ILLINOIS POWER COMPANY



1605-L U-10196

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

August 23, 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 55-84-17 Work Performed on General Electric Components

Dear Mr. Keppler:

On July 23, 1984, Illinois Power Company notified Mr. Jablonski, NRC Region III, (Ref: IP memorandum Y-21937, dated July 23, 1984) of a potentially reportable deficiency concerning work performed on General Electric components. 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

On July 21, 1984, Illinois Power issued Condition Report No. 1-84-07-070 concerning General Electric's (GE's) quality requirements pertaining to visual inspections and/or wire checks on GE design change documents (i.e., Field Disposition Instructions (FDIs) and Field Deviation Disposition Request (FDDRs).

General Electric's quality requirements have been incorporated into the Nuclear Control & Instrument Department (NC&ID) Procedures II GA-024 and 026 for inspection of electrical work involving the following:

- Power Generation Control Complex (PGCC) modification in the Control Room, and
- GE safety related equipment modifications outside the Control Room.

NC&ID Procedures II GA-024 and 026 have not been directly utilized by the Constructor, Baldwin Associates (BA), for work performed on GE components outside the Control Room.

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GE has qualified their electrical equipment, both seismically and environmentally, based on workmanship as outlined in NC&ID Procedures II GA-024 and 026. GE requires assurance that these qualifications are evident in their equipment. Omission by the Constructor to directly utilize the NC&ID Procedures in the work travelers has resulted in equipment being modified that may not meet GE's requirements for equipment qualification.

Investigation Results/Corrective Action

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

- 1. A review will be performed of appropriate Baldwin Associates' Procedures and Instructions to determine any GE quality inspection requirements that have not been incorporated,
- Appropriate BA procedures will be revised to resolve discrepancies identified by Item 1 above,
- 3. A review, for adequacy, will be performed of Baldwin Associates' Training Program, SAM 21, for electrical control and instrumentation work,
- 4. A review will be performed to identify all safety related electrical FDDRs/FDIs incorporated into travelers involving work on safety related GE components.
- 5. A review will be performed of the travelers identified in Item 4 above to determine if additional QC inspection/checks are needed to meet GE quality requirements, and
- 6. Closed safety related electrical equipment travelers will be supplemented as appropriate to incorporate additional QC requirements as identified in Item 5 above.

Illinois Power will evaluate the effect of this potential problem on other equipment and investigate similar concerns with respect to implementation of vendor inspection requirements.

Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is evaluated. It is anticipated that approximately ninety (90) days will be necessary to complete our investigation and to file a final report on this issue.

Mr. James G. Keppler

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 issue.

Sincerely yours,

D. P. Hall Vice President

RLC/lag

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