

ILLINOIS POWER COMPANY



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

U-10251

February 28, 1985

Docket No. 50-461

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

Subject: Potential 10CFR50.55(e) Deficiency 55-85-01  
 Substitution of AISI-1010 Carbon Steel All Thread Rod  
for ASTM A-36

Dear Mr. Keppler:

On February 1, 1985, Illinois Power Company notified Mr. R. Knop, NRC Region III (Ref. IP memorandum Y-26072 dated February 1, 1985) of a potentially reportable deficiency concerning the indeterminate quality of certain carbon steel all thread rod. Our investigation of this issue is continuing, and this letter represents 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 this issue.

Sincerely yours,

D. P. Hall  
 Vice President

RLC/lr (NRC2)

Attachment

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 55-85-01  
Substitution of AISI-1010 Carbon Steel  
All Thread Rod for ASTM A-36

Interim Report

Statement of Potentially Reportable Deficiency/Background

Baldwin Associates (BA) Quality Engineering Procurement Department has identified a deficiency with threaded carbon steel rod, the quality of which is currently indeterminate (ref. Nonconformance Report (NCR) No. 70456). The identified deficiency involves vendor (Barr Saunders, Inc.) supplied AISI-1010 carbon steel threaded rod, 3/8" (HT #HC0032) and 1/2" (HT #HC0148) in diameter. The AISI-1010 carbon steel rod was supplied by the vendor in lieu of ASTM A-36 which was specified on purchase order (PO), #C-30428. AISI-1010 carbon steel rod has lower physical properties (tensile and yield strength) than A-36. This material has been utilized in safety-related electrical installations.

Investigation Results

Illinois Power has prepared and implemented an investigation plan to determine the extent of this deficiency at Clinton Power Station (CPS). The investigation plan included:

1. A review of the material specification/tensile requirements for AISI-1010 and ASTM A-36 material was performed.
2. A review was performed by Baldwin Associates Resident Engineering (BARE) to identify the electrical installation details utilizing threaded rod, reference E05-1200, E05-1900 and E06-1000 Series Drawings.
3. Identified installation details were provided to Sargent and Lundy (S&L) for evaluation of design requirements and assessment of the use of AISI-1010 rod in lieu of ASTM A-36 material.
4. The results of item #3 will be reviewed to determine the extent/nature of any further activities which may be required, eg., traveler review, additional evaluation of design requirements, and/or replacement of AISI-1010 threaded rod with ASTM A-36 material.

ATTACHMENT A  
(continued)

A review of purchase orders issued to Barr Saunders, Inc. was performed and the following AISI carbon steel material was supplied in lieu of ASTM A-36 which was specified on the purchase order:

			<u>PO #C-33584</u>	
<u>Grade &amp; Size</u>			<u>Qty Purchased</u>	<u>Qty on Hold</u>
AISI-1008	1/4"x 6'	(HT #39884)	10	0
AISI-1008	3/8"x 6'	(HT #20845)	10	.0
AISI-1010	5/8"x 6'	(HT #20929)	20	1
AISI-1010	3/4"x 6'	(HT #HC0652)	20	0
AISI-1010	1"x 6'	(HT #HC0806)	20	12
AISI-1020	1 1/8"x 6',x7'	(HT #211239)	27	19(6')

NOTE: The above material was purchased for the Millwright Department to be used in temporary installations only. The located material has been placed on hold per NCR No. 70771. The investigation is continuing for the above material.

PO #C-32734

AISI-1010 3/8" (HT #SY1077)  
AISI-1010 1/2" (HT #KC5964)

NOTE: Purchasing requisition #91261 specified that the grade of material was to be ASTM A-36, but PO #C-32734 did not specify the grade of material required other than carbon steel (ref. NCR No. 27243).

Complete corrective action needed to correct the specific problems and to eliminate the root causes(s) to preclude recurrence will be addressed after further background information is evaluated.

Safety Implications/Significance

Illinois Power's investigation of this potentially reportable deficiency is continuing. The safety implications and significance will be assessed after further background information has been evaluated. It is anticipated that approximately sixty (60) days will be required to complete our investigation, determine reportability and to file a final report on the issue.