

ILLINOIS POWER COMPANY



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

January 31, 1986

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

Subject: Response to the Notice of Violation dated
December 27, 1985, in Inspection Report 50-461/85056

Dear Mr. Keppler:

This letter is in response to the Notice of Violation in Inspection Report 50-461/85056. Please see Attachment A to this letter for the details of Illinois Power Company's response concerning the attachment of a component support to the yoke of an ASME Class 2 valve without an engineering evaluation.

I trust this response will ensure compliance with regulatory requirements.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'F. A. Spangenberg'.

F. A. Spangenberg
Manager - Licensing and Safety

REL/ckc

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety
Director, Office of I&E, USNRC Washington, DC 20555

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Attachment A
Illinois Power Company
Clinton Power Station

The Notice of Violation states in part:

"...the safety-related mechanical snubber rear end bracket of Sargent & Lundy (S&L) designed pipe support 1RH16035S was welded to the yoke of Seismic Category I, ASME Code Class 2, Residual Heat Removal System, Anchor Darling (A/D) Limitorque valve 1E12-F064A, without either the Architect/Engineer (S&L) or the valve manufacture (A/D) conducting an engineering evaluation of the valve assembly seismic qualification report to justify the addition of the attachments to the "active" mechanical support."

I. Corrective Action Taken and Results Achieved

Illinois Power Company's Architect/Engineer, Sargent & Lundy (S&L), has performed the necessary calculations to verify the seismic qualification and operability for the Anchor/Darling Limitorque valve 1E12-F064A. This calculation demonstrated the operability of valve 1E12-F064A with support 1RH16035S attached. The seismic qualification package (SQ-CL100) has been updated to reflect these calculations. In addition, S&L has identified all safety-related valves which are restrained by component supports and is performing or has performed the calculations necessary to verify seismic qualification and operability. Seismic qualification packages are being up-dated to reflect these calculations.

II. Corrective Action to be Taken to Avoid Further Violations

Since the actual violation occurred in 1981, S&L has revised Project Instruction PI-CP-003, "Processing a Baldwin Associates Field Change Request or Nonconformance Report and a Zack Company Nonconformance Report", and issued PI-CP-071, "Procedure for Incorporating Changes Into Affected Documents." The revision of PI-CP-003 and issuance of PI-CP-071 clearly proceduralized the requirements for interface reviews of design changes. These project instructions specifically require assessment of impact on seismic qualification due to design changes. In addition, specific written instructions were given to the support designers in January 1985 concerning obtaining interface reviews on supports attached to valves.

III. Date When Full Compliance will be Achieved

Illinois Power Company will be in full compliance on February 28, 1986.