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U-0306  
Q37-81(10-15)-L  
October 15, 1981

Mr. C. E. Norelius, Director  
Division of Engineering and Technical  
Inspection  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 61037

Dear Mr. Norelius:

This is in response to your Notice of Violation and Inspection report Number 50-461/81-20. Illinois Power Company's response to the item of noncompliance cited is as follows:

The Notice of Violation states, in part:

"Contrary to the above, as of August 14, 1981, the following instances of failure to develop appropriate or adequate procedures were identified:

- a. Adequate procedures had not been developed in that Baldwin Associates Procedure BAP 3.3.2, Revision 8, "Cable Installation", did not address the minimum quantitative or qualitative acceptance criteria for raceway prior to pulling cables, nor did it address the acceptance criteria to be used in resolving the discrepancies noted on the pre-pull walkdown of the raceway.
- b. Appropriate procedures had not been developed to provide adequate assurance that cables previously pulled into incomplete raceways will not be damaged when work is resumed on the raceway."

With regard to item (a) of the Notice of Violation, Illinois Power Company's response is as follows:

1. CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

Baldwin Associates procedures/instructions are being revised to include acceptance criteria

for raceway prior to pulling cables and the acceptance criteria to be used as a basis for resolving discrepancies noted during the pre-pull walkdown.

II. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

Personnel responsible for reviewing and approving procedures/instructions have been advised of their responsibilities to ensure that future procedures/instructions contain or reference applicable acceptance criteria.

III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Baldwin Associates will be in full compliance with the revised procedural requirements on or before October 31, 1981.

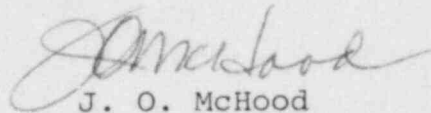
With regard to item (b) of the Notice of Violation, Illincis Power Company does not consider the development of procedures to be the appropriate means of assuring that cables previously pulled into incomplete raceways will not be damaged. Due to the fact that work to be performed to complete raceway is varied in nature and is not generally performed under the control of a work document such as a traveler, procedural controls for protecting cables already pulled are not considered practical. Illinois Power Company does recognize, however, that work on incomplete raceway containing cables must be performed with cable protection in mind. Therefore, the following measures have been or are being implemented:

- 1) Mandatory training of craft supervisory personnel in the responsibility for and techniques of cable protection.
- 2) Incorporation of specific cable protection training sessions into the regularly scheduled craft "Tool Box" meetings.
- 3) Revision of the Personnel Safety Book, issued to all craft personnel, to include precautions for and methods of cable protection during work on uncompleted raceway.

Item (1) above was completed on September 15, 1981. Completion of items (2) and (3) is to be completed by October 31, 1981.

I trust that our response is satisfactory to allow closure of this issue of noncompliance. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,



J. O. McHood  
Vice President

AJB/mw

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