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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445 and
COMPANY, <u>et al.</u>)	50-446
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

AFFIDAVIT OF DAVID H. WADE
 REGARDING (1) MIDLAND-ROSS SUPERSTRUT
 MATERIAL (BOARD NOTIFICATIONS 83-02 and 83-14),
 AND (2) WELDS IN MAIN CONTROL PANELS
(BOARD NOTIFICATIONS 82-90, 90A AND 116)

I, David H. Wade, being first duly sworn, do depose and state as follows: I am employed by Texas Utilities Services, Inc. as Senior Licensing Engineer, Comanche Peak Steam Electric Station ("CPSES") Project. In this position I am responsible for evaluation and resolution of licensing issues. As such, I am familiar with Applicants' commitments and program to assure the quality of conduit and instrumentation support materials supplied by Midland-Ross Corporation. I am also responsible for coordinating activities to address the welding matters in the Main Control Panels at Comanche Peak identified in IE Information Notice 82-34. A statement of my professional qualifications is attached hereto.

I. Midland-Ross Superstrut Material

This portion of my affidavit addresses Applicants' commitments and program to assure qualification of conduit and instrumentation support materials supplied by Midland-Ross Corporation. This matter was the subject of Board Notifications 83-02 (January 7, 1983) and 83-14 (February 18, 1983) concerning apparent deficiencies in Midland-Ross "Superstrut" materials (fittings, brackets and channels) supplied to nuclear facilities for use in conduit and instrumentation supports. This concern was identified as a result of an NRC inspection of the Midland-Ross Superstrut manufacturing facility in Oakland, California during the period December 6-8, 1982.

Applicants purchased some Midland-Ross Superstrut material for use at CPSES in conduit and instrumentation supports. At the time Applicants purchased that material they were aware that the material was not qualified as Q-material (i.e., not subject to a qualified 10 C.F.R. Part 50, Appendix B QA program) and thus would require additional measures to verify the quality of the material for safety-related applications. Accordingly, Applicants determined that appropriate confirmatory sampling and testing should be performed on the material before its quality could be verified. Applicants' commitment to perform such sampling and testing is set forth in the FSAR at Table 17A-1 (Sheets 33 of 48 and 48 of 48, n.49) (Applicants' Exhibit 3).

In accordance with these Board Notifications Applicants are developing test procedures and instructions for the sampling and testing of Midland-Ross Superstrut material. These tests are intended to determine appropriate material physical properties in accordance with applicable material specifications. If any material is found to be in noncompliance with these specifications its use will be evaluated by engineering personnel and appropriately dispositioned. The confirmatory sampling and testing program and results will be available for NRC evaluation.

II. Welds in Main Control Panels

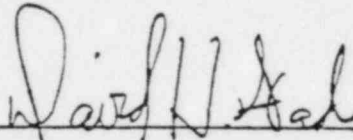
In August, 1982, IE Information Notice 82-34 was issued as early notification of a potentially significant problem pertaining to welds in main control panels supplied by Reliance Electric of Stone Mountain, Georgia. As a result of this notice, an inspection of Control Panels at Comanche Peak was conducted during the week of September 6, 1982. The inspections confirmed that, in fact, welds did not comply with AWS D1.1-79 requirements and Non-Conformance Report NCR-M-82-01380S was issued on September 14, 1982. The vast majority of the noted deficiencies was structurally insignificant. The end result of our review was that the potential problem did not represent a significant deficiency and was not reportable under the provisions of 10 C.F.R. § 50.55e. The NRC, however, did not close the issue for CPSES and it remained an unresolved item in NRC Inspection Report 82-19.

Due to the advanced stage of construction, it was virtually impossible to map the main panel's welds. Likewise it was not practical to proceed with weld repairs. As a result an alternative approach to test the structural integrity of the panel was pursued.

Since the Unit 2 Hot Shutdown Panel (HSP) was under fabrication at Reliance Electric, an effort was undertaken to demonstrate structural similarity between the HSP and main control panels. Reliance Electric and Gibbs & Hill confirmed that the HSP, by virtue of its geometry, would be subjected to equal or higher stresses during a seismic event than the main control panels, and that subjecting the HSP to a shaker table test would demonstrate the structural integrity of the main control panels.

Inspectors representing the NRC, TUGCO QA, Gibbs & Hill and Reliance Electric reviewed welding on the main control boards and HSP to determine that the frequency and severity of the welding anomalies in the HSP were, in fact, representative of the main control boards. Having established both structural similarity and weld similarity, a shaker test was scheduled at Wyle Labs in Huntsville, Alabama. A test plan was developed and submitted to Gibbs & Hill for review and approval and was submitted to the NRC Staff for their review.

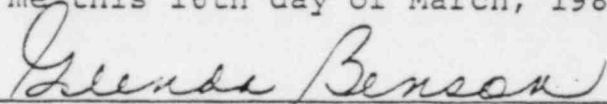
The shaker test was conducted on February 9 and 10, 1983, and was witnessed by representatives of Gibbs & Hill, Reliance Electric and Texas Utilities. Following the tests, the welds were examined and no evidence of weld failure was observed. A complete test report is due from Reliance Electric by the end of March, 1983 that will demonstrate the structural integrity of welding performed by Reliance.



David H. Wade

County of Dallas)
State of Texas)

Subscribed and sworn to before me this 16th day of March, 1983.



Notary Public

GLEND A BENSON, Notary Public
in and for Dallas County, Texas

My Commission Expires 2/17/85

DAVID H. WADE

STATEMENT OF EDUCATIONAL
AND PROFESSIONAL QUALIFICATIONS

POSITION: Senior Licensing Engineer

FORMAL EDUCATION: 1971, BS Mechanical Engineering,
University of Texas, Arlington

REGISTRATION: Professional Engineer, State of Texas
#47622

EXPERIENCE:

1982 - Present Texas Utilities Services Inc. as
Senior Licensing Engineer

1981 - 1982 Texas Utilities Services Inc. as Pro-
ject Mechanical Engineering Depart-
ment Head. Supervised Comanche Peak
Mechanical Engineering efforts.

1980 - 1981 Texas Utilities Services Inc. as Area
Supervisor. Supervised Mechanical
Field Engineering Activities at
Comanche Peak.

1978 - 1980 Texas Utilities Services Inc. as
Design Engineering Supervisor for
the Field Support Design Group at
Comanche Peak. Responsible for
resolutions of field interference
problems.

1975 - 1978 Texas Utilities Services Inc. as Com-
anche Peak Mechanical Engineer. Respon-
sible for specification and procurement
of piping, valves, supports and in-line
components.

1973 - 1975 Dallas Power and Light Company as
Associate Engineer in the Engineering
Dept. Responsible for design and
engineering of power plant systems
and modifications to existing facilities.

1972 - 1973 Dallas Power and Light Company as Junior
Engineer in the Plant Dept. Responsible
for plant start-up, testing, maintenance
and technical assistance to operations.

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SEARCH

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TEXAS UTILITIES GENERATING) Docket Nos. 50-445 and
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(Comanche Peak Steam Electric) (Application for
Station, Units 1 and 2)) Operating Licenses)

CERTIFICATE OF SERVICE

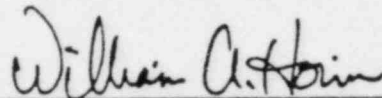
I hereby certify that copies of the foregoing "Applicants' Assessment of Relevance and Significance of Board Notifications," in the above-captioned matter were served upon the following persons by hand delivery (*), express delivery (**), or by deposit in the United States mail, first class postage prepaid; this 18th day of March 1983:

- | | |
|---|---|
| * Marshall E. Miller, Esq.
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Washington, D.C. 20555 | Chairman, Atomic Safety and
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