

ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 399, CLINTON, ILLINOIS 61727

0981-L
Q37-81(06-11)-L
U-0244
June 11, 1981

Mr. James G. Keppler
Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 61037

Dear Mr. Keppler:

This is in response to your Notice of Violation and Inspection Report Number 50-461/81-05 on the NRC special team inspection of the Clinton Power Station conducted during the period February 9 - March 5, 1981. Illinois Power Company's response to the items discussed during the March 12, 1981 meeting and summarized in the "Inspection Results" section of your report is included as Appendix A. In addition, Appendix B provides the additional information requested in your letter dated April 21, 1981 related to the unresolved matter discussed in Paragraphs C.2.b and D.4.b(4) of your report.

Illinois Power Company's response for the eleven (11) items of noncompliance cited in the Notice of Violation is as follows:

1. Criterion V, Instructions, Procedures and Drawings -

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion V and Illinois Power Company, Clinton Power Station PSAR Section 17.1.5.1):

- a. The hanger installation/inspection tolerance procedure was incomplete in that it did not cover all areas necessary to ensure proper installation and QC acceptance inspection.
- b. Specific instructions for installing mechanical snubbers was lacking.
- c. The procedure for installing the penetration seismic guides was not adequately detailed to control weld distortion."

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A new procedure, BAP 3.2.5, "Piping Component Supports", covering the installation and inspection of piping component supports/hangers has been written, reviewed, approved, and issued for implementation. This procedure provides specific installation and inspection instructions and criteria, including: dimensional tolerances, base plate bolt hole location/bolt pattern, support pin-to-pin dimensions, locations, angularity clearances, centers of gravity and other related criteria. Quality Control instructions, including checklists were revised to reflect the new installation and inspection procedure requirements.

Specific installation and inspection instructions for Pacific Scientific mechanical snubbers are also included in BAP 3.2.5. Certain handling, storage, and preventative maintenance precautions or requirements are being included in the existing Storage and Maintenance program.

A trial program for installation and inspection of piping component supports/hangers to the new procedures has been completed and results reviewed by the NRC during an inspection visit on June 5-6, 1981.

A nonconformance report (NCR) was issued to document conditions noted on the Reactor Water Cleanup pipe seismic guides inside the guard pipe for engineering review and disposition. Work was terminated until the NCR was dispositioned and appropriate installation procedures/guidance were issued. The S&L drawing (M06-1000, Sheet 6) has been revised to indicate that the "cold gap position" is the thickness of shim stock to be used during fabrication/installation welding of seismic guides. The installation traveler for the remaining seismic guide work is being revised to incorporate additional detail and steps to control weld distortion within acceptable limits.

2. Criterion V, Instructions, Procedures, and Drawings -

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion V and Illinois Power Company, Clinton Power Station PSAR, Section 17.1.5.1) in the area of pipe supports and restraints:

- a. Eight out of the nine safety-related and installed hangers, struts and snubbers observed by the inspector did not conform to the construction drawing requirements.
- b. The Reactor Water Cleanup pipe penetration seismic guide inside the guard pipe did not conform to the design drawing clearance requirement."

A new procedure, BAP 3.2.5, "Piping Component Supports", which provides specific and generic instructions for the fabrication, installation, and inspection of pipe supports, has been issued. Training classes were held for craft, supervisory, quality control, and technical services personnel. All previously installed hangers will be reinspected and reevaluated to the criteria included in the new procedure.

A trial program was conducted to ensure that the new procedures were adequate for controlling hanger installations and inspections. The results of the program were reviewed by the NRC during an inspection visit on June 5-6, 1981.

A nonconformance report (NCR) was issued to document conditions noted on the Reactor Water Cleanup (RWCU) pipe seismic guides inside the guard pipe for engineering review and disposition. Work on further installation of such seismic guides was suspended until the NCR was dispositioned and appropriate installation/guidance were issued. The A-E determined that even a zero clearance condition would not result in unacceptable stresses for any of the assemblies. Further investigation in the field substantiated that the installed condition is bounded by the A-E's calculations. As a result of this investigation, the NCR was dispositioned "accept-as-is". Since the fabrication procedure followed for the other installed seismic guides was the same (except that main steam guides were shop assembled with some additional welding controls) and no repairs were required for the RWCU guide assembly, no further action will be needed on the others. The S&L drawing (M06-1000, Sheet 6) has been revised to indicate that the "cold gap position" is the thickness of shim stock to be used during fabrication/installation welding of the seismic guides. The installation traveler for the remaining seismic guide work is being revised to incorporate additional detail and steps to minimize weld distortion.

Installation of all seismic guides is expected to be completed by July 31, 1981.

3. Criterion X, Inspection

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion X and the CPS PSAR Section 17.1.10.1):

- a. The existing hanger inspection program was inadequate in that it did not provide for timely inspections to identify deficiencies and to initiate corrective actions to prevent recurrence and it did not distinguish the inspection requirements for each phase of hanger installation.

- b. The traveler QC acceptance provision for the pipe penetration seismic guide was inadequate in that it did not provide for inspection measurement after component installation."

A three phase program for installation and inspection of piping component supports/hangers has been developed and instituted through a new procedure, BAP 3.2.5, "Piping Component Supports" and all new safety-related pipe hangers will be installed and inspected to its provisions. The three phases of this program are:

- Phase I: Installation and inspection of the hanger/support's primary attachment to the building or structure.
- Phase II: Installation and inspection of the hanger/support's construction from the anchor point to the pipe.
- Phase III: This phase occurs just prior to system functional testing and encompasses final cold setting adjustments, removal of travel stops, and other final setting adjustments.

As the craft completes installation activities of each phase, the hanger will be inspected. A copy of each inspection checklist, for each of the three phases, is forwarded to Baldwin Associates Quality Assurance for trend analysis. In this way, generic or repetitive problems can be identified and corrective action initiated to prevent recurrence.

A trial program for installation and inspection of piping component supports/hangers to the new procedure has been completed and results reviewed by the NRC during an inspection visit on June 5-6, 1981.

As noted in the previous two items of noncompliance, relative to the Reactor Water Cleanup pipe seismic guides inside the guard pipe, a nonconformance report (NCR) was issued to document conditions noted and to obtain engineering review and disposition. Work on further installation of such seismic guides was suspended until the NCR was dispositioned and appropriate installation and inspection procedures/guidance was issued. The S&L drawing (M06-1000, Sheet 6) was revised to indicate that the "cold gap position" is the thickness of shim stock to be used during fabrication/installation welding of the seismic guides. The installation traveler for the remaining seismic guides work is being revised to incorporate additional detail and steps to minimize weld distortion and to ensure design requirements are met. This will include appropriate QC inspection signoffs.

Installation of all seismic guides is expected to be completed by July 31, 1981.

4. Criterion XVIII, Audits

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion XVIII and CPS PSAR Section 17.1.18.1), relative to pipe hanger design and installation activities, the licensee audit of the A-E, the licensee audit and surveillance of contractor site performance, and the contractor's internal audits were considered inadequate in that detailed hanger audit requirements were absent, problems were not prevented from recurring, and programmatic audit planning, scheduling, and implementation was absent for on-going safety-related hanger installation and QC inspection activities."

A plan for coordinated licensee and contractor audits and surveillances was developed and implemented in conjunction with the trial program for pipe hanger installation and inspection activities. In addition, a detailed plan of licensee and contractor audits and surveillances to periodically assess the adequacy and effectiveness of programs for design, fabrication, installation and inspection of seismic Category I piping and component supports and hangers has been issued. This plan includes a series of audits, which were already part of previously established audit plans and schedules, and a series of surveillances of on-going activities. The plan also describes the time/period of the planned audit or surveillance, the overall scope of activities, the items or components, and the applicable 10CFR50 Appendix B criteria to be covered.

IP Construction QA has developed a detailed surveillance checklist to be used during surveillance of hanger installation/inspection activities in the field. Detailed checklists for audits are prepared by the audit team after formal assignment and the scope of the audit is determined. This occurs prior to the scheduled audit and complies to IP's commitment to Regulatory Guide 1.144 (Jan. 1979) and ANSI N45.2.12 (1977) "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants."

IP Construction QA surveillance program has been upgraded to include a plan and pre-prepared checklists for certain activities. Surveillances are scheduled dependent on the nature of activities and performance trends.

The contractor and licensee audit programs and plans are being reviewed to determine what changes or improvement, if any, are needed to ensure comprehensive and sufficient coverage of activities. This review is expected to be completed by July 31, 1981 and any changes should be implemented throughout the remainder of 1981.

5. Criterion IX - Control of Special Processes -

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion IX; CPS PSAR, Section 17.1.9.3; and ASME B&PV Code, NA-4411), welding was not being accomplished in accordance with applicable codes, in that, controlled welding procedure specifications with the associated welding parameters sheets were not located at the prescribed activity (welding)."

The Welding Procedure Specification Information Handbooks ("Blue Books") which contain a listing of welding parameters have been recalled and will be reissued to Discipline Superintendents for distribution to welders as controlled documents and will be kept current per BA Project Procedures. This will be accomplished by July 15, 1981 and we will be in full compliance. In addition, welding procedure specifications and the associated welding parameter sheets are available in controlled Technical Services Manuals at various Document Control centers within the plant.

6. Criterion XVII, Quality Assurance Records

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criteria XVII and CPS PSAR Section 17.1.17.1), reviews of nonconformance reports, audits, and surveillances, for reportability pursuant to 10CFR50.55(e) are not being documented to enable verification of proper review."

The nonconformance report (NCR) form has been revised to include a block for the contractor's project engineering group to indicate review for 10CFR50.55(e) reportability. Additionally, the contractor's QA organization has revised their procedures for reviewing NCR's to include documentation, via a log entry and a stamp on the NCR, that their review for reportability has been accomplished. IP QA conducts a quarterly trend review of NCR's. The form which documents the results of their review is being modified to include documented evidence of IP QA's review for reportability at that time.

The contractor has also revised their QA procedures regarding reviews of audit and surveillance reports to include a requirement for the Manager of QA to stamp, sign and date the affected documents indicating a review for potentially reportable 10CFR50.55(e) conditions has been made. IP has modified their audit report title page form to include a definite signed statement that indicates a review of the report including the audit findings for potentially reportable items by the team leader has been completed. Further changes/modifications to the IP QA surveillance finding form are being made to provide documented evidence that the QA Supervisor's review includes a review for reportability.

All the above documentation of reviews will show the results of these reviews as either "yes" or "no". The actual reporting process of the potential reportable item will be in accordance with formal procedures issued by the contractor and licensee. The above noted actions should ensure appropriate documentation of reviews in the future.

We expect to have appropriate changes/modifications in procedures and forms and necessary training associated completed such that full compliance is achieved by July 1, 1981.

7. Criterion XVI, Corrective Action

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion XVI and IPC Quality Assurance Manual, Chapter 16):

- a. Neither prompt nor effective corrective action to preclude repetition was taken in response to the following audits and other documents concerning electrical hanger installation activities.
 - (1) Baldwin Associates (BA) Internal Audit Report I-134, dated January 22, 1980.
 - (2) BA Internal Audit Report I-137, dated February 19, 1980.
 - (3) Corrective Action Request (CAR) number 049 dated March 3, 1980.
 - (4) BA Internal Audit Report I-150, dated June 24, 1980.
 - (5) Site Surveillance Report No. S-313 dated August 18, 1980.
- b. The licensee failed to take prompt corrective action in response to a special QA Review of IEEE Environmental and Seismic Qualifications, dated 9-17-80, which identified the current practice of granting unconditional acceptance status to components lacking quality documentation."

a. This item involves the recognition of an overall problem during an early phase when subproblems arise which are not recognized as being related. Problem recognition is not unique to nuclear power plant construction; it is common to most complex, multi-activity functions.

Electrical hanger installation is a complex activity. Initial corrective actions (audit findings and CARs) were directed toward correcting specific deficiencies within the established electrical hanger installation system. It was not obvious at that time that the individual specific problems were

indicative of a broader general problem. The full extent and need for substantial revision of the entire system were not realized until it was determined to be reportable under 10CFR50.55(e) in September 1980.

In retrospect, it can be concluded that an earlier decision to revise the entire system could have been made. This, however was not apparent as each successive level of corrective action was taken. Based on evaluations made at the time, and the value judgments rendered by those involved, the corrective action proposed at each step was considered sufficient. This experience emphasizes the difficulty in "seeing the forest when working on individual trees." We believe that this form of problem recognition can be improved by better communications between the parties involved.

It has been Illinois Power Company's philosophy that the responsibility for quality lies with the organizations responsible for doing the work. The quality assurance organizations (IP and BA) monitor this effort through audits and surveillances, including the identification of the development and/or evaluation of resolutions which will ensure compliance with established program and commitments. These deficiencies are normally resolved without top management involvement; however, the lines of communication are maintained and problems which warrant such attention are reported to upper management.

To improve communications between the parties involved in evaluating and correcting findings and to enhance management participation, a system of periodic quality review meetings has been established. These meetings will bring together quality, engineering, and construction management and supervision from Illinois Power, Baldwin Associates and others such as Sargent and Lundy and General Electric, as necessary, to evaluate and coordinate quality activities in the work areas involved. Concurrence with evaluation of quality problems and plans of action will be documented. These periodic assessments will be in addition to reporting and resolution methods currently employed, and will be conducted specifically to avoid escalation of lower-level problems, or lack of prompt execution of previously approved action plans.

We believe that this interchange will improve communication and coordination of quality activities and will enhance our capability to identify trends or other signals which indicate that broad corrective action is needed.

b. Corrective action was taken to resolve this issue. The Baldwin Associates Quality Assurance Manual and associated procedures were revised subsequent to and as a result of the Special QA Review to better distinguish types of documentation and conditions to be met for conditional acceptance and final acceptance of safety-related equipment. Based on the revisions to the program for obtaining documentation, we consider this an adequate approach to satisfying the intent of our regulatory commitments.

8. Criterion III, Design Control

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion III and CPS PSAR Section 17.1.3.3):

- a. The pipe suspension system components were fabricated and installed prior to formal calculations (design verification) being performed and documented including review and approval by authorized personnel.
 - b. Management failed to act to prevent further fabrication and installation of seismic supports when the apparent problem concerning lack of formal approval of calculations had been identified."
- a. As of March 1, 1981, formal design calculations for pipe suspension system component drawings which were reissued based on verification to new dynamic loads data have been reviewed and approved by authorized personnel. Design calculations for pipe suspension system component drawings which have not yet been verified to new dynamic loads data, will be reviewed and approved in conjunction with the final load verification program now scheduled for completion in July 1981. Therefore all pipe suspension system component drawings are expected to be reissued and based upon approved design calculations by August 1, 1981.
 - b. The inspector notes that Sargent and Lundy's management did not place a hold on the Clinton dynamic hanger/seismic supports released for fabrication and installation without reviewed and approved calculations as a result of a similar finding in 1979 on another S&L project. However, in late 1978, all the unfabricated dynamic hangers for the Containment, Fuel, and Auxiliary Buildings were put on hold by ECN's 844 and 908. Sargent and Lundy and Illinois Power Company determined that the installation of dynamic hangers of the Control and Diesel Generator Buildings would continue because the dynamic response spectra changes were judged to have minimal effects in these buildings. During the NRC inspection, Sargent and Lundy issued ECN 2071 which put the remaining uninstalled (but previously fabricated) non-verified dynamic hangers on hold until the load verification is completed. As of June 3, 1981, the following status existed, (doesn't include May releases):
 - (1) 1556 dynamic supports released with verified loads
 - (2) 22 dynamic supports installed without verified loads
 - (3) 94 dynamic supports supports on "hold"

It is expected that drawings for those dynamic supports installed without verification to new loads data and those on hold will be reissued based on new loads verification by August 1, 1981.

9. Criterion II, Quality Assurance Program

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion II and IFC Quality Assurance Manual Chapter 2) the licensee failed to provide quality assurance controls over the preparation, review, and approval of "As-built" electrical hanger drawings prepared by IPC engineers. Furthermore, the licensee failed to establish which Quality Assurance Organization would have functional control over the "As-built" electrical hanger program. As a result, activities affecting the quality of safety related hangers were performed without approved procedures. For example:

- a. The actual "As-Built" hanger installation could not be determined on six "As-built" electrical hanger drawings reviewed and approved for use by Sargent and Lundy (S&L), the Architect Engineer, due to conflict in drawing dimensions and indeterminate dimension orientation.
- b. No program was established to ensure that approved "As-Built" design parameters would be implemented into the base design documents. As a result, the use of an alternate hanger detail contrary to that specified in the base design criteria was approved."

These "As-Built" drawings had been prepared and reviewed by IP and submitted to S&L by BA for review and statusing in accordance with a program documented in a letter. However, formal procedures had not been adequately prepared for performing these activities at Clinton. Sargent and Lundy did have a procedure Project Instruction PI-CP-023, Rev. 0, "Review of Baldwin Associates Prepared Seismic Category I Cable Tray Hanger and Conduit Hanger Assembly Drawings", which was originally intended to cover "shop drawings." However, this procedure appeared to be written in terms general enough to cover "As-built" drawings also. After S&L had received and reviewed some of the "As-built" drawings it was determined that although most of the same requirements apply, more specific delineation regarding review of "As-builts" and revision of pertinent Sargent and Lundy design documents was required. Prior to the NRC inspection, Project Instruction PI-CP-023 had been revised to incorporate the needed changes and was in comment and approval circuit. The drawings reviewed by the NRC inspector were the first ones returned by S&L to the site.

Although several errors were noted in the "As-built" electrical hanger drawings, none of them would have compromised the structural integrity of the supports, nor prevented the QC inspector

from performing his inspection (i.e. the inspector would have issued an NCR if the hanger did not agree with the drawing.) However, Illinois Power was concerned with the number of errors and has taken, or is taking the following actions

- (a) The responsibility for preparing, reviewing, approving and submitting "As-Built" electrical hanger drawings to S&L for review and statusing was transferred from IP to BA.
- (b) Baldwin Associates has developed, approved, and issued a procedure, BAP 3.3.8 "Electrical Hanger As-Built Drawings" to cover the activities of (a).
- (c) "As-Built" drawings completed under IP direction, but not yet transmitted to S&L prior to shifting responsibilities to BA, have been or are being reviewed, corrected and processed in accordance with BAP 3.3.8.
- (d) Sargent & Lundy has revised, approved, and issued Project Instruction PI-CP-023 Revision 1 to include specific requirements regarding the review and statusing of "As-Built" hanger drawings. The procedure requires verification of the adequacy of a hanger which deviates from the S&L design document.
- (e) "As-Built" drawings completed and submitted to S&L have been or are being reevaluated to the requirements of PI-CP-023, Rev. 1.
- (f) "As-Built" drawings completed by IP, statused by S&L, and transmitted back to CPS prior to issuance of BAP 3.3.8 and PI-CP-023, Rev. 1, have been or are being reviewed, corrected as necessary and processed in accordance with these procedures/instructions. Although not all "As-Built" drawings have been prepared, reviewed, approved, and statused to date, corrective action has been taken to ensure that the final product, "installed hangers", meets all design and quality requirements.

10. Criterion VI - Document Control

The Notice of Violation states in part:

'Contrary to the above (10CFR50 Appendix B, Criterion VI and IPC Quality Assurance Manual) changes and current revision to electrical drawings were not being used as follows...."

Field Change Requests (FCR) noted in the noncompliance have been listed on the field copy of the drawings. The latest drawing revisions noted in the item of noncompliance are now in use in the field and the superseded drawings have been removed. It should be recognized that the two (2) noted later drawing revisions either had not been or were being processed by Document Control/

Reproduction group at time of the NRC inspection. An undocumented check of approximately 50 FCR's/drawings was made to determine extent of problem and no other cases/deficiencies were noted.

One additional person, the Drawing Inventory Coordinator, is being assigned to full time document control inventory and survey responsibilities, effective June 15, 1981. This position had been vacant since January 1981. A formal routine and ongoing inventory which is the prime responsibility of this position, will be accomplished commencing June 15, 1981. Four people and a new blue print machine have been added to our operation in an effort to improve drawing turn around time and keep pace with the ever increasing influx of new/revised drawings. These actions should minimize recurrence of these and similar problems.

11. Criterion V, Instructions, Procedures and Drawings

The Notice of Violation states in part:

"Contrary to the above (10CFR50 Appendix B, Criterion V and IP-Quality Assurance Manual, Chapter V), equipment receipt inspection activities affecting quality were not accomplished in accordance with written procedures as follows:

- a. Paragraph 6.9.1.3 of Baldwin Associates Procedure (BAP) 2.3 states, in part, "Quality Control shall revise documentation related to the receipt of the items/materials, e.g. RIR, logs, etc., to reflect the return." Contrary to this, RIR S-11630, dated September 29, 1980, which documented the receipt of the electrical penetration primary header plate bolts was not revised to reflect the return of these bolts to Conax for rethreading.
- b. Paragraphs 112.11 and 112.11a of Sargent and Lundy Specification K-2978, states "In special cases, where all of the documentation may not be available at the time the equipment is ready for shipment, shipment to the site will be permitted under the following conditions: upon written approval of the Purchaser, a Certificate of Compliance shall be transmitted with the shipment. Approval for use of Certificate of Compliance shall be obtained prior to shipment."

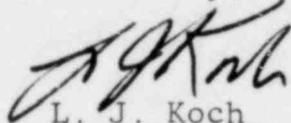
Paragraph 5.2.3 of BAP 2.20 states, in part: "The authorization shall be in letter form signed by the Manager of Quality Control and.....shall form a part of the procurement documents." Contrary to these requirements, Conax Corporation electrical penetrations were shipped to the licensee and a Certificate of Compliance was transmitted in lieu of complete documentation without prior written authorization.

- c. Paragraph 5.2.4 of BAP 2.20 states "Upon receipt of the authorized letter of compliance, items shall be placed on "Conditional Accept" status in accordance with BAP 2.3, for documentation requirements." Contrary to this electrical penetrations IEE21E, IEE01E, and 4160V electrical switchgear IAP07E were not placed on "Conditional Accept" status nor were conditional accept tags attached as required by BAP 2.3."
- a. Baldwin Associates Procedure (BAP 2.3) has been revised to delete the requirement to revise the original RIR when items are returned to the vendor. The documentation of items being returned is accomplished using a Material Return Transmittal, Form JV-418, which is and has been a requirement of BAP 2.3. Therefore, the revision of the original RIR is not considered necessary.
- b&c. The requirement to obtain prior written authorization to ship equipment on a Certificate of Compliance in special cases where all documentation may not be available at time of shipment was not construed to be applicable to missing engineering or design documentation. All manufacturing documentation was available and was shipped with the equipment. Seismic and environmental qualification data reports were not available, in that tests had not been accomplished yet. However, these documents are considered design/engineering documentation and are required to be submitted directly to Sargent and Lundy. A Field Change Request (FCR-9071) has been initiated to revise Sargent and Lundy Specification K-2978, and other specifications, to clarify that shipment of equipment to the site will be allowed in cases where design/engineering documentation is not available. However, a Certificate of Compliance will be required for manufacturing documentation that is lacking.

The requirements of BAP 2.20, paragraph 5.2.4 and BAP 2.3 apply to manufacturing data/documentation received from the vendor and not the engineering/design data. The electrical penetrations and switchgear referred to in the item of noncompliance were received with all the appropriate manufacturing data/documentation. The engineering/design documentation is being tracked through appropriate checklists and computer file system to ensure that the documentation is obtained.

I trust that our response is satisfactory to allow closeout of these items when all actions are complete. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,



L. J. Koch
Vice-President

Attachments:

- Appendix A - IPC Response to Concerns Expressed in Paragraph C.2 of the NRC Special Team Inspection Report, 50-461/81-05.
- Appendix B - Additional Information on Items Regarding Unresolved Matter

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

CPS/DRC

Appendix A

IPC Response to Concerns Expressed in Paragraph C.2 of the NRC Special Team Inspection Report, 50-461/81-05

Section C.2 "Conclusion" of the Inspection Report describes five (5) concerns or "specific weaknesses" perceived by the NRC inspection team based on the inspection findings and consists of impressions or opinions formed by the team in five areas. These opinions are generally very broad and difficult to address in detail. They may have been formed from a particular perspective and do not necessarily reflect all the pertinent considerations at the time. Some are based on incomplete information. These concerns were discussed during a meeting at NRC Region III office in Glen Ellyn, Illinois on March 12, 1981.

Illinois Power Company's response to each of these concerns is included in the following sections. Where we differ with the position taken by the inspection team, we have attempted to explain the basis for the difference.

- a. "Weakness in the identification of root causes and the initiation of prompt and effective corrective action."

Summary (by NRC of their findings)

"Deficient Class 1E electrical raceway hanger installation activities continued over a nine-month period with ineffective construction and engineering controls and inadequate QA involvement and enforcement of quality program requirements to bring timely corrective action."

This finding involves the recognition of an overall problem during an early phase when subproblems arise which are not recognized as being related. Problem recognition is not unique to nuclear power plant construction; it is common to most complex, multi-activity functions.

The example given on electrical hanger installation involves a complex activity. Initial corrective actions (audit findings and CARs) were directed toward correcting specific deficiencies within the established electrical hanger installation system. It was not obvious that the individual specific problems were indicative of a broader general problem. The full extent and need for substantial revision of the entire system was not realized until it was determined to be reportable under 50.55(e).

In retrospect, it can be concluded that an earlier decision to revise the entire system could have been made. This however, was not apparent as each successive level of corrective action was taken. Based on evaluations made at this time, and the value judgements rendered by those involved, the corrective action proposed at each step was considered sufficient. This experience emphasizes the difficulty in "seeing the forest when working on individual trees." We believe that this form of problem recognition can be improved by better communications between the parties involved.

It has been Illinois Power Company's philosophy that the responsibility for quality lies with the organizations responsible for doing the work. The quality assurance organizations (IP and BA) monitor this effort through audit and surveillance, including the identification of the development and/or evaluation of resolutions which will ensure compliance with established program and commitments. These deficiencies are normally resolved without top management involvement; however, the lines of communication are maintained and problems which warrant such attention are reported to upper management.

To improve communications between the parties involved in evaluating and correcting findings and to enhance management participation, a system of periodic

quality review meetings has been established. These meetings will bring together quality, engineering and construction management and supervision from IP, BA and others such as S&L and GE, as necessary, to evaluate and coordinate quality activities in the work areas involved. Concurrence with evaluation of quality problems and plans of action will be documented. These periodic assessments will be supplemental to reporting and resolution methods currently employed, and will be conducted specifically to provide for early detection of lower-level problems, and prompt execution of previously approved action plans.

This interchange should improve communication and coordination of quality activities and enhance our capability to identify trends or other signals which indicate that broad corrective action is needed.

- b. "No controlled and documented system has been fully and effectively implemented as of February 27, 1981, to identify the status of items as to their acceptability to procurement specification requirements.

Summary (by NRC of their findings)

"Significant amounts of equipment has been accepted in violation of procurement specification documentation requirements, and released for installation without full knowledge of the status of required documentation or identification of the equipment as to its acceptability. The Clinton plant quality control and quality assurance organizations and project management has allowed this situation to continue for two years and only recently had steps been taken to bring it under control."

Actions to improve the documentation receipt and accounting system have been in progress since inadequacies were first identified in 1978.

The first initiative was to develop new, more comprehensive checklists, and verify status against documentation received. This was a detailed, time-consuming effort and uncovered problems not originally foreseen. Results of this effort indicated that engineering reports to support compliance to codes and standards imposed by equipment specifications could not be assessed adequately by the contractor. These engineering reports required extensive review by the design engineer, and protracted time for resolution of comments and deficiencies. At that time the decision was made to account for these engineering documents separately. As described in detail in the response to the unresolved item on documentation (Appendix B to this letter), this appeared to be consistent with NRC guidance on "documents which cannot be readily obtained in a timely fashion."

Proper accounting for this documentation was always intended. While the process of developing complete checklists for the engineering documents was time consuming, and some equipment was installed prior to receipt of engineering documentation, procedural controls to prevent use of any equipment lacking adequate documentation were instituted. These included a requirement for the contractor to verify completion of both checklists (manufacturing and engineering) prior to turnover, and prior to final contract payment. With these controls in effect, it was known that accurate documentation accountability could be achieved prior to any equipment being turned over for pre-operational testing. Any documentation missing at the time of turnover will be controlled as part of the turnover control system.

Most of the engineering documents listed on the engineering document checklists are ASME Code related reports, environmental qualification reports, or seismic qualification reports. Receipt of ASME code related reports is proceeding satisfactorily. Environmental qualification reports are all being re-evaluated (and many being held by suppliers) due to the ramifications of NUREG-0588. Many seismic qualification reports are being re-evaluated and some retesting performed due to MARK III containment new-loads effects. Accordingly, the actual receipt of some documentation may be late, but will be maintained under controlled conditions.

- c. "Weakness in the development of installation/QC inspection plan and criteria and in the timeliness of effectiveness of QC inspections."

Summary (by NRC of their findings)

"Weaknesses in the "travelers" which detail installation and inspection requirement, have frequently been identified in QA audits and surveillances. Improvements have resulted from recent changes but further attention is needed as evidenced by the team inspection findings. Included should be: (a) strong action by QA/QC when hold points are bypassed, (b) assuring current requirements are reflected in the travelers, if QC (as recently requested by the manager) is removed from the review cycle for Field Change Requests (FCR's) and (c) closer review for establishing inspection points so they occur in the proper sequence to assure design requirements are met."

Installation plans and the associated QC inspection criteria are embodied in the installation travelers and the procedures which govern their development and use. Weaknesses noted during this inspection focused primarily on the piping and component support traveler system.

Improvements to this system are currently in progress in response to noncompliance items 81-05-01, 81-05-02, and 81-05-03. Details of these improvements are contained in the response to these items.

Other traveler systems such as welding, equipment installation, electrical hanger and raceway installation, concrete placement, earthwork, electrical cable pulling and cable termination are also being reviewed for possible improvement. Except for the latter two, which have not yet been fully implemented, most of these traveler systems are considered adequate at this time.

For all traveler systems, and especially pipe hanger/-component support, a critical assessment is being made of work package scope, and the integration of proper levels of QC inspection at appropriate intervals. In some cases, scope of individual travelers will be reduced to permit inspection as discrete work elements are completed; while others will require in-progress inspection. In all cases, the processing of each traveler and traveler modification (required for each FCR) will include QC review for establishment of inspection points. Through QA surveillance or audit of these travelers, the completeness and detail of the inspection plans will be assessed against design criteria. Both DA and IP management have emphasized the importance of adhering to established HOLD points.

- d. "Weakness in adherence to procedures, design requirement and PSAR commitments."

Summary (by NRC of their findings)

"Quality organization could be more effective with stronger emphasis and support by top management. Throughout the interviews and discussions, the prevailing attitude was getting the job done with inadequate concern for QA/QC and job details. QA/QC in their enforcement of procedures and other requirements must not be unduly swayed by arguments based on cost and schedule considerations. Recent changes have resulted in improvements but further improvements are needed."

- (1) We believe that all information available was not reviewed by the NRC inspection team. An extensive PSAR Commitment Control Program is maintained in the NSED offices located in Decatur. The computer program used to track CPS PSAR commitments was established in 1976. The program lists all PSAR commitments, including Regulatory Guides, industry codes, and standards. It is continuously used as a management tool to provide responsible IP managers and supervisors guidance for reviewing CPS-related specifications and procedures. Other documents, such as a PSAR index to commitments and various special commitment summaries are also used.

The program description was revised and strengthened on June 23, 1978, to require positive feedback from internal IP organizations assigned responsibility for verifying that PSAR commitments were being implemented.

This program was again revised on February 23, 1980, to require written verification from organizations outside IP that PSAR commitments were being met. These verification letters are maintained on file, and in many cases, outline the detailed methods of compliance. Status of this compliance program is reported monthly to IP's top management. A condensed version of the program output is also reported monthly by the Company to the Illinois Commerce Commission.

The formal program description was not reviewed during the inspection. We believe that the IP Commitment Control Program for CPS has been, and is currently, an effective management tool for monitoring PSAR commitments.

- (2) The requirement for vendors to have prior written authorization to ship with Certificate of Compliance in lieu of all documentation, is contained in most CPS procurement specifications. This has proved to be an unrealistic requirement. We have successfully demonstrated a new system of document accountability and control which assures that regulatory requirements are met for issuance of materials and equipment for installation or use at the site.
- (3) We disagree with the inspector's interpretation of Procedures BAP 2.20 and 2.3. Equipment with missing "engineering documents" is not placed in a conditional accept status, nor is this required by those procedures. Consequently, we feel that we are following these procedures to meet the purpose for which they were written.

e. "Other Items"

Summary (by NRC of their findings)

"Management is not sufficiently involved in plant quality problems and has not fully utilized QA as a management tool."

This topic deals with the authority and involvement of the quality organizations within Illinois Power Company and Baldwin Associates. Particular emphasis was placed on discussion of identification and resolution of QA/QC problems. A related subject involved the discussion of interaction between the quality organizations and the management of IP and BA.

There was considerable discussion of the involvement of IP QA in the development of departmental procedures in the Company. Existing practices involve a QA review of these departmental procedures, but does not require

QA approval. This does not in any way diminish the authority of QA since through their auditing programs, they review all departmental documents that relate to control of work and also audit conformance to those documents. Therefore, Quality Assurance has the ability and authority to ensure that departmental procedures and instructions conform to all applicable requirements as established by regulations, codes, standards, etc. and to ensure that they are properly implemented. Upon further evaluation, however, we have determined that this philosophy and practice would be better understood if IP departmental procedures were approved by IP QA and we will revise our procedures to include such documented review and concurrence. Although this action will not change the principle or intent of our existing practices, it will make them clearer and more obvious to all participants.

The discussions relating to responsiveness of the total organizational structure to the findings of quality organizations reveal that this is a very complex process and that effective communications are necessary to ensure thorough understanding of the process. We found, for example, that some corrective actions taken in response to a finding by a quality organization were not effectively communicated through the records system relating it to the finding. In some instances, similar findings were reported several times in a series of audit reports without reflecting the actions which had been taken to correct the reported conditions. This quite logically creates the impression of unresponsiveness to the findings, even though very significant efforts had been made to attempt to correct the condition. In some instances, corrective actions were taken, but they were unsuccessful and, therefore, a similar problem was found in a subsequent audit. The audit reports and related documents, however, do not adequately describe the actual sequence of events. We believe that this situation can be improved by revising our communications to more clearly tie the corrective action to the audit findings. We are evaluating various record and document control systems which will relate these communications in such a manner that the "entire story" will be available in one place. This should make the quality audits more effective and should assist management in evaluating the responsiveness of all segments of the organization to the quality program. These improvements should also simplify the task of the NRC in conducting their audits of the Clinton Project.

Another item of discussion involved the role of Illinois Power Company upper management and their support of quality activities. This is a difficult subject to place in perspective because many of the activities of top management are not documented or recorded. The influence of top management is primarily exercised through discussion and verbal direction. In fact, it is generally expected that

top management will work in this manner rather than writing letters of communications to people in the organization. A determination of the interest and involvement of top management should include some measurement of accessibility of top management to the quality organization management and supervision. Illinois Power Company top management has always had an "open-door" policy to QA/QC personnel. This includes not only direct communication in accordance with the line organizational structure, but also across organizational lines. For example, the Director - QA is in direct contact with the Executive Vice-President and Vice-Presidents as well as managers and supervisors in the total Clinton project organization. Both the IP and BA quality organizations independently establish their audit programs and schedule, and do not require prior approval of a specific audit activity. In other words, they are free to conduct formal audits or informal surveillances at any time to report the results directly to appropriate management levels without going through a line organization. This independence of action and communication provides a very effective method of communication and exercise of authority. Unfortunately, it does not always leave convenient "tracks" which lend themselves to audit or review. To overcome this inherent deficiency, Illinois Power Company has relied heavily on independent reviews and audits by outside parties. These audits are scheduled at the option and direction of top management. They tend to focus on communication flow of information, management direction, and responsiveness to the quality objectives of the Company. We believe that this combination of informal availability of top management to the quality organizations and the independent review of the effectiveness of the total quality enterprise provides a good balance.

Another area which generated considerable discussion involved the management role of the quality organizations. As stated earlier, some problems in resolving quality findings were interpreted erroneously as a lack of responsiveness. In addition, some lack of involvement by quality organization personnel was interpreted as lack of management involvement by QA and lack of management recognition of the role of QA. We wish to emphasize that we consider QA an arm of management with the very specific responsibility of monitoring and verifying the quality aspects of the overall job. We expect our quality organization to be aware of construction needs and to be responsive to those needs within the constraints of their primary responsibility. This means that the quality organization should be aware of scheduling requirements to ensure that QA does not unnecessarily delay construction work, but they must not permit scheduling considerations to affect the quality or completeness of their work. A question was raised as to why the IP Supervisor of

Construction Quality Assurance did not participate in the weekly construction scheduling meetings. As we indicated, he is permitted to participate in these meetings, but he is not required to do so. He is aware of the information to be discussed at the meeting and he is free to participate if he wishes. On the other hand, if he judges that the material is not of direct interest or importance to the quality organization, he is free to not attend. We believe that this approach permits the quality organization to maintain the flexibility and freedom which is necessary to effectively carry out its responsibilities. To require participation in construction and scheduling activities may generate undue concern about construction problems and to influence the planning and effectiveness of the quality organization. We have tried to maintain maximum freedom of operation of our quality organization; to permit freedom of choice by the organization as to where and what to audit and to conduct surveillances they see fit. We do, of course, expect our quality organization to do their work in a timely fashion and to not unnecessarily delay construction work.

Finally, there was considerable discussion of timeliness of inspection and other quality-related activities on the Clinton project. In particular, the timeliness of inspections relative to construction progress was emphasized. Our evaluation of our current practices indicates that this matter interacts with many activities. We expect to modify some of our procedures and practices to reduce the time span between the performance of work and its inspection and acceptance. This will require some modification in the philosophy in developing travelers for the work and in "packaging" the work to permit interim inspection as well as final inspection of smaller work packages. We believe that we can improve our overall system to reduce some of the timing intervals involved and view this as an overall planning and scheduling activity rather than simply a quality activity. We expect to be making changes in both the construction and quality practices which will reduce the time interval and reduce the volume of work which has not yet been accepted. We will try to be realistic in making these changes and to take into account the status of the work involved. For example, approximately 80% of the large bore pipe has been erected and to backfit a different system at this time would undoubtedly be counterproductive. In most cases, we will make modifications to the existing system, but not depart significantly from present practices. In instances where little work is now in place, we may make more significant changes. In addition, we expect to achieve a general improvement in this area by the simple mechanism of making the people in all organizations aware of the importance of performing inspections and establishing acceptance of work as soon as practicable after the work has been performed.

Appendix B

Additional Information on Items Regarding
Unresolved Matter

The following additional information is provided relative to the unresolved matter on the control of documentation and release of safety-related equipment for installation.

1. Question: "When will it be required to write an NCR for either insufficient or deficient documentation prior to conditional release of hardware at the site? The response should address both quality-related and engineering documentation required to satisfy procurement and specification requirements."

Answer: Per BA's existing procedures, NCR's are required to be generated for items conditionally released to the field without acceptance of all manufacturing related documentation. Engineering documentation is accepted through BA's documentation procedures. Per the requirements of BA's QA Manual an item is not final accepted until all documentation is received and acceptable.

2. Question: "Describe the criteria used to determine how one differentiates between quality-related documentation and engineering documentation. Provide a representative list of engineering-type documentation."

Answer: The term "engineering documentation" as used at CPS is a general category of documentation which is included in the generic term "quality-related documentation." Engineering documentation typically includes design calculations, design criteria, drawings, specifications, stress reports, etc.

This usage is consistent with ANSI N45.2.9, Appendix A, which - in a general way - lists various types of quality assurance records or documents. Section A.1 addresses design (engineering) records and includes - as examples - calculations, design reports, stress reports, etc.

3. Question: "Describe in detail when and how S&L determines the required engineering documentation that must be received at the site and found acceptable by BA. Describe the extent of an independent review and verification of the BA prepared engineering documentation lists prior to release. Include in your description the extent the list is signed, dated and controlled to assure it can be properly tracked to maintain it current with hardware configuration and/or purchase order."

Answer: Sargent & Lundy determines the documentation submittal requirements during the review of the draft copy of the specification. These requirements are included in the specifications, in the S&L standard forms which are part of the specification (Examples: S&L Forms 350, 1922, etc.) and in the Quality Assurance requirements section of the specification. The Quality Assurance requirements section of the specification provides a generic preliminary list of documentation submittal requirements. This list is reviewed by the Contractor during contract negotiations and is finalized as part of the contract.

After award of the contract, and in accordance with Sargent & Lundy's Project Instruction PI-CP-019 the specification responsible engineers prepare and forward to the Quality Control Division (QCD) a list of engineering documents expected to be submitted by the Contractor for each specification. This list is entered into the "Engineering Documents List." The list is updated and issued monthly. The specification responsible engineers notify QCD of any corrections, additions or deletions to be made to the issued document.

The BA "Engineering Documentation Checklist" is prepared by the BA QA Procurement Engineer and is reviewed against the S&L "Engineering Documents List." Any conflicts are resolved and the checklist is dated, signed and forwarded with the original requisition for further review. The checklist is returned to BA QA with typed purchase order for review and distribution for use in accounting for documentation received. Any modifications/changes to the checklist, including that resulting from change/amendments

to the purchase order after original preparation, dating and signing results in a revision being prepared in the same manner as the original.

4. Question: "Describe the involvement of the S&L QA or QC organization in the preparation of the engineering documentation list."

Answer: Sargent & Lundy Quality Control Division (QCD) organization's involvement in the preparation of the Engineering Documents List is described in Sargent & Lundy's Project Instruction PI-CP-019. This involvement can be summarized as follows:

1. QCD receives a list of the expected documents from the engineers and includes them in the list.
2. QCD issues the list on a monthly basis.
3. Any corrections/deletions/additions to the issued list are received from the engineers and incorporated in the next issued list.
4. When documents are received at S&L from the contractor, they are transmitted to QCD for distribution within S&L for review. At this time, the list is revised to note receipt of the documents.
5. QCD resolves with the engineer all comments generated during the review; then returns the results of the review to the contractor. The list is then revised to note the data returned and the status.
6. QCD is responsible for followup on any open comments until they are resolved.

5. Question: "Describe the extent the engineering documentation list delineates the specific engineering, technical, or specification requirements which must be met and which must be substantiated by documentation at the site. Describe the detail in which the received documentation must record engineering results in order to be found acceptable."

Answer: Sargent & Lundy's Engineering Documents List is a tracking log which lists all specific engineering, technical and specification documents required. The documents are identified by tag numbers for each specification. The specific requirements to be met and documented by the listed documents are not a part of the Engineering Documents List. Determination of the adequacy of this documentation is the responsibility of the cognizant Sargent & Lundy design engineer.

6. Question: "Describe the controls which assure the engineering document list is properly prepared and released prior to conditional release of the hardware."

Answer: The "Engineering Documentation Checklist" is prepared by BA QA upon the issuance of a requisition to purchase equipment to a specification. The Engineering Documentation Checklist is reviewed and finalized when the Purchase Order is issued to the vendor. This action is controlled by BA procedures BAP 2.20, "Documentation Review;" BQA 122, "Review of Requisitions and Purchase Orders;" and BQAI-120-1, "Instructions for Preparing and Processing Documentation Checklists" and occurs prior to the hardware arriving on-site.

7. Question: "Describe the procedural controls for maintaining control and accountability (punch list/computer list) for incomplete or deficient documentation. Include in your description the specific information the punch list and/or computer program contains. Must the punch list and/or computer program identify incomplete or deficient engineering documentation prior to conditional release of hardware? Provide your rationale if it does not. Describe the controls to close out open items on the punch list and/or computer program in a timely manner."

Answer: Basically, our system for maintaining control and accountability for incomplete or deficient documentation consists of two major parts:

- (1) Manufacturing documentation, and
- (2) Design/engineering documentation.

1. Manufacturing documentation. Items received on site with missing, incomplete, deficient or otherwise unacceptable manufacturing documentation can only be released to the field for installation under controlled and documented measures. The items will be tagged with a "Conditional Accept" tag and the Receiving Inspection Report (RIR) will remain open until the required documentation is received and found acceptable. Except for those cases where an Authorized Interim Letter of Compliance is provided as temporary evidence of compliance (i.e., required documentation not available yet and as agreed upon in the procurement document), a nonconformance report (NCR) is generated to provide for engineering and quality review and authorization to release. The BA QA generated manufacturing Documentation Checklist, the RIR, and the NCR are all used to maintain control and accountability of this type documentation.

2. Design/engineering documentation. Design/engineering documentation is not sent to the site by the supplier at the time of shipment. This documentation is sent directly to Sargent & Lundy (S&L) for their review and acceptance and may be accomplished prior to or after delivery of the item to the site. Subsequent to S&L's review a copy of the accepted documentation is sent by S&L to the site.

The BA QA generated Engineering Documentation Checklist is used to maintain control and accountability of this type of documentation. In addition, a computer file is generated from the documentation checklists. As the design/engineering documentation is received on site, the Engineering Documentation Checklist and the computer file are updated. Design/engineering documentation is not required to be on site prior to releasing the item for installation. Therefore, "Conditional Accept" tags are not attached for this situation.

This computer file provides an indispensable tool for fast reference on documentation status. It can be sorted in any number of ways; equipment number, specification, all complete documentation, turnover package, system, area, etc.

The computer file is used to assist the engineers in preparing the Turnover Exception List. Baldwin Associates Procedure BAP 2.17, "System/Sub-system Turnover," outlines steps required in the preparation of turnover packages. Included in it are provisions for listing missing documentation as exception items at the time of turnover. Exception items are tracked on the Turnover Exception List, and are finally dispositioned upon evaluation of Illinois Power Company, Baldwin Associates, and Sargent and Lundy.

Missing items, hardware or software, when received on site after a system has been turned over to Illinois Power Company Startup, are identified by Baldwin Associates on a Construction Work Request. This is forwarded to Illinois Power Startup Group who in turn issues the Construction Work Request to Baldwin Associates for action. Once action is complete, whether it involves installation of an item or update of checklists and computer files and transmittal of a documentation to the Document Records Center (DRC), Baldwin Associates Quality Control will verify and document appropriate action to the Illinois Power Startup Group. Illinois Power Startup Group then closes the item on the exception list.

The computer file is a tracking tool, a log of documents required and documents received. Items listed as required, but not complete, are closed only upon receipt of acceptable documentation and subsequent notification by Baldwin Associate engineering that the documentation has been sent to the Document Records Center.

8. Question: "Describe in detail the specific responsibilities of the BA QA organization when it receives the completed quality and engineering checklists. Does BA QA evaluate the results of both lists to verify all required objectives have been met, and is BA QA required to sign and date the lists attesting to such?"
- Answer: BA QA reviews both checklists for accuracy and completeness. This review assures the documentation requirements of the contract have been met. BA QA stamps, initials, and dates each checklist and forwards them to the Document Records Center.
9. Question: "Describe the planning for requiring BA and IPC to audit and survey this overall program on a regularly scheduled basis."
- Answer: BA audits this activity, as other activities, in accordance with the BA QA Manual and BA QA Procedures. This program is subject to IP QA audit as a part of the regularly scheduled audits of BA.
10. Question: "Describe the extent Mr. Ennen will evaluate the total program and conduct special surveillance to provide additional professional QA overview and input as to the workability and controllability of this program."
- Answer: The Quality Assurance department assigns personnel to various work assignments and surveillance activities based upon experience and the nature of activity. This practice will continue. Concerning surveillances regarding the documentation efforts, Quality Assurance will continue to review both the program and practices to ensure adequacy with regulatory requirements. Various personnel assignments will be made to accomplish this objective in the future.
11. Question: "Describe the role of IPC top management in overseeing this overall effort to assure it is properly managed and effective. How much will top management rely on QA in this regard?"
- Answer: Quality Assurance will provide periodic reports to upper management regarding the progress and status of the documentation efforts. These reports may be in the form of surveillance reports, audit reports, monthly QA reports, or Quality Review meeting notes. These reports will be reviewed by management and form a basis for keeping management advised as to the adequacy of company efforts in

meeting regulatory efforts. Since IP upper management is dedicated to ensuring compliance with regulations and committed to codes and standards, action will be taken by appropriate levels of management for those identified issues which do not comply with our commitments.

12. Question: "Does S&L intend to revise their specification requirement for the use of a "Certificate of Compliance" in lieu of missing documentation? If not, how will you comply with Paragraph 5.2.4 of BAP 2.20?"

Answer: A field change request (FCR 9071) has been initiated to revise various Sargent and Lundy Specifications to clarify that shipment of equipment to the site will be allowed in cases where design/engineering documentation is not available. However, a Certificate of Compliance will be required for manufacturing documentation that is lacking. The requirements of Paragraph 5.2.4 of BAP 2.20 apply to manufacturing/quality documentation only.

13. Question: "Will Paragraph 17.1.17.1 of the CPS PSAR be revised? If not, will Paragraph 17.1 of the CPS FSAR which states that Paragraph 17.1 of the PSAR was fully implemented be revised?"

Answer: Illinois Power will ensure that the FSAR accurately reflects the QA program and practices. If, after reviewing the PSAR Chapter 17.1.17.1, we consider that further clarification of interpretation is necessary, we will amend the FSAR to better describe the essential points of our documentation efforts.