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ILLINOIS POWER COMPANY



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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, IL 60137

Dear Mr. Keppler:

Clinton Power Station Unit I
10CFR50.55(e) Reportable Deficiency 82-06
Structural Steel Inspection Records

On June 25, 1982, Illinois Power verbally notified Mr. J.M. Hinds, NRC Region III, of a potentially reportable deficiency involving quality control inspection records for the containment building structural steel, in that the documentation and records may not provide assurance that the structural steel meets design and construction requirements. This initial notification was followed by one (1) interim report (IP Letter U-0521, 1605-L, W.C. Gerstner to J.G. Keppler dated July 23, 1982). Illinois Power has conducted an investigation of this matter and has determined that the deficiency is reportable under the provisions of 10CFR50.55(e) (3).

STATEMENT OF REPORTABLE DEFICIENCY

Structural steel inspection documentation for certain areas in the containment building was inadvertently destroyed, and requires extensive resources to re-obtain access, reinspect, and re-document inspection of the affected structural steel. The loss of this quality documentation, requiring extensive resources to correct such loss, is considered a reportable deficiency per 10CFR50.55(e).

INVESTIGATION RESULTS/BACKGROUND

Due to reported quality problems pertaining to structural steel at other nuclear power stations, a Quality Assurance surveillance of structural steel erection and inspection activities at CPS in the containment building was performed by IP Quality Assurance personnel, in order to determine if the structural steel work at Clinton meets regulatory requirements. The surveillance (Y-13521, 4138-L) was conducted during the period April 27 - May 10, 1982 and resulted in eight (8) quality assurance findings. As a result of the surveillance report and findings, Illinois Power issued a MANAGEMENT CORRECTIVE

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ACTION REQUEST (MCAR) No. 2, which was transmitted to Baldwin Associates (IP Contractor) requesting immediate corrective action to the quality concerns identified in the surveillance report. This surveillance report also resulted in a 10CFR50.55(e) reportable deficiency (82-04) pertaining to the installation of jam-nuts on bolted slip-type structural steel connections and component supports, reported to the NRC (Region III) on September 17, 1982 (IP letter U-0538, 1605-L). The issuance of MCAR-02 culminated in STOP WORK ACTION #019, issued by Baldwin Associates on June 23, 1982, stopping all structural steel installation activities in the containment building.

In order to fully investigate and resolve this matter, an Illinois Power Structural Steel Recovery Plan for Stop Work #019 was developed. This Plan included the analysis and investigation of each surveillance finding, both individually and as a group, to determine if adverse trends caused by shortcomings in the quality program existed, to determine root cause, to determine generic applicability of the findings to plant structural steel, and to determine if a condition(s) existed which could adversely affect the safety of operation of the plant.

Analysis of the eight (8) findings found that three (3) resulted, either directly or indirectly, from the inadvertent loss of inspection documentation for certain areas in the Containment Building. This documentation consisted of structural steel framing drawings utilized by Baldwin Associates Quality Control, upon which the performance of inspections is recorded. These drawings are issued to Quality Control in a controlled manner by the on-site Document Records Center (DRC). The drawings were superseded by a later revision, and, in accordance with Baldwin Associates document control procedure BAP 2.0, the superseded drawings were inadvertently disposed of, resulting in the loss of inspection information. This situation was found to have occurred in four (4) quadrants of elevation 737 and one (1) quadrant of elevation 755 in the containment building.

Analysis of the remaining five (5) findings found no further significant deficiency per 10 CFR 50.55(e). Resolution of these five (5) findings is being pursued through normal corrective action systems at CPS, and the Illinois Power Structural Steel Recovery Plan for Stop Work #019 under close scrutiny by the NRC (Region III).

CORRECTIVE ACTION (FINAL REPORT)

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

1. All drawings utilized to document the progress of structural steel inspections were placed in locked cabinets. Limited access has been established, with Quality Control being responsible for what drawings can be removed and destroyed. Baldwin Associates Procedure BAP 3.1.3 and Quality Control Instruction QCI 203 will be revised by November 1, 1982 to incorporate these requirements.

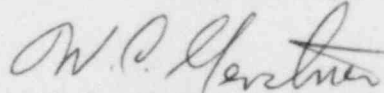
2. A Deviation Report (DR) 2631 was written to document the destroyed drawings.
3. A reinspection of all affected structural steel connections will be performed to re-verify and re-establish the quality documentation package. This reinspection program is described in the Illinois Power Structural Steel Recovery Plan for Stop Work #019 and is under close scrutiny by the NRC (Region III). It is estimated that this inspection will be complete by November 1, 1982.
4. Quality Control has conducted a review of structural steel inspection documentation for other plant structures, to determine extent of this problem. This review found that this problem is limited to the five (5) quadrants within the containment building.

SAFETY IMPLICATIONS/SIGNIFICANCE

The inadvertent loss of quality documentation for the five (5) quadrants of the containment building does not in itself result in a condition which could adversely affect the safe operation of CPS. Additionally, the reinspection of these five (5) areas is not expected to identify hardware problems which could affect plant safety. However, the loss of this documentation is a condition which will require extensive resources to correct such loss. On this basis, this deficiency is considered significant and is therefore reportable under 10CFR50.55(e).

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

Yours very truly,



W.C. Gerstner
Executive Vice President

cc: NRC Resident Inspector
Director - Quality Assurance
Director - Office of I&E, USNRC, Washington, D.C. 20555
Illinois Department of Nuclear Safety