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ILLINDIS POWER COMPANY

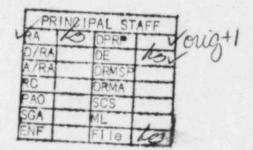


0982-L U~10164 CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

June 18, 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: Illinois Power Overinspection Program Sample Plans

Dear Mr. Keppler:

The Illinois Power Company (IP) Overinspection Program consists of two major parts, Baldwin Associates (BA) Field Verification (FV) and IP Overinspection (IP OI) process. The Sample Plans and Evaluation Procedures associated with the total Overinspection Program have been reviewed and changes to the procedures are required to improve the performance.

The following items are germane:

- 1. Definition of sample lots should be made consistent with the methods of defining work packages.
- 2. The sample plans were developed prior to the inspection checklists and considered that components and items of interest would be classified critical or non-critical. In the current program, inspection attributes rather than components or items were classified as critical or non-critical.
- Under the present procedures, one attribute (rather than an item) rejected out of many in a lot may cause the lot to be rejected.
- Evaluation of acceptability should be based on the number of attributes in a lot inspected rather than the number of travelers or components.
- 5. Identifying and sampling items within a traveler is administratively complex and time consuming. Inspecting all items on a traveler as identified by a Turnover Package Scope is more efficient and provides a greater degree of inspection of hardware represented by

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the traveler. Therefore, travelers may be selected as the sample element instead of an item within a traveler.

The proposed changes described in Attachments 1 through 4 are summarized as follows:

- 1. The method of developing sample lots by identifying items within travelers has been broadened to include the following:
 - Identify and sample travelers within a Turnover Package.
 - Identify and sample items within a specified area.
 - Identify and sample items within a commodity such as conduit hangers, large bore pipe hangers, etc.
- As each attribute represents a discrete quality decision, the method of determining acceptability of a lot is changed from acceptance based on an item count to acceptance based on attribute count. Separate charts have been included to determine acceptability of a lot to a 95-5 critical and 95-15 non-critical criteria.
- 3. Single normal and single reduced sample tables for critical and non-critical populations are replaced by one sample table to be used in all cases where less than 100% inspection is required.
- The number of administrative forms is reduced from three to one which may be used by all disciplines.

Illinois Power intends to implement these procedures on July 1, 1984. Should you have any comments, please contact me.

Sincerely yours,

Vice President

RLB/lag Attachments

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