ILLINDIS POWER COMPANY



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

February 21, 1984

Docket No. 50-461

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

Subject: Potential 10CFR50.55(e) Deficiency 55-84-01 Design Change Control (NCRs/FCRs)

Dear Mr. Keppler:

On January 11, 1984, Illinois Power Company notified Mr. R. C. Knop, NRC Region III, (ref: IP memorandum Y-18979 dated January 11, 1984) of a potentially reportable deficiency per 10CFR50.55(e) concerning the control of field design changes at Clinton Power Station (CPS). Our investigation of this matter continues, and this letter represents an interim report in accordance with 10CFR50.55(e).

Statement of Potentially Reportable Deficiency

Potential problems have been identified with the control of field initiated design changes between Sargent & Lundy (CPS Architect/Engineer) and Baldwin Associates (CPS Constructor). The problems pertain to the revision of Field Change Requests (FCRs) and Nonconformance Reports (NCRs), their incorporation into affected design documents, and the identification of all directly affected documents on the FCRs/NCRs. An evaluation of this issue is being performed to determine the scope; the effects on installed hardware; and the significance on the safety of operation of CPS.

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Background/Investigation Results/Corrective Action

As a result of Illinois Power Company Quality Assurance Audits, findings were written to document problems identified in the area of control of field design changes for CPS. The findings concerned procedural requirements defining the design change interface between Sargent & Lundy and Baldwin Associates. The specific nature of the concerns included:

- 1. FCRs were identified that were not posted against or incorporated into design drawings. This inhibits verification of the documents within Baldwin Associates document control system.
- 2. FCRs were revised and incorporated into design drawings without noting the FCR revision number on the design drawings. This inhibits verification of the FCR revision incorporated into the design drawings.
- Baldwin Associates' procedures for processing revisions to 3. field design change documents require more detailed guidance. As a result, revised FCRs and NCRs must be checked to ensure the hardware change was made in the plant.

An investigation plan has been prepared and issued by Illinois Power Company to investigate the above concerns and to determine root causes and corrective action on the issue. The plan includes a review of FCRs/NCRs issued prior to December 1, 1983, to assure that the directly affected documents associated with the field design change have been properly identified. review will also be performed to assure that the hardware installation was performed using the latest revision of NCR/FCR. Procedures used by affected organizations for control of field design changes will be reviewed for consistency and adequate interface. The methods and interface for controlling other types of design change documents, such as Field Engineering Change Notices (FECNs), will also be evaluated for adequacy.

To prevent further problems in this area, enhancements have been made in the method of identifying the status of design change documents. These enhancements include the entry of additional information into the IP computer data base to track the status of design change documents and revisions thereto. The use of the IP data base will provide consistent information to all affected organizations and better traceability of these documents. Other corrective action measures may be necessary as a result of the on-going investigation of the issue.

4.

Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is evaluated. It is anticipated that approximately six (6) months will be necessary to complete our investigation and to file a final report on this issue. Illinois Power intends to provide an update on this issue in approximately ninety (90) days.

We trust that this interim report provides you sufficient background information to perform a general assessment of this potentially reportable deficiency and adequately describes our overall approach to resolve the issue.

Sincerely yours,

Vice President

RDW/lag

cc: NRC Resident Office Director - Office of I&E, US NRC, Washington DC 20555 Illinois Department of Nuclear Safety INPO Records Center