

MAR 28 1990

MEMORANDUM FOR: Robert D. Martin, Regional Administrator  
Region IV

Thomas E. Murley, Director  
Office of Nuclear Reactor Regulations

Jack R. Goldberg, Deputy Assistant General Counsel  
for Enforcement  
Office of the General Counsel

FROM: James Lieberman, Director  
Office of Enforcement

SUBJECT: OI REPORT 4-89-013, COMANCHE PEAK STEAM ELECTRIC STATION:  
FAILURE TO PROVIDE ACCURATE AND COMPLETE INFORMATION TO  
THE NRC

The above captioned OI report did not identify violations of NRC requirements. The evidence developed did not substantiate that TU/CPSES management intentionally provide inaccurate or incomplete information to the NRC regarding the SWS/Code V procurement inspection. I do not intend to request OGC analysis of this report. We will consider it closed unless we receive a different view within three weeks of the date of this memo. Please contact me or William Troskoski with any comments.

Original Signed By  
Edward Baker

James Lieberman, Director  
Office of Enforcement

cc: H. Thompson, DECS  
J. Partlow, NRR  
B. Hayes, OI  
D. Crutchfield, NRR

OE *Wan T*  
WTroskoski  
3/27/90

OE:D  
JLieberman  
3/ /90

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FOR FOIA  
CONDIT 90-294 PDR

*B/S*



OFFICE MEMORANDUM

6/20

To: L. D. Nace E-01

NE-22156  
September 30, 1988

COMANCHE PEAK STEAM ELECTRIC STATION  
REVIEW OF PREVIOUS CODE V SERVICE PROCUREMENTS

Based on shortcomings identified in procurement documentation and prequalification testing associated with removal of Plasite 7122 coating from Unit 1 and Common Station Service Water System piping, commitments were made in TXX-88699 and Engineering Report ER-ME-19 to review Previous Code V services procurements. Two objectives were established for these reviews: 1) Determine if these procurements experienced shortcomings similar to those identified for Service Water coating removal; 2) Determine if prequalification tests associated with these procurements were properly proceduralized and controlled. These reviews have been completed, satisfying licensing commitments LCR-88-894 and LCR-88-898.

Six Code V services procurements were identified involving specialty contractors performing work on safety-related equipment onsite as follows:

<u>Requisition No./Date</u>	<u>Purchase Order No./Date</u>	<u>Service Description</u>
6R-345086/8-19-87	CPF-144220-S/8-26-87	Chemically Clean Diesel Generator Lube Oil and Fuel Oil Piping and Jacket Water Heat Exchanger.
6R-48370/7-28-86	CPF-13597-S/8-28-86	Application of Protective Coatings to Inlet and Outlet Water Channels, Tube Sheets, and Tube Ends of Component Cooling Water Heat Exchangers.
6R-49642/8-4-86	CPF-13593-S/8-29-86	Trim Tube Ends and Map Plugged Tubes in Component Cooling Water Heat Exchangers.
6R-282720/12-11-86	661-74054/1-16-87	Measure and Inspect Steam Generator Nozzles

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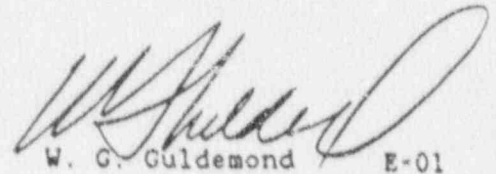
6R-340403/4-9-87	661-74340/4-16-87	Chemically Clean Unit 1 and 2 Train B Component Cooling Water Heat Exchangers.
6R-282724/12-15-86	661-74038/12-23-86	Chemically Clean Unit 1 and 2 Component Cooling Water Heat Exchangers, Diesel Generator Jacket Water Heat Exchangers, and Unit 1 Vacuum Pump Seal Water Systems.

Based on a review of the documentation associated with these procurements, a number of key points were identified:

1. Unlike Service Water coating removal, all involved well developed and previously employed processes. Consequently, no pre-qualification testing was required.
2. Unlike Service Water coating removal, the verification plan for each explicitly required that TU Electric Quality Assurance monitor Vendor activities. With the exception of one procurement (6R-345086; CPF-144220-S) which does not appear to have been finalized, Quality Assurance Contractor Surveillance Reports exist demonstrating that the activities were properly conducted. However, in the case of Steam Generator Nozzle measurement and inspection, the activity was completed before the purchase order was finalized.
3. Each procurement required that the vendor submit procedures for approval. With the exception of the Steam Generator Nozzle measurements and inspection, and the one procurement which was not finalized, these procedures were incorporated into quality-related work process control documents which were reviewed by Quality Assurance prior to work performance. Given that Steam Generator Nozzle Measurement and inspection did not involve physical work on hardware, and that the results were required to be documented in a special vendor report to TU Electric, this exception is acceptable.
4. Detail was found to be lacking in the verification plans for each procurement. Those associated with chemical cleaning did require Chemistry to take periodic samples, but did not specify sample type or frequency.
5. The procurement documents did not clearly define the relationship between the organizations involved and the TU Electric Quality Assurance Program. However, in the case of Purchase Orders 661-74340 and 661-74038, Operations prepared special temporary procedures which clearly delineated the duties and responsibilities of the parties involved.

6. None of the procurements explicitly addressed the identification and disposition of nonconforming conditions.
7. The procurement for protective coating application to the Component Cooling Water Heat Exchangers (CPF-13597-S) permitted activities which should have fallen under the auspices of ASME Section XI. This was not addressed in the procurement or the implementing work order.

From this information it is concluded that while the level of quality involvement in these activities was better than that in the case of Service Water coating removal and that the activities were properly controlled and conducted, the procurement documents in general were of similar quality to those associated with Service Water coating removal. Further, it is concluded that the corrective/preventive actions contained in Engineering Report ER-ME-19 will address the findings of this review.

  
W. G. Guldemon E-01

WGG:jw

cc: J. L. Barker E-10 - *Handwritten initials*  
T. L. Heatherly E-13  
ARMS E-06

*Handwritten initials*

ENFORCEMENT CONFERENCE  
November 9, 1988

ATTENDEES

<u>Name</u>	<u>Affiliation</u>	<u>Title</u>
P. McKee	NRC:OSP	CPFD
C. Grimes	NRC:OSP	D:CPFD
J. Partlow	NRC:OSP	D:OSP
RF Warnick	NRC:OSP	Assist. Dir for Insp Prog
JOHN W. BECK	TU ELECTRIC	VICE PRESIDENT
R. Ted Jenkins	TU Electric	Manager Mech. Engr
Roger D. Walker	TU Electric	Manager Nuclear Licensing
William Guldemond	TU Electric	Executive Assistant To The Vice President of Engineering and Construction
Larry D. Haco	TU Electric	Vice President
William B. Courji	TU Electric	Executive Vice President
Jack D. Raddins	TU Electric	Executive Assistant
Maurice Axelrad	Neumann and Holmberg	ATTORNEY
John F. Street	TU Electric	Director of Quality Assurance
J. Lyons	NRC:OSP	AID Technical Programs
Melinda Malloy	NRC:OSP	Project Manager
Howard Wong	NRC OFFICE OF ENFORCEMENT	Deputy Director
James H. Wilson	NRC:OSP	AD for Projects

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 Facility: COMMUNITY HOME  
 Unit: 1.2

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 ESR: H.K.  
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 Rev. Lev: 4 0 0 0 0  
 NIBSR:  
 Region:  
 Team:  
 Job:  
 Description:  
 Date:  
 Status:

Factor No. 1 of opening of Service Water by

Edward J. Conroy  
 (Name)

Time/Date	Info	Date Sent	DDJ	DDJ
Time/Date	Info	By Region	Ref. No.	Action
01/20/39	1/20/39	12/13/38		✓
01/20/39	01/20/39	01/20/39	0	Other Action NOV 01/20/39

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 Title: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_  
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 Zip: \_\_\_\_\_  
 Other: \_\_\_\_\_

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- 0 Days from rec'd in DE to issuance of proposed O.P.
- 0 Days from issuance of proposed O.P. to proposed O.P. to issuance of proposed O.P.

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 Checked by: \_\_\_\_\_ Date: \_\_\_\_\_  
 Edited by: \_\_\_\_\_ Date: \_\_\_\_\_

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01 4-89-013

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SUBJECT Comanche Peak

DATE Rec'd 3/26/9

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JAMES LIEBERMAN

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