

inconsistencies resulted in the material certifications being suspect and, therefore, the material suspect. These inconsistencies in documentation have, and will require extensive resources to evaluate, correct, and prove adequacy of material, and is considered a reportable deficiency per 10CFR50.55(e).

INVESTIGATION RESULTS/BACKGROUND

During a Zack Company Quality Assurance review of the certifications for the Clinton Power Station HVAC materials, a number of inconsistencies were identified. These inconsistencies were categorized into the following four areas:

- 1) Incomplete material test reports,
- 2) Incorrect material test reports,
- 3) Improperly modified test reports, and
- 4) Possibility of individual(s) within the Zack Company improperly changing test reports.

As a result, the Zack Company issued Corrective Action Request (CAR) #014-b on September 25, 1981, which identified the problem, contained a plan of action to determine the extent of the problem, including a review of all material test reports for accuracy and completeness, and a time frame for completion. As a result of this review, Zack Company has generated for Baldwin Associates (Illinois Power Contractor), a final list of nonconforming purchase order / CMTR documentation packages. Fifty-three (53) nonconformance reports have been submitted to Baldwin Associates for evaluation and disposition. The status of the fifty three (53) nonconformance reports is as follows:

- a. reviewed by Illinois Power Company Quality Assurance and Baldwin Associates, and considered closed.....17
- b. submitted to Sargent and Lundy for review.....29
 - recommended disposition to "use-as-is" evaluated as acceptable..... ..15
 - requires additional research and/or physical sampling and test of material.....14
- c. additional research required by Zack Company prior to closure by Zack.....4
- d. pending Baldwin Associates review and evaluation.....3

Corrective Action Request #014-b has not been closed to date pending completion of corrective action measures addressed in this letter.

In addition to the actions being taken to resolve the identified documentation discrepancies, Illinois Power Quality Assurance has conducted three (3) evaluation/verifications of Zack Company's corrective action on this matter.

CORRECTIVE ACTION

The following measures have been or are being taken to correct this deficiency and to prevent further recurrences:

- 1) Zack Company is revising their Quality Assurance Manual to enhance controls and describe in detail the programs for assuring that the requirements of 10CFR50, Appendix B, and the HVAC Installation Specification K-2910 are met. Approval of the revised manual is scheduled to be accomplished by February 27, 1983.
- 2) The Zack Company's Corporate Training Practices, for Cicero, Illinois employees in quality assurance program requirements has been reviewed by Illinois Power Quality Assurance and was evaluated as being effectively implemented.
- 3) A centralized documentation center has been established within the Zack Company's Cicero, Illinois office. Specific guidelines have been established in Zack Company Quality Assurance Instruction (QAI No. 4) titled, "Control and Maintenance of QA Purchase Order / Certified Material Test Report Files".
- 4) The Zack Quality Assurance Department reviews all procurement documentation and receiving inspection reports for compliance. Procedures titled, "Procurement" (POCP-15) and "Receiving Inspection" (POCP-1), incorporates the requirement for quality assurance review.
- 5) Unauthorized personnel are not allowed access to quality records at the Cicero, Illinois office.
- 6) Zack Company management has established, in written directives, a company policy addressing disciplinary action to be taken as a result of instances of failure to follow procedures by employees.
- 7) The Zack Company has added additional Quality Assurance personnel to support the upgraded procurement program.
- 8) Illinois Power and Baldwin Associates Quality Assurance Departments have increased surveillances and audits of Zack Company (Cicero, Illinois) activities.

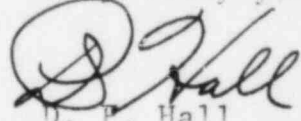
- 9) Procurement documentation has been revalidated by the Zack Company Quality Assurance and Document Control Departments and results have indicated a possible fifty-three (53) questionable procurement document packages. These are identified by a nonconformance report for each package. Resolution of these nonconformance reports will assure that HVAC materials are adequate in meeting the design intent.

SAFETY IMPLICATIONS/SIGNIFICANCE

At this time, the impact of this deficiency on the safety of operations of Clinton Power Station is unknown, and cannot be ascertained until the nonconformance reports have been dispositioned, dispositioning action taken, and reports closed. The corrective actions identified above will identify and assure resolution of all potential documentation and material discrepancies and will prevent further discrepancies. It is anticipated that ninety (90) days will be necessary to evaluate and disposition the nonconformance reports, evaluate for safety impact, and provide a final report on this matter.

This letter is hereby submitted as an interim report in accordance with 10CFR50.55(e)(3). I trust that is sufficient for analysis and evaluation of the deficiency and corrective action.

Very truly yours,


D. P. Hall
Vice President

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