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#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

DOCKETING & SERVICE BRANCH

IN THE MATTER OF
ILLINOIS POWER COMPANY,
SOYLAND POWER COOPERATIVE, INC.
and WESTERN ILLINOIS POWER
COOPERATIVE, INC.

Docket No. 50-461 OL

(Operating License for Clinton Power Station, Unit 1)

## NOTICE

TO:

Hugh K. Clark, Esq., Chairman P.O. Box 127A Kennedyville, Maryland 21645

Dr. George A. Ferguson School of Engineering Howard University 2300 Sixth Street, N.W. Washington, D.C. 20059

Dr. Oscar H. Paris
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Executive Legal Director United States Nuclear Regulatory Commission Washington, D.C. 20555

Allen Samelson Assistant Attorney General Environmental Control Division Southern Region 500 South Second Etreet Springfield, Illinois 62706

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Fred Christianson
U.S. Nuclear Regulatory Commission
Clinton Power Station
R.R.3, Box 228
Clinton, Illinois 61727

Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555

PLEASE TAKE NOTICE that I have today filed with the Secretary of the United States Nuclear Regulatory Commission the attached THIRD SUPPLEMENTAL RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' SECOND SET OF INTERROGATORIES TO APPLICANTS. A copy of this document is attached hereto and hereby served upon you.

One of the Attorneys for Applicants

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#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

CONTROL OF SECRETARY BRANCH BRANCH DOCKET No. 50-461 OL

IN THE MATTER OF
ILLINOIS POWER COMPANY,
SOYLAND POWER COOPERATIVE,
INC. and WESTERN ILLINOIS
POWER COOPERATIVE, INC.

(Operating License for Clinton Power Station, Unit 1)

THIRD SUPPLEMENTAL RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' SECOND SET OF INTERROGATORIES TO APPLICANTS

Pursuant to Section 2.740(e) of the Rules of Practice of the Nuclear Regulatory Commission, Illinois Power Company ("IP"), on behalf of itself, Soyland Power Cooperative, Inc., and Western Illinois Power Cooperative, Inc., the Applicants for an operating license for Unit 1 of the Clinton Power Station, hereby further supplements for the period October 1, 1983 through September 30, 1984, with respect to those interrogatories on Contention II, its RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' SECOND SET OF INTERROGATORIES TO APPLICANTS dated December 15, 1981 (the "Response"), its SUPPLEMENTAL RESPONSE OF ILLINOIS POWER TO THE STATE OF ILLINOIS' FIRST SET OF INTERROGATORIES dated March 16, 1982 (the "First Supplemental Response"), and its SECOND SUPPLEMENTAL RESPONSE OF ILLINOIS POWER TO THE STATE

OF ILLINOIS' SECOND SET OF INTERROGATORIES TO APPLICANTS dated March 23, 1984 (the "Second Supplemental Response"), as follows:

[General Interrogatory No. 1: Identify all persons who have assisted in any way in the preparation of each answer to each interrogatory below and describe the substance of each person's assistance.]

ANSWER: All information for this Third Supplemental Response was prepared under the supervision and direction of W. Connell, Illinois Power Manager--Quality Assurance.

[General Interrogatory No. 2: Identify all documents that were relied upon to provide an answer to each interrogatory below, and describe the substance of each document so used.]

ANSWER: Relevant documents have been made available to the State of Illinois on December 6-8, 1983, February 9-10, 1984, and March 19, 1984 covering the period November 15, 1981 through December 8, 1983. Relevant documents not previously available for inspection are available for inspection at the Clinton Power Station.

[General Interrogatory No. 3: Identify all persons whom IPC plans to call to testify as to each contention, and state the qualifications of each person so identified.]

ANSWER: Illinois Power presently plans to provide its list of witnesses on Contention II on November 15, 1984 in a separate filing.

[General Interrogatory No. 4: Describe for each interrogatory any additional research or work, if any, that IP plans to do that will affect the answer.]

ANSWER: Illinois Power is continuously engaged in monitoring information that may affect the design, construction or operation of the Clinton Power Station. Unless otherwise noted, or unless new information indicates the need for further investigation, Illinois Power does not plan to conduct further research which may affect the answers relative to a particular interrogatory.

- [5. Identify the persons who were, but are no longer, employed on the inspection staff of Baldwin Associates' (BA) Department of Quality Control (QC). For each person so identified state:
  - a. his qualifications for the position
  - b. his performance in the position
  - c. the time period of his employment in the position; and
  - e. the reason for termination of employment.]

# ANSWER: See Exhibit A

[5.d. the substance of any complaints made by him to IP, BA, or NRC about QA/QC program;]

ANSWER: See answer to Interrogatory No. 24.

[6. State how many persons are now employed on the QC inspection staff.] ANSWER: One hundred sixty five individuals are presently employed on the Baldwin Associates QC inspection staff.

[6.a. State how many of that number are undergoing training to meet the requirements for the position. Describe what training they are receiving.]

ANSWER: Fifty individuals are undergoing training. These individuals are being trained for advanced certifications.

The general training description for QC personnel is as follows:

## CLASSROOM TRAINING

required to attend specific training sessions conducted by Training Instructors from each discipline or site training personnel as defined by the Training Coordinator and Senior Discipline Engineer. Included in these training sessions are instructions to reference the latest revisions to all applicable documents. An outline of each training session is presented to all new employees for guidance during the training period. Classroom training varies for each employee according to the area for which the new employee is being trained.

The training sessions are arranged to supplement on-the-job training the new employee will receive (i) in the field and (ii) with required reading of procedures, codes and standards. A classroom attendance record is kept on

each employee to document total man-hours in training. A personnel package of records for each employee to be certified is established and maintained throughout the duration of his or her employment.

### ON-THE-JOB TRAINING

Each employee during the training period must accumulate a minimum number of hours performing tests, examinations, and inspections. This on-the-job training is documented to show that each employee meets minimum requirements for actual firsthand experience performing quality functions.

Training schedules are developed on a week-to-week basis to judge progress and determine evaluation of performance during the training period. To coincide with the onthe-job training, there are required reading lists. The reading of materials from these generic and specific reading lists helps to guide employees during their training and to develop proficiency in their particular areas.

[7. State how many persons are now employed in the BA QC Department.]

ANSWER: One hundred ninety-one individuals are presently employed in the Baldwin Associates QC Department.

[7.a. State how many of the number are undergoing training to meet the requirements for the position. Describe the positions for which

they are receiving training and the type of training involved.

ANSWER: See answer to Interrogatory No. 6.a.

- [8. Identify those persons who were, but are no longer, employed on the inspection staff of BA's piping department. For each person so identified state:
  - a. his qualifications for the position;
  - b. his performance in the position;
  - the time period of his employment in the position; and
  - e. the reason for termination of employment.]

ANSWER: Baldwin Associates Piping department does not have an inspection staff. Inspection activities are performed by Baldwin Associates Quality Control employees responsible for mechanical inspection. See Exhibit B for former Baldwin Associates Quality Control personnel responsible for piping/mechanical inspections.

[8.d. the substance of any complaints he made to IP, BA or NRC about the QA/QC program;]

ANSWER: See answer to Interrogatory No. 24.

- [9. Identify those persons who are now employed on the inspection staff of BA's Piping Department. For each person so identified state:
  - a. his duties and responsibilities;
  - b. his qualifications for the position]

ANSWER: Baldwin Associates' Piping Department does not have an inspection staff. Inspection activities relating to piping are performed by Baldwin Associates' Quality Control employees responsible for mechanical inspections. See Exhibit C for information requested with respect to present Baldwin Associates' Quality Control employees responsible for mechanical inspections.

[9.c. the substance of any complaints he had made to IP, BA or NRC about the QA/QC program.]

ANSWER: See Answer to Interrogatory No. 24.

- [10. Identify each person who is now employed in the BA small bore design group. For each person so identified state:
  - a. his duties and responsibilites; and
  - b. his qualifications for the position;

ANSWER: See Exhibit D

[10.c. the substance of any complaints he has made to IP, BA or NRC about the QA/QC program.]

ANSWER: See Answer to Interrogatory No. 24.

- [11. Describe the current QA system for the documentation of procurement and specification requirements.
  - a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection Report 50-461/81-05.]

ANSWER: The answer to Interrogatory No. 11 in the Second Supplemental Response is still valid.

[11.b. Identify all those persons who are responsible for the changes, if any, that IP has made in this system.]

ANSWER: No changes were made to this system since the Second Supplemental Response.

[11.c Identify all those persons who are responsible for the management, operation and implementation of this system.]

ANSWERS: The persons responsible are J.D. Geier, Illinois

Power Manager--Nuclear Station Engineering Department (NSED)

until February, 1984; H. Victor, Illinois Power Manager-
NSED, since February, 1984; L. Osborne, Baldwin Associates

Manager of Quality and Technical Services; W. Connell, Illinois Power Manager--Quality Assurance; L. Moore, Baldwin

Associates Resident Engineer until August, 1984; and S. Lyons,

Baldwin Associates Superintendent of Engineering since August,

1984.

- [12. Describe the current system of using travelers to detail installation and inspection requirements.
  - a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection Report 50-461/81-05.]

ANSWER: The answer to Interrogatory No. 12.a in the Second Supplemental Response is still valid.

[12.b. Identify all those persons who are responsible for the changes, if any, that IP has made in this system.]

ANSWER: No changes were made to this system since the Second Supplemental Response.

[12.c. Identify all those persons who are responsible for the management, operation, and implementation of this system.]

ANSWER: The persons responsible are D.P. Hall, Illinois
Power Vice President; W. Connell, Illinois Power Manager—
Quality Assurance; J.H. MacKinnon, Illinois Power Project
Manager until March, 1984; H.E. Daniels, Illinois Power
Project Manager since March, 1984; W. Harrington, Baldwin
Associates Project Manager until January, 1984; A. King,
Baldwin Associates Project Manager since January, 1984; and
L.W. Osborne, Baldwin Associates Manager of Quality and
Technical Services.

[13. State the basis for IP's conclusion that the requirement that vendors acquire written authorization from IP, prior to shipment, to substitute a certificate of compliance for missing documentation, is unrealistic.]

ANSWER: The answer to Interrogatory No. 13 in the First Supplemental Response is still valid.

[14. Describe the QA system of document accountability and control that IP believes assures compliance with requirements for issuance of materials and equipment for installation or use at CPS-1. ANSWER: The answer to Interrogatory No. 14 in the First Supplemental Response is still valid.

[15. State what IP believes is the purpose of Procedures BA 2.20 and BA 2.3 and describe what procedures IP uses to meet this purpose.]

ANSWER: The answer to Interrogatory No. 15 in the First Supplemental Response is still valid.

[16. Describe the system IP is using to inspect safety-related pipe hangers.]

ANSWER: The system used to inspect safety-related pipe hangers is described in BAP 3.2.5, Rev. 6D.

[16.a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection 50-461/81-05.]

ANSWER The system used to inspect safety-related pipe hangers is described in BAP 3.2.5, Rev. 6D. The following changes have been made to the system since the Second Supplemental Response:

- The requirements of QCI 300 were incorporated into BAP 3.2.5 and QCI 300 was deleted.
- A requirement was added for QC to verify transfer of material identification markings prior to any cutting operations or subdivision of material.

- Technical Services inspection requirements for supports with more than one primary attachment were clarified.
- 4. Phase III inspection checklists were added for Hydraulic Snubbers, Restraint Hangers, Riser Clamp Hangers, U-Bolt Hangers, Sliding Type Supports, and Multi-Direction Clamp Hangers.
- An attachment was added to provide inspection instructions and acceptance criteria for Strut/ Snubber Clearance verification by QC.
- 6. Instructions and acceptance criteria were added for QC inspection of site threaded rod used in pipe supports.
- Dimensional tolerances for box type supports were clarified.
- 8. When supplemental travelers or Nonconformance Reports are required to perform rework or fabrication on previously accepted hangers, the inspection may now be documented on an Inspection Report. Phase II or Phase III inspection checklists are not required for this activity.

[16.b. State the average maximum time span between hanger installation and QC inspection.]

ANSWER: The answer to Interrogatory 16.b in the Second Supplemental Response is still valid.

[16.c. State whether this system requires documentation of who installed the hanger components and when installation was completed.]

ANSWER: The answer to Interrogatory 16.5 in the First Supplemental Response is still valid.

[16.d. Identify all those persons who were responsible for the changes, if app, that IP has made in this system.]

ANSWER: The person responsible is L. Osborne, Baldwin Associates Manager of Quality and Technical Services.

[16.e. Identify all those persons who are responsible for the management, operation, and implementation of this system.]

ANSWER: The persons responsible are W.C. Gerstner, Illinois
Power Executive Vice President; D.P. Hall, Illinois Power
Vice President; W. Connell, Illinois Power Manager—Quality
Assurance; and L. Osborne, Enldwin Associates Manager of
Quality and Technical Services.

[17. Describe IP's system to ensure that welders are familiar with welding procedures and parameters.

- a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection Report 50-461/81-05.
- b. Identify all those persons who were responsible for changes, if any, that IP made in this system.
- c. Identify all those persons who are responsible for management, operation, and implementation of this system.]

ANSWER: The answer to Interrogatory No. 17 in the Second Supplemental Response is still valid.

- [18. Describe the record and document control system that IP uses to correlate IP audit findings to the necessary corrective actions.
  - a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection Report 50-461/81-05.1

ANSWER: The method used to correlate corrective actions to audit findings is the attachment (to the audit finding form) of a written response submitted by the audited organization which documents the corrective action taken. Furthermore, the Audit Team Leader's evaluation of corrective action and the verification of corrective action is documented on the audit finding form. Upon completion of these actions, a formal close-out of the audit finding is performed by a Lead Auditor, and then the finding is forwarded to the Supervisor--Audits for review and concurrence signature.

- [18.b. Identify all those persons who are responsible for the changes, if any, that IP has made in this system.
  - c. Identify all those persons who are responsible for the management, operation and implementation of this system.]

ANSWER: The persons responsible are W. Connell, Illinois

Power Manager--Quality Assurance, R.E. Campbell, Illinois

Power Director--Quality Systems and Audits, and C.F. Pegg,

Illinois Power Supervisor--Audits.

- [19. Describe the system that IP uses to control the time taken between the completion and QA/QC inspection of work.
  - a. Describe the changes, if any, that IP has made in this system since the issuance of IE Inspection Report 50-461/81-05.]

ANSWER: The answer to Interrogatory No. 19.a. in the Second Supplemental Response is still valid.

- [19.b. Identify all those persons who are responsible for the changes, if any, that IP has made in this system.
  - c. Identify all those persons who are responsible for the management, operation, and implementation of this system.]

ANSWER: The persons responsible are D.P. Hall, Illinois
Power Vice President; W. Connell, Illinois Power Manager-Quality Assurance; J.H. MacKinnon, Illinois Power Project
Manager until March, 1984; H.E. Daniels, Illinois Power

Project Manager since March, 1984; and L. Osborne, Baldwin Associates Manager of Quality and Technical Services.

[22. Identify all S&L, BA, or GE documents, known to IP, specifically calling into question the judgment, experience, capability or commitment to quality of IP regarding the construction or proposed operation of CPS-1.]

ANSWER: To the best of Illinois Power's knowledge, none since the Second Supplemental Response.

[23. State whether IP has any knowledge of any IP, BA, or S&L employee resigning his position or otherwise being terminated on account of disagreement or dissatisfaction with the quality of construction or engineering work, or management decisions or policies relating to the construction or proposed operation of CPS-1 and, if so, identify documents or otherwise provide details pertaining to any such occurrences.]

ANSWER: Illinois Power, in order to protect the confidentiality of employees, will produce documents relevant to this interrogatory, in the same manner as information is produced with respect to the Quality Report System, described in the Answer to Interrogatory No. 24, upon the State of Illinois signing an appropriate protective order.

[24. State whether IP has any knowledge of any IP, BA or S&L employee lodging a complaint with IP concerning disagreement or dissatisfaction with the quality of construction or engineering work, or decisions or policies relating to the construction or proposed operation of CPS-1, which complaint did not result in the resignation or termination of that employee,

and, if so, identify documents or otherwise provide details pertaining to any such occurrences.]

ANSWER: There are four methods by which Illinois Power may have the information requested:

- 1. As of February 24, 1982, as described in the answer to Interrogatory No. 24 of the First Supplemental Response, a Quality Report System was instituted at Clinton Power Station. In accordance with the agreement with the State of Illinois of June 25, 1982, and the Agreed Protective Order dated August 2, 1982, Illinois Power will produce documents relating to Quality Reports in a separate filing.
- 2. Since the Second Supplemental Response, Illinois Power has instituted a quality concern telephone hotline. All messages received are investigated by the Illinois Power Manager - Quality Assurance and the results are reported to the Illinois Power Vice President Nuclear.
- 3. Since the Second Supplemental Response, the Safeteam Project has been established to provide opportunitites for all onsite personnel to report nuclear
  safety or other construction-related concerns to
  IP management. These opportunities are:
  - a. Periodically, interviews are scheduled with QA, QC, and other employees involved in the

inspection or testing of safety-related systems at the Clinton Power Station in which employees may express any concerns.

- b. An opportunity for an interview is provided to elicit any concerns any exiting employee may have.
- QA and BA Q&TS employee are held prior to the employee's departure.
- d. Any onsite employee with a concern can arrange for an interview at any time.
- e. Safeteam Concern Report forms are available at numerous locations throught the plant.

  These forms may be used by employees to describe concerns in writing. They also list Illinois and nation-wide toll-free telephone numbers which may be used to report concerns.

The Safeteam program is voluntary and the identity of participating individuals is protected. Each concern is investigated and the results of the investigation are reported to the employee raising the concern and to IP management; and

4. In the day to day course of construction, individuals may have complained to supervisors concerning the construction or proposed operation of the Clinton Power Station.

Illinois Power, in order to protect the confidentiality of the persons making complaints and preserve the effectiveness of the systems, will produce documents relating
to the quality concern telephone hotline, the Safeteam Project, and the individual complaints, if any, in the same
manner as information is produced with respect to the Quality
Report System, upon the State signing an appropriate Protective Agreement.

ILLINOIS POWER COMPANY

By:

D.P. Hall

Vice President

Sheldon A. Zabel Charles D. Fox IV Sara L. Johnson SCHIFF HARDIN & WAITE 7200 Sears Tower 233 South Wacker Drive Chicago, Illinois 60606 (312) 876-1000

Jack Newman
George L. Edgar
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Suite 1000
1615 L Street, N.W.
Washington, D.C. 20036
(202) 955-6600

Dated: November 15, 1984

STATE OF ILLINOIS )
COUNTY OF MACON )

D. P. Hall, being duly sworn, deposes and says that he is Vice President of Illinois Power Company, one of the Applicants in this proceeding; that he has read, or has knowledge of, the foregoing Third Supplemental Answers of Illinois Power Company to the State of Illinois' Second Set of Interrogatories to Applicant; and that the same are true and correct to the best of his knowledge, information, and belief.

D.P. Hall

SUBSCRIBED AND SWORN to before me this /4-1 day of

Notary Public

My commission expires: October 1, 1986

EXHIBITS

# EXHIBIT A

Third Supplemental Response of Illinois Power to the State of Illinois' Second Set of Interrogatories to Applicants.

FORMER QC

CULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Richard Acevedo 2490 San Pasqual Pasadena, Ca.		P/M Inspector	15 Months 12-15-82 to 3-18-83 Transferred to Turnover.
	II		
Joseph Amadon 1102 L. Washington	11	Р/М	1
Leroy, Illinois			Transferred to Turnover
Craig E. Anderson 2303 B. Melrose Champaign, Illinois	III	QC Manager	13 Months 7-1-82 to 8-3-83 Transferred to QA Mgr.
Bill Armstrong 1312 W. Mt. Gilead Rd. Decatur, Illinois	II	P/M Inspector	22 Months 9-7-82 to 7-11-84 Transfer to QE
Randy Beeker 802 Tyler Monticello, Illinois	11	Vendor Surveillance Engineer	59 Months 5-4-76 to 4-24-81
Dennis Bell R.R. 5, Box 385 Dunnello, Fla.	II	c/s	11 Months 6-28-78 to 2-25-83
Eric Bergameyer P.O Box 306 Clinton, Illinois	II II	c/s	21 Months 8-16-76 to 9-2-77
		-1-	

FULL NAME AND	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
ADDRESS			
Gerald Bitner Town & Country Motel Clinton, Illinois	II	Hydro & T/O Coord.	7 Months 8-17-82 to 2-25-83 Transferred to T/O
Chris Blenstraub 2313 Anchor Drive Bloomington, Illinois	11	P/M Inspector	12 Months 8-17-82 to 2-25-83
Sharon Bodine 1406 #2 Grandview Dr. E Champaign, Illinois	11	Electrical Inspector	33 Months 5-11-81 to 1-18-84 Transfer to Turnover
David Boehm 211 Third St. Lincoln, Illinois	I	Electrical Inspector	19 Months 1-4-82 to 7-5-83
John Brimm 158 Lori Lynn Decatur, Illinois		Material Control Inspector	4 months
	II	Electrical Inspector	8 Months 1-7-81 to 8-11-81
Bobby G. Brown 217 Sorrento Drive Terre Haute, Indiana	τ	P/M Inspector	3 Months 6-15-81 to 9-11-81
G. Bennette Brown P.O. Box 306 Clinton, Illinois	III	QC Manager	34 Months 7-9-75 to 9-11-81
		-2-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Paul E. Bryant P.O. Box 48 Clinton, Illinois	II	C/S Inspector	12 Months 8-16-82 to 8-12-83 Rehired:
Robert Buck 3220 Vining Drive Decatur, Illinois	III	c/s	7-74 to ?
Scott Buck R.R. #1, Box 27 McLean, Illinois		Electrical	18 Months 6-17-81 to 8-13-82
Bruce Buffie	II	P/M Inspector	
Michael D. Bunch 445 W. Roberts Mt. Zion, Illinois	II	P/M Inspector	Transfer to Q&TS  19 Months 7-31-80 to 2-9-82
Kenwood Bush R.R. #1, Box 418D Monticello, Illinois	II	Р/М	15 Months 1-5-83 to 4-11-84
Michael Byers R.R. #2, Box 212, Ridgeview Acres Clinton, Illinois	11	Vendor Surveil_ance	69 Months 4-5-77 to 2-23-82
Richard Campbell 1109 E. Van Buren Clinton, Illinois	II I	Electrical Inspector S/M	39 Months 1-26-81 to 4-11-84
Ronald Campbell R.R. 2, Deerhaven Drive Bloomington, Illinois	111	Sr. P/M Engireer	18 Months 8-18-80 to 2-23-82
Randy Callison R.R. #2 Farmer City, Illinois	I I	c/s	15 Months 7-23-76 to 10-31-77
	11	-3-	

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II	Material Control	23 Months 8-2-76 to 7-5-78
		0-2-70 10 7-3-78
Not Cert	Material Control Receiving	4 Months 1-19-83 to 4-22-83
II	Electrical	10 Months 9-30-81 to 7-30-82
	Storage/Maintenance	
	c/s	52 Months 8-20-79 to 1-4-84 Transferred to TOPS
II II	Vendor Surveillance	7 Months 4-5-77 to 10-31-77
II	P/M	62 Months 6-28-78 to 8-12-82
	Electrical	
II	P/M Inspector	7 Months 10-31-83 to 4-20-84
		II Storage/Maintenance  II C/S  II Vendor Surveillance  II P/M  Electrical

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FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
David Cordy 907 Westbrook Drive Mahomet, Illinois	II	Electrical Engineer	21 Months 5-4-80 to 9-15-81
Fredrick E. Creamer P.O. Box 871 Clinton, Illinois	II	P/M Inspector	43 Months 7-11- to 2-13-81
Myles Denny 603 E. Washington St. Clinton, Illinois	II	11/P	18 Months 5-15-78 to 1-21-81
Warren Dixon Highway 54 Clinton, Illinois	II	P/M	17 Months 10-5-81 to 3-29-83
Richard Emerson 3244 Blueoird Dr. Decatur, Illinois	II	P/M	17 Months 3-11-81 to 8-12-82
Michael Evans 1515 E. Washington Clinton, Illinois	II	P/M	29 Months 6-15-77 to 12-31-80
Randy Evans 4308 E. Alta Visa Phoeníx, Arizona			54 Months 6-15-77 to 12-31-80
Michael Fiorentini 1714 Hoover Drive Normal, Illinois	11	Electrical	10 Months 4-19-82 to 2-28-83
Lawrence Fletcher 5569 Piazza Ln Clay, New York	11	Р/М	3 Months 11-21-83 to 3-9-84
	i	-5-	

TOTAL BA EMPLOYMENT	6 Months 9-16-81 to 2-23-82	5 Months 10-6-80 to 2-27-81	21 Months 9-13-84 Transferred to QC	3 Months 1-29-81 to 3-3-81	6 Months 11-30-83 to 5-1-84	5 Months 2-7-84 to 6-1-84	20 Months 3-24-81 to 10-6-82	Transferred to QA 5-18-81	4 Months 1-14-81 to 5-19-81	6 Months 1-5-81 to 6-16-83	
CERTIFIED	>	Electrical	Electrical Transferred to QE	Electrical	Electrical	Electrical	Electrical	N/A (Not Certified	Electrical	P/M and Training Coordinator	-9-
LEVEL		11	11	I	II	п	1	11	Ι	п	
FULL NAME AND ADDRESS	Thomas Flannery Hill Brest, Apt. #2, Box 438, R.R. 2 Clinton, Illinois	Donald "Scott" Foster 6 Hillcrest Clinton, Illinois	Mark Freeman 530 S. Broadway Decatur, Illinois	Douglas Fuller Rt. #7 Kenny, Illinois	Thomas Gagnon P.O. Box 582 Emporia, Kansas	William Galbreath R.R. 2, Box 51 Hanover, Indiana	Victor Gallup R.R. #1 Sherman, Illinois	Cecil Garner R. R. #1 Bellflower, Illinois	Larry Gassaway 518 S. Isabella Clinton, Illinois	Morgan Gassman, Jr. R.R. 2, Box 437 Clinton, Illinois	

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FULL NAME AND ADDRESS		CERTIFIED	TOTAL BA EMPLOYMENT
Michael Gates R.R. #1, Box 5 Heyworth, Illinois	# # # # # # # # # # # # # # # # # # #	Materials Control	25 Months 9-9-81 to 10-31-83
Larry Gelbert R.R. #1, Box 5 Heyworth, Illinois	III	QC Manager	29 Months 11-26-80 to 4-28-82
Mark Geyer 502 Jolier Road New Lenox, Illinois	II	P/M	7 Months 2-13-83 to 8-31-84
John Golden 521 W. William St. Monticello, Illinois	II	P/M	13 Months 9-28-81 to 10-26-82
Phillip Gorden 905 E. Warren Moweaqua, Illinois	1	Storage/Maintenance	13 Months 2-15-82 to 1-28-83
CLifford Gorden 13-15 28th Road Flushing, New York	N/A	Certed	1 Month 4-20-81 to 5-29-81
David Graumenz Apt. #17, 1730 S. Fairview Decatur, Illinois	1	Electrical	4 Months 8-10-81 to 12-22-81
Jeffrey Gremchuck 105 E. Orr, Apt. E Normal, Illinois	N/A	Not Certed	5 Months 6-8-82 to 11-29-82
James Groblewski 157 E. Picadilly Sq Cinninnati, Ohio	1	P/M Inspector	1 Month 2-13-81 to 3-30-84
Joseph Guynn P.O. Box 46 Cisco, Illinois	н	M/d	6 Months 3-3-81 to 9-8-81
		-7-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Ronald Halverson 605 S. Center Clinton, Illinois	II	P/M	35 Months 627-78 to 5-22-81
Kenneth Hammer 721 N. Mulberry, Apt. #A Clinton, Illinois	II	Electrical	19 Months 2-17-82 to 7-25-84 Transferred to QE
James Hall 414 Woodward St. Farmer City, Illinois	NA	Not Certed	1 Month 6-1-81 to 7-2-81
Howard H. Hanson Town & Country Motel Clinton, Illinois	I	Electrical	4 Months 4-25-84 to 8-27-84
Michael Harper 1728 E. North St. Clinton, Illinois	I	Electrical	12 Months 8-17-81 to 7-26-82
Harold J. Harris R.R. 3, Box 60 Champaign, Illinois	III	Sr. Electrical Engineer	13 Months 3-23-81 to 4-19-82
Scott Haugh 307 W. Julian Clinton, Illinois	II	Electrical	22 Months 9-13-82 to 7-25-84 Transferred to QE
Robert Helton Apt. #1, Park Motel Clinton, Illinois	I	Electrical	8 Months 10-22-80 to 5-27-81
Ben Hendricks 1307 W. Rick Urbana, Illinois	II	Vendo: Surveillance	43 Months 7-10-78 to 2-23-82
Kevin Herbert 1222 S. Henshaw Bloomington, Illinois	11	Electrical	4 Months 11-28-83 to 4-13-84
		    -8-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
James Heyen 4542 Adams Dr. Decatur, Illinois		Electrical	5 Months 5-26-80 to 9-16-80
Jack Hilding % Air Force ROTC, U Of I Armory Champaign, Illinois	III		1 Month 5-22-78 to 6-23-78
Joe Hindman Box 322, 109 S. East Clinton, Illinois	II II	P/M Coordinator	24 Months 10-19-77 to 1-9-81
James Hindson Town & Country Motel Clinton, Illinois	E	Electrical	5 Months 12-5-83 to 4-17-84
George F. Hines RR Box 44, Rt. #10 Deland, Illinois	N/A	Not Certed Staff Engr. TPRG	5 Months 1-3-84 to 6-29-84
John Hinthorn 1919 E. Clay Decatur, Illinois	I	Electrical Limited	6 Months 1-26-81 to 7-3-81
George S. Hoke, Jr. 708 Albert hill Road Sestminister, Md.	II II	Electrical	3 Months 7-10-78 to 10-3-78
Randy Hoke 18 E. Julia Clinton, Illinois		P/M	28 Months 6-20-79 to 11-3-81
John Hook 40 S. Catherine LaGrange, Illinois	I	C/S Concrete/Rebar	16 Month 5-16-77 to 9-21-78
		-9-	

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FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Fred Householder 307 W. Clark, Apt. 302 Champaign, Illinois	II	c/s	6 Months 1-5-76 to 1-30-81
Terry Jennings P.O. Box 122 Niantic, Illinois	I	E	5 Months 5-28-81 to 10-27-81
John Johnson 1222 Searle Dr. Clinton, Illinois	11	c/s	31 Months 8-23-78 to 2-27-81
Larry Johnson 60 W. Hickory Pt. Road Decatur, Illinois	I	Е	28 Months 5-9-88 to 9-21-79
Peter Johnson 2391 Wheeless Road Augusta, Ga.	H II	P/M	10 Months 11-29-83 to 8-27-84
William Johnson P.O. Box 306 Clinton, Illinois	II	Electrical	10 Months 3-21-83 to 1-3-84
John Paul Jones R.R. #1 Clinton, Illinois	II	Vendor Surveillance	45 Months 5-24-76 to 2-13-81
Don Kabuss Box 58, R.R. #1 Danvers, Illinois	I	Electrical	8 Months 9-9-81 to 4-16-82
		-10-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
A.O. Kennedy 1305 Searle Drice Normal, Illinois	III	QC Manager	12 Months 8-24-83 to 8-14-84
Clement Kamphaus 1003 Weaver Drive Urbana, Illinois	N/A	Not Cert'd	1 Day 1-26-81
Michael Kilgore	I	Electrical	Job Shop
Woodrow Kist R.R. 1 Cisco, Illinois	11	c/s	8 Months 7-1-82 to 2-25-83
Daniel Kanakaras 304 S. Evergreen Bloomington, Illinois	II	Staff Engineer	7 Months 8-16-82 to 2-25-83
Robert Knapp 28 Colonial Dr. #2 Clinton, Illinois	II	Electrical	
Alan Koca R.R. 1 Country Lane Ct. Clinton, Illinois	II	P/M	27 Months 8-3-77 to 11-5-79
Richard Kramer 2664 Burgener Drive Decatur, Illinois	II	Receiving	17 Months 11-17-77 to 1-27-78
		-11-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Gerald Lane 247 N. Wood Maroa, Illinois	II	Electrical	14 Months 11-2-78 to 1-14-81
William Langley P.O. Box 306 Clinton, Illinois	i II	Electrical	
Glenn Lapsley 2501 N. East 96th Staurt, Fla.	11	c/s	9 Months 10-8-76 to 7-22-77
Clifford Libby, Jr. Folly Pond Road Beverly, Mass.	7 III	Material Constrol	26 Months 10-26-76 to 4-13-79
John Linehan	III	QC Manager	
Robert Lord (Robbie) 76 S. East St. Clinton, Illinois	II	Receiving	31 Months 6-28-78 to 5-8-81
Linda Lord 300 S. Walnut Wapella, Illinois	ii II	Documentation Coordinator	48 Months 1-2-80 to 1-2-84
Thomas LaBaw 268 N. Ash Maroa, Illinois	N/A	No Cert	1 Month 3-10-81 to 4-27-81
Calvin Lunny 2503 Springfield Champaign, Illinois	11	P/M	30 Months 10 -20-76 to 4-13-79
Allan Lynch 112 S. Jackson Clinton, Illinois	I	P/M	10 Months 8-13-80 to 6-12-81 Rehire: 2-1-84 to present
Clinton, Illinois		-12-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMEN
David Laurendine 21 Imperail Drive New Orleans, La.	N/A	Not Certed	2 Months 11-13-78 to 4-27-81
Ricky Ledbetter 2912 Trent St. Winstom Salem, N.C.	N/A	Not Certed	1 Day 4-30-80
Sam May #2 Mayfern Forsythe, Illinois	II	P/M	24 Months 3-2-81 to 3-4-83
Michael Makowsky	I	P/M	Job Shop
Rafael Mari, Jr. 106 Pennsylvania Drive Decatur, Illinois	II	Electrical	16 Months 12-22-82 to 4-20-84
Richard Matthews 1002 W. Carl Drive Mahomet, Illinois	11	P/M	14 Months 11-8-82 to 1-2-84
David McCorkle 2545 Twin Oaks Ct. #149 Decatur, Illinois	I	Electrical	6 Months 11-21-83 to 4-17-84
Timothy McGuire Mt. Vernon, Illinois	I	Electrical	
Steve McHood 158 E. Prarie Argenta, Illinois	I	s/m	12 Months 5-11-83 to 5-10-84
		-13-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Peter J. McKenna 1706 E. Washington Clinton, Illinois	I	P/M	30 Months 5-8-78 to 11-21-80
Martin Merritt Box 390, R.R. #2 Clinton, Illinois	II	Р/М	25 Months 4-5-77 to 3-20-78
Dale Meyer R.R. #2, Box 228 St. Genevieve, Missouri	11	Electrical	9 Months 10-24-83 to 6-29-84
John Monical 304 W. Cedar Leroy, Illinois	I	S/M	17 Months 4-12-82 to 8-27-84
George Montgomery 1709 E. Washington Clinton, Illinois	II II	S/M F/M	9 Months 5-18-81 to 1-4-82
Thomas Moran 42 Hodgson Avenue Pittsburg, Pa.	II II	P/M	21 Months 1-23-76 to 11-77
Timothy Morrow R.R. 4 Mahomet, Illinois	II	P/M	46 Months 2-27-77 to 11-18-70
Vicki Morrow 108 S. Henderson Kenny, Illinois	I I	Documentation Coordinator	96 Months 6-1-76 to 1-12-84
William Neeley 1052 W. Main Decatur, Illinois	B II	Welding Coordinator	12 Months 11 9-18-78 to 8-31-79
		-14-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Melvin Murray 108 Ginger Creek Ct. Bloomington, Illinois	II	Vendor Surveillance	12 Months 2-16-81 to 2-23-82
Andrew Nielsen 21 Willowdale St. Joseph, Illinois	II	c/s	28 Months 2-16-81 to 2-23-82
Malcolm Norton 605B N. Dianne Lane Mahomet, Illinois	11	c/s	6 Months 5-18-81 to 11-9-81
William J. O'Brien WYE Motel Clinton, Illinois	III	P/M	7 Months 8-18-80 to 3-17-81
Ivan Padget Lot 19, Wilderness Est. Salisburg Pleasant Plains, Ill	II II	Cal Lab	12 Months 4-15-81 to 3-26-82
Donald Patterson R.R. #1 Clinton, Illinois	I	c/s	27 Months 9-15-76 to 12-15-78
Richard Paulcheck 3239 Field Ct. Decatur, Illinois	III III	QC Manager	29 Months 4-20-84 to 8-30-76
Michael Pinca 15 N. Quincy Clinton, Illinois		Electrical	24 Months 9-17-77 to 9-7-79
		-15-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Mark J. Porter 63 Country Club Road Urbana, Illinois		Electrical	2 Months 8-24-81 to 10-16-81
J.M. Powers 409 Washington St. Shreveport, La.	III	Materials Control	15 Months 8-30-76 to 12-15-77
Victor Pozzerle 7535 Dixie Drive Houston, Texas	II	P/M	6 Months 1-5-83 to 6-3-83
Larry Prather 424 W. Prairie Avenue, Apt. 6 Decatur, Illinois	H I	Electrical	20 Months 6-11-79 to 1-7-81
Coleman Price, Sr. 520 N. Maple Clinton, Illinois	I II	Vendor Surveillance	20 Months 6-12-80 to 2-23-82
Thomas Quagliano 907 N. Westbrook Mahomet, Illinois	I	Electrical	17 Months 1-5-81 to 5-12-82
William Ragan 1977 Queen Mary Ct. Decatur, Illinois	II II	Materials Control Receiving	6 Months 9-19-83 to 2-27-84
Art Rahm 51 Gateway Drive Mt. Zion, Illinois	i II	P/M	13 Months 2-8-82 to 1-5-83
Ray Rasor 505½ E. Main St. Clinton, Illinois	B I I I I I I I I I I I I I I I I I I I	Materials Control	32 Months 12-9-81 to 8-27-84
Larry Ratliff 304 W. Walnut Chatham, Illinois	H II	Electrical	10 Months 11-9-81 to 8-13-82
		-16-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Kevin Reeves 140 Magnolia Drive, P.O. Bx. 127 Forsythe, Illinois	II	Cal Lab	23 Months 4-5-78 to 10-22-80
Harry C. Reiling 1617 E. Washington, Box 373 Clinton, Illinois	II	Cal Lab	31 Months 7-23-75 to 2- <b>2</b> 4-78
Michael Reynolds 1376 W. Marietta Decatur, Illinois	I	P/M Transferred to Site Training	-19-83 to
Larry Richardson 1705 S. Country Club Rd Urbana, Illinois	III	Cal Lab	31 Months 7-23-85 to 2-24-78
Donald Richter 2329 Arrowhead Springfield, Illinois	III	Sr. Electrical Engr.	# 48 Months # 12-1-80 to 1-3-84
Thomas Ricks	11		Job Shop
Roy J. Roberts 452 B. Granada St. Ft. Pierce, Fla.	II	c/s	22 Months 10-13-76 to 1-3-78
Lee Schaffert R.#1, Box 21 Sidney, Illinois	II II	C/S Training Coordinator	3-8-76 to 3-25-81 Rehire 7-11-81 Total:
		-17-	

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FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Walter Shanks RT 3, Box 674 Iuha, Mississippi	II	C/A	2 Months 3-2-81 to 5-7-81
Gary Sharar 8905 Marquis St. Clinton, Md.	I	Materials Control	19 Month 4-4-77 to 11-28-78
William Shinneman 335 Illinois, Box 38 Deland, Illinois	II	Electrical	18 Months 1-23-80 to 6-24-81
Mark Siewart Howard Johnson, Box 605 Urbana, Illinois	11	Engineer	15 Days 8-13-84 to 8-27-84
B.J. Silverstone 2421 El Washington Clinton, Illinois	11	P/M	7 Months 5-9-80 to 12-12-80
John Skelley 2610 E. Main Decatur, Illinois	I	Materials Control	12 Months 11-15-80 to 10-21-81
Edward Skoog 203 E. Union Mahomet, Illinois	11	c/sc	18 Months 4-12-78 to 11-1-79
Warren Sobolewski 200 E. Jefferson Clinton, Illinois	II	Vendor Surveillance	4-20-77 to 2-22-79 Rehires: 9-10-79 to 2-23-82
Kurt Sommer Rt. 1 Wapella, Illinois	11	c/s	24 Months 4-4-77 to 3-27-79
Glenroy Spandow P.O. Box 306 Clinton, Illinois	II	P/M	3 Months 10-3-83 1-1-84 Transferred to T/O

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Jeffrey Sprague 308 S. Center Clinton, Illinois	II	Materials Control Transferred to QA Procurement	1-18-78 to
Charles Staffield 806 Holiday Park Champaign, Illinois	II	c/s	58 Months 5-10-76 to 3-12-82
Ted Stama 7377 Red Arrow Hwy. Stevensiville, Michigan	11	C/S V/S Training Coordinator	12 Months 3-16-81 to 3-12-82
Douglas Stephens 310 W. Main Princeville, Illinois	II	Vendor Surveillance	19 Months 10-8-79 to 6-1-81
William Stokes 204 E. South Moweaqua, Illinois	III	Senior P/M Senior QC Asst. Mgr. Transferred to Construction	40 Months
Mark Stone P.O. Box 127 Forsythe, Illinois	11	Р/М	58 Months 2-28-79 to 1-12-84 Trans. to T/O
Robert Storms R.R. #1, Kirby Road Lawrenceburg, Kansas	II	Electrical	8 Months 1-9-84 to 8-27-84
Robert Stout 830 Green Road Madison, Indiana	II	Electrical	24 Months 1-26-81 to 11-83
Robert Strade 412 N. Monroe Clinton, Illinois	11	PT Craft	16 Months 3-3-80 to 6-9-81
Robert Sturgill P.O. Box 268	I	Electrical	18 Months 10-1-81 to 4-20-83
Clinton, Illinois		-19-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
George F. Sulwer, Jr. (Sonny) 483 M 34th St. Decatur, Illinois	I	Materials Control Receiving	7 Months 12-10-80 to 4-22-83
Gary Sutton P.O. Box 192 Maroa, Illinois	11	c/s	44 Months 3-8-76 to 11-6-79
Martin Tellez P.O. Box 306 Clinton, I-linois	III		6 Days 10-18-74 to 10-22-74
Fred Thompson 395 Loma Drive Forsythe, Illinois	I	Electrical	2 Months 6-17-80 to 8-8-80
Kevin Thompson	11	Electrical	Job Shop
Dennis Threatt R.R. Dewitt, Illinois	111	C/S Sr. Engineer Transferred to QA	72 Months 4-4-77 to 3-9-83
Timothy Walker 2313 Anchor Drive Bloomington, Illinois	III	P/M	59 Months 9-29-76 to 8-15-80
Debra Walters P.O. Box 31 Weldon, Illinois	II	Documentation Coordinator Transferred to T/O	108 Months 9-29-75 to 1-84
Harold Washington P.O. Box 193 Ashford, Ala	11	Electrical	5 Months 1-5-31 to 6-2-81
Michael Watkins R.R. #2 Clinton, Illinois	I I	Electrical	6 Months 2-18-81 to 7-3-81
		-20-	

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FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Brian Weaver 416 Adams Clinton, Illinois	II	P/M Transferred to QE	72 Months 5-31-77 to 7-25-84
Richard Whitehead 501 N. Grant Clinton, Illinois	II	Electrical	24 Months 2-2-81 to 1-11-83
Steven Wilber 215 N. Adams, P.O. Box 561 Cerro Gordo, Illinois	1	Electrical	5 Months 2-4-81 to 7-30-81
J.C. Wilson 800 Jackson Monticello, Illinois	III	Asst QC Manager	7 Months 6-19-81 to 2-3-82
Clark Wilson	III	Electrical	Job Sho <sup>3</sup> 2
Timothy Wilson 2421 E. Washington Bloomington, Illinois	11	Cal Lab	19 Months 11-16-81 to 6-17-83
Clarence Winfrey 2311 Galen #42 Champaign, Illinois	II	c/s	71 Months 5-24-76 to 4-7-81
John Wollrab 39 Country Club Bloomington, Illinois	II	SW	29 Months 8-9-78 to 1-9-81
Ilene Leach Wong 2 Pepperridge Ct. Decatur, Illinois	11	Documentation Coordinator	50 Months 4-3-78 to 6-4-82
Donald Wootten 4927 Roja Drive Oceanside, Ca.	I	c/s	6 Months 4-27-81 to 10-30-81
		-21-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Sam Wright 517 Centennial Monticello, Illinois	II	Р/М	4 Months 5-23-83 to 9-13-83
harles Zalewski .O. Box 173 olono, Illinois	II	c/s	17 Months
Merle Zumwalt 202 W. Virginia Normal, Illinois	II	c/s	3 Months 5-16-79 to 8-17-79
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# EXHIBIT B

Third Supplemental Response of Illinois Power to the State of Illinois' Second Set of Interrogatories to Applicants.

FORMER QC PIPING MECHANICAL

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Richard Acevedo 2490 San Pasqual Pasadena, California	11	P/M Inspector	15 Months 12-15-82 to 3-18-83
Linda Adkins 3713 Northhaven Ct. Decatur, Illinois	11	Not Certified	1 Month 7-23-84 to 8-27-84
Joseph Amadon 1102 E. Washington Leroy, Illinois	11	P/M Inspector (Transferred to T/O)	19 Months 6-14-82 to 1-18-84
Bill Armstrong 1312 W. Mt. Gilead Road Decatur, Illinois	11	P/M Inspector (Transferred to QE)	22 Months 9-7-82 to 7-11-84
Chris Blenstraub 2313 Anchor Drive Bloomington, Illinois	11	P/M	12 Months 8-17-82 to 2-25-83
Sharon Bodine 1406 #2 Grandview Dr. E Champaign, Illinois	11	Electrical	33 Months 5-11-81 to 1-18-84
Bobby G. Brown 217 Sorrento Drive Terre Haute, Indiana	I	P/M Inspector	3 Months 6-15-81 to 9-11-81
Bruce Buffie 3294 Robin Drive Decatur, Ilinois	11	P/M Inspector	19 Months 7-31-80 to 2-9-82
Michael Bunch 445 W. Roberts Mt. Zion, Illinois	11	P/M Inspector	19 Months 7-31-80 to 2-9-82
Kenwood Bush R.R. #1, Box 418D Monticello, Ill.	11	P/M Inspector	15 Months 1-5-83 to 4-11-84
		-1-	

LEVEL	CERTIFIED	TOTAL BA EMPLOYMEN
III	Sr. P/M Engineer	18 Months 8-18-80 to 2-23-82
11	P/M Inspector	62 Months 6-28-78 to 8-12-82
11	P/M Inspector	7 Months 10-31-83 to 4-20-84
11	P/M Inspector	43 Months 7-11-77 to 2-13-81
11	P/M Inspector	17 Months 10-5-81 to 3-29-83
11	P/M Inspector	17 Months 3-11-81 to 8-12-82
11	P/M Inspector	29 Months 6-15-77 to 12-31-80
11	P/M Inspector	3 Months 11-21-83 to 3-9-83
	III III	II P/M Inspector  II P/M Inspector

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMEN
Morgan Gassman, Jr. R.R. #2, Box 437 Clinton, Illinois	11	P/M Inspector	6 Months 1-5-81 to 6-16-83
Mark Geyer 502 Jolier Rd. New Lenox, Illinois	п	P/M Inspector	7 Months 2-13-83 to 8-31-84
John Golden 521 W. William St. Monticello, Illinois	11	P/M Inspector	13 Months 9-28-81 to 10-26-82
James Groblewski 157 E. Picadilly Sq, Cinninnati, Ohio	I	P/M Inspection	1 Month 2-13-81 to 3-30-84
Juseph Guynn P.O. Box 46 Cisco, Illinois	11	P/M Inspector	6 Months 3-3-81 to 9-8-81
Ronald Halverson 605 S. Center Clinton, Illinois	11	P/M Inspector	35 Months 6-27-78 to 5-22-81
Joe Hindman Box 322, 109 S. East Clinton, Illinois	11	P/M Inspector	24 Months 10-19-77 to 1-9-81
Randy Hoke 18 E. Julia Clinton, Illinois	1	P/M Inspector	28 Months 6-20-79 to 11-3-81
Peter Johnson 2391 Wheeless Road Augusta, Ga.	11	P/M Inspector	10 Months 11-29-83 to 8-27-84

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Alan Koca R.R. 1, Country Lane Ct. Clinton, Illinois	11	P/M Inspector	27 Months 8-3-77 to 11-5-79
Calvin Lunny 2503 Springfield Champaign, Illinois	11	P/M Inspector	30 Months 10-20-76 to 4-13-79
Allan Lynch 112 S. Jackson Clinton, Illinois	I	P/M P/M	10 Months 8-13-80 to 6-12-81 Rehire: 2-1-84 to Present
Sam May #2 Mayfern Forsythe, Illinois	11	P/M	24 Months 3-2-81 to 3-4-83
Richard Matthews 1002 W. Carl Drive Mahomet, Illinois	111	P/M	14 Months 11-8-82 to 1-2-84
Peter McKenna 1706 E. Washington Clincon, Illinois	11	P/M	30 Months 5-8-78 to 11-21-80
Martin Merritt Box 390, R.R. #2 Clinton, Illinois	11	P/M Inspector	25 Months 4-5-77 to 3-20-78
Thomas Moran 42 Hodgen Avenue Pittsburg, Pa.	11	P/M Inspector .	21 Months 1-23-76 to 11-77
Tim Morrow R. R. 4 Mahomet, Illinois	II	P/M Inspector	46 Months 2-27-77 to 11-17-80
		-4-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
W.J. O'Brien WYE Motel Clinton, Illinois	111	P/M	7 Months 8-18-80 to 3-17-81
Victor Pozzerle 7535 Dixie Dr. Houston, Texas	11	P/M Inspector	6 Months 1-5-83 to 6-3-83
Art Rahm 51 Gateway Drove Mt. Zion, Illinois	11	P/M Inspector	13 Months 2-8-82 to 1-5-83
B.J. Silverstone 2421 E. Washington Clinton, Illinois	11	P/M Inspector	7 Months 5-9-80 to 12-12-80
Glenroy Spandow P.O. Box 306 Clinton, Illinois	11	P/M Inspector	3 Months 10-3-83 to 1-1-84
Mark Stone P.O. Box 127 Forsythe, Illinois	11	P/M Inspector	47 Months 2-28-79 to 1-2-84
Fimothy Walker 2313 Anchor Drive Bloomington, Illinoi	111	Р/М	59 Months 9-29-76 to 8-15-80
Brian Weaver 416 Adams Clinton, Illinois	11	P/M Inspector (Transferred to QE)	96 Months 5-31-77 to 7-25-84
Sam Wright 517 Centennial Monticello, Illinois	11	P/M	4 Months 5-23-83 to 9-13-83
		-5-	

# EXHIBIT C

Third Supplemental Response of Illinois Power to the State of Illinois' Second Set of Interrogatories to Applicants.

CURRENT QC PIPING/MECHANICAL

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
Larry Clark 1219 E. Washington Bloomington, Illinois	111	P/M Sr. Supervisor	
P.K. Adams R.R. #6, Box 188 Decatur, Illinois	11	P/M Inspector	
Sean M. Adamson 303 E. Chestnut Moweaque, Illinois	I	P/M Inspector	
P.A. Anderson 904 S. 9th Shelbyville, Illinois	11	P/M Inspector	
Larry Becker 702 S. Lynn Champaign, Illinois	11	P/M Inspector	
M. Becraft R & R Motel Clinton, Illinois	II	P/M Inspector	
Roger Bush 25 Carlson Decatur, Illinois	II	P/M Supervisor	
G. Camp 1604 Ravina Park Decatur, Illinois	11	P/M Assistant Supervisor	
William Cornthwaite R.R. #8, Box 327B Decatur, Illinois	I	P/M Inspector	
J.W. (Woody) Culumber R.R., Box 49 Assumption, Illinois	i II	P/M Field Supervisor	
		-1-	

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FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
E.J. Frey 219 S. Center Clinton, Illinois		P/M Inspector	
Kevin Frey R.R. #1, West Side Pk. Lt. #23 Clinton, Illinois	II	P/M Assistant Supervisor	
George Gettel 603 N. Madison Clinton, Illinois	II	P/M Inspector	
Antonio J. Hurtado 701 N. Plum Farmer City, Illinois	11	P/M Inspector	
William Jarred P.O. Box 396 Forsythe, Illinois	11	P/M Inspector	
J. Karl 345 Melrose Ct. Decatur, Illinois	11	P/M Assistant Supervisor	
D.F. Kerwood #10 Illini Decatur, Illinois	п	P/M Inspector	
J.J. Longstreet 1020 N. Oakcrest Decatur, Illinois	11	P/M Inspector	
Allan Lynch 21342 E. Main Clinton, Illinois	11	P/M Supervisor	
Dennis McCay 201 S. 29th	11	P/M Inspector	
Decatur, Illinois		-2-	

FULL NAME AND ADDRESS	LEVEL	CERTIFIED	TOTAL BA EMPLOYMENT
F.A. Richard 3561 Plover Drive Decatur, Illinois	II	P/M Inspector	.:
N.L. Smith 1835 Van Buren Drive Madison, Indiana	11	P/M Inspector	
J. Swearingen 604 Rajon Oreana, Illinois	11	P/M Inspector	
W. Taylor 745 Fawn Ct. Mt. Zion, Illinois	11	P/M Supervisor	
D.D. Thaden 700 W. Webster Clinton, Illinois	11	P/M Assistant Supervisor	
M.K. Urbanawiz 3666 Dove Drive Decatur, Illinois	11	P/M Inspector	
R.L. Wright 2020 N. Mattis, Box 58 Champaign, Illinois	11	P/M Inspector	
T.L. Wylder R.R. #1, Box 40B Wapella, Illinois		P/M Inspector	
	5 26 26 38 30 10		

## EXHIBIT D

Third Supplemental Response of Illinois Power to the State of Illinois Second Set of Interrogatories to Applicants.

NAME/ADDRESS:

J.C. Levinsky 103 S. Williamsburg Dr. Bloomington, IL 61701

POSITION:

Drafting-Supervisor

DUTIES/RESPONSIBILITIES:

Responsible for the Supervision of all personnel, time, production and preparation of piping, instrumentation, electrical and misc. drawings for construction.

QUALIFICATIONS:

31 years experience in design and drafting of piping and related systems. Includes 18 years nuclear related design and construction. 5 years post high school education in mech. engineering, math and HVAC.

NAME/ADDRESS:

G.R. Smith 303 Union St. Bloomington, IL 61701

POSITION:

Drafting Administrative Assistant

DUTIES/RESPONSIBILITIES:

Assistant Supervisor - Responsible to replace supervisor in his absence. Responsible for organization, timekeeping, progress and production reporting, senior coordinator supervises clerical personnel.

QUALIFICATIONS:

11 years experience in construction piping engineering, design and drafting. 9 years nuclear construction related. Associate degree - Mech. Engineering Technology.

NAME/ADDRESS:

A.L. Baker

403 Woodlawn Rd. Lincoln, IL 62656

POSITION:

Coordinator - Piping Drafting

DUTIES/RESPONSIBILITIES:

Responsible for production of piping drawings and misc. drawings. Supervises checkers and draftsmen.

QUALIFICATIONS:

6 years at Clinton Site. B.A. in

Graphic Arts.

NAME/ADDRESS:

R. Jackson

503 S. Clinton Street Clinton, IL 61727

POSITION:

Coordinator - Instrumentation

Drafting

DUTIES/RESPONSIBILITIES:

Responsible for production of Instrumentation tubing isometric

and misc. instrument detail drawings. Supervises checkers and

draftsmen.

QUALIFICATIONS:

3 years 6 months nuclear related

experience at CPS. B.S. in Architecture.

NAME/ADDRESS:

R.L. Pike

1502 Greenridge Dr. Urbana, IL 61801

POSITION:

Coordinator - Instrumentation Hanger

Drafting

DUTIES/RESPONSIBILITIES:

Responsible for the production and checking of instrumentation tubing hanger drawings and misc. drawings -

Supervises draftsmen.

QUALIFICATIONS:

11 years drafting experience

3 years nuclear related at Clinton

Site.

1 year - Tech School.

NAME/ADDRESS:

T.A. Andreopoules 233 Freeport Dr.

Bloomingdale, IL 60108

POSITION:

Checker Instrumentation Drafting

DUTIES/RESPONSIBILITIES:

Responsible for checking of instrumentation tubing isometric and misc. instrument detail drawing.

QUALIFICATIONS:

21 years construction piping engineering - 5 years nuclear related, 6 years fossil, 2 years at CPS. 2 years college.

NAME/ADDRESS:

J. Porter 934 N. West

Jacksonville, IL 62650

POSITION:

Draftsman - Piping Drafting

DUTIES/RESPONSIBILITIES:

Prepares and revises piping isometric and misc. related drawings per design drawings and as-built information prepares traveler addendum sketches for field engineers.

QUALIFICATIONS:

7 years drafting experience; 3 years at CPS Assoc. Degree - Applied Science/Drafting Tech.

NAME/ADDRESS:

S. Hostetler P.O. Box 306

Clinton, IL 61727

POSITION:

Draftsman - Piping Drafting

DUTIES/RESPONSIBILITIES:

Prepares and revises piping isometric and misc. related drawings per design drawings and

as-build information.

**OUALIFICATIONS:** 

3 years nuclear experience. 1 year college.

NAME/ADDRESS:

R. Picchiette P.O. Box 1412

Bloomington, IL 61701

POSITION:

Draftsman - Instrumentation Drafting

DUTIES/RESPONSIBILITIES:

Prepares and revises instrumentation tubing isometric and misc. instrument detail drawings per design drawings and as-built information.

QUALIFICATIONS:

6 years drafting experience; 4 years at CPS
2 years college
2 years Tech School.

NAME/ADDRESS:

T. Saffaripour 300 Shelbourne Dr. #58 Normal, IL 61761

POSITION:

Draftsman - Instrumentation Drafting

DUTIES/RESPONSIBILITIES:

Prepares and revises instrumentation tubing isometric and misc. instrument detail drawings per design and as-built information.

QUALIFICATIONS:

18 years drafting experience. 3 years at CPS. Assoc. Degree - Civil/Struct. Engineering - 3 year Tech School.

NAME/ADDRESS:

B. Auer

1401 Chadwick Dr. Normal, IL 61761

POSITION:

Jr. Draftsman Instrumentation

Drafting

DUTIES/RESPONSIBILITIES:

Assists Instrumentation drafting coordinator with record and info-keeping; performs misc.

drafting duties.

QUALIFICATIONS:

1 year 2 months at CPS. 2 year

college - Mech. Technology.

NAME/ADDRESS:

S. Randolph

3868 Camelot Dr. Apt. #1H

Decatur, IL 62526

POSITION:

Draftsman - Instrumentation Hanger

Drafting

DUTIES/RESPONSIBILITIES:

Prepares and revises detail dwgs. of instrumentation tubing supports and mics. related details per

design drawing and as-built info.

QUALIFICATIONS:

6 years drafting experience; 2 years nuclear experience

1½ years college.

NAME/ADDRESS:

L. Pierce

R.R. #2 Box 175 Clinton, IL 61727

POSITION:

Technical Assistant-Drafting

Department (Piping Instrumentation

Groups)

DUTIES/RESPONSIBILITIES:

Responsible to maintain drawing files and logs pertaining to piping

and instrumentation drawings.

QUALIFICATIONS:

3 years at CPS. 2 year degree Legal and Executive Secretarial College.

NAME/ADDRESS:

P.D. Bessler #7 Willedrob Rd. Apt. 1A Bloomington, IL 61701

POSITION:

Jr. Draftsman Drafting Department

DUTIES/RESPONSIBILITIES:

Responsible to maintain drawing files and logs pertaining to piping and instrumentation drawings and misc. drafting.

QUALIFICATIONS:

1 year 5 months at CPS

NAME/ADDRESS:

Ed Brent P.O. Box 306 Clinton, IL 61727

POSITION:

Checker - Instrumentation Drafting

DUTIES/RESPONSIBILITIES:

Responsible for checking of instrumentation tubing isometric and misc. instrument detail drawings.

QUALIFICATIONS:

24 years total experience
14 years nuclear related power
piping - design, layout, detailing
- checking pipe and instrumentation
isometric drawings. Higher
National Cert. Mechanical
Engineering - England (Equiv. to
Assoc. Degree - USA)

### CERTIFICATE OF SERVICE

I hereby certify that an original and two conformed copies of the foregoing document were served upon the following:

> Secretary of the Commission United States Nuclear Regulatory Commission Washington, D.C. 20555 Attention: Docketing and Service Branch

and that one copy of the foregoing document was served upon each of the following:

Hugh K. Clark, Esq., Chairman P.O. Box 127A Kennedyville, Maryland 21645

Dr. George A. Ferguson School of Engineering Howard University 2300 Sixth Street, N.W. Washington, D.C.

Dr. Oscar H. Paris Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Executive Legal Director United States Nuclear Regulatory Commission Washington, D.C. 20555

Allen Samelson Assistant Attorney General Environmental Control Division Southern Region 500 South Second Street Springfield, Illinois 62706

Jean Foy 511 W. Nevada Urbana, Illinois 61808

Prairie Alliance Box 2424 Station A Champaign, Illinois 61820

Fred Christianson U. S. Nuclear Regulatory Commission RR 3, Box 228 Clinton, Illinois 61727

Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel U. S. Nuclear Regulatory Commission Washington, D.C. 20555

in each case by deposit in the United States Mail, postage prepaid on November 15, 1984.

Applicants

Sheldon A. Zabel Charles D. Fox IV Sara L. Johnson SCHIFF HARDIN & WAITE 7200 Sears Tower 233 South Wacker Drive Chicago, Illinois 60606 (312) 876-1000

Jack R. Newman George L. Edgar NEWMAN & HOLTZINGER, P.C. Suite 1000 1615 L Street, N.W. Washington, D.C. 20036 (202) 955-6600