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Docket No. 50-461

10CFR21.21

Document Control Desk
Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: 10CFR21 Final Report 21-98-021: Deficiencies in
Material Dedication Process Used by Goulds Pumps
in Supplying Safety-Related Parts to Nuclear Power Plants

Dear Madam or Sir:

Illinois Power (IP) has completed the evaluation of the Goulds Pumps material dedication deviations supplied to Clinton Power Station (CPS) and has concluded that this issue is not reportable under the provisions of 10CFR, Part 21.

On December 10, 1997, the Nuclear Regulatory Commission (NRC) issued an inspection report (No. 99900732/97-01) to Goulds Pumps, Incorporated, identifying a deficiency in their quality assurance program. This inspection report contained a Notice of Nonconformance regarding deficiencies in the material dedication process used by Goulds Pumps. Goulds Pumps notified IP of the NRC finding in a report under the provisions of 10CFR, Part 21. This notification states that the NRC found that Goulds' use of a portable metal analyzer, Texas Nuclear Model 9277 -Metallurgist - XR to analyze 316 stainless steel material for conformance to ASTM A743 Grade CF8M was unacceptable. The NRC identified that Goulds has not verified all material characteristics during the dedication process. Goulds did not verify all of the chemical requirements and did not check for any mechanical properties of the material being tested.

Illinois Power notified the NRC in a letter (IP letter U-602995), dated May 5, 1998, that on the basis of the Goulds Pumps notification, IP performed an independent investigation into the dedication process and quality assurance programs of Goulds Pumps and found additional discrepancies.

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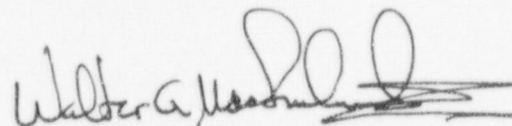
A review of Goulds Pumps parts in Clinton Power Station stores was performed to verify chemical content and material hardness. The discrepancies identified were determined to be acceptable with the exception of some replacement parts that did not contain the required material for application in safety-related systems. Specifically, a pump coupling kit in stores contained SAE Grade 2 hex head screws rather than the required SAE Grade 5 hex head screws. IP identified 8 safety-related applications where the deficient coupling kit could have been installed and initiated inspections of the potentially affected equipment. One safety-related water leg pump coupling was found to have Grade 2 hex head screws installed. This condition was evaluated by the Nuclear Station Engineering Department and found to be acceptable. However, the hex head screws were replaced with the proper Grade 5 hex head screws to restore the equipment to the design configuration. Inspections of the other potentially affected safety-related pumps were not complete at the time of the May 5, 1998 letter.

IP now has completed the inspections and evaluations of all 8 pump couplings. The inspections identified that 7 pump couplings contained SAE Grade 2 hex head screws rather than the required SAE Grade 5 hex head screws and 1 pump coupling contained SAE Grade 8 socket head cap screws. An engineering evaluation concluded that the deviation in bolting material would not affect the ability of the pumps to perform their safety functions. The SAE Grade 2 hex head screws in 7 pump couplings were replaced with SAE Grade 5 material. The SAE Grade 8 socket head cap screws are acceptable as is, but may be replaced with Grade 5 material in the future.

On the basis that the deviations in the Goulds Pumps material dedication process did not affect the ability of CPS components to perform their safety functions, this issue is not reportable under 10CFR21.

Additional information about this issue may be obtained by contacting A. A. Startz, Procurement Engineer, at (217) 935-8881, extension 4203.

Sincerely yours,



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RSF/krk

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety
INPO Records Center
Goulds Pumps, Incorporated