DMB

ILLINOIS POWER COMPANY

1605-L
U-10172

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

July 3, 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

Subject: Potential 10CFR50.55(e) Deficiency 55-84-11:
Uncertified Flanges Installed in ASME Systems;
Stainless Steel Thread-O-Lets
Manufactured from Unqualified Stock Material

Dear Mr. Keppler:

On May 25, 1984, Illinois Power Company notified Mr. F. Jablonski, NRC Region III, (Ref: IP memorandum Y-21457 dated May 25, 1984) of a potentially reportable deficiency concerning uncertified flanges installed in ASME systems and stainless steel thread-o-lets manufactured from unqualified stock material. Our investigation of this issue is progressing, and this letter is submitted as an interim report in accordance with the requirements of 10CFR50.55(e)(3).

Statement of Potentially Reportable Deficiency/Background

During a review of purchase order files by Baldwin Associates Quality Assurance group, it was identified that approximately 1,000 small bore flanges were purchased without proper documentation certifying that the material met the requirements of ASME III, NA 3700/NCA 3800.

An internal review of Quality Assurance records by B&W/Bonney Forge, a supplier to Hub, Inc., revealed that various stainless steel thread-o-lets were manufactured from stock material which was neither purchased under the provisions of ASME NCA 3800 nor did the stock material receive the product analysis for upgrading per ASME requirements.

Investigation Results/Corrective Action

Illinois Power has prepared and is implementing an investigation plan to determine the extent of this problem at Clinton Power Station (CPS). The investigation plan includes:

IE27
1/0

1. Review of Architect/Engineer material and design requirements found in design documents and specifications,

2. Review of Construction Quality Control procedures and inspection basis,

3. Review of material procurement and receiving inspection methods,

4. Review of the record review programs to determine capability to identify certification deficiencies, and

5. Review of deficiency documents (Nonconformance Reports, audit findings, etc.) which identify certification discrepancies.

The data compiled above will be reviewed to determine if there exists a possible generic concern of materials not meeting the requirements of codes and specifications and will provide the root cause for the problems. Appropriate action necessary to identify the scope of the problem, correct specific deficiencies, and to preclude recurrence can then be determined.

To date, Baldwin Associates Resident Engineering (BARE) has researched all isometrics pertaining to safety-related systems. As a result of this research, BARE has identified all travelers containing pipe sizes between 1/2" and 2" inclusive (Note: The uncertified flanges were received in these sizes only). A traveler search has been conducted to determine the number of uncertified flanges installed in safety-related systems. To date, BARE has identified 76 of 253 flanges issued to construction as having been installed in safety-related systems. NCRs or traveler addendums have been generated to replace the 76 uncertified flanges with certified material.

The second issue concerning stainless steel thread-o-lets manufactured from unqualified stock material is currently under investigation. Additional action will be determined and taken as the investigation progresses.

Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implications and significance of the issue will be assessed after further background information is evaluated. It is anticipated that five (5) months will be necessary to complete our investigation and to file a final report on the matter. Illinois Power intends to provide you an update on the investigation progress in approximately ninety (90) days.

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

Sincerely yours,

D. P. Hall
Vice President

RLC/lag

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