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In Reply Refer To:
Dockets: 50-445/82-25
50-446/82-13

Texas Utilities Generating Company
ATTN: R. J. Gary, Executive Vice
President & General Manager
2001 Bryan Tower
Dallas, Texas 75201

Gentlemen:

This refers to the inspection conducted by Messrs. J. T. Conway, H. W. Roberds, and R. C. Stewart of our staff during the period November 22-24, 1982, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for the Comanche Peak facility, Units 1 and 2, and to the discussion of our findings with Messrs. Vega, Boren, and other members of your staff at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspectors.

During this inspection, it was found that certain of your activities were in violation of NRC requirements. Consequently, you are required to respond to these violations, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The discoveries at the Comanche Peak facility of weld defects in components which had been previously inspected and accepted at the vendor facilities by Texas Utilities Generating Company (TUGCO) personnel raise concerns in regard to compliance of TUGCO source surveillance activities with the requirements of Criterion VII of Appendix B to 10 CFR Part 50. It is acknowledged that a recent action was initiated (Reference: R. J. Gray/G. L. Madsen letter dated December 27, 1982) to improve the effectivity of weld inspection by TUGCO source surveillance personnel; namely, the retention for training purposes of

R&CPS
JConway/dsm
2/23/83

R&CPS
IBarnes
2/24/83
IB

VPB
UPotapovs
2/24/83

RPS
TWesterman
2/25/83

RPB1
GMadsen
2/24/83

DV&TP
RBangart
2/28/83

DRR&EP/RIV
JGagliardo
2/28/83

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a consulting firm with specific expertise in the field of ASME and AWS welding requirements. This action does not in itself, however, fully resolve present NRC concerns in regard to the scope and overall effectivity of the TUGCO source surveillance program.

An NRC inspection in July 1982 of a TUGCO manufacturer (i.e., Chicago Bridge and Iron Company), revealed instances of vendor failure to adequately control inprocess fabrication activities. Examples of deficiencies noted included: failure to comply with the preheat and interpass temperature requirements of welding procedure specifications, absence of QA program provisions for assuring performance of required nondestructive examination of weld repairs, absence of required repair cavity documentation for performance of weld repairs after final assembly postweld heat treatment, improperly maintained welder qualification records, and shipment of a component containing an unresolved dimensional nonconformance. As identified in the enclosed inspection report, our review of TUGCO vendor QA records for this manufacturer showed that approximately 90 percent indicated unacceptable vendor inspection performance for the time period of 1980 through 1982. This vendor had, however, been denoted by your rating system as having an acceptable performance for 1980 and 1981.

The results of this inspection and that performed of the identified vendor bring into question whether current surveillance practices sufficiently address vendor inprocess activities, and whether the TUGCO vendor performance measurement system gives a sufficient weighting to significant identified product deficiencies and deficiencies of a recurring nature. Accordingly, you are requested to evaluate these areas of concern and, in addition to the response noted above, provide to us a description of those actions which have been or will be implemented to more effectively assess vendor performance and assure timely vendor corrective actions.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter, and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

Texas Utilities Generating
Company

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By
G. L. Madsen

G. L. Madsen, Chief
Reactor Project Branch 1

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report 50-445/82-25
50-446/82-13

cc w/encl:

Texas Utilities Generating Company
ATTN: H. C. Schmidt, Project Manager
2001 Bryan Tower
Dallas, Texas 75201

bcc to DMB (IE01)

bcc distrib. by RIV:

RPB2	Resident Inspector
TPB	Section Chief (R&CPS)
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RIV File	H. Roberds
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