

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

TXX-3289
March 19, 1981

Mr. G. L. Madsen, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

Docket Nos. 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC
NOTICE OF VIOLATION
INSPECTION REPORT NO. 81-02
DOCKET NOS. 50-445 & 50-446
FILE NO: 10130

Dear Mr. Madsen:

We have reviewed your letter dated February 25, 1981 on the inspection conducted by Mr. R. G. Taylor of activities authorized by NRC Construction Permit No. CPPR-126 for the Comanche Peak facility. We have responded to the finding listed in Appendix A of that letter.

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

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

Very truly yours,

R. J. Gary
R. J. Gary

RJG:1jj
Attachment

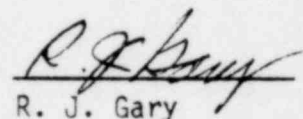
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
TEXAS UTILITIES GENERATING COMPANY) Docket Nos. 50-445
) 50-446
(Comanche Peak Steam Electric)
Station, Units 1 and 2)

AFFIDAVIT

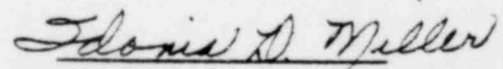
R. J. Gary being duly sworn, hereby deposes and says that he is Executive Vice President and General Manager of Texas Utilities Generating Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report 81-02; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



R. J. Gary
Executive Vice President
and General Manager

STATE OF TEXAS)
) ss
COUNTY OF DALLAS)

Subscribed and sworn to before me, a Notary Public in and for
Dallas County on this 20 day of March, 1981.


Notary Public

My commission expires December 31, 1984.

Appendix A

NOTICE OF VIOLATION

As a result of the inspection conducted on February 20, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

Failure to Follow Procedures for Piping Installation

10 CFR 50, Appendix B, Criterion V states, "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."

Piping Erection Specification 2323-MS-100, Revision 5, as modified by Design Change Authority 4184, prohibits the temporary support of piping from valves. Licensee's letter, dated May 5, 1980, in response to IE Inspection Report No. 50-445/80-11; 50-446/80-11, states in part, "The Brown and Root Procedure governing piping installation has been revised and now precludes attachment of piping systems to the associated equipment prior to positive support of the piping." Paragraph 3.17 was added to Brown and Root procedure CP-CPM-6.9E, "Pipe Fabrication and Installation," to fulfill this commitment.

Contrary to the above:

On February 20, 1981, at approximately 3:00 p.m., the NRC Resident Reactor Inspector observed that an estimated 18 feet of 16 inch, schedule 40 pipe was being supported entirely by only the welded connection to a 16 inch check valve and further that the valve and the aforementioned pipe assembly were being entirely supported for an unidentified length by the continuation of the piping run through a wall sleeve. The unsupported line was identified as line number 16-CT-1-001-151R2, the valve as 1CT-149 and the connecting continuing line as 16-CT-1-120R2; all as shown on Figure 6.2.2-1, "Flow Diagram, Containment Spray System," in the Final Safety Analysis Report.

This is a Severity Level V violation (Supplement II).

General Comments

Our investigation of the subject report indicates an interface problem among the different craft disciplines. The previous programs for ensuring pipe is adequately supported initially have proven adequate, but removal of temporary supports by other crafts appears to be the cause of the condition observed by the RRI.

Corrective Steps Which Have Been Taken and Results Achieved

The pipe found to be unsupported on February 20, 1981 has been properly supported, thus removing any further deadweight loading on the pipe or valve. CPSES engineering personnel are now evaluating the unsupported condition for any potential product problems which may exist.

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

Preventive actions have or will include the following:

1. Construction Procedure CP-CPM-6.9E has been revised to permit only rigid "hard" supports for temporary support of pipe in the event that permanent deadweight supports cannot be installed.
2. Construction Procedure CP-CPM-14.1, "Guidelines for Protection of Permanent Plant Equipment", has been drafted and prohibits the removal of temporary hangers or permanent hangers by any craft except as defined therein. After issue, all craft personnel will receive a training session on the procedure and attendance will be documented.
3. A walkdown of all plant areas is currently in progress to ensure all procedure and instruction requirements have been fully implemented. Rigid, hard supports will replace supports such as pipe stands or wooden cribbing that are easily removed.

Date of Full Compliance

Corrective actions are scheduled for completion by March 26, 1981. Preventive actions were initiated March 12, 1981. Procedure CP-CPM-14.1 will be issued, and training will be completed by March 23, 1981. Other preventive actions described in Item 3 above are scheduled for completion by April 13, 1981.