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ILLINOIS POWER COMPANY



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

January 9, 1985

Docket No. 50-461

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

Subject: Response to Notice of Violation and Notice of Deviation  
dated December 4, 1984, NRC IE Inspection Report No.  
50-461/84-30

Dear Mr. Keppler:

This letter is to respond to the December 4, 1984 Notice of Violation concerning the nonconforming installation of concrete expansion anchors and the Notice of Deviation concerning the processing of "use-as-is" nonconformance reports. Please refer to Attachment A for the details of the response to the Notice of Violation. Attachment B provides our response to the Notice of Deviation.

I trust that our response is sufficient to close the item of noncompliance identified in the Notice of Violations and the deviation identified in the Notice of Deviation.

Sincerely yours,

*Wilfred Connell*

W. Connell  
Manager-Quality Assurance

REC/jf

Attachments

cc: Director, Office of I&E, US NRC, Washington, DC 20555  
NRC Resident Office  
Illinois Department of Nuclear Safety

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ATTACHMENT A

Illinois Power Company  
Clinton Power Station

Docket No. 50-461

Subject: Installation of Concrete Expansion Anchors

The Notice of Violation states that piping support traveler H-DO-751-I, Supplement 3, Revision 6 has numerous examples of failure to follow applicable instructions, procedures, or drawings. Violations include failure to properly document the nonconforming installation of concrete expansion anchors, failure to verify concrete expansion anchor torque, and failure to inspect new work.

I. Corrective Action Taken and the Results Achieved

1. Illinois Power Company performed an investigation into the circumstances surrounding the installation of piping hanger 1D018010G, traveler H-DO-751-I, Supplement 3. Several violations of procedural requirements were identified and documented by IPQA Surveillance Findings C-84-310 through C-84-317. The violations of procedures are categorized as failure to perform required inspections, failure to correctly differentiate a design change condition from a nonconforming condition, and replacement of concrete expansion anchors (CEAs) without adequate procedures or design documents.
2. The installation of CEAs for hanger 1D018010G was not in accordance with design. The nonconforming condition is identified by CPS Nonconforming Material Report 1-0338. Violation of the minimum embedment requirements is documented by CPS Condition Report 1-84-12-018.
3. Criteria for the installation of concrete expansion anchors addressed only the requirement for replacing failed anchors. Work on hanger 1D018010G involved replacing an anchor with insufficient embedment, an activity not addressed by design or procedures. Performance of this uncontrolled activity was documented on IPQA Surveillance Finding C-84-313. A design change document will be initiated to establish the requirements for replacing an anchor with one of the same diameter but a longer length. Procedure BAP 2.16, Concrete Expansion Anchor Work, will be revised to incorporate these requirements for the installation of concrete expansion anchors.

## II. Corrective Action to be Taken to Avoid Further Noncompliance

1. In order to correct the specific problems identified in this case, the following will be accomplished:

Inspection personnel will be retrained in the procedural requirements for inspecting CEA installation. Redundancy between BAP 2.16 and BAP 3.2.5, Piping Component Supports, will be eliminated by procedure revisions anticipated no later than January 15, 1985.

Craft supervision and inspection personnel shall be retrained in the project guidelines for distinguishing the need for a design change document from the need for a nonconformance report. Training will be completed by January 15, 1985, and the activity will be documented.

Sargent & Lundy will provide design criteria for the replacement of CEAs having insufficient embedment. BAP 2.16 will be revised to incorporate these new design criteria. Revision is anticipated no later than January 15, 1985.

Disposition of the specific nonconformance will be accomplished in accordance with established procedures. Installation procedure BAP 2.16 will be revised to establish the necessary requirements to assure achieving minimum embedment of CEAs. Revision is anticipated no later than January 15, 1985.

The revised criteria will be incorporated into BAP 2.16.

2. In addition to dealing with the specifics and resultant corrective action from this Notice of Violation, Illinois Power will conduct an in-depth review of the specification, procurement, receiving and issuance, installation and inspection, and training of personnel for anchor bolts. This will ensure that the program is clearly documented and that personnel are further trained in performing the above activities.

Corrective action completion date January 31, 1985.

## III. Date When Full Compliance Will be Achieved

Illinois Power Company will be in full compliance on January 31, 1985.

ATTACHMENT B

Illinois Power Company  
Clinton Power Station

Docket No. 50-461

SUBJECT: Designer Review of Nonconforming Conditions

The Notice of Deviation states in part:

...nonconformance reports identified as "Type B" and dispositioned "use as is" were not sent to Sargent & Lundy for justification of the disposition.

I. Corrective Action Taken

Investigation into the cited condition has identified an inconsistency between implementing procedures and FSAR Chapters 1 and 17. Procedure D.7, Handling Clinton Power Station Nonconformance Reports, controls the manner in which Illinois Power Company Nuclear Station Engineering (NSED) dispositions nonconformance reports (NCRs). However, the FSAR does not accurately reflect this responsibility. FSAR amendments have been initiated to revise the design responsibilities delineated in Chapters 1 and 17.

II. Corrective Action to be Taken

FSAR Chapter 1 will be revised to reflect the current division of responsibility for the design organization disposition of nonconforming conditions. FSAR Chapter 17, as well as the Illinois Power Company Construction Quality Assurance Manual, will be revised to reflect current design responsibilities.

Illinois Power Quality Assurance will perform an audit of the NSED design responsibilities.

III. Estimated Date of Corrective Action Completion

The amendment to the FSAR will be issued by April 15, 1985.

The revision to the Illinois Power Company Construction Quality Assurance Manual will be issued by January 31, 1985.

The audit of NSED design responsibilities will be performed by January 31, 1985.