

PDR-016



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 22, 1982

Mr. Bill Lodge
c/o The Dallas Morning News
Communications Center
Dallas, TX 75265

IN RESPONSE REFER
TO FOIA-82-193

Dear Mr. Lodge:

This is in further response to your letter dated April 8, 1982, in which you requested, pursuant to the Freedom of Information Act (FOIA), information concerning the Hayward Tyler Pump Company and two specific reports on Comanche Peak.

Enclosed are IE Reports 81-12 and 81-20 for Comanche Peak. Also enclosed are the documents listed on the Appendix to this letter with the following exceptions.

Document 41 contains information which is confidential business (proprietary) information. This information is being withheld from public disclosure pursuant to exemption (4) of the Freedom of Information Act (5 U.S.C. 552(b)(4)) and 10 CFR 9.5(a)(4) of the Commission's regulations. The non-exempt portions of this document are enclosed.

Document 56 contains information which constitutes advice, opinions and recommendations regarding the Commission's deliberations in this matter. Release of this document would tend to inhibit the open and frank communications between a Commissioner and his assistants, communication which is essential to the deliberative process. This document contains no reasonably segregable portions. Therefore, it is being withheld in its entirety pursuant to exemption (5) of the FOIA and 10 CFR 9.5(a)(5).

Documents 57 and 58 are investigatory records compiled for law enforcement purposes and are being withheld in their entirety pursuant to exemption (7)(A) of the FOIA and 10 CFR 9.5(a)(7)(i) because disclosure would interfere with an ongoing enforcement proceeding.

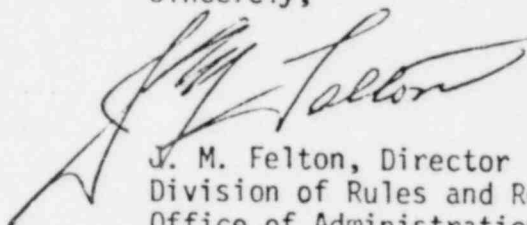
Pursuant to 10 CFR 9.9 and 9.15 of the Commission's regulations, it has been determined that the information withheld is exempt from production or disclosure, and that its production or disclosure is contrary to the public interest. The person responsible for the denial of document 41 is the undersigned. The person responsible for the denial of document 56 is Mr. Samuel J. Chilk, Secretary of the Commission. The persons responsible for the denial of documents 57 and 58 are the undersigned and Mr. Richard C. DeYoung, Director, Office of Inspection and Enforcement.

Mr. Bill Lodge

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The denials by Mr. DeYoung and myself may be appealed to the Executive Director for Operations within 30 days from the receipt of this letter. Any such appeal must be in writing, addressed to the Executive Director for Operations, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision." The denial by Mr. Chilk may be appealed within 30 days to the Commission and should be addressed to the Secretary of the Commission.

Sincerely,

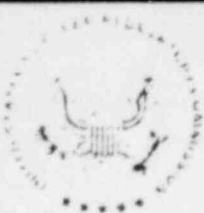
A handwritten signature in cursive script, appearing to read "J. M. Felton".

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

Appendix

41. Management Reporting Structure.
42. February 12, 1982 Letter from Lyons to Collins regarding HTPC QA improvements.
43. March 25, 1982 Letter from DeYoung to Lyons regarding HTPC field tests and inspections.
44. March 31, 1982 Letter from Kammerer to Markey regarding OIA report of investigation.
45. March 25, 1982 Memo from Kammerer to Commission regarding Markey Subcommittee hearing.
46. March 24, 1982 Memo from Kammerer to Commission regarding additional information on HTPC.
47. April 8, 1982 Memo from Kammerer to Commission regarding Markey hearing.
48. March 19, 1982 Note from Rehm to DeYoung and Collins regarding requests from Markey's office.
49. April 1, 1982 Memo from Kammerer to Commission regarding time and witness change for Markey Subcommittee hearing.
50. March 31, 1982 Memo from Kammerer to Commission regarding OIA report on HTPC.
51. April 2, 1982 Letter from Kammerer to Markey regarding transcripts of Commission meetings.
52. March 30, 1982 Memo from Dircks to Commission regarding HTPC.
53. April 6, 1982 Testimony of Dircks.
54. March 26, 1982 Note from Collins to Sniezek regarding HTPC inspection report No. 82-03.
55. March 30, 1982 Memo from Cummings to Commission regarding answers to Chairman's questions.
56. Undated, handwritten notes of Roxanne Goldsmith to Commissioner Gilinsky regarding OIA answers to questions posed by Commissioner Gilinsky.
57. April 2, 1982 Memo from Fortuna to Collins regarding review of investigation/ inspection results.
58. March 31, 1982 Note from Dromerick and Peranich to Fortuna regarding request for additional information.
59. March 30, 1982 Memorandum for William J. Dircks et al., from Samuel J. Chilk, Subject: Staff Requirements- Discussion of Pending Investigation.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

In Reply Refer To:
Dockets: 50-445/81-12
50-446/81-12

April 16, 1982

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

Gentlemen:

This refers to the investigation conducted by Messrs. D. D. Driskill and R. K. Herr of our staff during the period August 7, October 8-24, and November 23-24, 1981, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for the Comanche Peak, Units 1 and 2.

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

Within the scope of this investigation, we found no instance where you failed to meet NRC requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room. We understand that you will conduct an expedited review of this investigation and will notify us by telephone when we will be able to release this report to the NRC Public Document Room and the ASLB.

~~8205030282~~
POR/LPOR

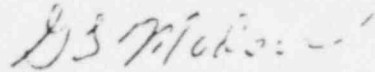
Texas Utilities Generating Company

-2-

April 16, 1982

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

Sincerely,



G. L. Madsen, Chief
Reactor Project Branch 1

Enclosure:
Appendix - NRC Investigation Report
50-446/81-12; 50-446/81-12

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

U. S. NUCLEAR REGULATORY COMMISSION

REGION IV

Investigation No. 50-445/81-12
50-446/81-12


Docket Nos. 50-445; 50-446

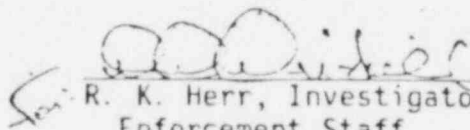
Licensee: Texas Utilities Generating Company

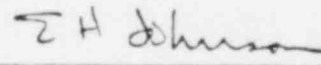
Facility: Comanche Peak, Units 1 and 2

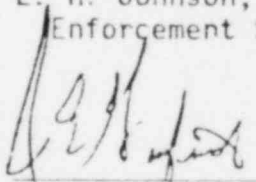
Investigation at: Glen Rose, Somervell County, Texas

Investigation conducted: August 7, October 8-24, and November 23-24, 1981

Investigators:  4-5-82
D. D. Driskill, Investigator, Investigation and Enforcement Staff Date

 4-5-82
R. K. Herr, Investigator, Investigation and Enforcement Staff Date

Reviewed by:  4/16/82
E. H. Johnson, Director, Investigation and Enforcement Staff Date

Approved by:  4/16/82
J. E. Gagliardo, Director, Division of Resident, Reactor Project and Engineering Program Date

~~8205030292~~
PAR/LPAR

Summary:

Investigation conducted on August 7, October 8-24, and November 23-24, 1981
(Report No. 50-445/81-12; 50-446/81-12)

Areas Investigated:

Individual A alleged that improper welding techniques have been utilized on some pipe supports; holes drilled in various components are illegally plugged; some hilti bolt QC inspectors do not conduct their inspections in compliance with procedures; there is a lack of control on a substance called Torque Seal (used to ensure integrity of inspected hilti bolts); and a hole in a concrete floor was not reported to QC, as required, prior to repair. This investigation involved 48 hours by two NRC investigators and one NRC inspector.

Results:

Investigation of the above identified allegations disclosed no evidence supporting the claims of Individual A. Numerous interviews of Comanche Peak Steam Electric Station (CPSES) construction personnel, Quality Control Inspectors and Craft Supervisors were conducted, in addition to inspections of areas identified by Individual A which allegedly exemplified his claims.

INTRODUCTION

Comanche Peak Steam Electric Station, Units 1 and 2, are under construction in Somervell County, Texas, near the town of Glen Rose, Texas. Texas Utilities Generating Company (TUGCO) is the construction permit holder with Brown and Root, Inc. (B&R), as the constructor and Gibbs and Hill, Inc. (G&H), as the architect/engineer.

REASON FOR INVESTIGATION

On July 21, 1981, Individual A telephonically contacted the NRC Region IV Duty Officer and alleged that defects existed in pipe welds within the CPSES Auxiliary Building. Individual A provided no additional information and agreed to be personally interviewed at a later date.

SUMMARY OF FACTS

On August 7, 1981, Individual A was interviewed regarding his concerns related to construction activities at CPSES. During this interview, Individual A identified the following matters as having potential, adverse safety significance:

1. Numerous pipe supports were fabricated utilizing weave welds which are prohibited by procedure.
2. Holes are drilled in various types of pipe supports, cable tray supports, and plates, and when, on occasion, they are found to have been drilled in the incorrect location the holes are filled, utilizing illegal plug welds.
3. There is a lack of control on a product called Torque Seal which is used on hilti bolts, once they have been inspected and torqued. This lack of control could lead to a questionable integrity of bolts which are marked with this substance.
4. Some hilti bolt QC inspectors do not properly ensure that bolts are correctly installed and torqued prior to documenting their satisfactory installation.
5. In November 1980, the removal of a hilti bolt from the floor in the Safeguards Building resulted in a cone-shaped section of concrete being removed, which extended through the floor. A general foreman and foreman had this hole repaired without properly notifying the QC Department.
6. Welders are not keeping their rod cans plugged in during the work day. (During a subsequent interview of Individual A, he withdrew this allegation, stating the problem had been corrected.)

1. Persons Contacted

Licensee Employees

- *R. G. Tolson, Site QA Supervisor, TUGCO
- *J. T. Merritt, Manager, E&C, TUCI

Other Persons Contacted

Individual A through L

*Denotes those attending exit interview.

2. Investigation of Allegation

Allegation No. 1

Numerous pipe supports were fabricated utilizing weave welds which are prohibited by procedure.

Investigative Findings

On September 8, 1981, Individual A was interviewed concerning his safety-related concerns at CPSES. Individual A stated that during his employment at CPSES he became personally aware that numerous pipe hangers were fabricated utilizing weave welds. He stated that according to his instructions weave welding was not to be used on any jobs at the site. He additionally stated that weave welding violates written procedures at the site, as he knew them. Individual A stated that numerous examples of weave welds on pipe supports could be found in the South Yard Tunnel, unless the surfaces of the welds were ground off and the welds were capped. Individual A identified three welders whom he believed would corroborate this allegation. Individual A went on to state that "literally thousands of weaved welds exist at various locations on the site." He stated that many of these have had the top surface of the weld ground off and the weld capped with the required stringer bead. Individual A identified five additional welders whom he stated were aware of this practice.

Interview of B&R Employees

On September 8, 1981, Individual B, a Brown & Root Mechanical Quality Control inspector at CPSES, was interviewed regarding the use of weave welds. Individual B stated that weave welds are used in some instances. Individual B recalled one occasion when a weave weld was noted during an inspection, but was subsequently ground out and correctly rewelded when the appropriate supervisors were notified.

On September 16, 1981, Individuals C, D, E, F, and G, all B&R structural welders at CPSES, were interviewed regarding the use of weave welds. All agreed that weave welds were not authorized for use at CPSES. Individuals C, D, and E stated that they had observed inexperienced welders use weave welds, but that these were always ground out and rewelded when identified. Individuals F and G stated they had never observed weave welds used at CPSES. None of these individuals were aware of the existence of any components containing weave welds which were not properly repaired.

Examination of South Yard Tunnel Hanger Welds

On September 10, 1981, a visual examination of the numerous pipe supports (hangers) located in the CPSES, Unit 1, South Yard Tunnel, was conducted by Mr. Robert Taylor, Resident Reactor Inspector, NRC, and reporting investigator. It was noted that all of the welds on these pipe supports were the approved stringer bead type welds and no evidence of grinding was apparent. Some welds did exhibit evidence of grinding, but had weld characteristics which made it possible to identify the type weld used as stringer beads. No evidence was found to support Individual A's contention that weave welds were used in the South Yard Tunnel.

Allegation No. 2

Holes are drilled in various types of pipe supports, cable tray supports, and plates, and when, on occasion, they are found to have been drilled in the incorrect location the holes are filled, utilizing an illegal plug weld.

Investigative Findings

On September 8, 1981, Individual A was interviewed and stated that holes are drilled in pipe supports and cable tray supports to facilitate bolting them in place. He stated that on occasions when it is determined that the hole was drilled in the incorrect location, it is filled in utilizing a plug weld. He stated that another hole is then drilled in the proper location on the component. Individual A stated he had the impression, based on comments made by various supervisors, that plug welding was not an accepted practice.

Interview of B&R Welders

On September 16, 1981, Individuals C, D, and E were interviewed regarding the use of plug welds. Each stated they had repaired holes in various components utilizing plug welds on numerous occasions in the past. Individuals F and G stated they had never been involved with plug welding, and both stated they understood that it was not an authorized practice.

Interview of B&R QC Inspectors

On September 15, 1981, Individuals H, I, and J were interviewed and stated they have observed on numerous occasions holes which were filled, utilizing the plug welding technique. Each stated a QC inspector is required to inspect the plug welding of holes (which is authorized by procedure) to determine if it is done properly and does not violate hilti bolt spacing requirements.

Allegation No. 3

There is a lack of control on a product called Torque Seal which is used on hilti bolts once they have been torqued and inspected. This lack of control could lead to the questionable integrity of bolts which are marked with this substance.

Investigative Findings

On September 8, 1981, Individual A stated he was concerned about the lack of control of the product Torque Seal, which he stated was placed on a hilti bolt after it had been torqued and verified by a QC inspector. He stated QC personnel are the only personnel onsite who are authorized to possess Torque Seal, and possession of Torque Seal by a member of craft is grounds for dismissal. He stated that he knows that Torque Seal is occasionally in the possession of craft personnel and that they use it. Individual A explained that when a hanger is installed using hilti bolts, a hilti bolt QC inspector is supposed to verify the torquing procedures. He stated this inspector will then put Torque Seal on the bolt to ensure that it is not moved. He stated that when a QC inspector does a final QC inspection, at a later date, of the hanger he/she checks to ensure that the Torque Seal has not been broken. Individual A stated he is personally aware that anchor bolts are moved and craft personnel replace the Torque Seal, therefore, the integrity of the Torque Seal is questionable. Individual A was unable to identify any personnel at CPSES who could provide additional information concerning this allegation.

Interviews of B&R Quality Control Inspector

On September 15, 1981, Individuals H, I, J, and K were interviewed regarding the misuse of Torque Seal. Individual H stated he has never observed any problem relating to the use of Torque Seal, nor has he ever observed craft

personnel in possession of the product. Individual I stated that there have been several occasions when he has found hilti bolts containing Torque Seal, however, no documentation existed relating to its receiving the required inspection. Individual I stated that on these occasions the hilti bolt was retorqued and sealed prior to the appropriate documentation being prepared. Individual J recalled two occasions when he was given tubes of Torque Seal by craft members. He stated he assumed that it had been dropped by a QC inspector and the craft member was turning it in. Individual J stated he had once heard an unsubstantiated rumor that craft personnel used Torque Seal, but he had no information which would substantiate this rumor. Individual K was aware of no misuse or impropriety concerning Torque Seal.

Interviews of B&R Welders

On September 16, 1981, Individuals C, D, E, F, and G were interviewed. Individuals C, E, F, and G stated they were not aware of any craft personnel being in possession of Torque Seal, nor had they heard rumors that craft personnel had utilized the substance. Individual G stated he has, on several occasions, observed pipe fitters with Torque Seal; however, he did not know what they had done with it. Individual G also stated that he has, on several occasions, found empty Torque Seal tubes lying on the floor at the site.

Allegation No. 4

Some hilti bolt QC inspectors do not properly ensure that bolts are correctly installed and torqued prior to documenting their satisfactory installation.

Investigative Findings

On September 8, 1981, Individual A was interviewed and stated that some hilti bolt QC inspectors do not always perform a proper inspection of hilti bolts subsequent to their installation. He stated that, in many cases, these inspectors just give the Torque Seal to the pipefitter to put on the bolt without their conducting the inspection, in the required manner. He stated their procedures require that they (the QC inspectors) visually inspect the torque wrench for proper calibration dates, and that they document the number of the wrench on their inspection reports. He stated they also must watch the torquing and verify that it is done properly. He stated they are then required to apply Torque Seal upon satisfactory completion of these steps.

Interview of B&R QC Personnel

On September 15, 1981, Individuals H, I, J, and L were interviewed regarding hilti bolt QC inspection practices. None of these QC personnel were aware of any improprieties concerning the inspection of hilti bolt installation.

Individual I specifically stated that all the QC inspectors do very good work and have no objections to climbing to difficult areas to ensure that hilti bolts are properly installed.

Interview of B&R Craft Personnel

On September 16, 1981, Individuals C, D, E, F, and G, all B&R structural welders, were interviewed. Individuals C, D, E, and G each stated that the hilti bolt QC inspection personnel generally always do a good job in their inspections of hilti bolt installation. Individuals C, D, E, and F each stated that occasionally some inspectors will not climb to a difficult area to conduct a closeup inspection, but will watch from a distance and accept the hilti bolt installer's word that the torquing was completed properly. (Each stated this happens on a very infrequent basis.) These individuals also stated that on many of these occasions an adequate inspection can be done from a distance away from the torquing operation, explaining that the clicking of the torque wrench can be heard and that the operation can be observed without the inspector "looking over your shoulder." Individual F stated he was not aware of any hilti bolt QC personnel violating the required inspection criteria.

Allegation No. 5

In November 1980, the removal of a hilti bolt from the floor at the 852 level of the Safeguards Building resulted in a cone-shaped section of concrete being removed, which, extended through the floor. A general foreman and foreman had this hole repaired without properly notifying the QC Department.

Investigative Findings

On September 8, 1981, Individual A was interviewed and stated that in about November 1980, he had been instructed to remove a hilti bolt from the floor on the 852 level, Safeguards Building. He stated that when the hilti bolt was removed, an approximately 14-inch diameter section of concrete broke loose, and was subsequently removed from the floor. He stated the hole was cone-shaped and that it extended all the way through the floor. Individual A stated he apprised his foreman regarding what had happened, and that the foreman and general foreman had later advised him to utilize glue and grout to fill in the hole and several other small holes which were in the area. Individual A stated that while in the process of grouting the hole, he had been removed from the job, and it had been covered with plywood in order that QC personnel would not see it. Individual A stated the hole was later repaired by other personnel and that the QC Department was never apprised of this incident, as required.

Examination of Identified Area

On September 10, 1981, an examination of the alleged patch in the concrete floor at the 852 area of the CPSES Safeguards Building was conducted by Mr. Robert Taylor and reporting investigator. As stated by Individual A

an area on the floor, adjacent to pipe support No. cc-1-137-700-E63R, was found to be discolored and gave the appearance of having been patched. Subsequent to this examination, Mr. Taylor examined the ceiling of the area below this alleged patch and found that no discoloration or evidence of a patch was present.

Other Investigative Aspects

On September 10, 1981, Mr. Robert Berry of B&R QC instrumentation, and formerly a concrete Quality Control Inspector, was contacted and agreed to research the CPSES records to determine, if possible, what documentation was on file concerning the alleged patch. Subsequently, Mr. Berry advised Mr. Taylor that no NCR or other documentation was on file which would confirm that the identified area was a patch. Additionally, Mr. Berry advised that he had personally conducted a test on the discolored area, which consisted of putting water on the discolored area and removing the smooth surface of the concrete. He stated this exposed aggregate (a gravel substance found in the concrete used for the original pour) would not have existed had the floor been patched with "dry pack" (the grout-like substance normally used in patching concrete which does not contain aggregate). Mr. Berry stated this finding would lead him to the conclusion that what appeared to be a patch was only an area where the original surface sheen had been "spaled off." (Investigator Note: Mr. Taylor agreed with the assumption presented by Berry based on the facts available. Further interviews regarding this matter were not possible due to the fact that all persons, identified by Individual A as having knowledge of this matter, were found to have terminated their employment with Brown and Root. Lastly, the safety-related significance of this alleged problem was nonexistent.)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

April 27, 1982

In Reply Refer To:
Dockets: 50-445/81-20
50-446/81-20

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

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the Comanche Peak Facility, Units 1 and 2, Construction Permits CPPR-126 and CPPR-127. The SALP Board met on September 1, 1981, to evaluate the performance of the subject facility for the period July 1, 1980, through June 30, 1981. The performance analyses and resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluation were discussed with you at your office in Dallas, Texas, on October 9, 1981.

The performance of your facility was evaluated in the following functional areas: Piping Systems and Supports; Safety-Related Components; Support Systems; Electrical Power Supply and Distribution; Instrumentation and Control Systems; and Licensing Activities.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. As you are aware, the NRC has changed the policy for the conduct of the SALP program based on our experiences and the recently implemented reorganization which emphasizes the regionalization of the NRC staff. This report is the product of the revised policy.

On April 1, 1982, you were requested to provide comments concerning our evaluation of your facility. In that 20 days have passed, and no comments have been received, the SALP Board Report is being issued as an NRC Report.

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PDA/LPOR

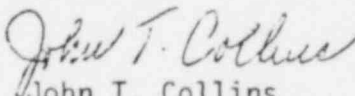
Texas Utilities Generating Company

-2-

April 27, 1982

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

Sincerely,


John T. Collins
Regional Administrator

Enclosure:

Appendix - NRC Report 50-445/81-20
50-446/81-20

cc:

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

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Report: 50-445/81-20
50-446/81-20

Dockets: 50-445 & 50-446

Category A2

Licensee: Texas Utilities Generating Company
2001 Bryan Tower
Dallas, Texas 75201

Facility Name: Comanche Peak, Units 1 and 2

Appraisal Period: July 1, 1980, to June 30, 1981

Appraisal Completion Date: September 1, 1981

Licensee Meeting: October 9, 1981

SALP Board:

- G. L. Madsen, Chief, Reactor Project Branch 1
- W. A. Crossman, Chief, Reactor Project Section B
- S. B. Burwell, NRR Project Manager
- R. G. Taylor, Senior Resident Inspector
- R. C. Stewart, Reactor Inspector

Reviewed By:

W. A. Crossman
W. A. Crossman, Chief, Reactor Project Section B

3/29/82
Date

Approved By:

G. L. Madsen
G. L. Madsen, Chief, Reactor Project Branch 1
(SALP Board Chairman)

3/29/82
Date

I. Introduction

Systematic Assessment of Licensee Performance (SALP) is an integrated NRC staff effort to collect available observations and data on an annual basis and evaluate licensee performance utilizing these data and observations as a basis. The integrated systematic assessment is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources and to provide meaningful guidance to licensee management.

II. Criteria

The assessment of licensee performance is implemented through the use of seven evaluation criteria. These criteria are applied to each functional area that is applicable to the facility activities (construction, pre-operation or operation) for the categorization of licensee performance in these areas.

One or more of the following evaluation criteria are used to assess each applicable functional area.

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

Attributes associated with the above evaluation criteria form the guidance for the SALP Board for categorization of each functional area in one of three categories. Performance categories are defined as follows:

Category 1. A combination of attributes which demonstrates achievement of superior safety performance; i.e., licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved. Reduced NRC attention may be appropriate.

Category 2. A combination of attributes which demonstrates achievement of satisfactory safety performance; licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved. NRC attention should be maintained at normal levels.

Category 3. A combination of attributes which demonstrates achievement of only minimally satisfactory safety performance; licensee management attention or involvement is acceptable and considers nuclear safety, but

weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved. Both NRC and licensee attention should be increased.

III. Summary of Results

<u>Functional Areas</u>	<u>Category</u>
1. Soils and Foundations	NA
2. Containment and other Safety-Related Structures	NA
3. Piping Systems and Supports	1
4. Safety-Related Components	1
5. Support Systems	2
6. Electrical Power Supply and Distribution	1
7. Instrumentation and Control Systems	1
8. Licensing Activities	2

IV. Performance Analyses

The SALP Board obtained assessment data applicable to the appraisal period of July 1, 1980, to June 30, 1981. The data for the Comanche Peak Steam Electric Station (CPSES) was tabulated and analyzed and a performance analysis was developed for each of six functional areas.

The SALP Board met on September 1, 1981, to review the performance analyses and supporting data and develop the SALP Board Report.

Functional Area Analysis

1. Soils and Foundations

All activities completed.

2. Containment and Other Safety-Related Structures

Very limited activities during assessment period.

3. Piping Systems and Supports

Three violations issued to the licensee in the review period were concerned with malfunction in this general area. Two of three involved vendor furnished support/restraint components. The first

was based on an allegation to the effect that a group of moment restraints could not have been properly examined in the vendor's facility by the vendor. Our examination at the site substantiated the allegation and the components were sent back to the vendor for rework and reinspection.

The second was by the same vendor regarding a group of seismic restraints that did not receive full penetration welding as specified. These components were reworked onsite by the vendor to satisfy the engineering criteria. Both instances, which occurred within an approximate 2-month period, indicated problems in the vendor component inspection program which have been rectified.

The third item involved a finding that due to the removal of temporary supports, certain piping and in-line components were in effect unsupported. The licensee responded to the noncompliance by installing so called 'hard supports' of a temporary nature until such time as the permanent supports are installed. Hard supports are supports that are difficult to remove inadvertently by being bolted to the building, the pipe, or both.

The licensee/contractor ASME Code based installation and quality control program is relatively simple, straightforward and is generally well implemented. The major weakness has been, and to a degree continues to be, an inability to hire/or retain the services of competent (as distinguished from Code qualification) pipe welders.

The licensee has responded to this problem by radiographing certain welds in some essential piping systems that he is not required to radiograph under the Code or NRC regulations. He also has a relatively strong welder training program aimed at improving the competence of the welders he hires.

The licensee's management controls have been demonstrated to be effective in this area and are assigned to Category 1.

4. Safety-Related Components, including Vessels, Internals, and Pumps

During the appraisal period, the major activity in this area was the maintenance and preservation of installed, nonoperational components. Limited work was also accomplished on the Unit 1 Reactor Vessel Internals. The maintenance and preservation activities in all areas have been diligently pursued by a group of construction and quality personnel specifically assigned to the activity controlled by central dispatchers and easy-to-follow procedures. NRC inspections in this area have revealed no substantive problems. No NRC inspections were made of installation work on the vessel internals during the period due to the limited work involved.

The licensee's management controls have been demonstrated to be effective in this area and are assigned to the Category 1 level.

5. Support Systems including HVAC, Radwaste and Fire Protection

The licensee's application of support systems, other than those involving concrete or piping systems (areas 2 and 3 above), are essentially limited to HVAC, radwaste, and the fire protection system. During the appraisal period, NRC inspections were directed toward review of the licensee's audit program for monitoring the subcontractors installing HVAC and fire protection systems. The subcontractor programs had been evaluated in an early appraisal period and found adequate for the work involved. The licensee's audit program was also found to be effective in monitoring these activities. Supports for the radwaste piping system are included with the licensee's Class 5 support program which has been evaluated as it relates to other Class efforts and found to be effective.

The licensee's management controls in this area are considered to be at the Category 2 level.

6. Electrical Power Supply and Distribution

The NRC inspections in this functional area have not identified any substantive problems. The licensee procedures for installation and quality control are relatively simple and straightforward. The licensee currently has a competent force of adequately trained and motivated personnel to carry out the procedural requirements.

Performance analysis in this area is determined to be Category 1.

7. Instrumentation and Control Systems

Although much effort has been expended in this area by the licensee's labor force, relatively few instruments are fully installed. The licensee's program for installation and quality control in this area is simple, straightforward, and effective. The assigned personnel appear to have been adequately trained and competent to carry out their assigned responsibilities. NRC inspections have not identified any substantive problems in this functional area during the appraisal period.

Assessment of the licensee's attributes in this area revealed a Category 1 level.

8. Licensing Activities

The applicant's ability to respond on schedule is slower than average. In the work leading to the issuance of the SER, the applicant was not able to perform at a rate necessary to meet schedule demands. (Granted, these schedule demands were heavy due to the shortened schedule.) In overall quality of work submitted, the applicant has performed slightly better than average over this appraisal period. The applicant is well supported by

Westinghouse and Gibbs & Hill. The principal need for improvement is in an increased participation in the licensing process by the station operations staff. We expect this to improve as the station approaches fuel loading.

Application of evaluation criteria in this area resulted in a Category 2 level.

Conclusion

The SALP Board concluded that the licensee has demonstrated an overall combination of attributes exhibiting Category 1 performance during the appraisal period. This evaluation was based upon the three primary areas where the construction efforts, and, therefore, the NRC inspection effort, were directed; i.e., piping, electrical, and instrumentation installations. The Board noted that 1069 of the 1699 inspection-hours were devoted to these three basic areas.

In regard to the licensee's ongoing interactions with NRR, the consensus of the Board was that the licensee has managed these activities in a Category 2 mode.

Board Recommendations

Although the SALP Board concluded that the overall licensee performance was Category 1, they did not recommend to the regional office that the inspection level for construction be changed. Programmatic changes for construction inspection have been made that will effectively reduce inspection activities for all construction sites.

V. Supporting Data and Summaries

1. Report Data

a. LER Numbers Reviewed

(Not applicable)

b. Construction Deficiency Reports

The licensee formally reported seven Significant Construction Deficiencies that he or his agents had identified during the appraisal period. These are summarized as follows:

- (1) Engineering failure to consider the thickness of architectural concrete on floors when specifying the embedment depth of anchor bolts.

- (2) Vendor error in not furnishing supports for piping and components on the Emergency Diesel Generator packages in accordance with the ASME Code.
- (3) Concrete anchor bolts being shortened by the craft labor force prior to installation.
- (4) Vendor identified problem with the closing time of certain motor operated valves when working against design pressure (Part 21).
- (5) Engineer failure to provide adequate air conditioning to rooms housing the vital AC power supply inverters (Part 21).
- (6) Failure of HVAC supplier engineer to stipulate embedment lengths of concrete anchor bolts used on supports for ducts and other components.
- (7) Failure of subcontracted engineer to consider SSE loads in design of instrument tubing support devices.

c. Part 21 Reports

The licensee did not file any Part 21 reports himself, but rather filed certain 50.55(e) reports in response to vendor Part 21 reports as noted above.

2. Licensee Activities

There were no especially significant licensee events during the appraisal period from a regulatory standpoint. Most construction work proceeded on a routine basis during the period.

3. Inspection Activities

There were no special team inspections performed during the appraisal period. Region IV performed 12 routine inspections related to implementation of the "B" level inspection program involving 498 inspector-hours. The Senior Resident Inspector expended an additional 963 inspector-hours over the period performing the "C" program. An additional 238 hours were expended performing the investigations noted below.

4. Investigations and Allegations Review

Three separate investigations were performed during the appraisal period, each based on allegations received by Region IV personnel. These are summarized below:

- a. Allegation that anchor bolts pull out of the wall; that there are hollows in certain concrete walls; and that a motor control center was not properly grounded. The investigation could not establish that anchor bolts pulled out after being tightened to specified values but frequently did during the tightening process, which was expected. The walls with hollow sounds based on tapping were located and excavated with no anomalies being identified by the SRI who observed most of the excavation process. No explanation was developed by the licensee or the SRI for the occurrence. The proper grounding of the motor control center was verified to have occurred as a part of the normal process of energizing the unit. The allegations were thus partially substantiated but proved to have no technical merit from a safety standpoint.
- b. An investigation was conducted regarding an allegation made by a licensee/contractor employee who was engaged in vendor inspections and audits that the licensee was knowingly allowing the shipment of vendor components identified as being of sub-standard quality. The investigation revealed that the components were in fact substandard and were the subject of a Notice of Violation which was discussed in IV.3 above. The balance of the allegation was not substantiated, partly because the allogger himself maintained a low profile and used an improper document to identify the original quality problem so that the licensee/contractor quality managers were apparently unaware of the substandard condition.
- c. An investigation was made regarding an allegation that the electrical QC section was supervised by personnel overly sympathetic to construction problems; were not conducting required inspections; and were using many unqualified personnel when performing other inspections. The allegation also inferred that construction welding engineering was deliberately impeding the orderly review of documentation packages for safety class pipe hangers. Based on an extensive number of interviews, reviews of records, and observations, the investigation concluded that the allegations were essentially without merit.

5. Escalated Enforcement Action

None

6. Management Conference Held During Appraisal Period

No management conferences were held with the licensee during the period, except as required by the SALP Program.

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