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ILLINOIS POWER COMPANY



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

June 20, 1984

Docket No. 50-461

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Clinton Power Station Unit 1
Application of ASME Code Case N-315

Dear Mr. Schwencer:

By Illinois Power Company letter U-0655 dated July 27, 1983, NRC approval was requested for the use of ASME Code Case N-315, "Repair of Bellows" for guard pipe expansion bellows repairs. Your reply letter of September 27, 1983 granted permission to use Code Case N-315, with certain conditions.

Subsequently, Illinois Power Company has determined as indicated in the attached IP letter (U-10141) to NRC Region III dated April 12, 1984 that Code Case N-315 will not be necessary for the ten damaged bellows on the guard pipes. These bellows were originally classified as ASME Section III for convenience in specifying design requirements for procurement. Since they are neither reactor pressure boundary nor containment pressure boundary they need not be classified ASME Section III in accordance with NRC Regulatory Guide 1.26. We are reclassifying them in accordance with ANSI B31.1 as Seismic Category I in order to facilitate the repairs. This was accomplished via reissuance of appropriate drawings and specifications, and Amendment #29 to FSAR section 3.2.1. The repair program being pursued by IP is technically equivalent to Code Case N-315; however, the reclassification allowed IP to request proposals for evaluation/repair programs from qualified, non-ASME code stamp holders.

Sincerely yours,

A handwritten signature in cursive script that reads "Daniel I. Herborn".

Daniel I. Herborn
Director - Nuclear Licensing
and Configuration
Nuclear Station Engineering

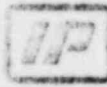
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cc: B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety

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ILLINOIS POWER COMPANY



U-10141

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500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

April 12, 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 Deficiency 55-83-08
10CFR50.55(e)
Damage to Guard Pipe
Bellows Assemblies

Dear Mr. Keppler:

On June 27, 1983, Illinois Power notified Mr. F. Jablonski, NRC Region III (Ref: IP Memorandum Y-17131, 1605-L, dated June 29, 1983) of a potentially reportable deficiency per 10CFR50.55(e) concerning construction damage to guard pipe bellows assemblies. This initial notification was followed by two (2) interim reports (Ref: IP letter U-10077, D. P. Hall to J. G. Keppler dated August 16, 1983, and IP letter U-10113, D. P. Hall to J. G. Keppler dated December 15, 1983). Our investigation of this matter continues, and this letter represents an interim report per 10CFR50.55(e).

Statement of Potentially Reportable Deficiency

Ten (10) guard pipe bellows assemblies used at Clinton Power Station (CPS) were damaged during installation and construction activities. This damage consists of small dents, nicks, scratches, and arc strikes, with one (1) assembly exhibiting a small hole in one (1) of the two (2) bellow plys. An evaluation of this issue is being performed to determine the consequences of this damage and necessary actions to make the bellows acceptable.

Background/Investigation Results/Corrective Action

During installation of the guard pipes and associated bellows assemblies, eleven (11) Nonconformance Reports (NCRs) were written to document cases of damage to ten (10) of eleven (11) bellows assemblies. These bellows assemblies, anchored to the drywell wall and welded to the guard pipe, act as a seal isolating the drywell environment while allowing free axial thermal and seismic movement of the guard pipe. The bellows assemblies are not pressure retaining parts of either the reactor or the primary containment, but were fabricated, tested, and certified in accordance with the ASME Code, Section III,

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Subsection NE (Class MC), to take advantage of available code specifications. The original supplier of the bellows assemblies is no longer in this type of business.

An evaluation of this problem is being performed to determine the remedial actions necessary to establish the acceptability of the damaged bellows. Several methods are being pursued, which include testing of a prototype bellows assembly and repair of the presently installed bellows. Pathway Bellows, Inc., was awarded the contract to perform testing of the prototype bellows assemblies and to supervise repairs, if required. A completed test report is scheduled to be submitted to Illinois Power and Sargent & Lundy by June 1, 1984, and is expected to justify a "use-as-is" disposition for most of the minor dents and scratches. The classification of the bellows assemblies was also revised from ASME to ANSI B31.1 to facilitate any repairs; however, they have retained their safety related, seismic Category I classification.

To prevent further damage, the installed bellows assemblies have been covered with protective coverings.

Safety Implications/Significance

The consequences of the damage to the installed bellows is not known at this time. Further evaluation of the issue is necessary to determine the significance of the damage and the need for repair or replacement of the assemblies. It is expected that remedial action will not be necessary on most of the minor dented and scratched bellows.

The evaluation of this issue has required an extended period of time to complete. Illinois Power expects to provide a final report on this issue in approximately one hundred twenty (120) 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 problem.

Sincerely yours,



D. P. Hall
Vice President

RDW/lag

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