

MAR 30 1983

Docket Nos.: 50-445
and 50-446

MEMORANDUM FOR: The Atomic Safety & Licensing Board for:
Comanche Peak Steam Electric Station, Units 1 and 2

FROM: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

SUBJECT: INFORMATION FROM CONSTRUCTION APPRAISAL TEAM (CAT)
INSPECTION OF COMANCHE PEAK, UNITS 1 AND 2 (BN 83-29A)

By Board Notice BN 83-29 dated March 2, 1983, we informed you of our preliminary findings of a Construction Appraisal Team (CAT) inspection at Comanche Peak, Units 1 and 2. The enclosed meeting summaries related to the applicant's design and construction activities at Comanche Peak are forwarded for your information.

pl

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

Enclosures:

- Summary of Meeting on Comanche Peak
IDVP-December 16, 1982
- Summary of Meeting on Comanche Peak
IDVP-March 10, 1982
- Texas Utilities Services, Inc., Office
Memorandum, dated March 11, 1983

cc: The Atomic Safety & Licensing
Appeal Board

Contact:
S. B. Burwell, ONRR
ext.: 27563

B304110007 B30330
PDR ADOCK 05000445
PDR

*SEE PREVIOUS ORC FOR CONCURRENCES.

OFFICE	DL:LB#1	DL:LB#1	DELD*	DL:AD/L	DL:DIR		
SURNAME	SBurwell/1g	JYoung/loed	STreby	TNovak	DEisenhut		
DATE	03/30/83	03/27/83	03/27/83	03/30/83	03/27/83		



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

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and 50-446

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~~The staff's position with regard to the need for an IDVP was modified during the meeting on March 10, 1983, as a result of the CAT inspection (BN 83-29). The NRC staff will provide additional information to the Board and address the CAT inspection as these matters are resolved.~~

In a related matter, the staff discussed the March 10, 1983 Comanche Peak meeting and our views relative to the CAT inspection and a need for of an IDVP at Comanche Peak during a public Commission meeting on the staff's use of an independent design verification program held on March 14, 1983.

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

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2. Summary of Meeting on Comanche Peak IDVP-March 10, 1982
3. *Texas Utilities Services, Inc, Office Memorandum, dated March 11, 1983*

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cc: The Atomic Safety & Licensing
Appeal Board

Contact:

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SURNAME	Ext.: 27503		SBurwell/lq	JYoungblood	STreby	TNovak	DEisenhut
DATE			03/30/83	03/30/83	03/29/83	03/29/83	03/29/83

no board objection

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DISTRIBUTION LIST FOR BOARD NOTIFICATION

Comanche Peak Units 1&2
Docket Nos. 50-445/446

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Mr. R. J. Gary
Dr. W. Reed Johnson
Dr. Walter H. Jordan
Dr. Kenneth A. McCollom
Marshall E. Miller, Esq.
Lucinda Minton, Esq.
Thomas S. Moore, Esq.
David J. Preister, Esq.
Nicholas S. Reynolds, Esq.
Alan S. Rosenthal, Esq.
Mr. Lanny Alan Sinkin
Mr. Robert G. Taylor

Atomic Safety and Licensing
Board Panel
Atomic Safety and Licensing
Appeal Panel
Docketing and Service Section
Document Management Branch

ACRS Members

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Mr. Myer Bender
Dr. Max W. Carbon
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Mr. Harold Etherington
Dr. William Kerr
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Mr. William M. Mathis
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Mr. Jeremiah J. Ray
Dr. Paul C. Shewmon
Dr. Chester P. Siess
Mr. David A. Ward



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

MAR 29 1983

Docket Nos.: 50-445
and 50-446

APPLICANT: Texas Utilities Generating Company
FACILITY: Comanche Peak Steam Electric Station, Units 1 and 2
SUBJECT: SUMMARY OF MEETING ON COMANCHE PEAK INDEPENDENT DESIGN VERIFICATION PROGRAM

Summary

On Thursday afternoon, December 16, 1982, a meeting was held at NRC Headquarters, 7920 Norfolk Avenue, Bethesda, Maryland. The purpose of the meeting was to discuss the applicant's plans for an independent design verification program (IDVP). The applicant made a series of presentations on 1) the commitment and involvement of Texas Utilities management in the Comanche Peak project, 2) the project organization, 3) the FSAR Certification Program, 4) the INPO Construction Evaluation Program, 5) the programs responding to IE Bulletin 79-14, plant damage studies and walkdown verification process, 6) the QA organization and its history, and 7) the QA verification of system compliance. The applicant ended the presentation with a statement that he believes the above programs represent and are responsive to the staff's objectives for an IDVP; i.e. the applicant does not believe the staff should require an IDVP in the case of Comanche Peak.

The staff advised the applicant we will consider the information presented and advise him of our conclusions after we have an opportunity to meet internally on this matter.

A list of attendees is given in Enclosure 1.

Meeting Details

The meeting opened with introductions and a short statement on the scope of the meeting by Mr. Schmidt. Mr. Schmidt also gave a brief description of the Texas Utilities organization using Slide 1. The slides used by the applicant are given in Enclosure 2.

Mr. Clements described the commitments and involvement of Texas Utilities' management in the Comanche Peak plant. Mr. Clements noted that the top management of Texas Utilities Generating Company (TUGCO) and Texas Utilities Services Inc. (TUSI) meets every Monday morning to review the Comanche Peak project. Every two

~~834107034~~
PDR

MAR 29 1983

months, the top management of Westinghouse, Brown & Root, and Gibbs & Hill are briefed on the project. Mr. George, Vice President and Project General Manager moved to the site in 1977 to provide first hand management control. Priorities in the design and construction of Comanche Peak are listed on Slide 2.

Mr. George described his organization for the engineering and construction of Comanche Peak, Slide 3. Mr. George emphasized that direct involvement of the applicant in the engineering and construction is the only way to assure a quality job. All blocks in the organization are managed by TUSI personnel. They all embrace QA/QC. Mr. George also described the design and overall verification processes outlined in Slides 4, 5, 6 and 7. Mr. George also reviewed their commitment to quality engineering and construction, Slide 8.

Mr. George then described the applicant's FSAR Certification Program, Slides 9, 10, 11 and 12. This program was initiated in late 1980 as an independent management tool to provide an additional level of confidence that Comanche Peak is designed, built and operated as described in the FSAR. This organization consists of up to 15 to 20 people, lead by a Texas Utilities manager, but staffed by engineers independent from the normal design staff. This group provides a check on all activities at the plant. The status of this group's review is summarized on Slide 12. It's work is not completed, but will be auditable as the plant approaches completion.

Mr. George described the INPO Construction Evaluation Program, Slides 13 and 14. Mr. George hired a team of Sargent & Lundy engineers, people with years of experience to conduct an evaluation of engineering, construction and project support activities. This program is an effort by the applicant to conduct a self-evaluation by an outside team of consultants.

Mr. George discussed briefly the applicants programs for responding to IE Bulletin 79-14, Slide 15. The verification processes for the plant damage studies, Slides 16 and 17, and the completions walkdown verification process was also briefly discussed, Slide 18.

The total list of verification actions taken by the applicant and the staff are tallied on Slides 19 and 20.

Mr. Chapman, Manager of Quality Assurance, reviewed the QA organization at Comanche Peak and the history of TUGCO involvement in QA using Slides 21, 22 and 23.

Mr. Vega described the applicant's early involvement in and commitments to QA by reviewing a booklet of audit extracts starting in January 1974 and extending to December 1978. This booklet is available for inspection in the project managers files. The scope of this discussion is outlined on the top of Slide 24.

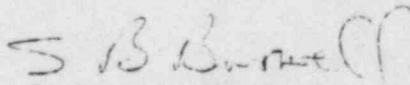
MAR 29 1983

Mr. Vega then discussed the FSAR System Compliance Verification Program using selected pages from TUGCO Procedure Number DQP-CS-9. This document establishes the method by which TUGCO Quality Assurance Services Engineering Staff will conduct the FSAR System Compliance Verification Program. Mr. Vega used sheets related to the service water system as a discussion sample. The applicant offered to meet further with the staff on this program. The selected sheets of DQP-CS-9 are available for inspection in the project managers files. The scope of these sheets are also outlined on Slide 24.

Mr. Clements summarized the applicants presentation by stating that they believe they have performed a series of programs on their own initiative that are equivalent to an IDVP and that the applicant is confident that Comanche Peak will be in conformance with the application and the regulations.

Mrs. Kathleen A. Welch, representing CASE, made a short statement and provided a copy of a prepared statement which is included as Enclosure 3.

At the closure of the meeting, the staff thanked the applicant for his presentation and advised that we will inform them whether we think an additional IDVP effort will be required after we have an opportunity to meet internally on the information presented.


S. B. Burwell, Project Manager
Licensing Branch No. 1
Division of Licensing

Enclosures:
As stated

cc w/encls.: See next page

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611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

ENCLOSURE 1

MEETING ATTENDANCE

MEETING ON COMANCHE PEAK INDEPENDENT
DESIGN VERIFICATION PROGRAM

December 16, 1982

NRC Staff

S. B. Burwell
E. L. Doolittle
S. Black
H. R. Denton
J. E. Gagliardo
T. M. Novak
B. J. Youngblood
D. G. Eisenhut
J. F. Scinto

Texas Utilities

J. B. George
B. R. Clements
D. N. Chapman
T. Vega

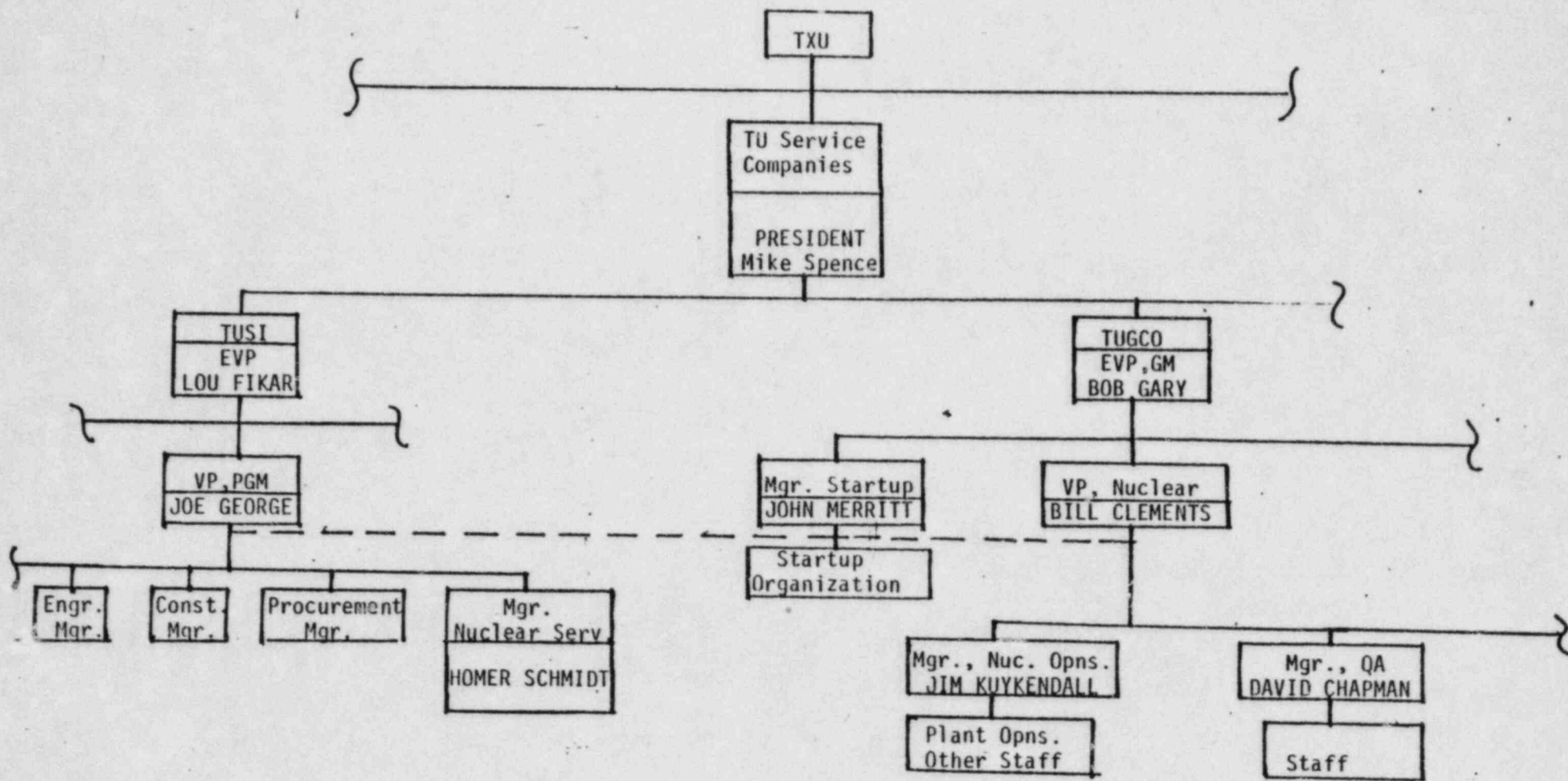
CASE

K. A. Welch

ENCLOSURE 2

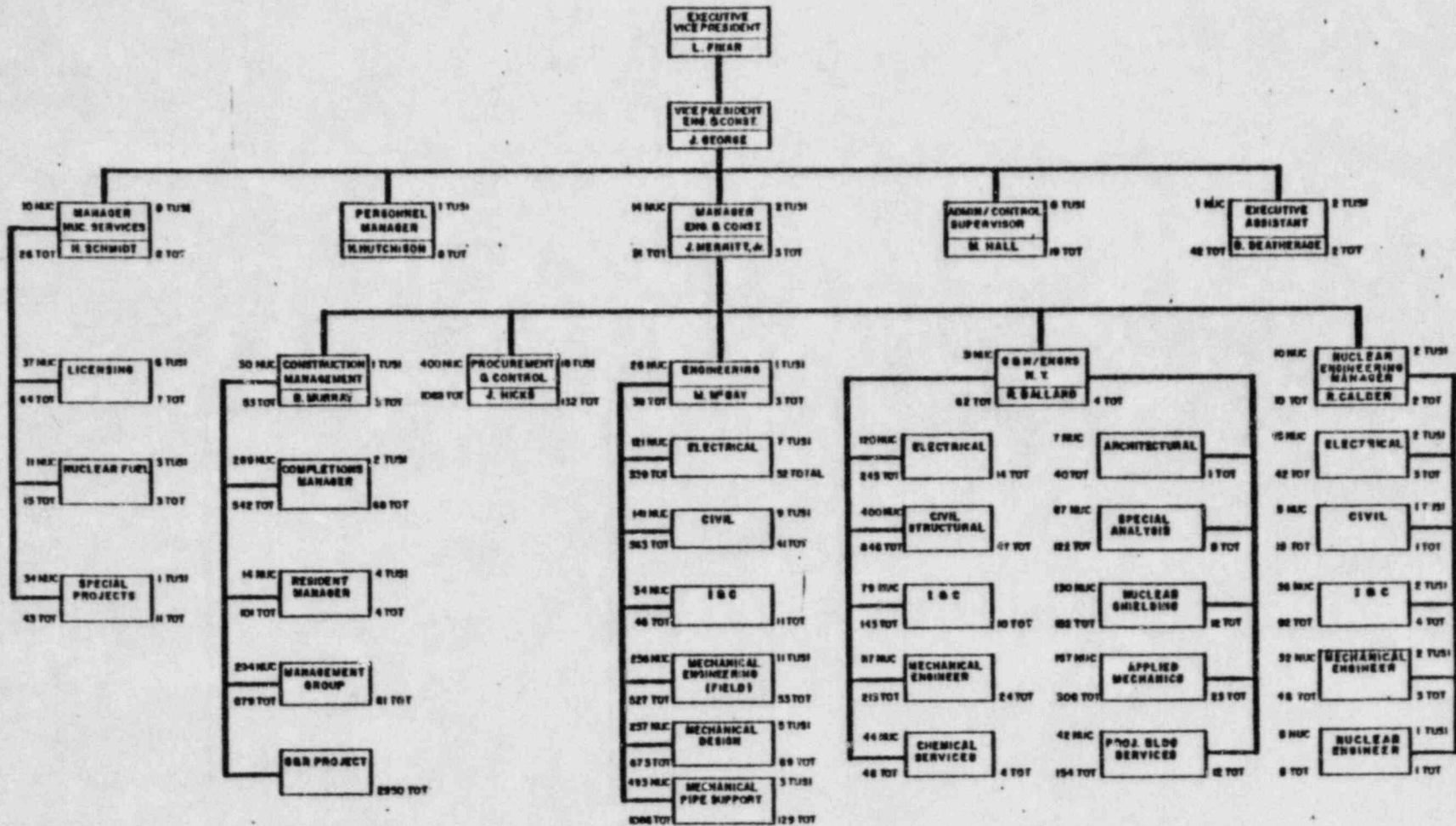
SLIDES USED BY TEXAS UTILITIES
TO DESCRIBE PROGRAMS CONDUCTED
AT COMANCHE PEAK STATION

Slides 1 through 24



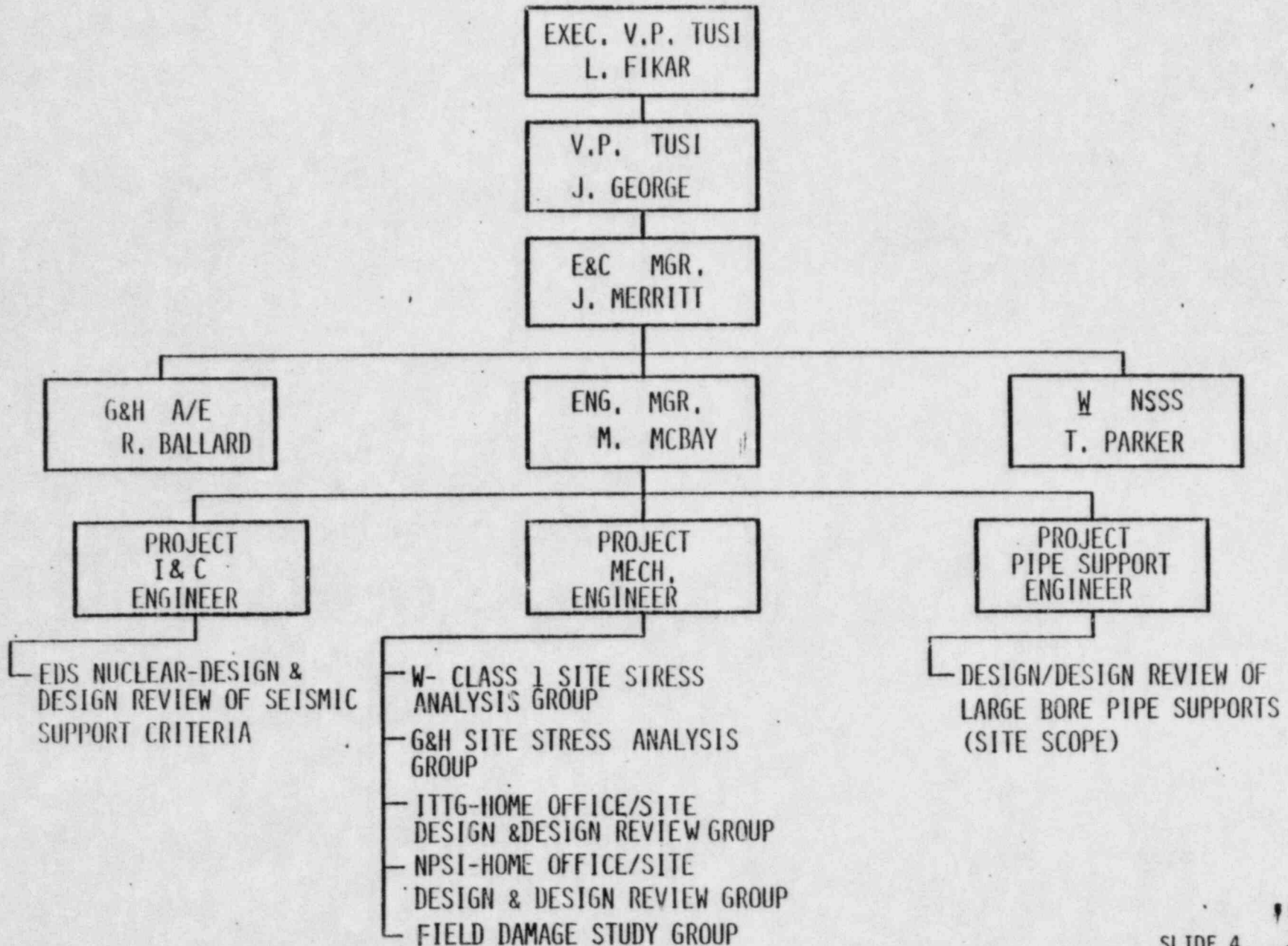
CPSES PRIORITIES

1. SAFETY & QUALITY
2. SCHEDULE
3. COST

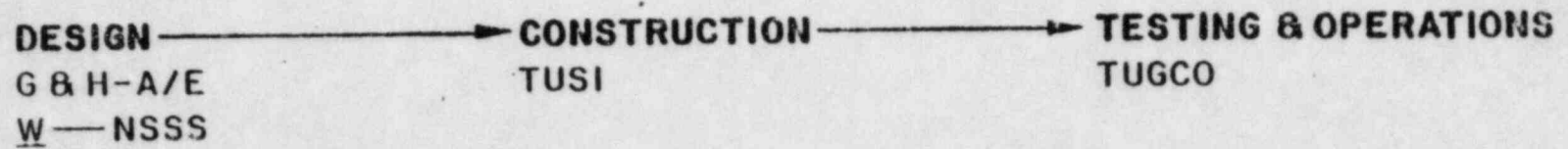


CPSES INTEGRATED ORGANIZATION CHART

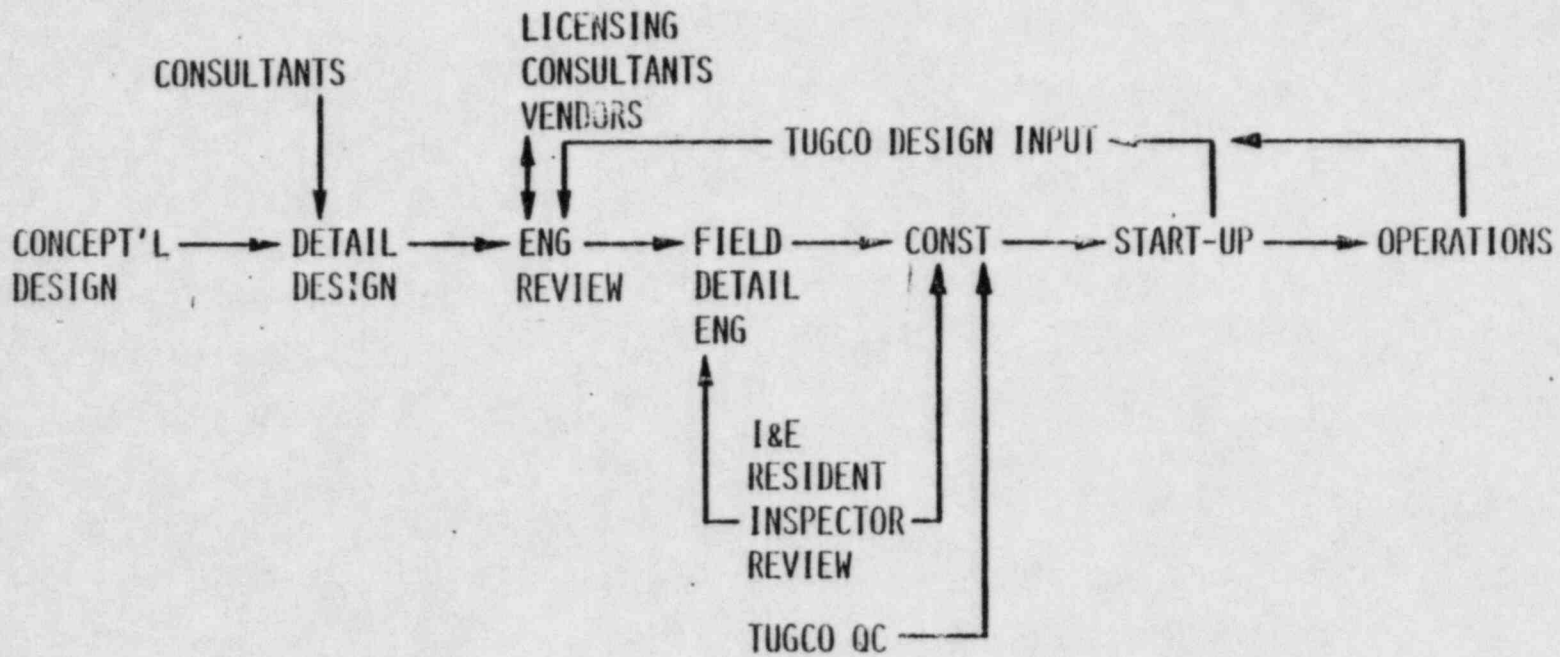
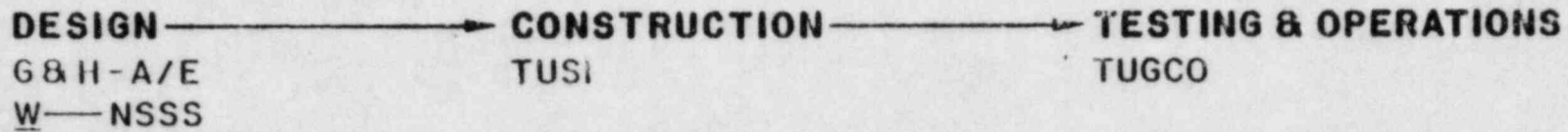
SPECIFIC DESIGN/DESIGN REVIEW GROUPS



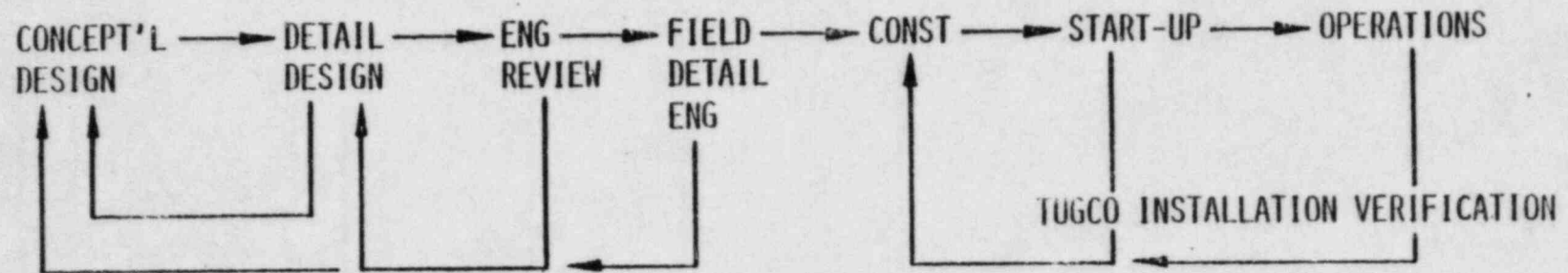
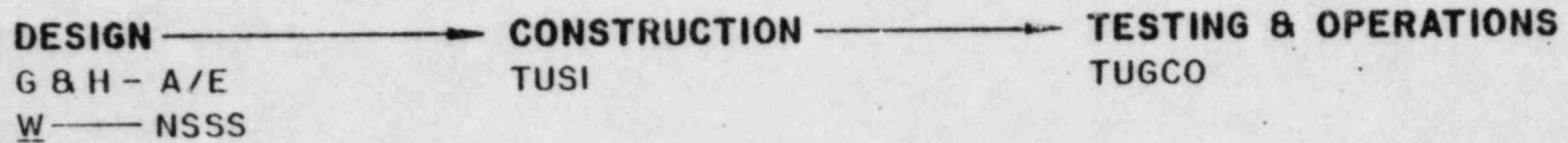
DESIGN PROCESS



DESIGN INTERFACE & INPUT CONTROL



VERIFICATION PROCESSES



DESIGN VERIFICATION PROCESSES

- INTERDISCIPLINARY REVIEW
- FAILURE MODES & EFFECTS ANALYSIS
- SYSTEM INTERACTION
- ACCIDENT ANALYSIS
- NSSS REVIEW
- INTERDISCIPLINARY REVIEW OF FIELD CHANGES

CONST VERIFICATION PROCESSES

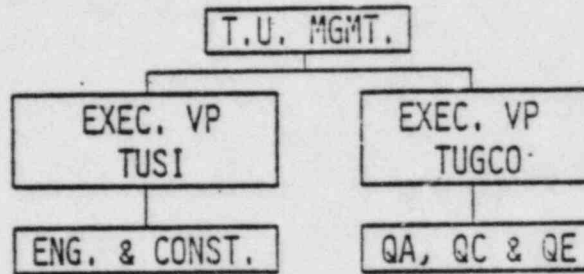
- TMI REVIEW/DESIGN REQUIREMENTS
- DAMAGE STUDY REVIEW
- AS-BUILT RECONCILIATION
- ENVIRONMENTAL/SEISMIC REPORTS
- INTERFERENCE RESOLUTION
- SPEC. VARIATION RESOLUTION
- FIELD CHANGES
- INSTALLATION VERIFICATION
- IEB 79-14 AS-BUILT VERIFICATION
- QA/QC AUDITS, SURVEILLANCES & INSPECTIONS

TESTING & OPERATIONS VERIFICATION PROCESSES

- COMPLETIONS WALKDOWN
- SYSTEM TURNOVER
- PRE-OP AND ACCEPTANCE TESTING

COMMITMENT TO QUALITY ENGINEERING & CONSTRUCTION

I. SEGREGATION OF RESPONSIBILITIES



II. STAFFING

DEVELOP ONGOING INDOCTRINATION FOR ALL PERSONNEL WHOSE ACTIVITIES INFLUENCE QUALITY. PLACE IN STAFF POSITIONS SPECIFIC QUALITY EXPERTISE IN ALL ENGINEERING AND CONSTRUCTION ORGANIZATIONS.

III. MANAGEMENT COMMITMENT

TO DEVELOP A CONTROL PROGRAM SUCH THAT QUALITY BECOMES SYNONYMOUS WITH T.U. ENGINEERING AND CONSTRUCTION. DEVELOP MANAGEMENT PRACTICES WHICH CAN BE APPLIED IN ALL PHASES OF THE T.U. SYSTEM TO ENSURE POSITIVE CONTROL OF ACTIVITIES.

IV. MANAGEMENT DIRECTIVE

TO COLLECTIVELY DEVELOP THE CPSES INSTALLATION IN A MANNER WHICH IS SAFE, LICENSABLE, AND ECONOMICALLY OPERABLE FOR THE PROJECTED LIFE OF THE PLANT.

FSAR CERTIFICATION PROGRAM

TUSI SPECIAL PROJECTS

PURPOSE

INDEPENDENT MANAGEMENT TOOL TO PROVIDE AN ADDITIONAL LEVEL OF
CONFIDENCE THAT CPSES IS AS DESCRIBED IN FSAR.

SCOPE

IDENTIFY CERTIFIABLE ITEMS FROM FSAR.
FIND EVIDENCE THAT THE PROJECT IS IMPLEMENTING THE ITEM.
CERTIFIABLE ITEMS RANGE FROM ORIGINAL DESIGN TO OPERATION.
DISCREPANCIES BETWEEN FSAR AND CPSES ARE REFERRED TO THE
RESPONSIBLE T.U. GROUP

INDEPENDENCE

ORGANIZATIONAL
STAFFING

NATURE OF CERTIFIABLE ITEMS

FUNCTIONAL DESCRIPTIONS

HARDWARE

INSTALLATION

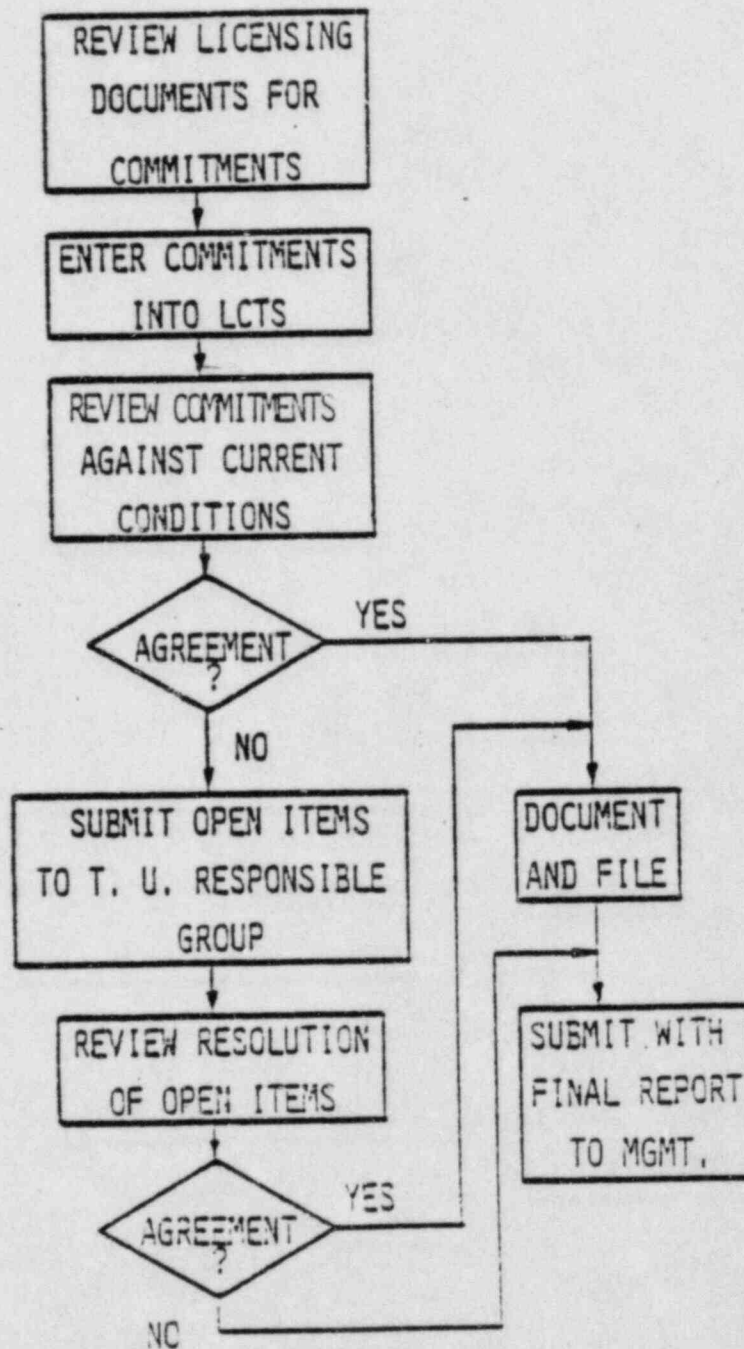
MATERIALS

ADMINISTRATION

ENGINEERING

FSAR CERTIFICATION

FLOW OF ACTIVITIES



NATURE OF CERTIFICATION SOURCES

PROCEDURES	VISUAL INSPECTION
SPECIFICATIONS	REPORTS
DRAWINGS	CORRESPONDENCE
MANUFACTURING DATA AND/OR TEST REPORTS.	

RESULTS

2500 ITEMS CERTIFIED.
116 ITEMS IDENTIFIED AS OPEN ITEMS.
68 OPEN ITEMS RESOLVED.

UNRESOLVED OPEN ITEMS INCLUDED IN FINAL REPORT TO MANAGEMENT

INPO CONSTRUCTION EVALUATION

EVALUATION TEAM

PROJECT MANAGER

TEAM LEADERS

ENGINEERS & SPECIALISTS

SCOPE OF EVALUATION

CONSTRUCTION ACTIVITIES

ENGINEERING ACTIVITIES

PROJECT SUPPORT ACTIVITIES

PERFORMANCE OBJECTIVES AND CRITERIA AREAS

ORGANIZATION AND ADMINISTRATION

DESIGN CONTROL

CONSTRUCTION CONTROL

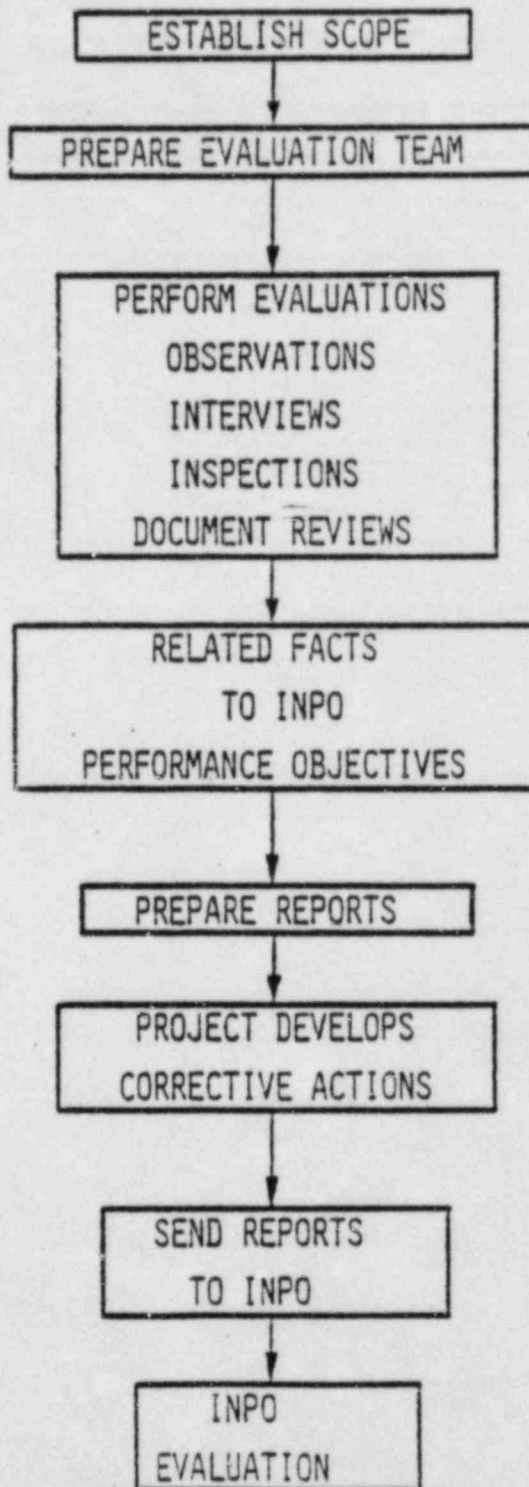
PROJECT SUPPORT

TRAINING

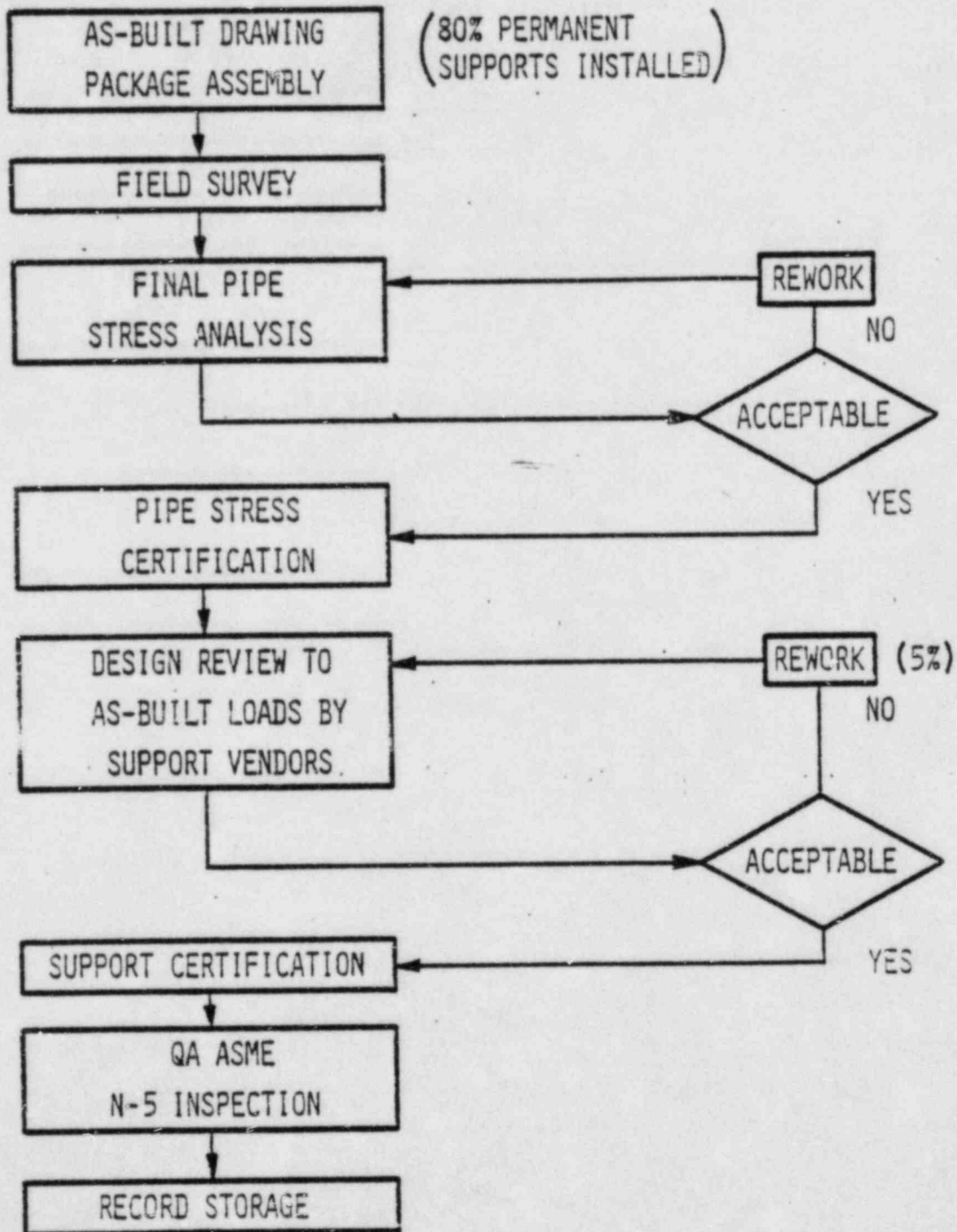
QUALITY PROGRAMS

TEST CONTROL

PROCEDURE FOR CONSTRUCTION EVALUATION



IEB 79-14
ANALYSIS & PIPE SUPPORT
VERIFICATION PROCESS



DAMAGE STUDIES VERIFICATION PROCESSES

HIGH & MODERATE ENERGY LINE BREAK EVALUATION

(HELB & MELB)

ENCOMPASSING:

JET IMPINGEMENT PIPE WHIP EFFECTS
FLOODING ANALYSIS SPRAY EFFECTS
ENVIRONMENTAL IMPACT

SEISMIC INTERACTION EVALUATION

(DECLASSIFICATION PROGRAM)

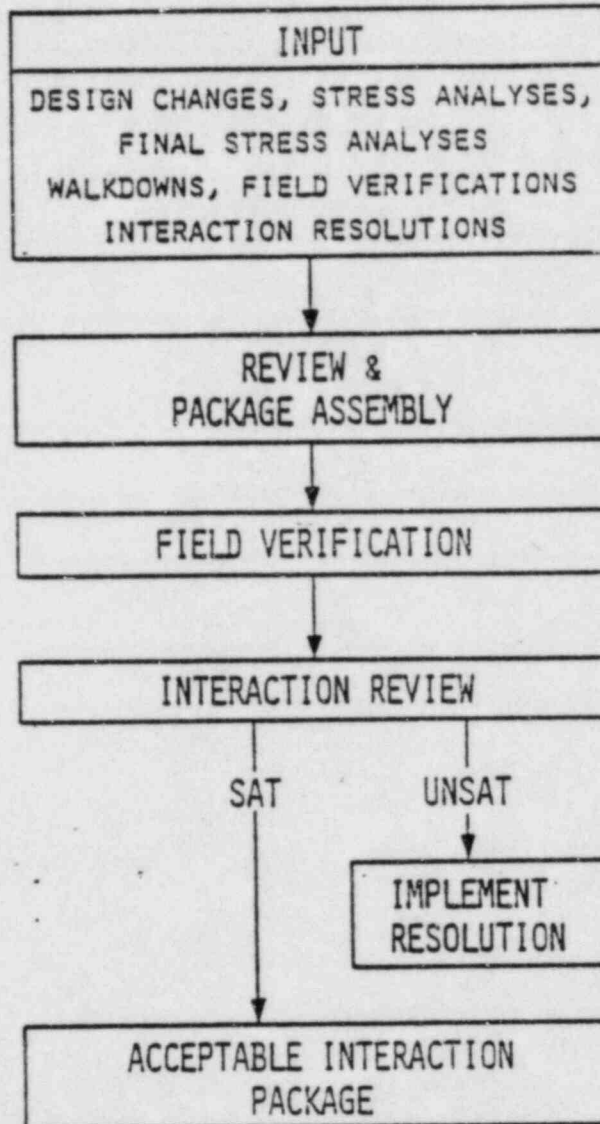
REVIEW INTERACTION OF SEISMIC &
NON-SEISMIC INSTALLATIONS

TRANSIENT FIRE HAZARD ANALYSIS

(TFHA)

REVIEW PLANT CONFIGURATION FOR
COMPLIANCE TO "APPENDIX R"
IMPOSING 20' INTERACTION RULE
TO PRECLUDE SIMULTANEOUS INOPERABILITY
OF TRAINS A & B DUE TO A SINGLE
INCIDENT (FIRE SCENARIO),

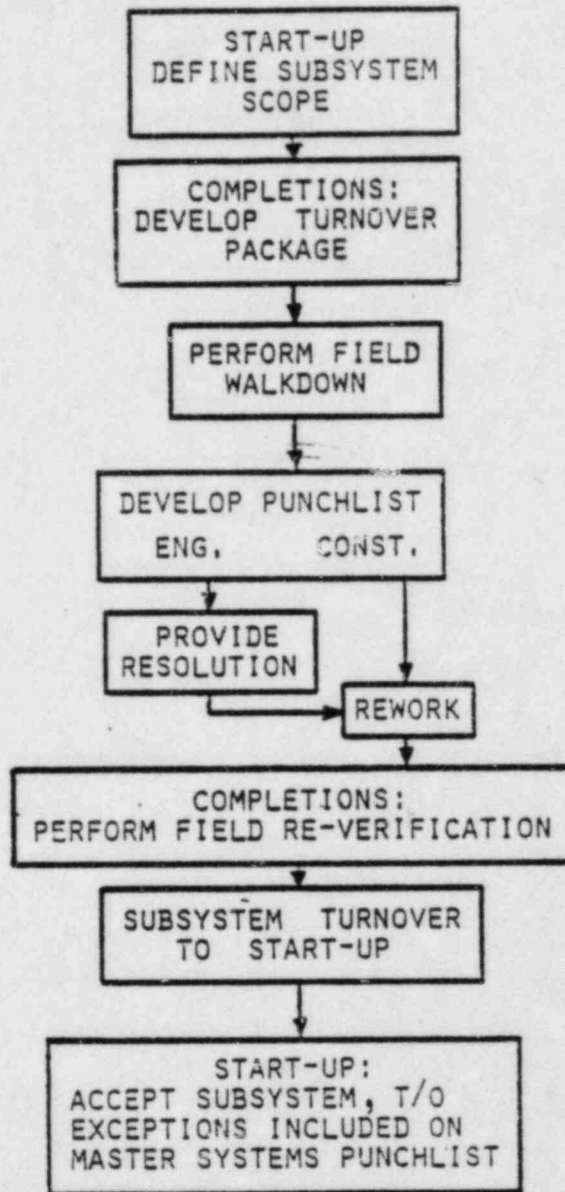
DAMAGE STUDIES VERIFICATION PROCESS



----- COMPLETE PLANT
CONSTRUCTION

FINAL WALKDOWN

COMPLETIONS WALKDOWN VERIFICATION PROCESS



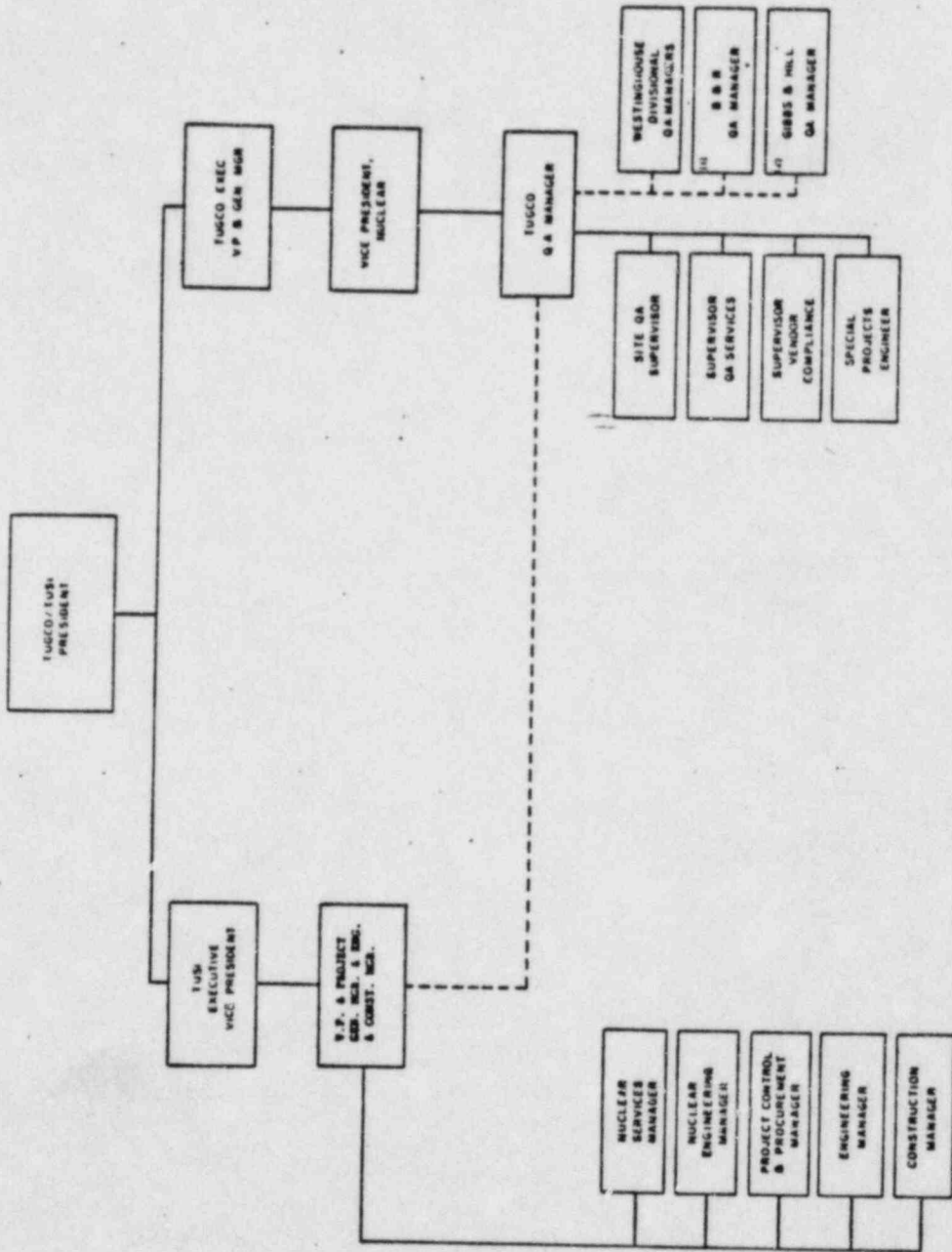
(AT 85% COMPLETE CONSTRUCTION)

VERIFICATION ACTIONS

1. TUSI ENGINEERING DIRECT INVOLVEMENT
2. TU TOP MANAGEMENT INVOLVEMENT
3. TMI BLUE RIBBON PANEL
4. NRC REVIEW OF QA PROGRAM TO APPENDIX B
5. INDEPENDENT QA EVALUATIONS
6. QA-FSAR COMMITMENT VERIFICATION PROGRAM
7. FSAR COMMITMENT VERIFICATION PROGRAM
8. SELF EVALUATIONS
 - 1.) S&L MANAGEMENT EVALUATION
 - 2.) INPO SELF-EVALUATION

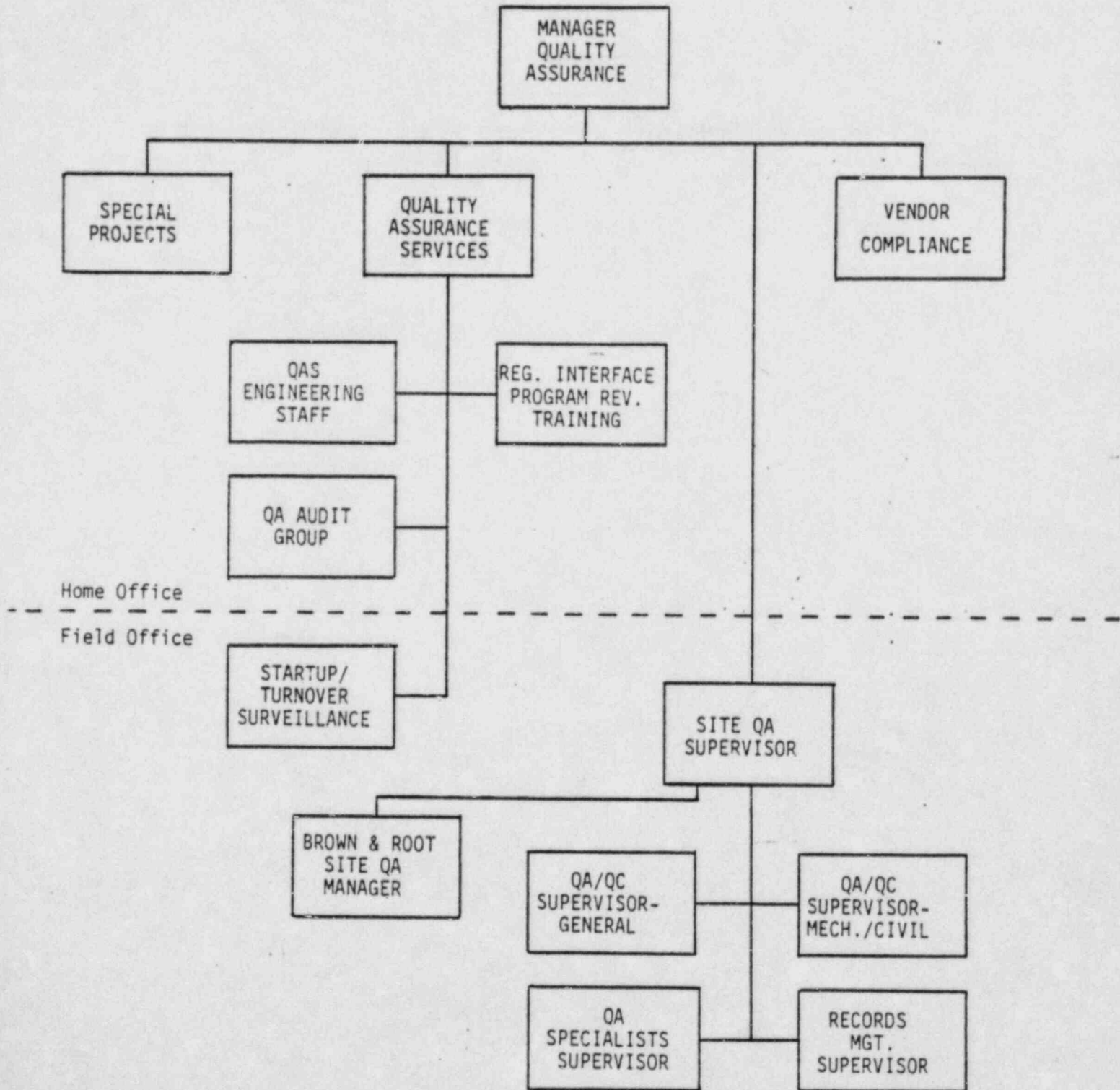
VERIFICATION ACTIONS

9. NRC INDEPENDENT REVIEW OF PIPE SUPPORT DESIGN
10. PIPING & SUPPORTS AS-BUILT VERIFICATION
11. DAMAGE STUDY DESIGN REVIEW
12. COMPLETIONS WALK-DOWN
13. PRE-OP & START-UP TESTS
14. REVIEW OF CLASS 2 & 3 S.S. ELBOW DESIGN
15. NRC SALP
16. NRC RESIDENT INSPECTOR- TESTIMONY AT ASLB

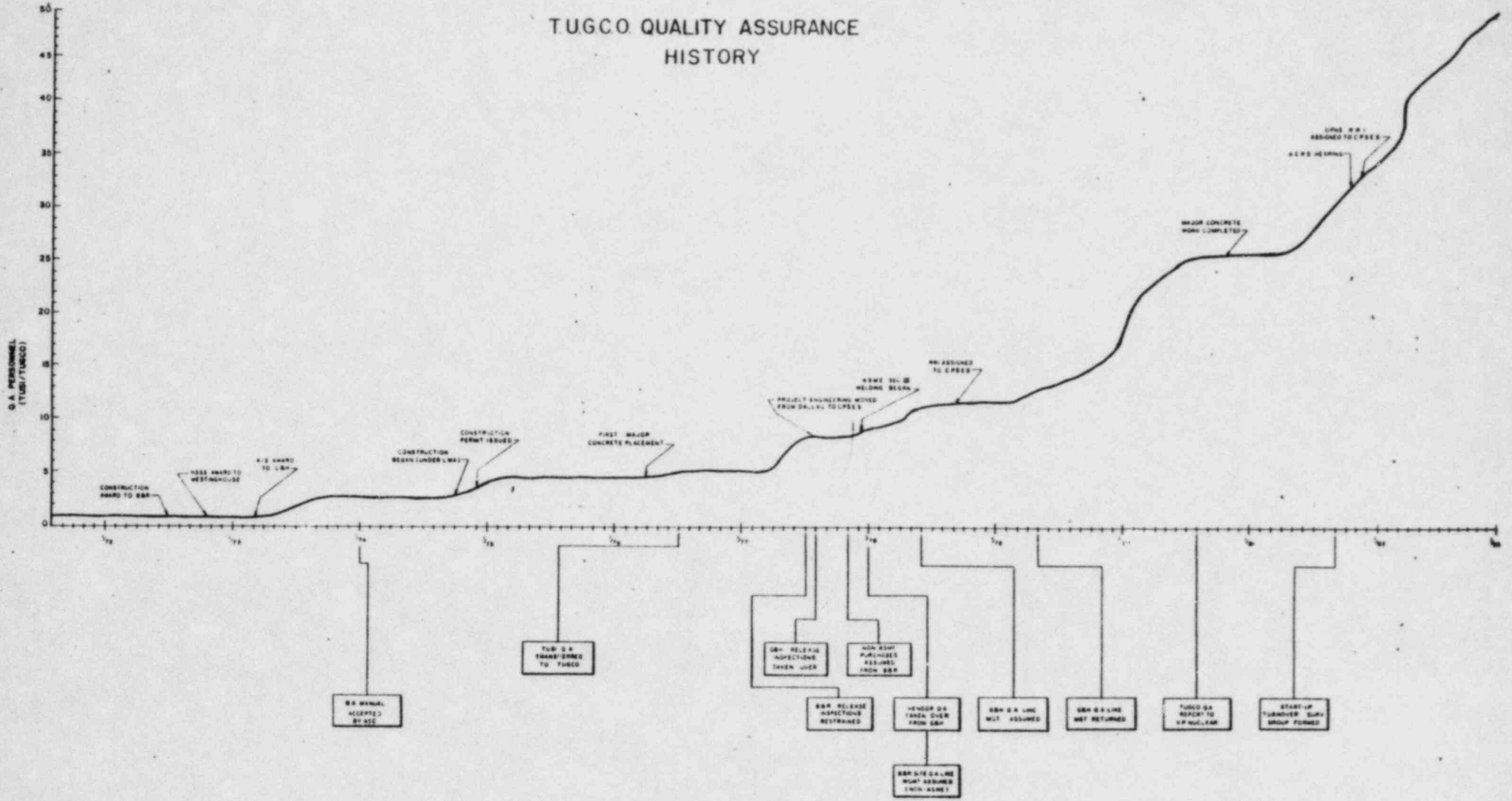


- - - - - AUTHORITY
 - - - - - COORDINATION
 (1) IN HOUSTON
 (2) IN NEW YORK

QA ORGANIZATION



TUGCO QUALITY ASSURANCE HISTORY



SUMMARY OF PRESENTATION

A. VEGA

1. USING AUDIT EXTRACT HANDOUT, DISCUSS EARLY AUDIT EMPHASIS ON:

- A. PSAR INPUT ADEQUACY
- B. CONSISTENCY OF DESIGN WITH PSAR
- C. CLASSIFICATION OF EQUIPMENT
- D. INTERFACE CONTROL
- E. INDERDISCIPLINARY REVIEWS
- F. DESIGN AND VERIFICATION RECORDS
- G. NONCONFORMANCES AND CORRECTIVE ACTION
- H. AUDIT FINDINGS AND RESOLUTION

2. DISCUSS EXTENSIVE TECHNICAL AUDITS BESIDES G&H:

SITE -- ENGINEERING (1 AUDIT - 300MD)
(PIPE SUPPORTS, FIRE PROTECT., HVAC...)

3. DISCUSS FSAR COMMITMENT VERIFICATION PROGRAM

- A. STARTING TIME FRAME APPROXIMATELY 18 MO. AGO
- B. CHECKLIST GENERATION
- C. VERIFICATION METHODS
 - REVIEW OF SPEC
 - REVIEW OF ENGINEERING DRAWINGS
(FLOW DIAGRAM, ELEMENTARIES, I&C ...)
 - PHYSICAL OBSERVATION
 - REVIEW OF VENDOR/SITE DOCUMENTATION
 - REVIEW OF PRE OP TEST PROCEDURE
 - WITNESS OF PRE OP SYSTEM TEST
- D. REPORTING/CLOSEOUTS
- E. INPO EVALUATION RESULTS

C A S E**(CITIZENS ASSN. FOR SOUND ENERGY)**1426 S. Polk
Dallas, Texas 75224

214/946-9446

CASE COMMENTS

AT

11/18/82

MEETING BETWEEN TUGCO AND NRC
TO DISCUSS APPLICANTS' PLANS FOR
AN INDEPENDENT DESIGN VERIFICATION PROGRAM
(DOCKET NOS. 50-445 AND 50-446)Please Note*This document was submitted
to the NRC on December 16,
1982; not the date shown
here.**S. B. Bunnell*

We want to call to the attention of the NRC Staff people here that in the operating license hearings for Comanche Peak, CASE witnesses have presented testimony that indicates that Applicants are in violation of IE Bulletin 79-14, Section 2 of CPSES guidelines, and various ASME Codes.

We would also call your attention to the November 24, 1982 Board Notification - Alleged Design Deficiency (Board Notification No. 82-105) which attached concerns from William Van Meter.

This is important to the Comanche Peak hearings because:

(1) There is included in CASE's exhibits which have been introduced and accepted into evidence documents which indicate that there are numerous instances of minimum wall violations at CPSES. (We had to limit our introduction of the exhibits regarding this item to a few examples, since Applicants had to go back and reopen numerous nonconformance reports which had been erroneously closed, resulting in one nonconformance report about a foot thick under which number all the previously closed reports were included. As far as CASE is aware, this nonconformance report is still an open item; at least it was at the time it was discussed in the hearings in July 1982.)

It is obvious that these minimum wall violations assume even greater importance if the concerns expressed by Mr. Van Meter are correct.

(2) Testimony by CASE witnesses expresses their concerns about the fact that U-bolts around the main steam line at CPSES are cinched up tight and torqued. CASE witness Jack Doyle estimates that about 1/2 of all supports at Comanche Peak, including some whole systems, are involved. Some of them are: main steam; safety injection; emergency diesel oil; service water; feedwater; component cooling; containment spray; and others.

CASE does not believe adequate attention has been given to these and other concerns expressed by CASE witnesses, either by the Applicants or the NRC Staff in our hearings, and we have little confidence that they will be prior to the granting of an operating license for CPSES.

We urge that those of you who are concerned about whether or not CPSES is built correctly and can operate safely prior to the granting of its license closely monitor the resolution of the issues raised in our proceedings.

We appreciate this opportunity to provide these comments.

For further information, please contact Mrs. Juanita Ellis, President of CASE.



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

MAR 29 1983

Docket Nos.: 50-445
 and 50-446

APPLICANT: Texas Utilities Generating Company
 FACILITY: Comanche Peak Steam Electric Station, Units 1 and 2
 SUBJECT: SUMMARY OF MEETING ON COMANCHE PEAK INDEPENDENT DESIGN
 VERIFICATION PROGRAM

Summary

On Thursday afternoon, March 10, 1983, a meeting was held at NRC Headquarters, 7920 Norfolk Avenue, Bethesda, Maryland. The purpose of the meeting was to discuss the NRC staff's overall confidence in the utilities design and construction activities in light of the preliminary findings of the Construction Appraisal Team (CAT) inspection and the various allegations raised concerning the design and construction of the plant. The staff advised the applicant that, in view of recent developments some form of added assurance that the plant has been designed and constructed in accordance with the application would be necessary. The applicant agreed to consider the matter and would contact the staff when they had decided what actions they propose to take in response to the staff position. Principal staff spokesperson was Mr. R. A. Purple. The meeting attendance is given in Enclosure 1.

Meeting Details

The staff called this meeting in response to recent events; i.e. the preliminary findings of the CAT inspection and the numerous allegations raised concerning the design and construction of the plant. These developments have resulted in an erosion of the staff's tentative conclusion that Comanche Peak did not need to perform an independent design verification program (IDVP). Therefore, the staff has concluded that some form of added assurance that the plant has been designed and constructed in accordance with the application will be necessary. The staff requested that the applicant consider conducting a program which would provide the staff with that added assurance.

The applicant responded that it was their understanding that the CAT inspection was favorable to Comanche Peak in its review of the piping design. With respect to the CAT inspection preliminary findings on the heating, ventilation and air conditioning (HVAC) supports, the applicant has issued a stop work order. They have conducted their own inspection of these HVAC supports and will file a potential 10 CFR 50.55(e) report. They are outlining a rigorous program to re-establish the creditability of the HVAC system and can assure us that this will be resolved. They believe the major deficiency is related to the field welding.

~~8304610625~~
 PDR

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With respect to the CAT inspection preliminary finding on cable separation the applicant stated that the routing of these cables is still within the construction and "as-built" design review program. This method of cable routing with close field-engineering follow-on was a management decision. The applicant believes that the observed deficiencies can be readily resolved, and that it is too early in this part of the construction to conduct a conclusive inspection. Finally, the applicant advised that it will inspect and document the cable routing in its "as-built" configuration for staff inspection.

The staff responded that it notes and understood that the applicant would respond to the specific findings of the CAT inspection when that inspection report is issued. However, the staff is looking for a program that is broader than a one-on-one response to identified deficiencies. The staff believes that the proposed program should provide an increased assurance that Comanche Peak has been built in accordance with the NRC regulations.

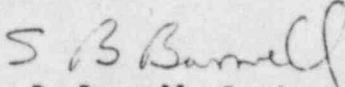
The applicant responded that he had described the numerous programs he had instituted to assure a quality plant at the earlier December meeting and believes that the sum of these programs lead to a conclusion that the plant has been and will be built in conformance with the application and will operate in a safe and reliable manner. The applicant stated that the self-evaluation conducted by members of Sargent & Lundy and the staff's inspection of the Walsh and Doyle allegations represent independent evaluations which lead to the overall conclusion that the design and construction of Comanche Peak was performed in an acceptable manner. The applicant also noted that he is currently conducting the preoperational testing program for Unit 1. The applicant commented that the preoperational and startup testing programs represent a major tool in uncovering and correcting the significant deficiencies in plant design and construction. These should be considered in the assessment of whether the plant is built right.

The discussion turned to the type of program which would be responsive to the staff's request. The staff advised that the program or effort should be designed to reinforce our overall confidence in the utilities design and construction activities in the face of recent events. As to the definition and scope of the effort, the staff is open to the applicant's proposals on the type of effort that might be performed. However, the staff remained firm that some type of effort would be required to provide increased confidence in the final design and construction of the Comanche Peak plant.

The applicant advised that he could make no commitments at this meeting but that they would consider the matter; in particular, the type of program which might be most responsive to the staff request. The staff noted that we should

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meet again once the applicant has had an opportunity to formulate a program so that we both would be assured that the proposed program will be responsive to the staff's request.


S. B. Burwell, Project Manager
Licensing Branch No. 1
Division of Licensing

Enclosure:
List of Meeting Attendees
cc w/encl.: See next page

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Executive Vice President and
General Manager
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Dallas, Texas 75201

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Mr. Homer C. Schmidt
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Dallas, Texas 75201

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Gibbs and Hill, Inc.
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New York, New York 10001

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Westinghouse Electric Corporation
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David J. Preister
Assistant Attorney General
Environmental Protection Division
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Mrs. Juanita Ellis, President
Citizens Association for Sound
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Mr. Robert G. Taylor
Resident Inspector/Comanche Peak
Nuclear Power Station
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Commission
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Mr. John T. Collins
U. S. NRC, Region IV
611 Ryan Plaza Drive
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Arlington, Texas 76011

ENCLOSURE 1

MEETING ATTENDANCE

MEETING ON COMANCHE PEAK INDEPENDENT
DESIGN VERIFICATION PROGRAM

March 10, 1983

NRC Staff

S. B. Burwell
B. J. Youngblood
R. A. Purple
J. M. Taylor
R. P. Heishman
A. B. Beach
W. P. Haass
R. H. Vollmer
J. E. Gagliardo
S. A. Treby

Texas Utilities

J. B. George
J. S. Marshall

TEXAS UTILITIES SERVICES INC.

Log # TUS-4066
File # 10005

OFFICE MEMORANDUM

To H. C. SchmidtDallas, Texas March 11, 1983Subject COMANCHE PEAK STEAM ELECTRIC STATIONTRIP REPORT
NRC IDVP MEETING

Mr. Robert Purple, Deputy Director, Division of Licensing opened the meeting with a statement to the effect that the TU management presentations in December had convinced the NRC management that an Independent Design Verification program was not necessary. This decision had been conveyed verbally and was to be followed by letter. However, the Construction Assessment Team (CAT) results and continued allegations of quality problems have forced them to reconsider their position. Their confidence in stating CPSES is a safe plant has been "eroded".

Mr. Jim Taylor, Director, Division of Quality Assurance, Safeguards and Inspection Programs, Office of Inspection and Enforcement went over the major areas of the CAT audit which were the cause of concern. These included the HVAC hanger welding issue, cable separation and the volume of change paper to be incorporated in project documents. Joe George discussed in detail the programs placed into action to address the specifics of each of these items as well as the generic implications of each. He also stated that he was not in a position to agree to any additional program of the IDVP nature.

The NRC was asked whether an IDVP program was even appropriate since the events cited by them as problems were more product quality problems than design problems (design change paper being the exception). They agreed that the vertical investigation programs carried out by some other utilities probably may not be the appropriate program for Comanche Peak.

Joe George then reiterated the TU position on IDVP and why it was not necessary. There was considerable interest in our approach to building a nuclear power plant. Judging by the head nodding and the tone and substance of the questions, it was evident that there was a good deal of sympathy for our position. However, the meeting ended with Robert Purple again stating that there was an "erosion of confidence" and they wanted us to propose a program that would bolster their resolve to pronounce CPSES a safe plant.

J. S. Marshall
J. S. Marshall

JSM:tls

TO: S. B. Burwell
FROM: H. C. Schmidt + 1 pg.

MAR 30 1983

DISTRIBUTION FOR BOARD NOTIFICATION ON INFORMATION FROM CONSTRUCTION APPRAISAL
TEAM (CAT) INSPECTION OF COMANCHE PEAK, UNITS 1 AND 2 (BN 83-29A)

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