

TEXAS UTILITIES GENERATING COMPANY

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R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

November 29, 1979
TXX-3071

Mr. W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

Docket Nos. 50-445/Rpt. 79-18
50-446/Rpt. 79-18

COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
RESPONSE TO NRC
NOTICE OF VIOLATION DATED
SEPTEMBER 24, 1979
INSPECTION REPORT NO. 79-18
DOCKET NOS. 50-445 & 50-446
FILE NO. 10130

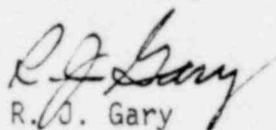
Dear Mr. Seidle:

We have reviewed the report dated September 24, 1979, on the inspection conducted by your resident inspector, Mr. R. G. Taylor, of the activities authorized by NRC Construction Permits No. CPPR-126 and 127 for the Comanche Peak facility. We have responded to the findings listed in Appendix A of that report.

To aid in the understanding of our response, we have repeated the requirement and your findings followed by our corrective action.

We believe the attached information to be responsive to the Inspector's findings. If you have any questions, please advise.

Very truly yours,


R. J. Gary

RJG:df
Attachment

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Appendix A

NOTICE OF VIOLATION

Based on results of the NRC inspection conducted during the period September 6, 7 and 10, 1979, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permits No. CPPR-126 and 127 as indicated below:

A. Personnel Not Properly Trained and Indoctrinated to Assure That Suitable Proficiency is Achieved and Maintained

Criterion II of Appendix B states in part that, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Comanche Peak Steam Electric Station Quality Assurance Plan, Section 2.0, Revision 0, dated July 1, 1978, requires training to assure that personnel achieve and maintain the proficiency and qualifications required for the quality-related activities performed.

Contrary to the above:

It appears that all the Quality Control-Electrical personnel have not received the necessary training to achieve and maintain the proficiency required for the quality-related activities performed as evidenced by the following:

The NRC Resident Reactor Inspection (RRI) observed on September 5, 1979, two Brown & Root (B&R) Quality Control-Electrical Inspectors in the act of witnessing "megger" tests of Class IE safety-related cables. During the period of observation regarding testing of five cables, the RRI noted that the B&R QC personnel did not verify the identification of the cables being tested. Rather, they relied on the testing personnel to provide the information. The RRI determined that two of the cables tested were misidentified, and this misidentification was not detected by either the testing or QC personnel.

This is an infraction.

Corrective Steps Which Have Been Taken and Results Achieved

Not required as stated in your transmittal letter of September 24, 1979.

1926 280

Corrective Steps Which Have Been or Will Be Taken to Avoid Further Noncompliance

A comprehensive evaluation of the Electrical Quality Control (QC) group was initiated in the latter part of September 1979. As a result of the review efforts, the following corrective actions have been or will be implemented:

- 1) Improvements in the site training program to include greater emphasis on inspection methods and techniques;
- 2) Reassignment of personnel based on experience levels and performance;
- 3) Revision of QC Procedures/Instructions to include maximum use of a "checklist" format and provide more definitive guidelines on inspection methods and techniques;
- 4) Additional training of inspection personnel; and
- 5) Assignment of senior personnel with substantial experience in power plant construction to the Electrical QC group.

The effectiveness of the above corrective actions will be evaluated by an indepth audit of the Electrical QC activities.

Date of Full Compliance

Preventive measures are currently in progress or completed and will be fully implemented consistent with safety-related construction activities. The indepth audit is scheduled for the latter part of December 1979.

B. Failure to Follow Inspection Procedure for Returning Inspection Stamp

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with prescribed procedures, instructions, or drawings.

Texas Utilities Generating Company Procedure CP-QP-15.1, "Inspection Stamp Control," requires, in paragraph 3.3, that inspection stamps shall be returned to the Product Assurance Supervisor upon request, termination or transfer of the individual.

Contrary to the above:

The NRC Resident Reactor Inspector (RRI) determined that the individual assigned inspection stamp number thirteen on June 16, 1978, was later transferred from the site Quality Assurance Unit to the Electrical Engineering Unit (date not established) and subsequently terminated his employment in May 1979 without having returned the stamp to the Product Assurance Supervisor.

This is a deficiency.

Corrective Steps Which Will Be Taken and Results Achieved

QA staff personnel will conduct a comprehensive review of inspection records involving inspection stamps to assure that this procedural disparity has not resulted in a product deficiency. Any problems encountered will be documented and resolved in accordance with established procedures.

Corrective Steps Which Have Been Taken to Avoid Further Noncompliance

The use of inspection stamps has been discontinued through the deletion of Procedure CP-QP-15.1, "Inspection Stamp Control" and total recall of all issued stamps.

Date of Full Compliance

Preventive measures relative to procedural matters were completed by November 16, 1979. The record review is currently in progress and should be completed by the end of January 1980.

1926 282

C. Failure to Follow Inspection Procedure to Initial and Date Operation Traveler

Criterion XVII Quality Assurance Records of Appendix B states in part, "Inspections and test records shall, as a minimum, identify the inspector"

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with prescribed procedures, instructions, or drawings.

Brown & Root Procedure CP-CPM-6.3, "Preparation, Approval and Control of Operation Travelers," in paragraph 3.7.1, states that, "Each QC Operation requires the initials and date denoting the inspection status. This shall be accomplished at the completion of each operation and prior to moving parts or assemblies to the next operation, unless otherwise noted on the Traveler."

Contrary to the above:

The NRC Resident Reactor Inspector (RRI) observed, on or about August 22, 1979, that a Class IE battery rack was complete and that measures were being taken to install the batteries. During a subsequent review of Operation Traveler EE79-036-01DD for installation of the Class IE battery rack, the RRI observed that the Traveler indicated that only four of the seven steps requiring QC verification were initialed and dated on September 5, 1979. The RRI interviewed the responsible QC inspector and established that work shown as being inspected on September 5, 1979, was actually accomplished sometime in July 1979, but that the Traveler was not available to him to initial and was perhaps lost for a period of time.

This is a deficiency.

Corrective Steps Which Have Been Taken and Results Achieved

This particular problem was noted by the Site QA Supervisor somewhat in advance of the RRI and a complete review of the implementation of the Traveler System in the Electrical area was immediately initiated. The inspector involved was also interviewed and indicated that his reason for not signing the traveler at the time of installation in July was that all of the required assembly work had not or could not be completed.

The results of the traveler implementation review indicated the apparent lack of timeliness in inspection signoff for safety-related installations was limited to the subject racks. However, the review also indicated the need for improvements in the preparation and control of individual travelers, as discussed below.

Corrective Steps Which Have Been or Will Be Taken to Avoid Further Noncompliance

Preventive measures have included the following actions:

- 1) All issued electrical travelers were reviewed by the Site Quality Engineering staff to assure that specified inspections were pertinent and required to assure the quality of the specific installation. Revisions were made, where appropriate.
- 2) The governing procedure, CP-CPM-6.3, was revised on November 5, 1979 to require travelers to be submitted to the Quality Engineering staff for review and assignment of inspection criteria prior to implementation.
- 3) A detailed surveillance program in all disciplines was initiated in September 1979 to assure effective implementation of the Traveler System. Problems noted have been and/or will be documented and resolved in accordance with Procedure CP-QP-19.2, "Site Surveillance."
- 4) Affected inspection personnel were given additional training in the latest requirements of CP-CPM-6.3 in mid-November 1979.

Date of Full Compliance

Corrective and preventive measures are currently complete. The surveillance program will be continued as required to maintain effective control of the Traveler System.

D. Failure to Follow Procedure for Verification of Performance of Automatic Welding Machines

10 CFR 50, Appendix B, Criterion V, "Inspection, Procedures and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings.

Comanche Peak Steam Electric Station Construction Procedure 35-1195-WCP-6, "Electronic Alignment, Performance Verification and Maintenance of Dimetrics Gold Track 11 Automatic Welding System," (Interim Change 1 to Revision 0) requires, in paragraph 4.2.3, that performance verification be accomplished by the QA/QC department and requires, in paragraph 4.3.2, that weld parameter monitoring be accomplished in accordance with Appendix 3 of the subject procedure.

Contrary to the above:

The NRC Resident Reactor Inspector verified through interviews with personnel who maintain the automatic welding machine, with QA/QC supervisory personnel, and by a review of pertinent records, that QA/QC has not verified the performance of the machines as required by the above procedure nor has the weld parameter monitoring been accomplished in accordance with Appendix 3 of the procedure.

This is an infraction.

Corrective Steps Which Have Been Taken and Results Achieved

As discussed by the RRI in NRC Inspection Report No. 79-18, as formally transmitted on November 9, 1979, the stated infraction is procedural in nature with no bearing on the quality of the completed installations. The automatic welding machines have in fact been maintained in good working condition, although accomplished by personnel other than those apparently formally delegated by Procedure WCP-6. For these reasons, corrective action will be limited to the preventive measures discussed below.

Corrective Steps Which Have Been or Will Be Taken to Avoid Further Noncompliance

Procedure WCP-6, Revision 0, was revised by Interim Change Notice 2. Major changes include:

- 1) Paragraph 4.2.3 now requires performance verification by Welding Engineering with the assistance of the Welding Operator(s) or Maintenance Technician(s).

- 2) Welding Operator(s) and Maintenance Technician(s) have been defined as Brown & Root employees specially trained in the Operation (Maintenance) of the Dimetrics Welding Systems.
- 3) The frequency of performance verification has been revised from a calendar to a machine (Arc) time basis.

To assure full compliance, QA staff personnel will periodically verify compliance to the established procedural requirements utilizing CPSES audit and/or surveillance procedures.

Date of Full Compliance

The subject procedure was formally revised on September 27, 1979. The procedural verification program will be implemented starting December 1979.