



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

HW
SAVE

June 23, 1989

NOTE TO: Bob Warnick
Herb Livermore
Shannon Phillips

FROM: Chris Grimes *CG*

SUBJECT: CITATION REFERENCE IN IR 89-23/23

As I discussed with Herb, we met with Jim Lieberman and Denny Crutchfield on 6/22/89 to discuss the follow-up actions on the apparent violation identified in Shannon's report. During that discussion, Mr. Lieberman pointed out that the proper reference for inaccurate and incomplete information is 10 CFR 50.9. Accordingly, with the oral approval of Herb and Shannon, I will have the report changed to reference 10 CFR 50.9 so that we can issue it promptly without having to cycle it back to the site. We have also modified the forwarding letter to require a written response from the utility concerning the issues identified in paragraph 4.b of the report before we determine how we will proceed on this matter.

cc: D. Crutchfield
J. Lieberman
P. McKee

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b. Incomplete and Inadequate Information Provided Concerning Concerning EA 88-310

The NRC inspector reviewed the TU Electric Enforcement Document which was docketed with the NRC Enforcement Action EA 88-310 and Notice of Violation 50-445/88-47, 50-446/88-42. TU Electric Response TXX-89070 to the enforcement action was also reviewed. These documents provided TU Electric's overall response. At the Enforcement Conference information was provided to the NRC which advocated a reduction in the proposed severity level from Level III to Level IV and V. During the enforcement conference TU Electric made several statements, some of which are discussed below, to show that QA/QC deficiencies identified by the NRC were not program breakdowns and, therefore, were not significant. The NRC inspector found that specific information related to the results of TU Electric's review of other Code V procured services was not included in the information provided to the NRC. Thus, the information provided by TU Electric concerning the enforcement action was inaccurate and incomplete. Further, the inspector believes that other information provided by TU Electric during the enforcement conference was misleading and misrepresented the deficiencies encountered during the SWS coating removal project.

NRC Regulation 10 CFR ^{50.9} ~~Part 2, Appendix G~~ requires the applicant/licensee to provide accurate, complete, and significant information to the NRC.

- (1) TU Electric stated during the enforcement conference that they had "[r]eviewed other Code V services activities with satisfactory Results."

Contrary to the above, the NRC inspector determined that TU Electric failed to provide significant information concerning the results of their review of six Code V service procurements which would have shown that these Code V procurements for services were not satisfactory. These deficiencies are described in TU Electric memorandum NE 22156 dated September 30, 1988. That memorandum indicated that there were deficiencies in the six Code V service procurements. These deficiencies were similar to the Code V procurement for service water system piping coating removal. Further, this information was not provided to the NRC in the meeting on September 13, 1988, in TU Electric Engineering Report ER-ME-19, Revision 0, or in the TU Electric Enforcement Conference Document handout.

TU Electric had not performed an adequate review of the other Code V service procurements to support the conclusions they presented. In addition, during the course of the review of this material, the inspector identified additional deficiencies associated with the subject procurement, as described in more detail in paragraphs 5 and 7.

- (3) TU Electric stated during the enforcement conference, in part, that "[d]amage did not occur following modifications to spinblaster."

Contrary to the above, the NRC determined that damage occurred during coating removal of Train B after modifications were made to the spinblaster after damage was found in Train A of the SWS in July 1988. In March 1989, three NRC inspectors performed a field inspection to view video tapes of Train B after coating removal. Defects caused by the spinblaster were observed in Train B (Spool SW-1-SB-7-14A-8 frame 1484). Although the video tapes of Train A and Train B had been misidentified during the video review, blasting marks on the Train B piping were confirmed by the inspectors. The TU Electric coating specialist was present when the NRC viewed Train B tapes and the NRC pointed to the marks that were apparently made by the spinblaster. When directly asked if they appeared to be spinblaster marks, he agreed that they appeared to be spinblaster marks.

The failure to provide the NRC with complete and accurate information ~~related to the enforcement~~ ^{during} conference on November 9, 1988, and EA 88-310 is a violation of 10 CFR Part 2, Appendix G, 50.9, (445/8923-V-01; 446/8923-V-01).

in the response to

Review of Component Cooling Water Heat Exchanger Work (50073, 50075)

During NRC Inspection Report 50-445/89-16; 50-446/89-16, the NRC inspector performed a follow-up inspection to verify the corrective actions taken for Code V service procurements, as described in TX-80070. Records at the procurement vault, construction QA records vault, and the QA Records Center were reviewed. The QA Records Center personnel provided the NRC inspector with a computer run which listed all QA records available for the component cooling water (CCW) heat exchangers. (One of the previous six Code V procurements was for work on the CCW heat exchangers.) Records for CPI-CCAHHX-02 were selected for review. About March 29, 1988, the NRC inspector met with TU Electric to discuss the results of the NRC review. TU Electric was informed that the avail