F-0995 L40-84(11-14)-L 8G.150b

#### ILLINOIS POWER COMPANY

CLINTON POWER STATION. P.O. BOX 678. CLINTON, ILLINOIS 51727

November 14, 1984

50-401

Mr. Gordon L. Parkinson Bechtel Power Corporation Fifty Beale Street San Francisco, CA 94119

Dear Mr. Parkinson:

Enclosed is S&L's response to Observation Report Number 13, Rev. O. This response has been reviewed by Illinois Power.

Sincerely yours,

. H. R. Victor

Manager,

Nuclear Station Engineering

DWW/1m

cc: See Attached Distribution List

Bool 11

PDR ADDCK 050G0461 A PDR

SARGENT & LUNDY ENGINEERS FOUNDED 1891 SS EAST MONROE STREET CHICAGO, ILLINOIS 60603 R. C. HEIDER (312) 269-2000 312-284-7048 TWX 910-221-2807 SLMI-13894 Date: November 2, 1984 Project No. 4536-51, -53 Illinois Power Company Clinton Power Station - Unit 1 Independent Design Review Observation and Resolution Reports Mr. J. D. Geier Assistant to Vice President Illinois Power Company 500 South 27th Street Decatur, Illinois 62525 Dear Mr. Geier: Enclosed is a copy of the below listed Resolution Reports with the proposed resolution (Items 5 and 6) completed by Sargent & Lundy: Resolution Report Number 13, Revision 0 We are also enclosing a copy of the corresponding Observation Reports for completeness. Please review our proposed resolution and, if you concur, sign Item 7 of the Resolution Report and forward the report to the independent reviewer. Also, please return a copy of the signed Resolution Report to Sargent & Lundy for our records. Yours very truly, R. C. Heider Project Manager RCH:nd Attachment - all recipients D. P. Hall E. B. Branch H. R. Victor B. A. Erler F. A. Spangenberg (originals) W. G. Schwartz L. E. Ackmann/W. A. Chittenden I. R. Stensland W. G. Hegener H. S. Taylor E. V. Abraham R. A. Witt R. X. French R. B. Johnson J. M. McLaughlin M. J. Shewski H. M. Sroka D. K. Schopfer

## CLINTON POWER STATION Job 15478-003

#### OBSERVATION REPORT

File Revision No. Date October 16, 1984

1. Level 1 classification of Observation:

Not significant to safety

X Additional information required \*See 5, "Recommendation for resolution"

Significant to safety, send to Level 2 Committee

Structure(s), system(s), or component(s) involved:

Pipe rupture restraints for HELB and MELB.

3. Description of Observation:

Pipe rupture restraints are designed based on calculations of cold and hot gaps as predicted by computer analysis. Verification is needed that the measured hot gaps match the theoretical gaps, considering changes in support locations, variation in temperatures, and uncertainties built in the mathematical model.

4. Significance of Observation:

The potential exists that the design of the pipe rupture restraints might not be adequate without provisions for monitoring and adjusting the gaps in the hot pipe position.

5. Recommendation for resolution (optional):

S&L should verify design adequacy of the pipe rupture restraints for hot gaps, and provide an assessment of its safety significance.

6. Signatures:

Level | Review Committee

P&CO

Cah

and low of

# CLINTON POWER STATION Job 15478-003

# RESOLUTION REPORT

	File Revision No. 0 Date October 16, 1984
1.	Resolution by Level 1 Internal Review Committee
2.	Classification of Observation:
	a. Not valid (see continuation sheet) b. Not significant to safety c. X Additional information required d. Significant to safety
3.	Program resolution is:
	a. Closed item b. X Action to be taken by Reviewee
4.	Review Committee signatures:  All Paul 10/17/84  R.S. Calm  Review Committee signatures:  R.S. Calm  All Paul 10/17/84  All Paul 10/17/84  All Paul 10/17/84
5.	Reviewee proposed resolution:
	a. Description of proposed resolution:
	(See Continuation Sheet)
	b. Basis of proposed resolution:
	(See Continuation Sheet)
6.	Reviewee response report/signed by  Engineer  Manager  Date  Date  Date
7.	Illinois Power Co. Review: H-R. Warter 11/13/94

#### CLINTON POWER STATION Job 15478-003

RESOLUTION REPORT (continuation sheet)

File	No.	13	
File	Revision	No.	0
Date			

5a. Based on experience with other in-house projects, Sargent & Lündy (S&L) has recognized that the Nuclear Regulatory Commission has required hot gap checks for pipe rupture restraints. Although there is no specific Final Safety Analysis Report commitment for such a program, the Clinton project has had provisions to perform a hot gap check. S&L has informally discussed a hot gap check program with Illinois Power Company (IPC) and the contractor over the past two years. As shown on the attached Man-Hour Deviation Request Number 830008-0, dated May 16, 1983, we had allotted man-hours for this program.

Due to the current on-going design and installation work on pipe rupture restraints, the hot gap program details had not yet been finalized. On October 10, 1984, the S&L recommendations for this program were forwarded to IPC (SLMI-13616, copy attached). IPC concurred with the S&L recommendation on October 24, 1984 (S-4870, copy attached.

Based on the above discussion, provisions for a pipe rupture restraint hot gap check program had been made on the Clinton Project. Therefore, there is no potential for Clinton pipe rupture restraints being inadequate due to gap uncertainties; thus, there is no safety concern.

5b. See Item 5a for response.

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10R H: 830008-0	Is tils a Scope of Work Change? D Yes U No		Routing									
Sheet 1 of 1	Change? 1	es L No	Name	Location								
Division END	SWCR No.											
Project: CLINTON  Client: ILLINOIS POWER COMPANY  Project Xo.: 4536  Date: MAY 16, 1983												
Project Part Number Affected: Part- 00.  Description of Change:  AS BUILT PIFE RUTTUCE UPDATE  Leview of a: built piec and piece whop portaint dimeration.  Assumes no substantial deviations requiring reanclu:  for pipe whep.												
								Eves Tris Change Affect O Mechanical Divisions! Wifeh? Does This Change Affect O Departments:		This	s Change is Mandas	et lonary
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*Assignable Cause 1 Citent Change 2 Vendor Change 3. S&I Change 4. Incorrect Estimate 5. Vendor Interface 6 Code Change 7 QA Requirements 8 Regulatory Change 9 Office	01	fect on vistonal u-Hours	Man-Ho Add	(Reduce)								
interior Bill	(an-	Reviewed E.C. Project	Level	7/1/83								
Submerting: A Division Head	4/4/13	Approved	Director ·	Dat.								

SARGENT & LUNDY ENGINEERS FOUNDED 1891

BS EAST MONROE STREET

CHICAGO, ILLINOIS 60603 (312) 269-2000 TWX 910-221-2807

> SLMI - 13616 October 8, 1984 Project Number 4536-00

Illinois Power Company Clinton Power Strtion - Unit 1

Pipe Whip Restraint Hot Gap Check

Mr. H. R. Victor
Manager - Nuclear Station
Engineering Department
Illinois Power Company
Clinton Power Station - V-928
P. O. Box #306
Clinton, Illinois 61727

Attention: Mr. P. E. Walberg

Dear Mr. Victor:

As previously reviewed with the Nuclear Station Engineering Department, Sargent & Lundy is recommending a hot functional field inspection of pipe whip restraint gaps. If Illinois Power Company agrees, the following will be done:

- Each gapped whip restraint will be visually inspected in the field to assure that the pipe does not contact the whip restraint in the pipe hot position.
- 2. The available margin in design will then be used in selecting those pipe whip restraints which require the hot functional gap check. These same pipe whip restraints will be tield inspected in the hot position to compare the measured hot gap with the calculated hot gap. This is required due to the following:
  - . The pipe whip restraint design load is sensitive to the actual gap. Gaps larger than design require reconciliation.

SARGENT & LUNDY

Mr. H. R. Victor Illinois Power Company

SLMI - 13616 October 8, 1984 Page 2

- Non-linearities in piping systems cause variations between the analyzed versus the actual thermal growth. This variation may be greater than that acceptable for pipe whip restraint design.
- 3. Those pipe whip restraints that have larger measured gaps than design can be reconciled by:
  - . Pipe whip restraint adjustment.
  - . Addition of shims.
  - . Engineering evaluation.

Please note that hot gap checks have been requested by the Nuclear Regulatory Commission on other projects.

We will await your concurrence prior to initiating this program.

Very truly yours,

M. J. Shewski

Mechanical Project

Engineer

MJS:rjp Copies:

D. Daniels

A. E. King

CPS D/R Center

R. C. Heider

W. G. S.hwartz

R. A. Witt

J. Gray

S. D. Killian

T. A. McKenna

R. A. Parson

R. E. Wadlington

R. S. Walters

## ILLINGIS POWER COMPANY

S-4870

F3 B60-84(10-24)-6

500 SOUTH STHEET, DECATURE HI INOIS 62575-1805

October 24, 1984

Mr. H. M. Sroka Sargent & Lundy Engineers 55 East Monroe Street, 21C05 Chicago, IL 60603

Attention: Mr. Ray Parsons

Dear Mr. Sroka:

With regard to your letter of October 8, 1984 (SLM1-13616) concerning pipe whip restraint hot gap checks, we concur with your recommendation that these gaps be checked during hot functional testing. Our program will consist of the following:

- (1) All gapped whip restraints will be visually inspected to assure that the pipe does not contact the whip restraint in the pipe hot functional position.
- (2) Selected whip restraint gaps will be measured and recorded. These measured gaps will be compared to the predicted gaps and those which fall outside their allowable tolerances will be submitted to you for additional evaluation.

To support the above effort we will require you to provide the following information:

- (a) A list of all whip restraints which are gapped and therefor require inspection per (1).
- (b) A list of all gapped restraints requiring inspection per (2) along with their predicted gaps and allowable tolerances for each.

If you have any questions please contact C. Stevens at NSED ext. 296.

D) Spencer

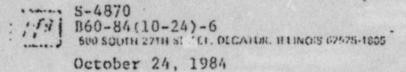
Sincerely,

Director - Design Engineering Nuclear Station Engineering

GMS/mms

ee: R. F. Thiel, V-270 P. E. Walberg, V-928 H. R. Victor, V-928 Jon Greene, T-31 Bob Ziminski, T-31

### ILLINOIS POWER COMPANY



Mr. H. M. Sroka Sargent & Lundy Engineers 55 East Monroe Street, 21C05 Chicago, 1L 60603

Attention: Mr. Ray Parsons

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If you have any questions please contact G. Stevens at NSED ext. 296.

Sincerely,

J. S. Spencer

Director - Design Engineering Nuclear Station Engineering

GMS/nons

ce: R. F. Thiel, V-270 P. E. Walberg, V-928 H. R. Victor, V-928 Jon Greene, T-31 Bob Ziminski, T-31

F-0995 L40-84(11-14)-L 8G.150b

#### Clinton Power Station

Independent Design Review Standard Distribution List

Director of Nuclear Reactor Regulation Attn: Mr. A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D.C. 20555

James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Byron Siegel Clinton Licensing Project Manager Mail Code 416 U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Fred Christianson
Mail Code V-690
NRC Resident Office
Clinton Power Station
R.R. #3, Box 228
Clinton, Illinois 61727

James L. Milhoan
Section Chief, Licensing Section
Quality Assurance Branch
Office of Inspection and Enforcement
Mail Stop EWS - 305A
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard C. Knop Section Chief Projects Section 1-C U. S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137 Richard J. Goddard, Esq.
Office of the Legal Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Don Etchison
Director, Illinois Department of
Nuclear Safety
1035 Outer Park Drive
Springfield, Illinois 62704

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

Jean Foy Spokesperson, Prairie Alliance 511 W. Nevada Urbana, Illinois 61801

Richard Hubbard
MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Gordon L. Parkinson
Bechtel Power Corporation
Fifty Beal Street
P. O. Box 3965
San Francisco, California 94119

Roger Heider Sargent & Lundy Engineers 55 East Monroe Street Chicago, Illinois 60603