 2b above and continue until the completion of the Category I support and restraint activities.

Please inform us immediately if your understanding of these items is different from that stated above.

Sincerely,

A Bert Davis

for James G. Keppler
Director

cc: Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Mr. Dean Hansell, Office of
Assistant Attorney General
Mr. Gary N. Wright, Deputy
Director
Mr. Pandall L. Plant, Prairie
Alliance

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