October 6, 1982

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

Gentlemen:

During the meeting held with you in our offices on September 30, 1982, we were informed that your Overinspection Program Plan would not be completed until November 1, 1982. In view of this and the fact our inspectors have determined that U.S. Testing Quality Control personnel, who are performing the overinspections, have not had site specific training in accordance with approved Illinois Power Company procedures, we have concluded that this ongoing activity is not being accomplished in accordance with an approved, well defined program.

Based on the above and the telphone conversation between you and Mr. R. C. Knop and others of my staff on October 5, 1982, it is our understanding that you have stopped all overinspection work, and that no further work will be allowed until you have developed an Overinspection Program Plan which satisfies the following:

- Problems/deficiencies identified in various special audits including the verification team, F-M, NRC and other special inspections have been evaluated and cataloged as to hardware or software and their significance established (Refer to MIL-STD 105D).
  - a. Root cause(s) established by evaluating the above problems/ deficiencies have been determined and corrective action, both ad hoc and generic, described.
  - b. New inspection forms, based on the above and previous inspection documents have been reviewed and approved by design and quality engineering. The engineering review shall include the determination that all critical inspectable elements of the various codes, Standards, drawings or specifications are included on the inspection forms. As a minimum, the inspection forms shall include the identification of the characteristics to be inspected, the accept/reject criteria, and requirements for recording the results of the inspection (that is, measurements or other objective evidence).

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- Contingent plans will be included for evaluating potential problems
  where installed components cannot be fully inspected for all characteristics, that is, if problems are identified on accessible components,
  how will those components or attributes, not accessible be evaluated.
- A plan is developed to adjust the sample size depending on the extent and nature of problems identified.
- 4. A method for feedback to the original plan is developed to factor in additional steps when further problems are found, for example, from ongoing work or audits, which may impact on the overinspection effort.
- 5. A site specific training program is developed for U.S. Testing personnel including the extent of training, the number of hours, and the content such as procedures, drawings, and specifications.
- A certification program is defined for U.S. Testing personnel to perform limited or all inclusive inspections by discipline based on their qualifications.
- Documenting and processing nonconformances identified during the overinspections shall be in accordance with established site programs.
- 8. Previous overinspection results shall be reviewed based on changes to the program resulting from this Confirmatory Action Letter, for example changes to inspection forms, and re-inspections shall be performed as indicated.

We understand further that you agree the stop work will not be lifted until the NRC has reviewed and concurred in the Overinspection Program Plan.

Sincerely,

R. L. Spessard, Director Division of Project and Resident Programs

TESTERS Per

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