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Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Reference: CASE Questions About Reports

Dear Mr. Grimes:

CASE reviewed a portion of the NRC reports processed in 1989 and issued prior to fuel load authorization. As a result of the review, CASE has the following questions for the NRC:

In regards to Inspection Report 50-445/446-89/88-88 Dated 1/10/90 CASE has the following questions:

- a. Did TU Electric's evaluation determine whether a breakdown occurred in the vendors QA Program, thus, allowing deficient tube steel to be shipped to site?
- b. CP-89-01
Contamination problems were found inside NAMCO switches in 1989. Contaminants were also found and reported in 1979 in NRC Bulletin 79-28. Were such deficiencies in the manufacturing process and QA controls investigated at NAMCO?
- c. CP-89-20
Why were unauthorized mounting bolts installed in Limitorque actuators?
- d. Were the above deficiencies caused by a deficient TU Electric vendor surveillance program?
- e. Allegation OSP-89-A-0080
Does the NRC statement about the SAFETEAM findings, ("destroying old records " and " the bulk of the documentation has been reviewed and corrected") mean that some records may have been inappropriately destroyed but the bulk were accounted for in some way (reconstructed)?

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In regards to Inspection Report 50-445/446-89/84-84 Dated 12/21/89
CASE has the following questions:

This NRC report documents a deficiency and a violation concerning cable grips and the potential for damage to Kapton. NRC letter to CFUR dated January 30, 1990 addresses the use of Kapton, under normal and transient conditions and included a statement about the flashover incident at Comanche Peak (9/29/89) which "destroyed" several wires.

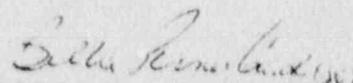
- a. Did the NRC close these issues without assuring that all possible mechanical interactions between Kapton and other items were eliminated.
- b. Did the NRC close this issue without addressing the mishandling of Kapton during installations?
- c. Accordingly, can the NRC be sure that TU Electric adequately addressed all Kapton issues?¹

In regards to Inspection Report 50-445/446-89/13-13 Dated 2/2/90 CASE has the following questions:

On page 3, 4, and 5, the NRC closed the open item on AIRCOM fasteners. CASE questions to the close are as follows:

- a. Were all samples randomly selected?
- b. Was the sample size statistically valid?
- c. Did the random sample cover all timeframes when counterfeit bolts could have been supplies?
- d. Were all bolts accessible and included the random sample?
- e. The NRC acknowledged that minor deviation from specifications occurred. What is the technical basis that they were minor?
- f. Because of the peculiar circumstances surrounding AIRCOM fasteners, how can anything less than 100% inspection/testing be justified?

We look forward to your reply. If you have any question please contact me at (414) 731-1917 or Mrs. Juanita Ellis, The President of CASE, at (214) 946-9446.


Billie P. Garde
CASE Attorney

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¹CASE understands that TU Electric originally contended that there were no problems with Kapton. Also the NRC had to exert pressure on Tu Electric to address the issue.