

ILLINOIS POWER COMPANY



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CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

August 6, 1982

Mr. James G. Keppler
Director, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

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Deficiency 82-07
10CFR50.55(e)

Potential Breakdown in Quality Assurance Program;
Criteria X, Inspection and XVI Corrective Action
Clinton Power Station

On July 8, 1982, Illinois Power notified Mr. R. Knopp, NRC Region III (ref: IP memorandum Y-13621, dated July 8, 1982) of a potential breakdown in the construction Quality Assurance program, in that certain portions of Criteria X and XVI, 10CFR50, Appendix B may not be effectively implemented. Our investigation into this matter continues, and this letter represents an interim report per 10CFR50.55(e).

Investigation Results/Background

A. Criteria X

Regarding Criteria X, Inspection, which reads in part, "A program for inspection activities affecting quality shall be established and executed", it has become apparent that numerous final inspections have not been conducted due to the manner in which field work was controlled and scheduled. The "timeliness of inspection" has been a concern at Clinton Power Station for some time. This concern first surfaced during NRC Inspection 80-27, which addressed "timeliness of inspection" of electrical hangers. The issue was brought to our attention again during NRC Inspection 81-05, which addressed "timeliness of inspection" of pipe hangers. More recently, as the result of a growing awareness that certain inspections were lagging, Baldwin Associates Quality and Technical Services Department performed an inventory and review of all travelers to determine the status of the inspection program. This review substantiated the concerns

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that considerable amounts of work had been completed and final QC inspections had not been completed due to the manner in which the work was scheduled and controlled. Of particular concern were:

- 1.) Large Bore Pipe and Supports
- 2.) Small Bore Pipe and Supports
- 3.) Instrumentation
- 4.) Electrical Hangers
- 5.) Electrical Conduit
- 6.) Structural Steel

As a result of the inventory and quality review, three (3) STOP WORK actions have been initiated by Baldwin Associates. These include the areas of conduit installation, electrical instrumentation installation and containment structural steel. Additionally, restraints have been placed on new construction in the areas of pipe hangers, piping, and instrumentation to allow inspection to "catch-up" with construction.

Further programmatic changes are being evaluated as part of an overall recovery plan being prepared by Illinois Power and Baldwin Associates. A separate recovery plan is being prepared to address each major area of concern. Although results are now preliminary, results have shown that the "inspection backlog" originally identified by the Baldwin Associates inventory and review, is not always due to lack of actual inspection, but often due to documentation "bottle-necks" in various departments. For example, it was determined that structural steel inspection does not lag behind construction. Rather the documentation which supports the inspections has not been completely reviewed. Likewise, this was partially the case in the area of pipe hangers. As the recovery plans have not been fully formulated, reviewed and approved, firm conclusions cannot be drawn to substantiate 10CFR50.55(e) reporting requirements.

B. Criteria XVI

Regarding Criteria XVI, Corrective Action which reads in part, "measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected", it has become apparent that Corrective Action for some identified nonconforming conditions is not being promptly implemented. Concerns in this area were first identified by the NRC during Inspection 80-02, which addressed an excessive number of NCR's that were allowed to occur before corrective action was taken. This concern was also addressed later in NRC Inspections 81-11 and 81-23. More recently, the Illinois Power Quality Assurance organization in conjunction with the Baldwin Associates organization began accounting for and trending the dispositioning of NCRs, DRs, etc. As a result of this Illinois Power

Quality Assurance review, it became apparent that a trend was developing which showed an increasing number of Nonconformance Reports and Deviation Reports being written, with the rate of closure not keeping pace. Other evidence associated with this concern is noted in the number of NRC open items, 10CFR50.55(e) deficiencies, IP QA Surveillance Findings, Baldwin Associates Corrective Action Requests, and IP Management Corrective Action Requests awaiting implementation of corrective action. A number of these items have been "open" for periods of time in excess of six (6) months.

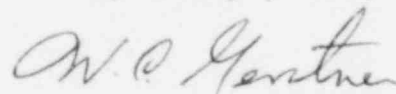
Presently, there are two Recovery Plans being developed to fully address the above concerns. These plans will develop methods for more effectively implementing corrective action systems for Clinton Power Station and for closing out the open concerns. The corrective action procedures implemented on site are being evaluated for their effectiveness in requiring responsive and timely corrective action in behalf of site organizations.

Summary

The results of the investigations and evaluations being performed in conjunction with the development of the general recovery plans will have significant bearing on our investigation and determination of reportability of this item per 10CFR50.55(e). Until these plans are completed, reviewed and approved, the full extent of this potential deficiency cannot be determined. It is anticipated that approximately sixty (60) days will be necessary to complete our investigation, to determine reportability, and to file our final report on the potential deficiency.

We trust that this interim letter provides you sufficient background information to perform a general assessment of this potential reportable deficiency and overall approach to resolution of concerns.

Very truly yours,



W.C. Gerstner
Executive Vice President

cc: H.H. Livermore, NRC Resident Inspector
Director, Office of I&E, USNRC, Washington, DC 20013
Illinois Department of Nuclear Safety
Director-Quality Assurance