

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER - DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

February 19, 1980
TXX-3099

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. 50-445/80-01
50-446/80-01

COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
RESPONSE TO NRC
NOTICE OF VIOLATION
INSPECTION REPORT NO. 80-01
DOCKET NOS. 50-445 & 50-446
FILE NO. 10130

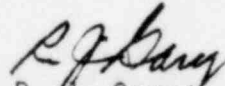
Dear Mr. Seidle:

We have reviewed the report dated January 23, 1980 on the inspection 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

Attachment
RJG:df

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APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on January 18, 1980, 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:

Failure to Provide Instructions and Procedures Appropriate to the Circumstance

10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above:

Instructions and procedures provided for securing the Class IE Battery Chargers to the building structure are inappropriate to the circumstance in that eight three-eighths inch fillet welds were required: It is impossible to achieve the required fillet weld size for four of these weld locations because the material thickness is less than .200 inches.

The documents containing instructions inappropriate to the circumstance were Design Change Authorization 3380; Power Conversion Products, Inc. Drawing D-55-1539; and "Analysis of Anchoring Method of 3SD-130-300 Battery Charger." These documents were verified by the RRI during a review on January 18, 1980.

The Resident Reactor Inspector verified by direct examination of two of the four Unit No. 1 Battery Chargers that the materials shown in the Power Conversion Products drawing referenced above was what was actually furnished and that the four welds do not conform to the required thickness for a three-eighths inch fillet weld.

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The Resident Reactor Inspector also established that the welding was accepted by site Quality Control on January 10, 1980, as documented in Inspection Report IR-E-5724 even though the welds could not be made in the manner required.

This is an infraction.

Corrective Steps Which Have Been Taken and Results Achieved

An analysis of the actual as-built configuration was performed in late January 1980 using the same rationale employed in the analysis supporting Design Change Authorization 3380. Results of these calculations indicate that the battery charger foundations, as installed, substantially exceed structural requirements and are acceptable as installed. Upon incorporation of the revised details into the formal analysis for the equipment, the entire matter will be independently reviewed by the Architect/Engineer to further assure the integrity of the equipment and validity of the qualification report.

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

Preventive measures have or will include the following actions:

1. Revision 2 to Comanche Peak Engineering Procedure CP-EP-4.6 included a requirement for A/E as well as Vendor review of site originated changes/deviations to items such as equipment foundation details prior to approval for fabrication or construction.
2. Senior Quality Assurance personnel will independently review selected installations to assure that electrical equipment mounting details satisfy basic structural requirements and that the results of the equipment qualification reports are consistent with the as-built configuration.

Quality Control actions associated with this matter were reviewed by the Site Quality Engineering group and appeared to be consistent with normal practice (i.e., fillet weld thickness is obviously limited by material thickness). Preventive action in this area will therefore stress the importance of the accuracy of equipment installation records, at both QC supervisory levels and in formal QC training sessions.

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Date of Full Compliance

Corrective actions were initiated on January 22, 1980 and are scheduled for completion by May 1, 1980. Preventive measures were initiated on January 31, 1980 through formal revision to the referenced Engineering Procedure. The planned QA reviews and QC actions are ongoing activities and as such have no finite starting or completion date.