

ILLINOIS POWER COMPANY



1605-L
U-0560

CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

October 1, 1982

Mr. James G. Keppler
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Potential Deficiency 82-08
10 CFR 50.55(e)
Distribution Control for
Instrument Data Sheets

On September 2, 1982, Illinois Power notified Mr. R. Knop, NRC Region III, (ref: IP memorandum Y-13906, 1605-L, dated September 2, 1982) of a potentially reportable deficiency concerning the lack of distribution control for instrument data sheets. Our investigation into this matter continues, and this letter represents an interim report per 10 CFR 50.55(e).

STATEMENT OF POTENTIALLY REPORTABLE DEFICIENCY

As a result of an Illinois Power Quality Assurance Special Surveillance (Y-13104, 4138-L dated September 3, 1982), it was determined that the methods of controlling the distribution of instrument data sheets is inadequate. This condition potentially allows for incorrect revisions of data sheets to be used during instrument procurement, receipt, installation, inspection, and calibration activities, which could result in errors in documentation and instrument requirements.

INVESTIGATION RESULTS/BACKGROUND

In May, 1982, Baldwin Associates (IP contractor) initiated a nonconformance report (NCR 6977) which addressed a problem with certain temperature switches which, although purchased as safety related under purchase specification K-2911, were receipt inspected as non-safety related, and were being installed in safety related systems. Further investigation into this problem resulted in the identification that the instrument data sheets originally issued by Sargent & Lundy (CPS Architect-Engineer) as part of specification K-2911 have not been kept current with subsequent revisions of the data sheets.

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This investigation identified several cases where revised instrument data sheets changed safety/seismic classification of instruments. This problem was documented in a Baldwin Associates Corrective Action Request (CAR 094 dated June 4, 1982). An Illinois Power Quality Assurance Special Surveillance was performed in July, 1982 to evaluate the adequacy of document control for instrument data sheets. This surveillance found a lack of, or incorrect revisions of instrument data sheets in procurement specifications which could allow for errors in documentation and instrument requirements.

Investigation has found that revisions to instrument data sheets are issued by Sargent & Lundy (S&L) to Baldwin Associates (BA) Document Control Center for insertion into Instrument Data Sheet Books. BA then distributes these sheets to individual bookholders utilizing a transmittal letter, however, the books are not treated as controlled copies. Additionally, it was found that the latest revision of instrument data sheets were not always incorporated into the purchase specifications. Only those revisions which impacted the instrument vendor's scope were transmitted by Sargent & Lundy to the vendor. If no such impact existed, the data sheets were sent to individual book holders via the BA Document Control Center. The above conditions resulted in discrepancies between the data sheet revisions found in the purchase specification, the Master Instrument Data Sheet Book found in the BA Document Control Center, and the data sheets held by individual book holders.

Investigation of the effects of utilizing improperly controlled instrument data sheets is in progress. This investigation will include the effects on procurement, receipt, installation, and inspection of instruments purchased under safety related procurement specifications K-2801, K-2882, K-2928, K-2911, and various bills of material. Investigation completed to date has determined that the problem has not adversely impacted the calibration of safety related instruments.

Investigation to determine if other instrument-related documents exist which lack distribution control has also been performed. Investigation revealed that Instrument Setpoint Logs are distributed in the same manner as instrument data sheets. These documents have not yet been used for instrument calibration activities at CPS, therefore no adverse impact on plant documentation or hardware have occurred as a result of this problem.

Corrective Action (Interim)

Although investigation of this potential reportable deficiency is still in progress, several actions have been or are being taken to correct the problem and to prevent recurrence:

1. Instrument data sheet bookholders have been directed to return their copies of instrument data sheet books to the BA Document Control Center. New copies of the book will be reissued under controlled distribution.

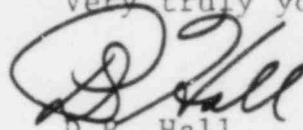
2. The master Instrument Data Sheet Book found in the BA Document Control Center was reviewed by the BA Document Control Center against the master Instrument Data Sheet Index provided by Sargent and Lundy. Discrepancies identified will be corrected, as well as those contained in the individual instrument data sheet books distributed by the BA Document Control Center.
3. The BA Document Control Center has established a computer tracking system for the instrument data sheets and instrument index for latest revision.
4. The instrument setpoint log books are being recalled, and will be re-distributed as controlled copies.
5. Sargent & Lundy has revised their methods of issuing revised instrument data sheets. These methods include:
 - A. The issuance of amendments or engineering change documents to the purchase specifications/bills of material noting the revised data sheet, when the purchase specifications/bills of material are active (i.e. affected instrument not yet received at CPS).
 - B. After receipt inspection of the affected instrument (i.e. procurement specification no longer active) revised data sheets will be transmitted to the Baldwin Association Document Control Center for controlled distribution to bookholders.
 - C. For instruments provided and installed under specification K-2911, the above is followed except the date of system turnover for the affected instrument will be considered the date when the purchase specification is no longer active.
6. An Engineering Change Notice (ECN 3204) has been issued to incorporate into specification K-2911, the latest revisions of instrument data sheets as of September 22, 1982.

Safety Implications/Significance

Investigation of this potentially reportable deficiency continues, to determine the effects of inadequate distribution control of instrument data sheets on plant documentation and hardware. Investigation will include the effects on instrument purchasing, receipt, installation, and inspection at Clinton Power Station; determine the need for additional corrective action; and will determine significance on plant safety. It is anticipated that approximately sixty (60) days will be necessary to complete the investigation, determine reportability, and to file our final report on the potentially reportable deficiency.

We trust that this interim letter provides you sufficient background information to perform a general assessment of this potential reportable deficiency and overall approach to resolution of the problem.

Very truly yours,



D.P. Hall
Vice President

cc: H.H. Livermore, NRC Resident Inspector
Director, Office of I&E, Washington, D.C. 20013
Illinois Department of Nuclear Safety
Director-Quality Assurance