

ILLINOIS POWER COMPANY



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

November 8, 1982

Mr. R.L. Spessard, Director  
Division of Project and Resident Program  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Docket No. 50-461

Dear Mr. Spessard:

The purpose of this letter is to acknowledge receipt of and provide initial response to your October 6, 1982 Confirmatory Action Letter (CAL) concerning Illinois Power Company's Overinspection Program. Illinois Power Company has reviewed and evaluated the conditions addressed in the CAL, and submits the following response:

1. In regards to the CAL statement which reads in part, "...U.S. Testing Quality Control personnel, who are performing the overinspections, have not had site specific training in accordance with approved Illinois Power Company procedures...", Illinois Power Company's interpretation of this condition is as follows:
  - U.S. Testing Quality Control personnel, who were performing the overinspections, were not trained in accordance with Illinois Power Company procedures. However, U.S. Testing Quality Control 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:

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- 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 Dept.
- Applicable Sargent & Lundy Specifications

During the NRC inspection of September 27 through October 8, 1982, this information may not have been thoroughly relayed by Illinois Power to the 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 Quality Control personnel. It was not intended that U.S. Testing Quality Control personnel be trained in accordance with Illinois Power training procedures, but to applicable U.S. Testing requirements described in the Program Plan. To clarify this matter, U.S. Testing Company is developing a procedure to define site specific training requirements. This procedure will be reviewed and approved by Illinois Power Company. Illinois Power Quality Assurance Instruction OAI-710.01 will be revised to clearly specify that U.S. Testing Company Quality Control personnel shall be trained in accordance with the Illinois Power approved U.S. Testing Company procedures.

2. In regards to CAL paragraph 1.a which states, "Root cause(s) established by evaluating the above problems/deficiencies have been determined and corrective action, both ad hoc and generic, described.", Illinois Power Company's response is as follows:
  - The Illinois Power Company Improvement Program, which includes the Overinspection Program, will address the "lessons learned" software and hardware deficiencies for root causes and corrective action.
3. In regards to CAL paragraphs 1.b through 8, Illinois Power Company's response is as follows:
  - Illinois Power Company is revising our Overinspection Program to address the items discussed in your CAL paragraphs 1.b through 8.

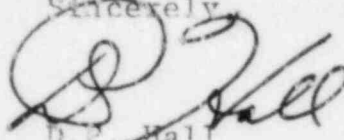
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Illinois Power Company terminated all new overinspection work on October 5, 1982 (Ref: A.J. Budnick letter Y-13974, 4250-L, dated 10/5/82). No further inspections will be performed until an Overinspection Program Plan, which addresses the items discussed in your CAL, has been fully developed, reviewed, and approved by Illinois Power Quality Assurance, and concurrence is obtained from the U.S. NRC.

I trust this initial response satisfactorily addresses your concerns with the Illinois Power Overinspection Program. We will continue to keep you advised as to our progress in achieving our objective.

Sincerely,



D.P. Hall  
Vice President

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