



January 28, 1983

Docket No. 50-461

Mr. C. E. Norelius, Director
Division of Engineering and
Technical Programs
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to Notice of Violation dated November 23, 1982

Dear Mr. Norelius:

This letter is in response to the Notice of Violation dated 11-23-82 for Clinton Power Station, Inspection Report Number 82-18. Illinois Power responses to the two items of violation are as follows:

1. The Notice of Violation states in part:

Contrary to the above, the Baldwin Associates Quality Assurance Manual did not describe the Quality Assurance Organization that is presently being implemented.

I. Corrective Action Taken and the Results Achieved

The training organization was recently placed under the control of the Baldwin Associates Manager of Quality and Technical Services. This change is intended to increase the Quality Assurance emphasis in the training program. Revision of the Baldwin Associates Quality Assurance Manual to reflect the training organization's authority and responsibility is in progress.

II. Corrective Action to be Taken to Avoid Further Noncompliance

The Baldwin Associates Quality Assurance Manual is being revised to require a periodic review of the manual by the BA Manager of Quality Assurance or designee. Such review will be performed at least annually to assure compatibility within the program. Illinois Power is confident that the corrective action taken will preclude further noncompliance.

III. Date When Full Compliance Will Be Achieved

Illinois Power will be in full compliance by February 11, 1983.

2. The Notice of Violation lists 14 items contrary to the Illinois Power Quality Assurance Manual, dated 6-28-82, Section 5.B, which states in part "Written procedures, instructions, and drawings shall be developed and used, as appropriate, for activities affecting quality." Items a. through n. are:
 - a. Nine instances were identified in which Baldwin Associates (BA) Quality Control Inspector qualification records did not contain visual examination results. This is contrary to the BA Quality Control Training Qualification Manual.
 - b. Five instances were identified in which BA Quality Control inspector certification records did not contain examination results. This is contrary to the BA Quality Control Training Qualification Manual.
 - c. Two instances were identified in which BA Quality Control inspector qualification records did not contain certification forms for Level III personnel. This is contrary to the BA Quality Control Training Qualification Manual.
 - d. Two instances were identified in which BA certified Quality Control personnel as Level III inspectors for the duration of employment rather than a three year period. This is contrary to the BA Quality Control Training Qualification Manual.
 - e. Three instances were identified in which BA Quality Control inspector qualification records did not contain a waiver letter when it was used as a basis for certification. This is contrary to the BA Quality Control Training Qualification Manual.
 - f. Two instances were identified in which BA Quality Control inspector qualification records contained waiver letters that were dated after the date of certification. This is contrary to the BA Quality Control Training Qualification Manual.
 - g. One instance was identified in which a BA Technical Services inspector had not been recertified at the specified three year interval. This is contrary to BA Technical Services Procedure BTS 307.

- h. Three instances were identified in which BA Technical Services personnel were initially certified without meeting the minimum certification requirements and whose waivers were dated significantly later. This is contrary to the BA Technical Services Procedure BTS 411.
- i. One instance was identified in which the Zack Company certified a QC inspector who did not meet the minimum qualification requirements of its procedure CB-FQCP-11, Revision 3.
- j. The BA Technical Services Training Manual was not reviewed at least annually by the Manager of Technical Services or his designee. This is contrary to BA Technical Services Procedure BTS 411.
- k. Ten instances were identified in which UST certified QC inspection personnel prior to completing a proficiency evaluation. This is contrary to UST Procedure UST-TQ-1.
- l. Seventeen instances were identified in which UST QC inspectors qualification records contained no evidence of indoctrination and training in accordance with either Illinois Power Company (IPCo) Procedure QAI-310.01 or 710.01.
- m. One instance was identified in which UST certified a QC inspector who did not meet the minimum qualification requirements of its procedure UST-TQ-1.
- n. One instance was identified in which a visual weld inspection was performed by UST QC inspectors not certified to perform visual inspections. This is contrary to IPCo procedures QAI-310.01 and QAI-710.01, and UST Procedure UST (CL) - QAP-1.

I. Corrective Action Taken and the Results Achieved

- a. Investigation of the nine (9) instances cited found that one (1) inspector's periodic eye examination had expired on 7-20-82 and was not retested as required. To correct this situation, the inspector was retested and test results forwarded to the inspector's qualification records. In the remaining eight (8) cases, investigation found that the individual inspectors were properly and currently examined. However, documentation attesting to this fact was misfiled. This documentation has now been properly filed in the inspectors' qualification records.

- b. Investigation of the five (5) instances cited where certification records did not contain examination results found that for one (1) of the five cases, an examination was not applicable because examination of Level III personnel is not required by the BA Quality Control Training Qualification Manual. For the remaining four (4) cases, it was determined that the inspectors had taken a proficiency examination. However, the examination was not properly filed in the inspection qualification file. This documentation has now been properly filed in the inspector qualification records. An evaluation of all QC inspector qualification record files is presently being performed, as described in 2.II. a below, and will correct these type of documentation discrepancies.
- c. At the time of the NRC inspection, only three (3) individuals were certified to Level III positions. Our investigation found that Level III certification letters, signed by Baldwin Associates Chairman of the Board, were included in the three individuals qualification files.
- d. The two instances cited were corrected as part of the Plan for Evaluation of Certifications of QC Inspectors. All BA QC certifications are being reviewed and evaluated in accordance with the plan. This review and evaluation will provide assurance that inspection activities were performed by properly certified personnel. Certification deficiencies will be corrected by the issuance of revised certification and reinspection as necessary.
- e. The reliance on waivers is a practice which was suspended in late May, 1982 by BA Q&TS. Inspector certifications, both with and without waivers, are being reviewed and evaluated per the Plan for Evaluation of Certifications of QC Inspectors. The three instances cited were corrected as part of this plan.
- f. BA Quality Control had qualified two inspectors without issuing the required waivers. This problem was identified in Illinois Power Quality Assurance Surveillance Y-10716, dated 12-5-79. Included in the corrective action taken by BA Quality Control was the evaluation of the individuals' certifications and issuing of the necessary waivers. The time gap between the waiver and the certification is attributable to this series of events.
- g. The inspector's certification expired on 3-19-82. This certification was for Level I Penetrant Test (PT). He did not perform any non-destructive examination after this date. The certification automatically expires 3 years after date of issue unless individual is recertified. BA chose not to recertify this individual for PT since U. S.

Testing, a BA subcontractor, performs the PT examination on site. The individual is however certified as a Grade II welding inspector, and his certification is still active.

- h. BA Technical Services had qualified three persons without issuing the required waivers. This problem was identified in Illinois Power Quality Assurance Surveillance Y-10716, dated 12-5-79. Included in the corrective action taken by BA Technical Services was the evaluation of the individuals' certifications and issuing of the necessary waivers. The time gap between the waiver and the certification is attributable to this series of events. The Manager of Technical Services has taken additional action by initiating, as result of the above surveillance, a multiple phase program for certification review.

The first phase consisted of conducting a thorough review of Technical Services certification records to determine whether waivers were necessary, and if necessary, were they provided and accurate, and to determine what could be done to improve the existing qualification and certification program. This review and evaluation revealed the need to provide waivers for several individuals. These persons had been certified without the necessary waivers to the education and/or experience requirements of procedure BTS-411, Certification. In some instances, resumes were provided so that information used to justify waivers could be verified. Also brought to light was the need to restructure the entire training and certification program, including the training manual. Revision of procedures was necessary to assure consistency between the newly revised program and existing procedures.

The next phase consisted of providing waivers, where necessary, with proper justification and providing resumes, where needed, so this information could be verified. Then the program was revised to permit recruiting personnel who did not meet all the requirements of ANSI N45.2.6-73, but who, through a combination of experience, education, training, and examination, could be qualified and certified with an appropriate waiver.

- i. An investigation was performed regarding the certification of the Zack Company QC inspector. This investigation found that substantiating evidence does exist to support a limited Level II Certification. The inspector's certification documentation was amended to indicate this level of certification, the basis for certification, and the activities qualified to perform. Additionally, basis for the inspector's previous certification was clarified and documented. The inspection performed on site is for over-short-damage and is in addition to a receipt inspection performed by a Zack Co. Level II inspector at

the Cicero, IL facility. A review was performed to determine all inspection performed by the on site inspector. This review found that four material shipments were receipt inspected by the inspector, consisting of twenty-four safety related items. All but two items were purchased for site stock. The 22 items will be subject to further inspection as fabricated items prior to final installation. The two items received as fabricated units were reinspected and accepted October 12, 1982 by a Zack Co. Level II inspector.

- j. The BA Technical Services Training Manual annual reviews, required by BIS 411, have not been clearly documented. Beginning with a review performed 11-1-82, a cover sheet will be maintained in the manual to clearly show accomplishment of review by the Manager of Technical Services or designee. Reviews for 1980, 1981, and 1982 were performed in conjunction with manual revisions.
- k. UST-TQ-1 has been revised to remove the requirements to perform a proficiency evaluation before the date listed on the document of qualification. The proficiency evaluation will now be performed after site specific training and before a U.S. Testing employee can perform inspections. All U.S. Testing employees, presently assigned to overinspection activities, will be provided with site specific training and proficiency evaluations prior to performing overinspection activities.
- l. U.S. Testing personnel, who were performing the overinspection, were not trained in accordance with Illinois Power Company procedures. However, U.S. Testing personnel, who were performing the overinspections, were given site specific training in accordance with the U.S. Testing Clinton Power Station Program Plan, dated August 1982. This Program Plan was approved by Illinois Power Company on August 11, 1982. The Program Plan required that training be presented to U.S. Testing personnel, prior to their commencing inspection activities, on the following subjects:
 - Baldwin Associates Project Procedures Manual
 - Baldwin Associates QA Procedures
 - Baldwin Associates Technical Services Manual
 - Baldwin Associates QC Instructions
 - Baldwin Associates QC Training Manual
 - Baldwin Associates Technical Services Instructions
 - Baldwin Associates Procurement Manual

- U.S. Testing Company QA Manual
- Verification Team Audit Report
- U.S. Testing Company Procedure UST(CL)-QAP-1
- Individual discipline training by QC Supervisor
- Safety training conducted by Baldwin Associates Safety Department
- Applicable Sargent & Lundy Specifications

During the NRC inspection, this information may not have been thoroughly communicated by Illinois Power to the NRC inspectors for their evaluation. Additionally, Illinois Power believes that the Illinois Power procedure for overinspection may have been misleading as to training requirements for U.S. Testing QC personnel. To clarify this matter, QAI-310.01 was cancelled and superseded by QAI-710.01. QAI-710.01 reflects the qualification / certification requirements of ANSI N45.2.6, 1978, as modified by Regulatory Guide 1.58, Rev. 1, and the Clinton Power Station FSAR project position. Additionally, the Illinois Power Quality Assurance Training/ Qualification and Certification Manual has been revised to incorporate site specific training requirements for U.S. Testing personnel performing overinspection activities.

- m. The one instance identified was investigated by Illinois Power. Our investigation revealed that the individual involved was in his training period, at the time of the inspection, and the document of qualification and proficiency evaluation had not been signed certifying him as a QC inspector for Illinois Power overinspection activities. It was also determined that this individual had not performed any inspection activities prior to being certified. A review was performed, by Illinois Power Quality Assurance, to determine if additional personnel did not meet the minimum qualification requirements of UST-TQ-1. This review indicated that this instance was an isolated case. U.S. Testing personnel, performing Illinois Power overinspection activities, are now being trained and certified in accordance with the Illinois Power Quality Assurance Training/Qualification and Certification Manual.

- n. The Related Experience section of the Document of Qualification for the inspectors in question contained visual welding inspection experience. However, U.S. Testing inadvertently omitted this information from the certification section of the Document of Qualification. In addition, the personnel files contained copies of written/practical examinations for visual weld inspection. The omitted information has now been incorporated in the certification section of the Document of Qualification.

II. Corrective Action to be Taken to Avoid Further Noncompliance

- a. In order to assure that Baldwin Associates Quality Control inspectors possess an adequate level of qualification, and associated certification documentation, an Evaluation Plan has been developed and is being implemented. This Plan calls for a four-phase review of Quality Control inspector certification records, and includes both current and previously employed inspectors who were certified either with or without waivers of requirements. This review process will include an evaluation of qualification / certification documentation, performance of inspector re-certification or other adjustments as necessary, and an evaluation of previously inspected work as warranted by the results of the evaluation.

A number of program enhancements are also being made and will be reflected in a revision to the Quality Control Training Qualification Manual, as follows:

1. Minimum levels of on-the-job/classroom training versus job description shall be established and documented.
2. Level III Certification period will be revised to a three (3) year period.
3. References identified on inspector resumes will be verified and documented in the inspectors qualification file.
4. Copies of all supporting back-up data, such as diplomas, transcripts, AWS Certifications, etc, will be obtained and placed in the inspector's qualification files.
5. Prior employment check, will be formalized and documented in the inspector's qualification files.
6. The examination question bank will be reviewed for adequacy.

7. A more formalized classroom indoctrination training program is being developed and will include quality assurance program/manual requirements, industry codes and specifications, and regulatory requirements.
8. A training program for procedural revisions is being established and will be implemented.
9. A standard format for resumes used for certification is being established and will be implemented.
10. A program providing for "limited" certification of QC inspectors will be defined and documented.
11. A re-evaluation of present methods of administering proficiency examinations to include open book tests on procedures, closed book tests on technical issues, and practical proficiency examinations will be made.

Illinois Power believes that implementation of the above Evaluation Plan and program enhancements are adequate to correct identified certification documentation deficiencies, and will prevent their recurrence.

- b. Illinois Power believes that the Evaluation Plan and program enhancements described in II a. above are adequate to correct identified certification documentation discrepancies and will prevent their recurrence.
- c. Illinois Power believes that procedural requirements were met for the specific concerns cited. No further action is believed necessary on this item.
- d. BA has re-evaluated the procedural guidance provided for recertification of Level III QC Inspectors. The results of this evaluation has concluded that a certification period of three years is appropriate. A revision to the BA Quality Control Training Qualification Manual will be made to reflect this clarified recertification requirement. Level III inspectors will be recertified in accordance with the new procedural requirements upon procedure approval. Illinois Power believes that this corrective action is adequate to prevent recurrence of this concern.
- e. Future use of waivers will be within the framework of a revised qualification plan. BA is instituting a training/certification plan for QC inspectors that will provide for limited certification definition and establish minimum OJT/classroom training for each job description. The evaluation of certificates and any recertification will be in accordance with the Plan for Training/Certification and the Plan for Evaluation of Certifications of QC Inspectors. Illinois Power believes that this corrective action is adequate to prevent recurrence.

- f. The NRC inspection item has identified a problem which has been previously corrected as a result of Illinois Power Quality Assurance Surveillance activities. No further corrective action appear necessary at this time.
- g. No corrective action required.
- h. The NRC inspection item has identified a problem which has been previously corrected as a result of Illinois Power Quality Assurance surveillance activities. No further corrective action appears necessary at this time.
- i. BA performed an audit of Zack Co. which included inspector certification within the audit scope. Audit E-375, performed 3-16 to 3-30-82, identified certain problems in this area requiring corrective action. The Zack Company procedure CB-FQCP-11 was subsequently revised to clarify the levels of certification and experience necessary. Illinois Power believes that this corrective action is sufficient to prevent recurrence.
- j. A cover sheet is now included with the manual for documentation of future reviews. No further corrective action appears necessary at this time.
- k. U.S. Testing personnel performing Illinois Power over-inspection activities are now being trained and certified in accordance with the Illinois Power Quality Assurance Training/Qualification and Certification Manual. Any U.S. Testing personnel hired in the future to perform over-inspection activities will be trained and certified in accordance with the Illinois Power Training/Qualification and Certification Manual. This manual requires U.S. Testing personnel to be trained in site specific requirements and perform a proficiency evaluation prior to performing overinspection activities. Illinois Power believes that this corrective action is sufficient to prevent recurrence.
- l. U.S. Testing personnel performing Illinois Power over-inspection activities are now being trained and certified in accordance with the Illinois Power Quality Assurance Training/Qualification and Certification Manual. Illinois Power believes that this corrective action is sufficient to prevent recurrence.
- m. No further corrective action required.
- n. A review of all Document of Qualifications and Proficiency Evaluation records was conducted on the records of persons assigned to the Overinspection activity as of the date of the NRC inspection. Deficiencies identified were corrected. The controlling document for certification has

been replaced with the Illinois Power Quality Assurance Training/Qualification and Certification Manual. Illinois Power believes that this corrective action will prevent recurrence.

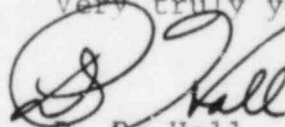
III. Date When Full Compliance will be Achieved

For items a. through j. Illinois Power will be in full compliance by February 1, 1983.

For items k. through n. Illinois Power was in full compliance by January 17, 1983.

I trust that our response is satisfactory to allow closure of the items 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 (Regional Administrator, Region III)
Director, Office of Inspection and Enforcement, Washington, D.C.
NRC Resident Inspector
Illinois Department of Nuclear Safety
IP Manager- Quality Assurance