

DmB

1A.120

1605-L  
U-10219

ILLINOIS POWER COMPANY



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

November 13, 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 two (2) interim reports (Ref: IP Letter U-10147, D. P. Hall to J. G. Keppler dated April 27, 1984; and IP Letter U-10192, D. P. Hall to J. G. Keppler, dated August 15, 1984). Illinois Power's investigation of the above issue is complete and has determined that the issue does not represent a reportable deficiency under the provisions of 10CFR50.55(e). This letter is submitted as a final report regarding this potentially reportable deficiency. Attachment A provides the details of our investigation.

We trust that this final report provides sufficient information to perform a general assessment of this potential deficiency and adequately describes our overall approach to resolve this problem.

Sincerely yours,

D. P. Hall  
Vice President

8411260016 841113  
PDR ADCK 05000461  
S PDR

NOV 19 1984

RLC/cbs (NRC2)

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

11  
Jc27

ATTACHMENT A

Illinois Power Company  
Clinton Power Station

Docket No. 50-461

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

Final Report

Statement of Potentially Reportable Deficiency  
(Withdrawn)/Background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 incorrect temperature of +40°F. where the correct temperature is +10°F. Some of these materials were also supplied by Rockwell Engineering prior to them being qualified in September, 1982, to the requirements of ASME Section III, Subsection NCA-3800 (NA-3700).

Investigation Results/Corrective Action

Illinois Power prepared and implemented an investigation plan to determine the extent of this problem at CPS. The investigation included:

1. A review 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 were performed where appropriate.
3. A review of material procurement and receiving inspection methods was performed.
4. A review of the record review programs was 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.

ATTACHMENT A

(continued)

Baldwin Associates Quality Assurance (BAQA) notified Baldwin Associates Resident Engineering (BARE) of the suspect materials received from Rockwell Engineering. Since Rockwell Engineering supplied only plates and structural shapes, BARE determined that the material would be utilized as either ASME III (all classes) piping attachments, or ASME III, Subsection NF Supports. On this basis, BARE proceeded with their investigation.

As the investigation progressed, Sargent & Lundy (S&L) was able to provide clarification to BARE through dispositions of Nonconformance Reports (NCRs) which documented the suspect materials used as attachments to ASME Class II, Subsection NC, and Class III, Subsection ND, systems. The dispositions to these NCRs accepted these materials based on paragraph NC/ND-2190. Suspect materials used as Class II and III hangers were accepted by BAQA based upon Code Cases 1728 and N-224-1. The acceptance of the materials used in Class II and III applications permitted BARE to narrow the scope of their investigation to Class I, Subsection NB, attachments; Class I, Subsection NF, supports; and Class MC, Subsection NE, head fittings.

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. (Carbon Steel Products, Dubose, Interstate Steel, and Rockwell)
2. Class MC head fittings were not Charpy V-Notch ( $C_v$ ) impact tested at the correct temperature or the Certified Materials Test Reports (CMTRs) showed no evidence of compliance to NCA-3800 (NA-3700). (Carbon Steel Products, Rockwell)
3. Class 1, Subsection NF, nonintegral supports for which the CMTRs showed no evidence of compliance to NCA-3800 (NA-3700). (Rockwell, LaBarge, DuBose, and Interstate)

A total of 33 NCRs were written to document and obtain resolution of identified cases of certification discrepancies. Of the 33 NCRs written, 32 have been closed.

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

## ATTACHMENT A

(continued)

1. The Class 1 head fittings, not examined in accordance with NB-2530 were 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. The class MC Head Fittings for which the CMTRs showed no evidence of compliance to NCA-3800 (NA-3700) are being replaced. The expected completion date of the rework (Ref. NCR 15635) is January 31, 1985.
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 have been developed and conducted for personnel involved in activities associated with ASME materials (i.e., procurement requisitions, purchase orders, vendor qualification, document review etc.). Baldwin Associates Resident Engineering expanded their review of procurement requisitions to ensure that material requirements are specified (i.e., specification, code etc.) BA's Procurement Manual was revised to assign BARE responsibility for the technical adequacy of requisitions and purchase orders (Ref: BA Procurement Manual, Appendix "A", Rev. 22).

Following resolution of CAR No. 147, a review was performed of the action taken to determine if additional corrective action was needed to resolve this issue. Based on this review, it was determined that no additional action was required.

### Safety Implications/Significance

Illinois Power requested Sargent & Lundy (S&L) to perform a safety significance evaluation of the Nonconformance Reports associated with this issue. Based on their evaluation, S&L has stated that, if the nonconforming conditions had gone uncorrected they would not have adversely affected the safe operation of CPS.

Investigation of this potentially reportable issue is complete. Illinois Power Company has reviewed and evaluated the findings of this investigation and has determined that no significant conditions adverse to the safety of operations of CPS were found. Therefore, this issue is considered to be not reportable under the provisions of 10CFR50.55(e).