ILLINOIS POWER COMPANY

0981-L
U-0239
Q37-81(06-01)-L
500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

June 1, 1981

Mr. R.F. Heishman, Acting Director
Director of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 61037

81-03

Dear Mr. Heishman:

This is in response to your Notice of Violation and Inspection Report 50-461/81-03. Our response is being resubmitted in accordance with your letter request dated April 13, 1981.

Our response for the two items of noncompliance cited in Report 50-461/80-03 is as follows:

1. Control of Special Processes

The Notice of Violation states, in part:

> "Contrary to the above, a 12-inch lift of concrete was poured in the Category I Diesel Generator Building floor without sandblast cleaning and removal of the curing compound from the construction joint surface."

ACI Standard 301-72 (Revised 1973), "Specification for Structural Concrete for Building", Sections 6 and 11, address the preparation of construction joints. Furthermore, Sargent and Lundy (S&L) Specification K-2944, "Concrete and Grout Work", Section 304, similarly adresses the preparation of construction joints that require positive bonding between existing and new concrete.

We requested Sargent & Lundy to review the general practice of pouring finish floors at CPS. S&L particularly concentrated on requirements for surface preparation and cleaning prior to pouring the finish floors. S&L determined that there are no significant seismic-induced shear loads or uplift loads which could cause problems because of the construction practices at CPS. More specifically, sandblast cleaning and removal of curing compound are not required.

We have found that the specifications and procedures associated with the preparation for finished floors may have been confusing. Consequently, we have taken corrective action

JUN 05 1981

to clarify the specifications, procedures and related practices. Field Engineering Change Notice (FECN) No. 138 has been issued to provide additional guidance and interpretation of S&L's specification K-2944, "Concrete and Grout Work." We believe that as a result of the detailed Sargent and Lundy review and the specification revision, that we are now in full compliance with applicable regulatory requirements for control of finish floor concrete pours.

2. Identification and Control of Materials, Parts and Components

The Notice of Violation states, in part:

> "Contrary to the above, non-traceable steel plate material is installed in some electrical hanger assemblies in the Auxiliary, Diesel Generator, and Control Buildings. Traceability and identification transfer during fabrication appear to be uncontrolled. Quality Control has not assured the recording of traceability identification of the subject steel plate in all cases."

The inspector's concern dealt with filler plates used in electrical hanger fabrication. These filler plates are functionally used as either spacer material or structural tie plates in the construction of electrical raceway supports at Clinton. When safety related plate material is divided for use in the field, it is to be marked with either its heat number or Receiving Inspection Report (RIR) number. Transfer of such identification is accomplished prior to any cutting operations.

Project procedure BAP 1.5, Material Identification, paragraph 4.12.8, states: "Small miscellaneous structural steel material received in bulk containers (such as sheared filler plates) shall have the RIR number recorded on the shipping container. Traceability shall be maintained until issued to the field for construction." This is consistent with other material installations of bulk commodities at CPS in that we have very high confidence that proper bulk materials are received at the site and that only these materials are then issued to the field for construction. We have evaluated unique piece traceability for sheared filler plates as impractical and not required for this application. While we recognize that unique traceability is necessary on other commodities, it is not necessary for this material. Further, the increased cost to achieve unique traceability of sheared filler plate does not provide any significant improvement in quality assurance.

We have determined that our procedures for material traceability which were in effect at the time of the Notice of Violation needed some changes. As a result the following corrective action was taken by March 30, 1981.

a. Project procedure BAP 1.5, Material Identification, was revised to clarify traceability requirements for safety related plate material.

b. Project procedure BAP 3.3.6, Electrical Raceway Support Installation was revised to clearly distinguish that sheared plates are treated differently from other plate material regarding traceability.

c. A meeting with foremen and general foremen was held to discuss plate traceability requirements.

I trust that our response is satisfactory to allow close out of these two issues of concern. I hereby affirm that the information contained in this letter is correct to the best of my knowledge.

Sincerely,

L.J. Koch
Vice President

AJB/prh

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