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U-0243
Q37-81(06-05)-L
June 5, 1981

Mr. C. E. Norelius, Acting Director
Division of Engineering and Technical
Engineering
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Norelius:

This is in response to your Notice of Violation and Inspection Report Number 50-461/81-09. Illinois Power Company's response for two items of noncompliance cited is as follows:

1. Instructions, Procedures and Drawings:

The Notice of Violation states, in part:

"Contrary to the above, as of April 9, 1981, the electrical contractor's Power Generation Control Complex (PGCC) interconnecting cable pulling activities were not accomplished in accordance with paragraph 5.2.1(f) of Baldwin Associates Procedures 3.3.7 which states, "Obstructions are cleared from cable pan/PGCC floor ducts, allowing cables to be pulled free of any sharp edges within the ducts." Sharp edges in the PGCC floor duct were observed at three locations resulting in damage to two cables."

The following corrective action is being taken in this matter. Damage to the above cited cables has been documented on a Nonconformance Report as noted by the inspector in your report (50-461/81-09). Disposition of the nonconforming condition will be handled in accordance with normal design control practices. Most of the cable pulling activities for the PGCC floor ducts have been completed. However, an inspection effort is presently underway to identify all floor ducts in which rubber edge guards are missing or are inadequate. Where these guards are found to be missing or inadequate, they are being replaced in order to achieve a final equipment condition consistent with the approved design.

In order to prevent future noncompliances of this nature, cognizant Quality Control personnel have received additional training in the Class 1E Electrical Cable Installation Procedure which addresses inspections for protection of cable from sharp edges in this and other cable pulling activities.

It is expected that all corrective action to this item of noncompliance will be completed by June 30, 1981 and we will be in full compliance at that time.

2. Design Control

The Notice of Violation states, in part:

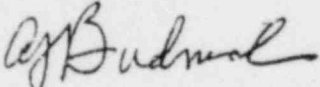
"Contrary to the above, as of April 10, 1981, the following instances of failure to maintain the required separation criteria were identified.

- a. The non-divisional utility power cable which connects Termination Cabinet H13-P709, Bay B, to panel H13-P672 and which is enclosed in flexible conduit is routed in a division 4 floor duct containing division 4 cables.
- b. The cable for the smoke detector and fire detector located in a division 2 floor duct at coordinates X-008, Y-015 in unit G of the PGCC floor duct complex and which is enclosed in flexible conduit is routed from the division 2 floor duct into a division 4 floor duct from which it enters a non-divisional floor duct.

The above described concerns have been referred to General Electric, the responsible design organization. General Electric, based upon preliminary evaluations, presently considers that the current design is acceptable and will provide justification for this position within 90 days. Illinois Power will review this justification and provide the Commission a written supplement to this letter regarding this issue.

I hereby affirm that the above information contained in this letter is correct to the best of my knowledge.

Sincerely,

 FOR
L. J. Koch
Vice President

msw

cc: H. H. Livermore, NRC Resident Inspector
Director, Quality Assurance
CPS/DRC