APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION REGION IV

Report: 50-445/82-18: 50-446/82-09

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

Inspection at: Comarche Peak Steam Electric Station

Inspection conducted: September 7-10, 1982

Inspectors:

L. D. Gilbert, Reactor Inspector, Engineering Section (Paragraphs 1, 2, 3, 4, 6, and 7)

9/28/82 Date

9-28-82 inson, Reactor Inspector, Engineering Section Date (paragraph 5)

Reviewed: R. J. Redance for T. F. Westerman, Chief, Reactor Project Section A

9-29-82 Date

Approved:

D. M. Hunnicutt, Chief, Engineering Section

Inspection Summary:

Inspection During September 7-10, 1982 (Report 50-445/82-10)

Areas Inspected: Routine, unannounced inspection of construction activities including site tour. The inspection involved two inspector-hours onsite by one NRC inspector.

Results: In the one area inspected, no violations or deviations were identified.

Inspection During September 7-10, 1982 (Report 50-446/82-09)

Areas Inspected: Routine, unannounced inspection of construction activities including site tour, observation of work for welding and nondestructive examination of safety-related piping and welding on main control panels. The inspection involved 25 inspector-hours onsite by two NRC inspector.

Results: In the four areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Principal Licensee Personnel

R. G. Tolson, Site QA Supervisor, TUGCO *C. T. Brandt, QA/QC Supervisor, TUGCO *R. M. Kissinger, Project Civil Engineer, TUSI

Other Personnel

G. R. Purdy, Site QA Manager, Brown & Root (B&R)
J. Ryan, Pipe Foreman, B&R
J. Caldwell, QC Inspector, B&R
H. Hill, QC Inspector, B&R
E. Holland, Supervisor QC-Receiving, B&R
B. O. Cromeans, QA Supervisor, B&R
J. Pixley, Authorized Nuclear Inspector (ANI) Hartford

J. Hair, ANI, Hartford

The NRC inspector also interviewed other licensee and contractor employees during the course of the inspection.

*Denotes those attending the exit interview.

2. Site Tour

The NRC inspector toured the reactor building, auxiliary building, and fuel handling building for Units 1 and 2 to observe construction in progress and to inspect housekeeping.

No violations or deviations were identified.

3. Safety Related Pipe Welding - Unit 2

The NRC inspector observed the welding and quality control activities associated with fabricating the following safety-related piping system welds:

Drawing	System	Class	Welds
SI-2-RB-026	Safety Injection	T	FW-3, FW-4
SI-2-RB-028	Safety Injection	1	FW-1, FW-2
SI-2-RB-018	Safety Injection	1	FW-7
RC-2-RB-C65	Reactor Coolant	1	W9A

Drawing	System	Class	Welds
FSI-2-0122-03	Main Steam	2	FW-1, FW-7, FW-10, FW-16, FW-19, FW-25, FW-28, FW-34, FW-43, FW-52, FW-52, FW-61
SI-2-RR-031	Safety Injection	2	FW-70 FW-5 FW-6

In the areas reviewed, the entries on the weld data cards were consistent with the status of the welds, the inspections of B&R QC personnel appeared to be adequate and consistent with ASME Pipe Fabrication and Installation Inspections Procedure QAP-11.1-26, the qualifications of the welders were consistent with ASME Section IX requirements, and filler materials were consistent with weld procedure requirements and were traceable to certified material test reports.

No violations or deviations were identified.

4. Nondestructive Examination of Safety-Related Piping - Unit 2

The NRC inspector observed the liquid penetrant examination and ultrasonic thickness examination of a Class 3 component cooling system valve after removal of arc strikes as directed by Nonconformance Report NCR-M-3947. In addition to the examinations performed on the valve, the NRC inspector observed the liquid penetrant examination of the following completed welds:

Drawing	System	Class	Weld
FSI-2-0122-03	Condensate Reservoir for Main Steam	2	FW-51, FW-57
SI-2-RB-031 SI-2-RB-026 RC-2-RB-065	Safety Injection Safety Injection Reactor Coolant	2 1 1	FW-9 FW-5, FW-6A FW-7

The examinations were performed by B&R QC personnel certified in accordance with NDE Personnel Certification Procedure QAP-2.1-1, as Level II examiners. In the areas observed, the examinations were performed consistent with Liquid Penetrant Procedure QAP-10.2-1. During review of the test results of the analysis for sulfur and halogens content for each batch number observed being used for liquid penetrant examination, it was noted that the certified test results for Batch 82-C-068 contained "pen and ink" changes to the date and batch number. This item is considered unresolved pending resolution of the questionable certification. (8209-01)

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5. Followup and Information Notice 82-34

Information Notice 82-34, dated August 20, 1982, was sent to all holders of a power reactor operating license or construction permit as an early notification of a potentially significant problem. Inspections at three vendors facilities disclosed numerous welding practices not in accordance with the American Welding Society (AWS) standards and several quality assurance practices not in compliance with the vendors procedures or NRC requirements.

The NRC inspector, accompanied by a TUGCO QA/QC supervisor, toured the warehouse and performed a visual inspection of the welding inside three unit control panels. It was apparent that TUGCO had previously performed this examination as the QA/QC supervisor knew the location of several weld discrepant conditions and readily pointed them out to the NRC inspector. Lack of fusion, undercutting, excessive weld spatter, apparent incomplete welding, and weld wire remnants attached to the panel welds were among the anomolies noted. Not all of these conditions were noted on each weld or each panel.

No specific action or response was required of the licensee at the time the information notice was issued. The licensee is, however, presently evaluating the reportability of this matter under the provisions of 10 CFR 50.55(e). Until future actions are taken by the licensee, this will be considered an unresolved item.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. An unresolved item related to certification of liquid penetrant examination materials is discussed in paragraph 4. A second unresolved item related to welding on main control panels is discussed in paragraph 5.

7. Exit Interview

The NRC inspectors met with licensee representatives (denoted in paragraph 1) and R. G. Taylor (NRC Resident Reactor Inspector) on September 10, 1982, and summarized the scope and findings of the inspection.