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ILLINOIS POWER COMPANY



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

July 31, 1984

Docket No. 50-461

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

| PRINCIPAL STAFF | | | |
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Subject: Proposed Changes to Illinois Power Company's
Overinspection Program

Reference: See Attachment 1

Dear Mr. Keppler:

The purpose of this letter is to identify those areas where duplication of efforts are occurring either within Illinois Power's Overinspection Program or with other Quality Assurance activities, and to propose changes to the program to reduce duplications.

1. Illinois Power, on September 13, 1983, authorized Baldwin Associates Field Verification and IP Overinspection to proceed with the IP Overinspection Program, which consists of two separate sampling activities based on an approved sampling plan (MIL-STD-105D). Under this program, Baldwin Associates QA performs Field Verification inspections of a sample of a "lot" within the scope of the Program. Accepted work is then submitted for IPQA to perform Overinspection by also sampling the work. If IPQA also determines that the work is acceptable, no further inspections of the "lot" are required.

As documented to the NRC in Reference (1), definition of sample lots, sample sizes, and sample elements is being accomplished by traveler-item, using a minimum sample dictated by MIL-STD-105D. This approach is used in order to maintain consistency with the method of defining work packages for turnover, and more importantly, results in the inspection of all items included on a traveler within the scope of the turnover package. Under this method, however, 100% BA Field Verification can occur in addition to 100% IP Overinspection, due to circumstances such as Turnover Packages providing sample lots of fifty or less travelers; or instances where it is administratively easier to conduct 100% inspection.

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Illinois Power thereby proposes that, in those instances where one of the Overinspection Groups performs 100% of the reinspection associated with all of the travelers in a Turnover package, that the other group be relieved from conducting a reverification. It is our position that quality will not be jeopardized since 100% reinspection of all of the items included in all of the travelers associated with a Turnover Package is sufficient to verify the quality of the installation.

2. In connection with commitments made in Stop Work Order #007 associated with the pulling of Class 1E cable, Illinois Power proposed in Reference (2) to rework and reinspect all cable tray hangers on an area basis using a dedicated team of Field Engineers and Quality and Technical Services Inspectors. Nonconformances would be documented, dispositioned, and reworked with travelers submitted for final review and vaulting. Progress would be documented on a weekly basis and would be available for review. Reference (2), in addition, outlined the significant advantages to this approach.

This reinspection and rework effort for tray hangers prior to cable pulling is, however, redundant to the cable tray hanger inspection performed under the Overinspection Program. Illinois Power hereby proposes to eliminate the tray hanger inspection from the Overinspection Program in order to better utilize quality, engineering, and construction manpower.

3. On June 28, 1982, Stop Work Order No. 016 was initiated on electrical conduit installation. A recovery plan was developed to correct the deficiencies associated with the Stop Work Order, which included the complete reinspection of conduits under the Phase 1 and 2 of the Plan. In Reference (3), Illinois Power stated to the NRC that it had completed the portions of the recovery plan necessary to lift the Stop Work Order and that appropriate procedures and instructions had been revised with training accomplished and documented. Reference (3) also requested that NRC review Illinois Power's action and concur in lifting the Stop Work Order on electrical conduit installation. The U.S. NRC, in Reference (4), concurred in our lifting of Stop Work 016 based on their review and inspection. These reviews have assured adequate quality and further reinspection of these conduit under the Overinspection Program seem unnecessary in light of the extensive inspection to which they have already been subjected. Illinois Power proposes to eliminate inspection of conduit installations inspected under Stop Work No. 016 Phase 1 and 2 from the Overinspection Program. Again, this action allows better utilization of resources without reducing the quality of the items.

I trust this information is sufficient to allow an adequate evaluation by your staff and subsequent concurrence. Should you require additional information on this matter, please contact Illinois Power.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'D. P. Hall'.

D. P. Hall
Vice President

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Attachment

cc: NRC Resident Office, V-690
Director, Office of I&E, US NRC, Washington, DC 20555
Illinois Department of Nuclear Safety

REFERENCES

- (1) D. P. Hall, IP, letter to J. G. Keppler, NRC, dated June 18, 1984.
- (2) D. P. Hall, IP, letter to J. G. Keppler, NRC, dated March 7, 1984.
- (3) D. P. Hall, IP, letter to J. G. Keppler, NRC, dated June 24, 1983.
- (4) J. G. Keppler, US NRC Region III, letter to W. C. Gerstner, IP, dated July 29, 1983.