

ILLINOIS POWER COMPANY



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

June 4, 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: Response to Notice of Violation dated
February 21, 1984, NRC IE Inspection Report
Number 50-461/84-04

Dear Mr. Keppler:

This letter is in response to your Notice of Violation dated April 24, 1984, Inspection Report Number 50-461/84-04. Illinois Power Company's response to the two items of noncompliance is as follows:

1. The Notice of Violation states in part:
 - a. The two installed load bolts of RHR pipe riser clamp M-IRH07105R were full length threaded rod rather than that of 1-3/4" diameter studs, threaded only at each end as called for on the drawing Bill of Material. As a result of the incorrect installation, load bolt threads were located in shear plane of the riser clamp, in violation of the ASME Code.
 - b. The installed load bolt on RHR pipe hanger clamp M-IRH05005V had threads located in the load bearing part of the shank (shear plane), in violation of the ASME Code.

I. Corrective Action Taken and the Results Achieved

Concurrent with the NRC inspection, Illinois Power Quality Assurance issued Surveillance Finding C-84-039 to document the incorrect material installation of item 1a. Nonconformance Report (NCR) 14968 was issued to identify the discrepant condition and to disposition the deficiency. Subsequently, the licensee identified item 1b. and issued NCR 15334.

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Baldwin Associates Corrective Action Request (CAR) 157 was issued to affect programmatic corrective action. As required by CAR 157, a review of similar travelers for piping hangers was performed. No additional instances of fastener substitution were identified.

The cognizant design organization (Basic Engineers) has reviewed the load capacity data calculations for the hanger configuration in question. Hanger load capacity is adequate to allow load bolt threads in the shear plane. The Architect/Engineer has accepted the conclusions of the design organization and has changed the design specification.

II. Corrective Action to be Taken to Avoid Further Noncompliance

A change to the design specification clarified the use of threaded fasteners subjected to shear plane forces. Appropriate inspection personnel have received training to re-emphasize that fastener threads are not allowed in the shear plane of ASME piping hangers except as permitted by design.

III. Date When Full Compliance Will be Achieved

Illinois Power Company is in compliance as of the date of this letter.

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2. The Notice of Violation states in part:

. . . Baldwin Associates Quality Control incorrectly invalidated (closed in process) Nonconformance Report (NCR) 15334 on the basis of a subcontractor memo, thereby bypassing the specified NCR management corrective action reviews and ASME Code requirements. The NCR identified a safety related strut pipe hanger bolt loaded in pure shear that had its threads located in the load bearing part of the shank. The NCR also identified that the installed condition was contrary to the requirements of ASME Code, Section III, Subsection NF, Paragraph 4722(b).

I. Corrective Action Taken and the Results Achieved

Evaluation of the cited condition resulted in the initiation of NCR 15976 to document and disposition the improper closure of NCR 15334. The required change to the design drawing was made, and NCR 15976 has been closed.

NCR 15334 was closed prematurely because of a misunderstanding about the acceptability of the subcontractor (designer) memo. The subcontractor memo was mistaken for an endorsement of existing design documents. Actually, the memo presented a new application for the identified pipe hangers. The Architect/Engineer had not yet reviewed the new application when NCR 15334 was closed in-process. Subsequently, the information supplied by the subcontractor memo was incorporated into the design specifications.

II. Corrective Action to be Taken to Avoid Further Noncompliance

Procedure BAP 1.0, Nonconformances, was revised to include management in the decision process for Nonconformance Reports that are closed in-process. In addition, training has been presented which reiterates the requirements for in-process closure of Nonconformance Reports.

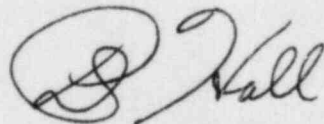
III. Date When Full Compliance Will Be Achieved

Illinois Power Company is in compliance as of the date of this letter.

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I trust that our response is satisfactory to allow closure of the items of noncompliance identified in the Notice of Violation.

Sincerely yours,



D. P. Hall
Vice President

JRS/lag

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