

ILL. IS POWER COMPANY



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U-10192

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

August 15, 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: Potential 10CFR50.55(e) Deficiency 55-84-09
Certification of Materials Supplied by
Rockwell Engineering and Carbon Steel Products

Dear Mr. Keppler:

On March 28, 1984, Illinois Power notified Mr. F. Jablonski, NRC Region III (Ref: IP memorandum Y-20512 dated March 28, 1984) of a potentially reportable deficiency under the provisions of 10CFR50.55(e) concerning some improperly certified pipe penetration head fitting materials supplied to CPS by the subject vendors. This initial notification was followed by one (1) interim report (Ref: IP Letter U-10147, D. P. Hall to J. G. Keppler dated April 27, 1984). Our investigation of this issue is progressing, and this letter is submitted as an interim report in accordance with 10CFR50.55(e).

Statement of Potentially Reportable Deficiency/Background

Discrepancies were identified during reviews of material certification documentation for pipe penetration head fitting materials supplied to Baldwin Associates by Rockwell Engineering and Carbon Steel Products. Some materials were identified as not meeting the Charpy V-Notch impact test requirements of the ASME Code, Subsection NE (Class MC). These materials were found to be impact tested at the wrong temperature of +40°F. where the correct temperature is +10°F. Some of these materials were also supplied by Rockwell Engineering prior to being qualified in September, 1982, to the requirements of ASME Section III, Subsection NCA-3800 (NA-3700).

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Investigation Results/Corrective Action

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

1. A review was performed of the Architect/Engineer's material and design requirements found in design documents and specifications.
2. A Review of construction Quality Control procedures and inspection basis will be performed where appropriate.
3. A review of material procurement and receiving inspection methods was performed.
4. A review of the record review programs is being performed to determine the capability of these programs to identify certification deficiencies.
5. A review was performed of deficiency documents (Nonconformance Reports, audit findings, etc.) which identify certification discrepancies.

To date, the investigation has identified the following material deficiencies:

1. Class 1 head fittings and shear lugs were not ultrasonically tested (UT) in accordance with NB-2530.
2. Class MC head fittings were not Charpy V-Notch (C_V) impact tested at the correct temperature.
3. Class 1, Subsection NF, nonintegral supports for which Certified Materials Test Reports (CMTRs) showed no evidence of compliance to NCA-3800 (NA-3700).

The deficiencies identified above involved materials received from Rockwell Engineering as well as Carbon Steel Products.

Nonconformance Reports have been written to document and obtain resolution of identified cases of certification discrepancies.

The following corrective action has been/is being taken to correct the material deficiencies:

1. The Class 1 head fittings, not examined in accordance with NB-2530 are currently under evaluation to determine if the required UT can be performed in the installed condition. If the required testing cannot be performed, the affected head fittings will be replaced.
2. The Class 1 shear lugs were replaced.

3. The Class MC head fittings which were not Charpy V-Notch impact tested at the correct temperature were replaced or material of the same heat was tested at the correct temperature.
4. The materials used to fabricate Class 1, NF, nonintegral supports were replaced.

Corrective Action Request (CAR) No. 147 was issued to document and obtain resolution of the issue regarding the qualification of Rockwell Engineering to ASME Section III, Subsection NCA-3800 (NA-3700) requirements. Training programs are also being developed for personnel involved in activities associated with ASME materials (i.e., procurement requisitions, purchase orders, vendor qualification, document review etc.). Baldwin Associates Resident Engineering has expanded their review of procurement requisitions to ensure that material requirements are specified (i.e., specification, code etc.)

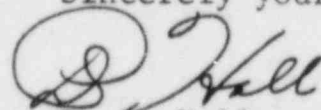
Following resolution of CAR No. 147, a review will be performed of the action taken to determine if additional corrective action is needed to resolve this issue.

Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implication and significance of the issue will be assessed after further background information is evaluated. It is anticipated that approximately 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 potentially reportable deficiency and adequately describes our overall approach to resolve the problem.

Sincerely yours,



D. F. Hall
Vice President

RLC/cch

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