

ILLINOIS POWER COMPANY



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U- 10205

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

October 18, 1984

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: Potential 10CFR50.55(e) Deficiency 55-84-11:
Uncertified Flanges Installed in ASME Systems;
Stainless Steel Thread-O-Lets
Manufactured from Unqualified Stock Material

Dear Mr. Keppler:

On May 25, 1984, Illinois Power Company notified Mr. F. Jablonski, NRC Region III, (Ref: IP memorandum Y-21457 dated May 25, 1984) of a potentially reportable deficiency concerning uncertified flanges installed in ASME systems and stainless steel thread-o-lets manufactured from unqualified stock material. This initial notification was followed by one (1) interim report (Ref. IP letter U-10172, D. P. Hall to J. G. Keppler, dated July 3, 1984). Our investigation of this issue is progressing, and this letter is submitted as an interim report in accordance with the requirements of 10CFR50.55(e). Attachment A provides the details of our investigation to date.

We trust that this interim report provides you sufficient background information to perform a general assessment of this potentially reportable deficiency and adequately describes our overall approach to resolve the problem.

Sincerely yours,

D. P. Hall
Vice President

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RLC/lag (NRC2)

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

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ATTACHMENT A

Illinois Power Company
Clinton Power Station

Docket No. 50-461

Potential 10CFR50.55(e) Deficiency 55-84-11
Uncertified Flanges Installed in ASME Systems;
Stainless Steel Thread-O-Lets
Manufactured from Unqualified Stock Material

Interim Report

Statement of Potentially Reportable Deficiency/Background

During a review of purchase order files by Baldwin Associates Quality Assurance group, it was identified that approximately 1,035 small bore flanges were purchased without proper documentation certifying that the material met the requirements of ASME III, NA 3700/NCA 3800.

An internal review of Quality Assurance records by Gulf & Western (G&W)/Bonney Forge, a supplier to Hub, Inc., revealed that various stainless steel thread-o-lets were manufactured from stock material which was neither purchased under the provisions of ASME NCA 3800 nor did the stock material receive the product analysis for upgrading per ASME requirements.

Investigation Results/Corrective Action

Illinois Power has prepared and is implementing an investigation plan to determine the extent of this problem at Clinton Power Station (CPS). The investigation plan includes:

1. Review of Architect/Engineer material and design requirements found in design documents and specifications,
2. Review of Construction Quality Control procedures and inspection basis,
3. Review of material procurement and receiving inspection methods,
4. Review of the record review programs to determine capability to identify certification deficiencies, and
5. Review of deficiency documents (Nonconformance Reports (NCRs), audit findings, etc.) which identify certification discrepancies.

ATTACHMENT A

(continued)

The data compiled above is being reviewed to determine if there exists a possible generic concern of materials not meeting the requirements of codes and specifications and will provide the root cause for the problems. Appropriate action necessary to identify the scope of the problem, correct specific deficiencies, and to preclude recurrence can then be determined.

The uncertified flanges were purchased from Barr Saunders Inc. under P.O. No. C-14951 and received under Receipt Inspection Reports (RIRs) No. S-5111 and S-5635. The total quantity of flanges received was 1035 in sizes ranging from 1/2" to 2" inclusive, in ratings of 300# and 600#. Nonconformance Report (NCR) No. 70178 states that the Certified Material Test Reports (CMTRs) for these items do not indicate compliance with ASME NA-3700/NCA-3800. There was also no objective evidence that National Flange and Fitting Co. (the supplier to Barr Saunders) was an ASME Quality System Certificate holder or that they were audited by either Barr Saunders or Baldwin Associates (BA).

In order to identify those systems in which the uncertified flanges may have been installed. BA Resident Engineering (BARE) performed a review of all safety-related isometric drawings. BARE then identified the corresponding travelers containing pipe sizes between 1/2" and 2" inclusive and identified 76 flanges, (with RIR No. S-5111) all of which were installed. The single item received under RIR No. S-5635 was returned to the warehouse.

BAQA Document Review Group (DRG) which has the responsibility of conducting a final review of all vendor - supplied and site-generated records, including Fire Protection and Augmented Class D, also identified one (1) additional safety-related installation (Ref: NCR No. 70363).

The following is a status of the 1035 flanges received under RIRs No. S-5111 and S-5635:

| | | |
|------------------------------------------------|-------|-------|
| Number of flanges issued to construction | | 253 |
| Number installed in safety-related systems | 77 | |
| Number not installed in safety-related systems | 176 | |
| | <hr/> | |
| Total issued | | 253 |
| Number of flanges on warehouse hold | | 782 |
| | | <hr/> |
| Total flanges received | | 1035 |

ATTACHMENT A

(Continued)

Nonconformance reports or traveler addendums have been generated to replace, with certified material, the 77 uncertified flanges installed in safety-related systems.

The stainless steel thread-o-lets manufactured from unqualified stock material were purchased from Hub Inc. under P.O. No. C-26876 and received under RIR No. S-12101. NCR No. 16881 identified these items as being manufactured from material that was not procured to the requirements of ASME NA-3700/NCA-3800. Of the 12 items received, 10 are currently on hold and are to be downgraded for use on Non-ASME systems, and the remaining 2 which were installed under travelers F-WF-776-A and WZ-810 will be acceptable based upon jurisdictional boundaries of the Code such that NA-3700/NCA-3800 is not applicable.

Corrective action taken to date includes the issuing of Corrective Action Request (CAR) No. 147 to document and obtain resolution regarding the requirements of ASME Section III, Subsection NA-3700/NCA-3800. Training programs were conducted for personnel involved in activities associated with ASME Materials (procurement requisitions and purchase orders, vendor qualifications, document review, etc.)

Safety Implications/Significance

Illinois Power Company's investigation of this potentially reportable deficiency is continuing. The safety implications and significance of the issue will be assessed after further background information is evaluated. It is anticipated approximately ninety (90) days will be necessary to complete our investigation and to file a final report on the matter.