

NOV 26 1990

Docket Nos. 50-445  
50-446  
License Nos. NPF-87  
CPPR-127

TU Electric  
ATTN: W. J. Cahill, Jr., Executive  
Vice President, Nuclear  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

Dear Mr. Cahill:

SUBJECT: REVIEW OF ALLEGATIONS AND TECHNICAL CONCERNS

Thank you for your letter of June 22, 1990 (TXX-90187) in response to our letter dated April 10, 1990, which transmitted three allegations received by the NRC that relate to your facility. As a result of our review of your Safeteam files for two of the allegations (i.e., OSP-90-A-0015 and OSP-90-A-0021), we believe that the Safeteam review was not sufficiently comprehensive on some of the issues for us to determine that they have been appropriately resolved. Issues requiring additional information are as follows:

1. OSP-90-A-0015 (Safeteam File 12832)

- a. Issue 1: The allegor stated during late 1988 or early 1989, a welder known as "Flop" was suspected of having been involved in slug welding. A large stanchion identified as having an excessive fit-up gap was alleged to have been filled with welding rods and welded closed by Flop. Comanche Peak performed examinations on selected hangers during the spring 1989. To permit inspection of the fit-up gaps, 1 inch to 1 1/4 inch holes were bored on two sides of each hanger. The allegor is concerned that the hanger assemblies were weakened from the boring of these holes on both sides of the tube steel.

The Safeteam investigation identified that a welding problem, slugging, had been documented previously in a nonconformance report (NCR) and that engineering had evaluated the effect of holes that had been bored for inspection, with the holes either being corrected or accepted by design change. The file documentation did not show, however, the relationship of the NCR to the engineering evaluation or the allegation, or address how the NCR was evaluated and closed.

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IBarnes/cjg  
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LJCallan  
A / 20/90

D:DRP  
SJCcollins  
11/21/90

AO  
Rwise  
11/21/90

\*previously concurred

IE SA  
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RIV:C:MQPS *IB*  
IBarnes/cjg  
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LJCallan  
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SJCollins  
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- b. Issue 3: The allegor questioned the qualification of the welders that worked for Fluor-Daniels on the hanger assemblies.

The Safeteam files answered this issue with a description of the Fluor-Daniels program for qualification of welders. However, Safeteam did not apparently address whether the program was being satisfactorily implemented. Specifically, the Safeteam files did not indicate that either a record review had been performed to verify that Fluor-Daniels welders were qualified for the work performed on hanger assemblies, or that QA/QC had verified, during audits and surveillances, that welders were appropriately qualified for the timeframe in question.

2. OSP-90-A-0021 (Safeteam File 12833)

- a. Issue 2: The allegor stated that individuals hired to work as MIG welders were given stick tests, and assigned to work as MIG welders. Any welders that were tested as MIG welders were tested in strictly controlled conditions, i.e., wire speed, heat preset. What requirements exist for qualification of MIG welders working on HVAC and other systems? What certification if any is required for welders working on nonsafety-related systems? What are the qualifications of welding inspectors?

The inspectors found, with respect to the statement that MIG welders were given stick tests, that the Safeteam files answered this allegation with a description of the Fluor-Daniels program for qualification of MIG welders. As noted for Issue 3 in OSP-90-A-0015, Safeteam did not apparently address whether the program was being satisfactorily implemented.

- b. Issue 6: The allegor stated that pipe supports had been fabricated in an area that was damp or wet using damp welding rods. What are the requirements for welding area environments? Do similar requirements exist for welding rods, wire, etc?

The inspectors found that the Safeteam files answered this allegation with a description of the Fluor-Daniels program for environmental controls for welding and weld materials. Safeteam did not apparently address implementation of the program in regard to the allegation. The Safeteam file did indicate, by reference, that a previous Safeteam investigation had identified a problem with environmental controls for weld materials which had been corrected. It was not clear to the inspectors, however, that this previous investigation sufficiently addressed the scope and timeframe of the alleged problem.

We request that you review these issues and implement appropriate actions to provide for their resolution. We also request that you inform the NRC of the resolution of this matter and make records available for NRC inspection within 30 days of receipt of this letter.

Should you have any questions concerning our requests, please contact Mr. Ian Barnes at (817) 860-8176.

Sincerely,

Original Signed By:  
Thomas P. Gwynn

Samuel J. Collins, Director  
Division of Reactor Projects

cc:

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TU Electric

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Texas Radiation Control Program Director  
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