

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/82-19(DPRP)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Power Station, Unit 1

Inspection At: Clinton Site, Clinton, IL

Inspection Conducted: October 1 through November 1, 1982

Inspector: *H. H. Livermore*
H. H. Livermore
Senior Resident Inspector

11/24/82

Approved By: *D. W. Hayes*
D. W. Hayes, Chief
Reactor Projects Section 1B

11/24/82

Inspection Summary

Inspection on October 1 through November 1, 1982 (Report No. 50-461/82-19(DPRP))

Areas Inspected: Routine safety, resident inspection of construction activities including material laydown and storage areas, general welding activities, program control and numerous stop work recovery activities. The inspection involved a total of 86 inspector-hours onsite by one NRC Senior Resident Inspector (SRI), including six inspector-hours onsite during off-shifts.

Results: Of the areas inspected one item of noncompliance was identified for this report (Paragraph 3.e).

DETAILS

1. Persons Contacted

Principle Licensee Employees, Illinois Power (IP)

*W. C. Gerstner, Executive Vice President
J. O. McHood, Vice President, Project Manager
*R. J. Canfield, Director, Construction
*A. J. Budnick, Director, QA
E. E. Connon, Director, Compliance
*J. S. Spencer, Director, Design Engineering NSED
*W. L. Calhoun, Electrical Construction Supervisor
G. N. Motsegood, Engineering Supervisor, Construction
*L. Brodsky, Assistant Plant Manager
*R. Weber, Station QA Engineer
*R. Campbell, Supervisor, Programs and Procedures
D. E. Korneman, Assistant Director, Construction
*L. J. Koch, Vice President, Engineering and Licensing
G. W. Bell, Supervisor, Audit and Surveillance
T. Parrent, Quality Assurance
*D. P. Hall, Vice President
*J. H. Mackinnon, Project Manager
*J. E. Loomis, Construction Manager
R. L. Bernard, Quality Assurance Coordinator

Baldwin Associates (BA)

*J. E. Findley, Manager, Quality and Technical Services
*W. J. Harrington, Project Manager and Vice President
H. R. Swift, Project Engineer
G. Chapman, Manager, Technical Services
T. Yearick, Assistant Project Manager
D. R. Murphy, Sr., Electrical Engineer
*P. Bryant, Assistant Manager, Quality and Technical Services
*R. Forbes, Quality Assurance Audit
*R. W. Jones, Assistant QA Manager
*M. E. Daniell, Assistant Manager, Technical Services
L. Schaffert, Training Coordinator
*C. Anderson, Manager, Quality Control
*D. L. Richter, Quality Control
*D. R. Cordy, Quality Assurance

Sargent and Lundy (S&L)

D. K. Schopfer, Field Project Manager

Authorized Nuclear Inspection (ANI)

M. L. Tracey, CPS ANI
L. Malabanon, CPS ANI

Other staff and personnel were contacted during the reporting period.
*Denotes those attending at least one of the exit meetings.

2. Licensee Action on Previous Inspection Findings

- a. (Closed) Open Item 50-461/82-05-04: IP NSED completed an evaluation and determined that the problem described as a design deficiency (underrated relay) at Browns Ferry does not apply to the Clinton Power Station RCIC System. This item is closed.

3. Functional or Program Areas Inspected

a. Site Surveillance Tours

At periodic intervals during the report period, surveillance tours of areas of the site were performed. These surveillances are intended to assess: the cleanliness of the site; the storage and maintenance conditions of equipment and material being used in site construction; the potential for fire or other hazards which might have a deleterious effect on personnel and equipment; and to witness construction activities in progress. In general the storage and maintenance of safety related material and equipment appears acceptable throughout the laydown areas and the Power Block. Considerable effort is being expended toward removing all untreated wood from Containment.

No items of noncompliance or deviation were identified.

b. Welding Activities

During the reporting period, the inspector observed general welding activities associated with electrical tray and structural attachments in the Auxiliary Building. For the welding examined, one or more of the following activities was observed: Protection of nearby electrical cable was satisfactory. The welding areas were free of contaminants. The welders were certified as qualified for the thickness and the process specified. Technique and weld results appeared to be satisfactory.

No items of noncompliance or deviation were identified.

c. Program Control

At periodic intervals, the SRI reviewed Nonconformance Reports (NCRs), Discrepancy Reports (DRs), S&L Specification Revisions, BA Audit Reports, Construction Procedure Revisions, IP Quality Procedure Revisions, Trend Analysis, IP Surveillance Reports, Findings, Audits, and plant problems identified by Corrective Action Requests (CARs) and other means. Numerous informal comments were forwarded to the Licensee and Constructor for action and/or discussion. The SRI attended numerous status and/or problem discussion meetings with the IP and BA. The SRI also reviewed and approved individual Stop Work exceptions and

Partial Release Plans as allowed by NRC Confirmatory Action Letters (CALs).

No items of noncompliance or deviation were identified.

d. Potential Problem Identification

The following item was forwarded to the Licensee for information and "followthrough" action. The item consists of generic problem information obtained by the NRC from other power reactors. The SRI explained that the information may identify a potential problem of a similar nature at Clinton. IP is requested to investigate the problem, determine its applicability, and denote action to be taken.

Detroit Graphite - a lead based paint - had been used at Byron, Braidwood, and Marble Hill Nuclear Power Plants. When the paint is sandblasted, the airborne lead particles may be detrimental to stainless steel. Special protective measures were required in the areas of open piping.

This is Open Item 50-461/82-19-01

e. Gas Control Boundary Test

The Gas Control Boundary is a sheet steel structure enclosing the periphery of the Containment Building. The structure provides a negative pressure void around the outside of containment, thereby preventing the possible emission of radioactivity. On October 27, 1982, the fabrication subcontractor, H. R. Robertson, was preparing to apply pressure to the enclosure. Pressure test equipment was connected and in place. Personnel of all applicable groups were present. The SRI determined that the test procedure (Air Infiltration Test Procedure No. 23) had not been approved by BA or IP. The procedure had unincorporated comments from S&L including one that addressed the method of pressure application. The SRI noted that personnel in attendance in the test area were BA Quality, IP Quality, IP Startup, IP Construction, S&L and H. R. Robertson. The SRI noted that the installed test pressure gauge/equipment had no record of calibration (sticker). The IP Quality representative stated that he too had noticed this fact; however, he was told it didn't matter since the test was only preliminary. After discussing the equipment and procedure problems with IP and BA Quality, it became apparent to the SRI that neither organization had instructed anyone to stop the test and that it would continue without their intervention. This concern was made known to IP Quality and subsequently Stop Work No. 021 was issued by BA.

The use of a test procedure that was not "up to date" (complete) and not approved by IP or BA is considered in noncompliance with 10 CFR 50, Appendix B, Criterion V (50-461/82-19-02).

4. Meetings and Site Visits

- a. A management meeting was held on site on October 8, 1982. Participants from NRC were D. W. Hayes, Chief, Projects Section 1B, F. J. Jablonski, Projects Inspector and H. H. Livermore, SRI at Clinton. The IP participant was Vice President, D. Hall. Subjects discussed were: how the NRC will operate in relation to the Recovery Plans; the tracking and control of commitments to the NRC; a general discussion of the Overall Schedule and Master Management Plan; 50.55e event reporting to the NRC within 24 hours; and forthcoming NRC inspections to the Clinton site in the areas of on-going work, design control, and Caseload Panel.
- b. Another site meeting of importance was held on October 22, 1982. In attendance were D. Hall, Vice President, IP, J. E. Findley, Manager of Quality, BA, and H. H. Livermore, SRI at Clinton. The NRC position on Stop Works was clarified by explaining that the Stop Works included all work in the particular area (e.g., conduit); not only installation of the item, but also removals (take downs and determinating cable). Individual removals on a case-by-case basis are allowed with prior SRI approval. IP was also requested to further define the boundaries of all Stop Works in more detail, also to include the Startup/Turnover area, and present the definition to the NRC for review and concurrence. Another item discussed in the meeting was the recently issued Zack Stop Work No. 1 in regard to the on-site fabrication of nonsafety seismic HVAC duct installations. The result was that the stop work would be included in BA's existing Stop Work No. 020, therefore, placing it under the CAL of September 1, 1982.
- c. An onsite management meeting was held on October 28, 1982. Participants from NRC were D. W. Hayes, Chief, Projects Section 1B, F. J. Jablonski, Project Inspector, and H. H. Livermore, SRI at Clinton site. The IP participant was D. Hall, Vice President. Subjects discussed were: NRC/IP interface problems in area of Recovery Plans; status review of Overall Management Plan; results of IP evaluations and problem causes; Over-inspection Program status; management changes; and corrective action to prevent recurrence (root causes). A tentative date of November 15, 1982, was set for the next IP and NRC management conference.

5. Stop Work Chronology

A summation of past Stop Work events has been presented in NRC Reports 50-461/82-05, 82-08, and 82-14. For this reporting period the following sequential events have taken place.

On October 5, 1982, five members of Stone and Webster Company assumed the top management positions of Illinois Power Construction Project Management. This additional nuclear expertise had been recommended in a previous outside agency audit of IP. On October 7, 1982, NRC issued a CAL encompassing the ongoing IP Overinspection Program. An NRC inspection concluded that ongoing activities were not being accomplished

in accordance with an approved well-defined program. The CAL documented the NRC's understanding that no further overinspection would be allowed until the NRC had reviewed and concurred in a revised Overinspection Program Plan. The CAL remains in effect.

On October 7, 1982, the NRC levied a \$90,000 civil penalty against IP for violations of Federal Regulations as detailed in Report 50-461/82-02. The penalty was paid in full without contention on October 21, 1982. On October 8, 1982, the NRC approved a partial release of Refueling Bellows Stop Work No. 010. The release consisted of allowing a controlled plan of ultrasonic inspection of questionable welds in order to provide the Architect Engineer with realistic data for problem disposition. The basic Stop Work remains in effect.

On October 8, 1982, the HVAC Subcontractor, Zack Company, replaced the site Project Manager and two Superintendents. The Corporate Project Manager is temporarily in charge on a part time basis. A site QA Manager, Mr. G. Larkin, has been appointed.

On October 13, 1982, a BA request was made to modify the numbers of travelers released to construction for work. Traveler control was an IP commitment made to the NRC in a presentation at a previous management conference. SRI approval of the request was granted and a follow-up approval letter from Region III was received on October 25, 1982. On October 21, 1982, Zack Company Stop Work No. 1 was issued encompassing all nonsafety seismic HVAC duct fabrication onsite. BA included this in existing Stop Work No. 020. The site fabrication and installation of nonsafety seismic HVAC duct systems is now included in the existing Stop Work Recovery Program.

On October 27, 1982, Stop Work No. 021 was issued against the subcontractor H. R. Robertson for testing of the Containment Gas Control Boundary Structure. Details are included in Section 3e of this report. Stop Work No. 021 is not within the purview of the existing CAL. The SRI will monitor IP's corrective action plans.

In summation the ten original Stop Works remain in effect, and three CALs remain imposed on IP by the NRC.

6. Exit Meetings

The inspector met with IP representatives (noted in paragraph 1) throughout the month of October and on November 1, 1982, and summarized the scope and findings of the inspections performed.

The inspector attended the following NRC inspector exit meetings:

J. Peschel, F. Hawkins, R. Hasse, and J. Kish on October 8, 1982
D. Keating on October 22, 1982
D. W. Hayes and F. J. Jablonski on October 29, 1982