

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/88018(DRS)

Docket No. 50-461

License No. NPF-62

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Power Station, Unit 1

Inspection At: Clinton Site, Clinton, Illinois
Midland Pipe and Supply Company, Cicero, Illinois

Inspection Conducted: July 7, 8, 12, 13, 27, 28
and August 10, 11, 16, 17, 1988

Inspector: *D. H. Danielson*
for E. Schapker

8/30/88
Date

Approved By: *D. H. Danielson*
D. H. Danielson, Chief
Materials and Processes
Section

8/30/88
Date

Inspection Summary

Inspection on July 7, 8, 12, 13, 27, 28 and August 10, 11, 16, 17, 1988 (Report No. 50-461/88018(DRS))

Areas Inspected: Special safety inspection into allegations made by former employees of an Illinois Power Company contractor, who were employed during the construction of the power plant and who indicated that certain requirements of the ASME Code and applicable QA Program requirements may have been violated. (99014)

Results: No violations or deviations were identified.

- The inspection concluded that the licensee and its contractor (Baldwin Associates) acted in accordance with the applicable QA Program requirements and the materials involved meet the ASME Code requirements.

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DETAILS

1. Personnel Contacted

Illinois Power Company (IP)

*D. P. Hall, Vice President
*K. A. Baker, Supervisor I&E Interface
*R. E. Campbell, Manager, Quality Assurance
*R. D. Freeman, Manager, Nuclear Support Engineering Department
*D. L. Holtzsher, Acting Manager, Licensing and Safety
*J. W. Wilson, Manager, Clinton Power Station
*J. S. Perry, Manager, Nuclear Program Coordination
*J. A. Miller, Manager, Scheduling and Outage Management
*R. E. Wyatt, Manager, Nuclear Training
*A. M. MacDonald, Director, Nuclear Program Assessment
*R. A. Schultz, Director, Planning and Programming
*K. L. Jones, Principle Assistant
J. Brownell, Project Specialist, Licensing
G. Baker, Supervisor, Quality Systems

Midland Pipe and Supply Company (MPS)

L. Walsh, President

Sargent and Lundy (S&L)

I. Garza, Mechanical Project Engineer

Nuclear Regulatory Commission (NRC)

P. Hiland, Senior Resident Inspector
S. Ray, Resident Inspector

*Denotes those attending the exit meeting on August 17, 1988.

The NRC inspectors also contacted and interviewed other licensee and contractor personnel.

2. (Closed) Allegation RIII-88-A-00766 - Allegation of Falsified Certified Material Test Reports (CMTR) for Commercial Pipes Fittings Supplied as Nuclear Grade

a. Allegation

During an interview by the NRC Office of Investigations regarding another case the interviewee alleged that he/she had evidence that the safety-related fittings at Clinton Power Station were not manufactured to nuclear grade standards, but were commercial grade.

The allegor named a specific purchase order and supplier. The allegor stated that he/she and another person went to the manufacturer's facility in July of 1984 to audit the manufacturer of the fittings for the purpose of verifying that the Provisions of Alternate Rules as specified in Code Case N-242-1, Paragraphs 2.0 and 3.0 existed and had been met as applicable. The results of the surveillance/audit was that the manufacturer did not meet the requirements of Code Case N-242-1 and therefore, the material was not certifiable to that code case. The allegor also stated that it appeared that the CMTR's were falsified and that the Inspection Supervisor at the vendor offered to create the inspection records that Baldwin Associate's (BA) might need. The Certification Supervisor at the vendor also stated that BA had requested CMTR's for the fittings and paid Standard Fittings Company to produce the required CMTR's.

b. Inspection

The NRC inspector reviewed the applicable purchase order (PO) identified by the allegor, the Document Exception Lists (DEL), the receipt inspection reports, the CMTR's, and the Supplier's and Baldwin Associate's audit records. The PO instructed the supplier to supply fittings which met the requirements of ASME SA-105, with no special requirements . . . Material was to be furnished in accordance with ASME Section III, Division I, with S74 Addenda for use in Nuclear Class II service. The supplier must be qualified per sub-article NA 3700. Review of material receipt inspection reports received in the later part of 1978 and early part of 1979 revealed a number of the fittings were rejected for improper identification (reference BA, NCR 1746) and returned to the vendor for replacement. This was the only finding identified by receiving inspection concerning this PO of nuclear grade material which could have been considered as commercial grade due to lack of the proper markings as required by SA 105/ASTM-A105. However, the licensee's contractor took the appropriate action and returned the deficient material to the vendor. Review of the applicable CMTR's revealed that the CMTR's were certified to meet SA-105 (which is identical to ASTM-A105 commercial grade), however, the certification to meet ASME Section III, NA 3700 was not included on all the CMTR's.

This deficiency was identified by the BA document reviewer in December of 1983. This document review was the Quality Assurance (QA) department's final documentation review prior to turn over to the licensee. Deficiencies identified by the document reviewers were recorded on "Document Exception List" (DEL) Form JV-935 in accordance with BAP Procedure BQAI-110-5, Revision 2, dated June 3, 1983. The Document Exception List Resolvers, also a part of the QA Department, were assigned to review and implement the appropriate corrective action to resolve the document discrepancies. The allegor was a member of this group and was assigned to resolve the document discrepancy. As part of the corrective action the BA management assigned the document resolvers to perform surveillances of the material manufacturer's to assure the appropriate QA program

requirements were implemented at the time of manufacture. Two code cases were cited to resolve document discrepancies applicable to ASME Section III, NA 3700 and NCA 3800. The two code cases were Code Case N-242-1 for large bore piping and fittings and Code Case 1713 for small bore piping (2" and less). The material supplier was Midland Pipe and Supply Company (MPS) who procured the material from Standard Fittings Company (SFC). MPS was an ASME Quality System Certificate (Materials) holder at the time of procurement. The material manufacturer SFC, had a quality program but was not an ASME Quality System Certificate holder. The Material Supplier qualified SFC as a material manufacturer by auditing the manufacturer to its QA program requirements as required by ASME Section III, and NA 3700 and NCA 3800. However, at the time of shipment of the fittings no statement of compliance to NA 3700 and NCA 3800 was included on the Certified Material Test Reports (CMTR's) as required by the PO. This deficiency was not identified upon receipt inspection; however, BA Quality Assurance identified this discrepancy and requested corrected copies from MPS.

The NRC inspector visited MPS and reviewed the following documentation: ASME Quality System Certificate (Materials) No. 2014 issued on February 24, 1978, expired on February 24, 1981; Purchase Order from BA No. C-14952; Audit Reports of Standard Fittings Company (SFC), and Memo's and notes to SFC regarding the application of NA 3700 statement of compliance to the CMTR's. The application of the ASME Section III, NA 3700 and NCA 3800 statement was requested and authorized by the ASME Certificate holder (MPS) and therefore, was not a falsification of the CMTR. In some cases the CMTR was dated prior to the issuance of NCA 3800 and therefore, appeared to be a fabrication of the document. However, requests by MPS and BA for corrected copies with the ASME Section III, NA 3700 and NCA 3800 statement were made after the implementation of NCA 3800 (1983-84) and were authorized by the ASME Quality Certificate holder who had audited the manufacturer and accepted his QA program as meeting those requirements. Therefore, the certification was not fabricated, since the requirements as stipulated in the ASME Code Section III, Division I, Subsection NA 3700 and NCA 3800 were complied with under the material supplier's QA program which was certified by ASME Certificate No. 2014.

The surveillance report the allegor prepared and signed indicated the "Records reviewed and found acceptable were limited to the following: Standard Fittings Company Heat Log, Standard Fittings Company Purchase Orders, Midland Pipe and Supply Company. Purchase order to Standard Fittings Company, Standard Fittings Company Certificate of Test, Material Receiving Reports, Receiving Form, Material Manufacturers CMTRs." Furthermore, it states, "In summary, the Survey Team could not verify that all of the requirements necessary for acceptance of this material under the Alternate Rules of Code Case N-242-1 have been met; acceptance of this material (PO #C-14962) under the Alternate Rules of Code Case 1713 have been met."

The final disposition in DEL No. V000527, Revision 1, dated September 12, 1984, (PO C-14952) Items #31, 33, 35, 37 and 38 which identify the deficiencies, for which the vendor surveillance was initiated, indicates Code Case 1713 was involved. Review of the PO C-14952 by the NRC inspector revealed that all material supplied under this PO was small bore pipe fittings (2 inches or less) and met the criteria as described in ASME Code Case 1713. Midland Pipe and Supply Company issued a certification of conformance to the requirements of ASME Section III, NA 3700 and NCA 3800 for the material manufactured by Standard Fittings Company on April 27, 1984.

To assure that this discrepancy was adequately addressed for other PO's the NRC inspector reviewed the licensee's investigation into potential 50.55(e) Deficiency Report No. 55-84-11, which was submitted at the same time frame as the above PO. These PO's were reviewed by the DEL Resolver group and the same deficiencies were identified (DEL V000528); CMTR's with inadequate certification of ASME Section III, NA 3700 and NCA 3800.

As in the above case the DEL Resolver group performed vendor surveillance of the material suppliers. The allegor had performed the surveillances for this document deficiency (PO C-6882). In a followup interview with the allegor he stated that the surveillance performed for this PO satisfactorily fulfilled the requirements of Code Case N-251-1. This PO included small bore and large bore pipe fittings. The allegor also stated that he had thought that PO C-14952 from Standard Fittings included large bore piping. The NRC inspector informed the allegor that his review of the PO concluded that all pipe fittings supplied in PO C-14952 were small bore, and that Code Case 1713 was invoked by the licensee to resolve the document deficiency. The allegor was satisfied that this deficiency was adequately resolved for the small bore piping as he/she stated in the surveillance report. Further review of 50.55(e) Deficiency Report No. 55-84-11 disclosed that the 50.55(e) was determined to be not reportable. The licensee contracted with the Architect Engineer (AE) to perform evaluations of the nonconformance reports issued identifying the document deficiencies to determine if the deficiencies had not been discovered, what the safety significance of the document deficiencies would be.

The AE's evaluation concluded that there would be no safety significance had the document deficiencies not been identified. The licensee subsequently withdrew the 50.55(e) submittal.

The NRC inspector requested pertinent data from the AE's evaluation which was used to form this conclusion since the NRC's review revealed some of the affected material was scrapped and replaced. Upon review of the applicable data the NRC inspector concluded that the licensee chose to replace and scrap the questionable material as a matter of conservatism at the time the document deficiencies were identified. The subsequent review performed by the AE was accurate

in assessing the materials supplied were adequate to perform their design function and would not have an adverse effect on the safe operation of the plant.

c. Conclusion

The NRC inspector's review of the alleged falsification of CMTR's and inadequate nuclear grade materials was not substantiated. The invocation of Code Case 1713 was acceptable and the changes made to the CMTR's were directed by the ASME Quality System Certificate (Materials) holder, (Midland Pipe and Supply Company) who was authorized by Certificate N-2014. The licensee's investigation into the potential 50.55(e) (55-84-11) demonstrated that the licensee had pursued this type of document deficiency to assure that no material deficiencies had occurred as a result.

The licensee's activities in addressing the alлегer's concern and the potential 50.55(e) were sufficient to assure the questionable materials were adequate to perform their design function.

3. (Closed) Allegation RIII-88-A-075 - Allegation of Improper Processing of Damaged Suppression Pool Downcomers

a. Allegation

During the course of an investigation conducted by the NRC Office of Investigation (OI), Region III, an alleged incident of improper initiation/closure of nonconformance reports (NCR) at Clinton was brought to OI's attention. Quality Control (QC) inspectors working in the Baldwin Associates (BA) QC Piping/Mechanical Department stated that late in January 1986 their supervisor failed to properly close NCR's. The NCR's in question relate to the suppression pool downcomers. The inspectors alleged that the downcomers were damaged by the craft, and because of schedule pressure, the NCR's were either not written or improperly closed without correction of the problem.

b. Inspection

The NRC inspector reviewed fabrication/inspection procedures, travelers, inspection reports, nonconformance reports (NCR) and a "Safeteam Report" concerning this allegation. "Safeteam" was an independent investigation/inspection team instituted by the licensee to address any concerns/allegations any employee had while employed at Clinton.

The following NCR's were reviewed: 40161, 40316, 40317, 40318, 40319, 40320, 40394, 40395, 40396, 40397 and 40398. These NCR's were initiated at the time the alлегers specified and addressed the damage to safety relief valve vent lines (downcomers). The NCR's

were processed in accordance with the applicable Code and BA Quality Program requirements. Repairs to damaged piping were initiated and dispositioned as required. Areas of damage which did not exceed the applicable acceptance criteria were not dispositioned by NCR's but were examined and accepted in accordance with BA's Quality Program requirements.

The review of the "Safeteam" report concludes the supervisor had examined the pitting indications on the downcomer piping. The "Safeteam" confirmed this by the QC inspector whom the allegers had identified as having discovered the indications. The supervisor, a welding inspector (from Technical Services (TS)) and a TS containment specialist were present during the reinspection. This was corroborated by informal notes, NCR's and personal statements. Some indications which the concerned persons supplied the "Safeteam" were visually estimated to be 1/16 inch by the QC inspector during his/her initial inspection. Examination with a depth gauge revealed that the indications were less than 1/32 inch. The acceptance criteria is 3/32 inch maximum depth for defects in the safety relief valve vent lines.

Therefore, the indications were acceptable and did not require an NCR. Other examples exceeding the acceptance criteria were recorded on the above listed NCR's. These indications had been reported to the supervisor and were being resolved per QA Program requirements.

c. Conclusion

The QC inspectors initiated inspection reports or NCR's concerning pitting and damage to the safety relief valve vent lines. The processing of the NCR's and inspection reports were in accordance with BA Quality Program and applicable ASME Code requirements. Defects addressed in these reports were reinspected utilizing appropriate measuring instruments and determined to meet the acceptance criteria or dispositioned to be reworked/repaired as required.

No violations or deviations were identified.

4. Exit Meeting

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on August 17, 1988. The inspector summarized the scope and findings of the inspection activities. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee identified the "Safeteam" reports as proprietary. The inspector assured the licensee that no proprietary information would be disclosed from the reports.