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ILLINOIS POWER COMPANY



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

September 26, 1984

PRINCIPAL STAFF			
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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: Illinois Power Company Clinton Power Station  
Record Verification Program Plan, Rev. 1

Dear Mr. Keppler:

Illinois Power (IP) has performed an evaluation of Revision 1 of the Records Verification Program Plan. As a result, changes have been made to provide a general update of implementing procedure revisions which incorporates changes that increase clarity and provide streamlining of the overall program.

The major areas of change are as follows:

- Section 2.1 of the subject plan identified the scope of the program as .... "All (100 percent) safety-related, fire protection, and augmented Class D system QA records...". Revision 2 defines the scope as the following record types for safety-related, fire protection and augmented Class D systems or structures:
  - Baldwin Associates' (BA) construction/fabrication/installation work documentation packages.
  - Site generated or maintained purchase order documentation packages, including associated receiving inspection and vendor data packages.
- Revision 1 of the plan, paragraph 2.4.2, required completion of all reviews and resolution of all record deficiencies prior to hardware turnover. Revision 2 allows the management option of completing reviews and resolution of deficiencies subsequent to hardware turnover. These reviews and resolutions will be adequately tracked through completion.

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3. According to Revision 1, paragraph 2.4.14, records reviewed by BA & IP are returned to the BA vault. As a practical matter, it is more efficient to transmit records directly from BA Document Review Group (DRG) to IP. Therefore, this option is allowed by Revision 2.
4. Section 4.0 of the subject plan described the basic content of a series of BA Quality Assurance procedures and instructions, (BQAs and BQAIs), which were needed in order to implement the plan. These have since been incorporated into Baldwin Associates' Procedures (BAPs). Revision was accomplished to show the current status of implementing procedures and instructions.
5. Section 6.0 discussed resource requirements which are considerably out of date. This section was revised to reflect current status.

In addition to these five major categories, a number of minor revisions were made for clarity and accuracy.

The revisions discussed above are listed on Exhibit A and correlated to the numbered paragraphs of Revision 1 of the plan. In addition, a copy of Revision 2 of the Records Verification Plan has been attached.

Illinois Power feels that the revised plan adequately clarifies and describes the program as presently implemented. Should you have any comments, please contact me.

Sincerely yours,



D. P. Hall  
Vice President

GLB/cah (NRC2)

Attachments

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

LIST OF CHANGES

RECORD VERIFICATION PROGRAM PLAN  
Revision 2

The following is a summary of changes incorporated in Revision 2 of the Record Verification Program Plan.

<u>Revision 1</u>		<u>Revision 2</u>
<u>Page</u>	<u>Paragraph</u>	<u>Change</u>
1	2.1	Revised scope statement.
1	2.2	Deleted references to phases (paragraph deleted).
1 - 4	2.3 - 2.5.5	Made appropriate paragraph number changes resulting from the deletion of paragraphs 2.2 and 2.4.1.
1	2.4.1	Deleted reference to phases (paragraph deleted).
1	2.4.2	Revised to allow completion of reviews and resolutions subsequent to hardware turnover if necessary.
2	2.4.3	Deleted unnecessary detail.
2	2.4.4	Clarified trending program.
2	2.4.7	Revised wording for accuracy.
2	2.4.9	Clarified that field traceability checks may be done under a separate plan.
2	2.4.10	Inserted the word "personnel" for "QAEs", since field checks may be done by other than QAEs.
3	2.4.11	Replaced the words "final acceptance" with "re-review". This more accurately describes the DRG function in the context of the paragraph.
3	2.4.14	Added the option of transferring records directly from the DRG to IP.
3	2.5.3	Added a sentence to clarify the scope of the IP records surveillance.

LIST OF CHANGES

<u>Revision 1</u>		<u>Revision 2</u>
<u>Page</u>	<u>Paragraph</u>	<u>Change</u>
3	2.5.4	Deleted unnecessary detail.
4	3.4	Modified procedure reference to read "applicable procedures".
4	3.6	Added "procedures" to the list of requirements documents from which checklists are derived.
5	3.8	Deleted unnecessary detail.
5	4.0 & 4.1	Revised to show that former BA QA procedures and instructions used to implement the program have been incorporated in BA Project Procedures (BAPs).
5 - 12	4.1.1	Deleted descriptions of former implementing procedures/instructions.  Retained the description of the QA/DRG training program.  Noted that the former training procedure BQA-184 had been incorporated into the BA QA Training Manual. Made changes in written training requirements commensurate with present BA QA Training Manual.
12	4.1.2	Removed unnecessary detail.
12 - 15	4.1.4 - a,b,c	Changed training reference from BQA-184 to the BAQA Training Manual.
17	4.1.5	Minor wording change for clarity. Corrected section referenced from "7.0" to "6.0".
17	4.1.6	Reworded for clarity and to remove unnecessary detail.
17	4.2.1.1	Reworded for clarity and accuracy. Deleted the necessity to implement surveillance prior to transfer to IP.
17	4.2.1.2	Reworded for clarity and accuracy. Deleted unnecessary detail.
17	4.2.1.4, 4.2.1.5	Corrected paragraph number to 4.2.1.3 and 4.2.1.4.

LIST OF CHANGES

<u>Revision 1</u>		<u>Revision 2</u>
<u>Page</u>	<u>Paragraph</u>	<u>Change</u>
18	4.2.1.6, 4.2.1.7, 4.2.1.8	Corrected paragraph number to 4.2.1.5, 4.2.1.6 and 4.2.1.7 respectively.  Also revised wording which indicated that the IP record surveillance group will be performing trend analysis. This is being done by another IP QA group.
18	4.2.1.9	Corrected paragraph number to 4.2.1.8. Also revised wording for clarity of intent with regard to stamping records reviewed.
18	4.2.1.10	Deleted this paragraph as unnecessary detail. Details of the review completion and turnover will be elaborated on in implementing procedures.
18	4.2.2	Deleted reference to types of checklists since it is redundant with previous statements that IP review would use the same criteria as BA.
19	4.2.3.2, 4.2.3.3	Wording was brought into line with actual words in IPQA Training, Qualification and Certification Manual.
20	4.2.5 - a	Deleted trend analysis program from Records Coordinator Responsibility. This is the responsibility of another IP QA group.
21	4.2.5 - b	Minor wording change for accuracy.
21	4.2.5 - d	Clarified duties of Records Engineer.
22	6.0	Revised the discussion of resource requirements to reflect current reality.
22 & 23	6.1	Deleted
23	6.2	Deleted
23	7.0	Deleted Attachments 4 and 5.