



December 22, 1982

Docket No. 50-461

Mr. R.C. Knop, Chief
Project Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to Notice of Violation
dated November 24, 1982

Dear Mr. Knop:

This letter is in response to your notice of violation dated November 27, 1982 for Clinton Power Station, Inspection Report Number 50-461/82-19. Illinois Power Company's response to the item of violation is as follows:

The Notice of Violation states on part:

"Contrary to the above, the subcontractor, H. Robertson, was performing a pressure test of the Containment Gas Control Boundary structure without a procedure approved by the principal Contractor, Baldwin Associates or the Licensee, Illinois Power."

I. Corrective Action Taken and the Results Achieved

Immediate corrective action was taken by Baldwin Associates through the initiation of Stop Work Action #021 issued to H.H. Robertson (Baldwin Associates subcontractor). A written plan for lifting the Stop Work Action and conducting the subject test, including review and approval of the test procedure by Baldwin Associates Quality Assurance, was developed. This plan, approved by Baldwin Associates and Illinois Power Quality Assurance, was successfully executed prior to returning to work. The plan included individual oral training, by their supervisors, for those persons responsible for conducting the test, documented training sessions for those persons involved with the on-site tests, and a pre-test meeting to review procedures and scope of work.

DEC 27 1982

II. Corrective Action to be Taken to Avoid Further Noncompliance

Our investigation of this item identified one of the root causes of this condition to be that project personnel are being driven by schedule and production. To alleviate this, letters were sent to all Baldwin Associates subcontractors emphasizing their responsibility in adhering to Quality Assurance Program requirements. Additionally, an approved method has been developed and is being implemented to schedule and control subcontractor's work. The method chosen will incorporate the subcontractor schedules into a 90 day rolling schedule, and will include appropriate interfaces and quality input to ensure quality resources are available. Where applicable, the safety-related subcontractors have supplied work schedules which indicate milestones and tests. These schedules and the job schedule will be used to monitor and control the subcontractor's work.

Documented training, with an approved lesson plan, was conducted in the use of approved procedures, instructions, and drawings as prescribed by regulations and the Quality Assurance Program. Training was given to appropriate Quality, Construction, and Start-up personnel and was completed on November 16, 1982. Long term plans, including periodic re-training, for subcontractor personnel are being developed by the Baldwin Associates Training Department. Those plans will specifically include the aforementioned requirements.

The Illinois Power Director-Quality Assurance held individual counseling with the Illinois Power Quality Assurance personnel involved with the test, which was to be performed by H.H. Robertson, to emphasize their responsibility for ensuring that proper work processes are followed at Clinton Power Station.

The Illinois Power Vice President, responsible for Quality Assurance, held a meeting with Illinois Power Quality Assurance supervisors to reiterate management's support of the Quality Assurance Department. This discussion was conducted to ensure that Quality Assurance supervision fully understand their responsibilities and authorities to stop work at Clinton Power Station.

Finally, in order to strengthen the Baldwin Associates Subcontractors Department, a new department manager has been obtained.

Illinois Power is confident that the corrective actions taken will preclude further noncompliance.

III. Date when Full Compliance will be Achieved

Illinois Power Company was in full compliance on
December 15, 1982.

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

Very truly yours,



D. P. Hall
Vice President

cc J. G. Keppler (Director - Region III)
NRC Sr. Resident Inspector
Illinois Department of Nuclear Safety
Director - Quality Assurance