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SEP 17 1984

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

Reference: D. P. Hall, IPCO letter to J. G. Keppler dated July 31, 1984.

Gentlemen:

This letter acknowledges receipt of the above-referenced letter and the meeting in our office on August 31, 1984, with Messrs. W. Connell and F. Pindar of your staff. We have reviewed your proposed changes to the Overinspection Program and considered the points discussed on August 31. Our comments follow:

Item 1, second paragraph:

As documented in our letter to you on June 22, 1984, it was our understanding that you would not implement the revised program described in your reference (1) until we completed our review of those proposed changes. We learned on August 22, 1984, that a statistical expert has been retained by you to evaluate the concerns of our Resource Management group about the proposed changes to the Overinspection Sampling Plan. Our understanding remains that you will not implement the changes until the concerns have been resolved, and all BA/IP reinspection activities will continue to be performed using existing procedures.

Item 1, third paragraph:

You propose not performing redundant overinspections if 100% reinspections have been performed by one of the assigned groups. By doing so you plan to reduce duplications and improve utilization of manpower. We do not believe that the BA/IP Verification/Overinspection Programs are equal. The emphasis of our review and concurrence has been on IP Overinspection Program and personnel. As

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described in Inspection Report 461/83-16 we determined that you met the requirements for overinspection described in Confirmatory Action Letters of September 1, 1982, and October 6, 1982. We concurred in your use of statistically based random sample verification and overinspection. We did not require separate BA verification inspections, only IP overinspections. It was never our intent to have redundant 100% inspections, but only to provide assurance that work accepted prior to July 20, 1982, met quality and safety requirements. We believe that when you choose to perform 100% reinspection or when the sample size requires 100% reinspection, that is, the lot is too small for sampling, the reinspection only need be performed by IP overinspection personnel. We also believe that when the sample size allows less than 100% inspection the BA Verification and IP Overinspection Programs should continue to be used.

Item 2; second paragraph:

You propose eliminating tray hanger inspections from the Overinspection Program. We are concerned because you have not provided results of already performed inspections that indicate the technical basis for making the change. Additionally, it is our understanding that the dedicated inspection team does not use the same, more comprehensive, inspection checklists and criteria used during overinspection. We believe that inspections of tray hangers should not be eliminated from overinspection at this time.

Item 3:

You propose eliminating overinspection of conduit installations inspected under Stop Work 016. The comments made under Item 2, second paragraph, apply to conduit installations.

In summary, we agree in principle with Item 1, third paragraph. We do not agree with Items 2 and 3 because they are not based on results of evaluated inspection findings. Without results which clearly indicate that safety and quality will not be jeopardized we cannot concur in your proposed changes.

Within the next 30 days we plan to review the results of your overinspection activities and inspect components accepted by you. Findings made at that time may result in the NRC granting you relief in performance of cable tray hanger and conduit inspections.

We will gladly discuss any questions you have concerning this matter.

Sincerely,

"Original Signed by J. G. Keppler"

James G. Keppler
Regional Administrator

cc: DMB/Document Control Desk (RIDS)
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