APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/91-07
50-446/91-07

Unit 1 Operating License: NPF-87
Unit 2 Construction Permit: CPPR-127
Expiration Date: August 1, 1992

Dockets: 50-445
50-446

Licensee: TU Electric
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: Glen Rose, Texas

Inspection Conducted: February 1 through March 12, 1991

Inspectors: R. M. Latta, Senior Resident Inspector
S. D. Bitter, Resident Inspector
C. E. Johnson, Project Engineer
A. Singh, Reactor Inspector

Reviewed by: Dwight D. Chamberlain 4-1-91
D. D. Chamberlain, Chief, Project Section B Date
Division of Reactor Projects

Inspection Summary

Inspection Conducted February 1 through March 12, 1991 (Report 50-446/91-07)

Areas Inspected: Unannounced resident safety inspection of Unit 2 construction activities, verification of as-built designs, mechanical containment penetrations, fire loop installation, review of the quality assurance (QA) manual, corrective actions, Three Mile Island (TMI) action items, licensee action on 10 CFR Part 50.55(e) deficiencies, and followup on previously identified inspection findings.

Results: Unit 2 construction activities are proceeding essentially on schedule with well established project management controls. Within the areas inspected, the verification of the as-built design configuration control program appears to be functioning well with the appropriate levels of management attention and

resources being applied. The program for the installation, inspection, and turnover of the mechanical penetrations has been properly established and implemented, and the installed fire loop has been appropriately maintained. Relative to the corrective action program, one violation was identified in paragraph 6 pertaining to the failure of the deficiency reporting process to adequately establish the threshold at which potentially significant conditions adverse to quality are identified and corrected.

TMI Action Items III.D.3.3.1 and III.D.3.3.2 were reviewed and closed and Open Items 446/8511-03, 446/8513-12, and 446/8921-13 were similarly reviewed and closed. Additionally a comprehensive review of the completion status of Unit 2 construction deficiencies was completed during this reporting period.

Inspection Conducted February 1 through March 12, 1991 (Report 50-445/91-07)

Areas Inspected: No inspection activities were conducted on Unit 1.

Results: Not applicable.

DETAILS

1. PERSONS CONTACTED

TU Electric
M. A. Bagale, Startup Manager
*R. W. Braddy, Project Engineering Manager
*H. D. Bruner, Senior Vice President
*W. G. Cahill, Executive Vice President, Nuclear
*H. M. Carmichael, Unit 2 Engineering Assurance (EA) Manager
H. Cruz, Deputy Group Supervisor, Bechtel
*S. P. Frantz, Newman and Holtzinger
A. Germany, Lead Construction Engineer, EBASCO
*W. G. Guldemond, Manager of Site Licensing
C. Hahn, Lead Engineer, Westinghouse
*T. L. Heatherly, Compliance Engineer
*J. C. Hicks, Licensing Manager
R. Hooten, Deputy Project Manager
J. D. Houchen, Assistant Project Manager
*J. W. Muffett, Manager of Project Engineering
*S. S. Palmer, Stipulation Manager
*C. W. Rau, Unit 2 Project Manager
G. Sexton, HVAC Superintendent, Brown and Root
*J. C. Smith, Plant Operations Staff
*R. L. Spence, Quality Control Manager
*C. L. Terry, Director of Nuclear Overview
R. L. Wakeman, Fire Protection Supervisor
*J. E. Wren, Construction Quality Assurance (QA) Manager
*D. R. Woodlan, Docket Licensing Manager

Citizens Association for Sound Energy (CASE)
*O. L. Thero, Consultant, CASE

NRC
*D. N. Graves, Resident Inspector
*T. P. Gwynn, Deputy Director, Division of Reactor Projects, Region IV
*R. M. Latta, Senior Resident Inspector, Unit 2

*Present at the exit interview.

In addition to the above personnel, the inspectors held discussions with various construction, engineering, startup, fire protection, maintenance, licensing, quality organization, and administrative members of the licensee's staff.

2. UNIT 2 ACTIVITIES (71302, 51053, 50073)

During this inspection period, routine tours of the Unit 2 facility were conducted in order to assess equipment conditions, security, and adherence to regulatory requirements. In particular, plant areas were examined for evidence

of fire hazards, installed instrumentation damage, and acceptability of system cleanliness controls and general housekeeping. The inspectors conducted evaluations of existing plant programs for the preservation and maintenance of installed systems and components. Additionally, electrical cable pulling activities and rework of the Train B emergency diesel generator (EDG) were observed.

2.1 Electrical Components and Systems - Work Observed

During the conduct of routine plant tours, the inspectors observed the cable-pulling activities associated with the installation of safety-related Class 1E Cables E0255046 and E0255048. These cables provide control power for the shunt trip mechanism associated with the safety injection system.

These cable-pulling activities were well controlled and appropriate care was taken to insure that the specified cable-pulling tension was not exceeded. It was also observed that the cables were properly identified, extreme care was taken to prevent damage to the cable jacketing, the craft personnel involved were cognizant of the electrical installation specification requirements contained in CPES-E-2004, and the required quality control (QC) hold points were properly observed.

2.2 Mechanical Components and Equipment

The inspectors conducted evaluations of the licensee's activities associated with the rework of the Unit 2 Train B EDG. This work is a continuation of the overhaul activities which resulted from the recommendations of the owners group design review and quality revalidation (DR/QR) program. Specifically, the EDG overhaul program is being performed as a result of generic operational and regulatory issues related to Transamerica Delaval diesel generators. These recommendations, which have already been implemented on the Unit 1 EDGs, specify the performance of detailed inspections and the upgrading/replacement of various components.

As previously documented in NRC Inspection Report 50-445/91-05; 50-446/91-05, the overhaul activities for the Train A EDG have been essentially completed. During this reporting period, the licensee's startup and maintenance organizations initiated the disassembly of the Train B EDG. Observations of this safety-related maintenance process included portions of the following activities.

- Removal of subassembly covers and cylinder heads
- Removal of pistons and connecting rods
- Removal of cylinder liners
- Cleaning of EDG generator
- Cleaning of engine block internal surfaces

These activities were conducted in accordance with the following maintenance procedures:

- MSM-CO-3830, Revision 0, "Emergency Diesel Engine Disassembly and Assembly"
- MSM-CO-3349, Revision 1, "Emergency Diesel Engine Pistons, Rods, and Rings Maintenance"

In general, the inspectors observed that the above listed activities were properly performed, cleanliness controls were very good, removed components were properly stored and controlled, and the mechanical maintenance and QC personnel involved exhibited very good work practices and were knowledgeable of the procedural requirements.

2.3 Summary of Findings

During the performance of general plant tours, no violations or deviations were identified. Housekeeping, including the control of combustible materials, was determined to be adequate and appropriate provisions for the segregation and control of Q-listed material had been implemented. Construction activities were generally proceeding on schedule with the total construction staffing for Unit 2 currently at approximately 3800 personnel. Installed systems and components were being protected and observed work activities were well controlled.

3. VERIFICATION OF AS-BUILTS (37051)

During this reporting period, the inspectors performed selected evaluations of the licensee's program for the verification of as-built plant design configurations. Specifically, the objective of these inspection activities was to determine if the as-built design controls, construction drawings, and installation specifications correctly describe the actual condition of the plant system and that the as-built configuration of the plant conforms to the approved final design, regulatory requirements, and FSAR commitments. This inspection process included the evaluation of the licensee's program for the incorporation of changes from the original design to determine if the changes were properly reviewed and approved, and that plant seismic considerations and stress calculations were based on as-built conditions.

3.1 Procedure Review

The inspectors reviewed procedures of various disciplines relating to the as-built verification program. As a result of this review, it was determined that there is no generic controlling procedure that encompasses all of the various disciplines. Accordingly, each discipline has its own unique, as-built verification procedure. This procedural control process is typified by Engineering Assessment Procedure (EAP) 2-EAP-017, which has been established to facilitate the assimilation of design input data for Category I heating, ventilation, and air-conditioning (HVAC) duct and supports currently installed in Unit 2.

In general, the procedures reviewed were determined to be adequate for their intended use. Additionally, it was determined that there was an adequate review and approval process for each procedure currently developed. A listing of the procedures reviewed is provided as Attachment A of this report.

3.2 Piping Systems

Utilizing the appropriate master control drawings (MCD), the inspectors and members of the licensee's QC staff visually examined portions of three safety-related piping systems that had been previously verified for as-built configuration control. This activity consisted of confirming attributes such as dimensional characteristics, correct material type, location and identification of pipe welds (including configuration and size), and the verification of component (valve) orientation.

No discrepancies were identified during the examination of the subject safety-related piping systems and it was determined that the existing procedural controls appeared to be adequate and that the observed as-built conditions were accurately reflected in the MCDs. The drawings utilized during the review of the piping system as-built verification program are listed in Attachment A of this report.

3.3 Pipe Supports

The inspectors also observed construction engineers (CEs) perform an as-built verification on selected safety-related pipe supports in the Unit 2 diesel generator room. In particular, the inspectors witnessed verification of the following attributes:

- Location and orientation
- Dimensional checks
- Material type
- Support identification
- Hilti bolt type, embedment length, and spacing
- Weld location

Based on the results of these observed activities, it was determined that the specified as-built verifications were properly performed and that the required information was appropriately recorded.

3.4 Heating, Ventilation, and Air-conditioning (HVAC)

As currently established in the licensee's construction completion program, the safety-related HVAC duct work in the EDG rooms and in the safeguard building is scheduled for replacement. Accordingly, no as-built design confirmation program is required for these replacement HVAC duct work sections. However, there is an as-built verification program for the air-handling units, plenums, and equipment supports associated with the existing HVAC system, which is delineated in Procedure EAP-021.

The implementation of this program was evaluated during the conduct of the as-built verifications of two safety-related plenums located inside the EDG rooms. During the conduct of this activity, the inspectors observed that the location, orientation, and configuration of the subject plenums were properly verified and documented and that the required dimensional checks were appropriately performed. Additionally, it was determined that the CEs who performed this verification process were knowledgeable of the system requirements and design perimeters associated with the HVAC system.

3.5 Structural Steel Assemblies

The installation and reconciliation of design/installation issues for structural steel supports is essentially complete for Unit 2. The program governing these activities utilized the same corrective actions and methodologies which were developed for Unit 1. This approach is reflected in the relevant design basis documents which are the same for both units. These documents were extensively reviewed by the NRC during the completion phase of Unit 1 and they were determined to appropriately incorporate the technical requirements delineated in the Final Safety Evaluation Report.

Additionally, the inspectors reviewed the licensee's structural steel installation Specification CPES-S-2006, which corresponds to Specification SS-16B for Unit 1. This review indicated that the Unit 2 specification appropriately included the programmatic improvements which were developed from the Unit 1 lessons learned, including the requirements for material, storage, installation, and inspection activities.

Based on these reviews and inspection-related activities, it was concluded that the licensee's programmatic controls for structural steel assemblies appeared to be adequate.

3.6 Instrumentation and Controls

The inspectors also evaluated the implementation of the as-built verification program for safety-related instrument tubing and supports. As currently defined in the licensee's program, the Scope B engineering contractor is responsible for all safety-related tubing stress analysis and tubing support design activities involving 3/8-inch and 1/2-inch O.D. tubing. Accordingly, the information obtained from the Scope B design validation process is utilized to establish the design inputs for the preparation of instrument impulse tubing isometric drawings. It is noted that, relative to instrument tubing systems, the isometric drawings are the MCDs.

In order to assess this aspect of the as-built verification process, the inspectors witnessed selected portions of the engineering field data collection associated with the steam generator level and flow transmitter instrumentation tubing. During the conduct of these activities, it was observed that the responsible engineers accurately measured and recorded as-built dimensions and installation attributes, correctly annotated tubing slope and support locations, and were familiar with the controlling procedure and installation specification requirements. Additionally, the inspectors reviewed a sample of

the completed data forms for the steam generator level and flow transmitter instrumentation tubing and determined that the recorded data appeared to accurately reflect the field-identified conditions.

Based on the results of these observed activities and documentation reviews, it was determined that the responsible engineers properly performed the specified as-built verifications and that the required field data was properly recorded. A listing of the procedures reviewed is provided in Attachment A of this report.

3.7 Verification of As-Builts Included in Stress Calculations

In order to determine if as-built conditions were appropriately incorporated into stress calculations, the inspectors met with representatives of the licensee's engineering organization and reviewed two pipe support stress calculation packages. The calculations which were reviewed are listed in Attachment A of this report.

Based on the inspectors' review of these pipe support stress calculations, it was determined that the requisite, as-built conditions were properly included as input into the subject stress calculations and that these packages were properly prepared. No discrepancies were identified during this review process and it was concluded that this portion of the licensee's program for the reconciliation of pipe support stress calculations appeared to be adequate.

3.8 Quality Assurance (QA) Audits

During the review of the licensee's as-built design verification program, the inspectors also evaluated the results of two recent QA audit reports and three recent surveillance reports which were conducted in this area. The QA audits and surveillances which were reviewed are listed in Attachment A of this report.

In general, the results and findings of the QA audit and surveillances that were reviewed indicated that the QA organization was actively involved in the oversight of quality-related activities and that these oversight functions were being performed in order to identify concerns and discrepancies early in the construction program. It was also ascertained that each concern/finding which was identified by the QA organization was appropriately responded to by the cognizant group and that these responses appeared to establish meaningful corrective actions.

3.9 Summary of Findings

Relative to the areas examined, it was determined by walkdowns of installed components, examination of records and procedures, and discussions with licensee personnel that the as-built verification program for CPSES, Unit 2, appears to be functioning properly. In particular, it was ascertained that the as-built drawings and installation specifications that were reviewed correctly reflected the installed plant configurations; the as-built conditions were properly incorporated into the examined stress calculations; and the lessons learned from Unit 1 had been incorporated into the controlling design and

installation procedures/specifications. It was also observed that appropriate levels of management attention and resources were being applied to this program.

4. CONTAINMENT PENETRATIONS (MECHANICAL) (53051, 53053, 53055, 35100)

4.1 Procedure Review

The purpose of this inspection was to determine whether the technical requirements stated in the Final Safety Analysis Report (FSAR) and the safety evaluation report (SER), NUREG-0797, concerning CPSES Unit 2 containment penetrations, have been addressed in the construction specifications, including drawings and work procedures. Additionally, the purpose of this inspection was to determine if QA plans, instructions, and procedures for the installation of mechanical containment penetrations had been appropriately addressed in the CPSES QA manual.

The mechanical containment penetrations (which are 100 percent complete) were fabricated and installed by Chicago Bridge and Iron (CBI) at CPSES, Unit 2, during the 1985 time frame. Accordingly, CBI developed and implemented the procedures and controls used to install the mechanical penetrations at CPSES, Unit 2. The inspectors reviewed the CBI procedures and drawings which are listed in Attachment B of this inspection report. The inspectors reviewed the construction specifications, drawings, and work procedures for containment penetrations and found that these procedures were complete and that they satisfactorily stated the acceptance criteria for each penetration. It was also determined that the applicable test procedure instructions were concise and that they provided for the independent verification of test results. During this review process, the inspectors also verified that appropriate procedural provisions had been established for the identification and disposition of weld failures and penetration discrepancies.

The inspectors also reviewed the training program for the individuals who performed the examination, inspection, and installation of the mechanical penetrations. This review indicated that the established procedures for the training and qualifications of individuals who performed the work on the containment penetrations were in accordance with the controlling procedures.

Additionally, the inspectors reviewed the procedures used by CBI and TU Electric during their conduct of QA audits of containment penetration installation activities. The inspectors also reviewed the QA manual for CPSES, which indicated that QA activities were being appropriately conducted in accordance with the manual. In general, this review indicated that sufficient quality records were available to demonstrate the effective implementation of the QA program.

4.2 Records Review

The purpose of this aspect of the inspection was to determine whether the licensee had established and maintained appropriate records for activities involving the containment mechanical penetrations. In particular, the

inspectors reviewed 47 data sheets for various penetrations. This review indicated that the installation, inspection, and required leak testing had been performed satisfactorily and that the associated records were legible and complete and had been reviewed by QC personnel for completeness and accuracy. The inspectors also reviewed the qualification records of the individuals who performed various work activities on the containment penetrations. This review indicated that the personnel involved had been properly trained and qualified in accordance with established procedures. Additionally, the inspectors reviewed the QA audits which had been performed in 1977 and 1985. This review indicated that deficiencies identified during these audits had been appropriately corrected.

In order to evaluate the implementation of this program, the inspectors performed a 100 percent walkdown of the accessible components, which involved 81 mechanical penetrations. This field walkdown inspection included the examination of penetrations inside and outside the containment building. It was noted during the containment walkdown that 14 of the penetrations were not labeled. However, subsequent discussions with the licensee indicated that all the penetrations are scheduled to be labeled prior to fuel load for Unit 2.

During this walkdown, the inspectors also observed that two of the mechanical penetrations in Room 91 of the safeguards building indicated spalling of the concrete around the penetrations. Subsequent to the identification of this condition, the licensee stated that the depression of the concrete around these penetrations was due to slippage of the block-out forms used during the concrete pour and was not attributable to spalling. The licensee also stated that this was a cosmetic/nonstructural defect and that the penetrations were structurally sound. Additionally, the licensee stated that Construction Procedure No. ECC 9.11, "Room/Area Completion Walkdown," would programmatically address the identification of defects associated with mechanical containment penetrations. Based on a review of Procedure ECC 9.11, the inspectors concluded that this issue had been adequately addressed.

4.3 Summary of Findings

Inspection results indicated that the licensee has established and implemented an effective program for the installation, inspection, and turnover of mechanical containment penetrations. This program includes the maintenance of quality records, procedures, and QA audit results. At the time of this inspection all work was complete on installation of mechanical penetrations and no modifications were planned.

5. FIRE LOOP INSTALLATION (64053)

The purpose of this inspection was to verify that the licensee had installed the fire loop for Unit 2 in accordance with applicable codes, standards, and licensee commitments.

Based on a review of the associated piping drawings and system walkdowns, it was determined that the fire loop at CPSES is common for both Units 1 and 2 and that this fire loop is currently operational. It was also determined that the

subject fire loop was installed in accordance with the applicable codes, standards, and licensee commitments which were established in Supplement 21 to NUREG-0797.

5.1 Summary of Findings

Based on documentation reviews and inspections performed on the installed fire loop, it was determined that the licensee has properly maintained an operational fire loop for CPSES, Unit 2.

6. CORRECTIVE ACTION (92720, 92700)

During this reporting period, the inspectors reviewed the licensee's corrective action program to determine if adequate management controls and administrative procedures had been developed to identify deficiencies, to provide comprehensive followup action, and to correct safety-related deficiencies.

In particular, the inspectors evaluated the implementation of the licensee's program for documenting and correcting nonconforming and deficient conditions as delineated in CPSES, Unit 2, Procedure 2PP-3.05, "Processing of TU Evaluations (TUE) Forms and Conditional Release Requests (CRRs)." This procedure establishes the licensee's consolidated mechanism for the identification and control of nonconformances and deficient conditions as well as the process for addressing programmatic and repetitive issues.

In order to assess the implementation of this program, the inspectors reviewed numerous TUE Forms which were generated from early November 1990 until the end of February 1991. During this review process, it was determined that the majority of the TUE Forms evaluated contained adequate responses to routine deficiencies; however, technical concerns were identified with several TUE Forms. Specifically, the technical resolution of these TUE Forms failed to adequately address the programmatic aspects of the release of nonconforming material to the field, the generic implications of deficient work practices on safety-related components, and the reporting considerations of 10 CFR 50.55(e).

As determined by the inspectors, these above noted deficiencies appear to be the result of procedural interpretations of Procedure 2PP-3.05, which establishes a high threshold for identifying potentially significant adverse conditions which would necessitate the identification of root cause and the implementation of comprehensive corrective actions.

The programmatic deficiencies described above are exemplified by the following TUE Forms.

- TUE Form 90-163 dated November 7, 1990, documented the release of nonconforming material from the warehouse in violation of Procedure MMO-409, "Storage, Issue, and Shipping of Construction Material Parts and Components," Revision 2. In particular, quantities of 1-inch, Schedule 40, carbon steel, galvanized pipe, procured in accordance with Purchase Order 665-72257-001, were released to the field for installation on the fire protection system with open Nonconformance Report (NCR) 90-504 against the material.

The technical resolution of this TUE Form dispositioned the subject material "use-as-is" based on the acceptability of alternate/equivalent galvanizing processes. Although this resolution appears to be technically adequate, relative to the acceptability of this material for installation purposes, the TUE Form failed to address the identified deficiency concerning the incorrect release of material to the field with an outstanding NCR against the material. In this case the failure to establish measures to assure that conditions adverse to quality are properly identified and corrected is identified as the first example of a violation.

- TUE Form 91-337 dated January 9, 1991, documented the unauthorized base metal repair of safety-related piping. The unauthorized base metal repair was performed on the wrony section of 16-inch containment spray piping, apparently on an undocumented defect. The technical resolution of this issue directed the completion of base metal repair on the appropriately located defect in accordance with the controlling installation Specification CPSES-M-2003, Revision 1.

  This disposition failed to adequately address not only the implications of the questionable work control practices which allowed the welder who performed the unauthorized base metal repair to perform this out-of-scope activity, but also the implications associated with the ASME QC inspector who examined and accepted the unauthorized weld repair.

  The failure to elevate this TUE Form to the "programmatic deficiency" category resulted in the failure to evaluate and correct the programmatic deficiencies associated with this unauthorized work activity. This is a second example of the previously identified violation.

- TUE Form 90-172 dated November 12, 1990, concerned the radiographic identification of incomplete weld penetration and incomplete fusion of the welds between the fuel transfer tube and the expansion joint. It is noted that similar conditions were identified on the Unit 1 fuel transfer tube and that they were the subject of a Unit 1 violation, 445/8938-05.

  The technical resolution of this reported deficiency on an ASME Code, Section III, Subsection NE 5000, welded joint, directed the weld repair in accordance with the methods described in the reference TUE Form. The technical justification concluded that the subject weld repairs would conform to the applicable specification and Code requirements. However, apparently no consideration was given to the potential reportability of the identified defects in accordance with the requirements of 10 CFR 50.55(e).

  As determined by the inspectors, the reporting requirements of 10 CFR 50.55(e), which stipulate the identification and evaluation of deficiencies found during construction and, if they had remained uncorrected, could have adversely affected the safety of operations at the facility, were not evaluated by the licensee because this condition was

not identified on the TUE Form as being potentially safety significant. This failure to appropriately consider the reportability aspects of this design deficiency is characterized as the third example of the licensee's failure to adequately evaluate and correct deficient conditions.

Collectively, these three examples indicate that the deficiency reporting process controlled by Procedures 2PP-3.05 has not adequately established the threshold at which potentially significant conditions adverse to quality are identified and corrected. Accordingly, these examples, of inadequately dispositioned TUE Forms, which constitute the failure to establish measures to assure that conditions adverse to quality are properly identified and corrected, are identified as Violation 446/9007-01.

Subsequent to the identification of this apparent programmatic deficiency involving the identification and correction of potentially significant conditions adverse to quality, the licensee's engineering, licensing, and QC organizations initiated a review and evaluation of this issue.

This action resulted in the development of several proposed enhancements to the corrective action program which included:

- Supplemental training for lead engineers and engineering group supervisors involving potentially reportable adverse conditions.
- Increased involvement of the quality accountability program in the TU evaluation process.
- Revision of TUE Form to emphasize potentially reportable items.
- Review of dispositioned TUE Forms by engineering assurance to evaluate effectiveness of program changes.

These proposed corrective actions are viewed as a positive indication of the willingness of Unit 2 project management to rapidly respond to identified deficiencies. Additional assessments of this issue will be documented in a subsequent inspection report.

7. TMI ACTION ITEMS (25565)

7.1 (Closed) TMI Action Items III.D.3.3.1 and III.D.3.3.2: Provision of means for detecting and accurately measuring in-plant radioiodine.

NRC Inspection Report 50-445/89-67; 50-446/89-67 documented the closure of these items for Unit 1. During the current inspection period, the inspectors confirmed that the equipment, training, and procedures for radioiodine detection and measurement are common for Units 1 and 2. Accordingly, the requirements of NUREG-0737, "Clarification of TMI Action Plan Requirements" have been met for Unit 2. Therefore, these items are closed for Unit 2.

8. LICENSEE ACTION ON 10 CFR PART 50.55(e) DEFICIENCIES (90712)

During this reporting period, the inspectors completed a comprehensive review of construction deficiencies (SDARs) to confirm the status of those which were closed in previous inspection reports. The results of this review are provided in Attachment C of this inspection report. This attachment identifies each SDAR and the NRC inspection report that closed the respective item for Unit 2.

9. ACTION ON PREVIOUS INSPECTION FINDINGS (92701)

9.1 (Closed) Open Item 446/8511-03: Connecting flange weld lengths on ductwork are less than allowable.

This item concerned a Comanche Peak Response Team (CPRT)-identified deficiency involving the length of a duct connecting flange corner weld. Specifically, the governing specification, QI-039, Revision 0, required the weld in question to be 1 inch in length. The weld was actually 1/4 inch in length. Because the specification allowed only a 1/8-inch underlength, the licensee issued a deviation report.

During the current reporting period, the inspectors determined that the duct work in question (located in the Unit 2 Train EDG room) was removed and replaced as part of a programmatic replacement of all Category I ductwork in the EDG rooms. Therefore, this deficiency is no longer considered applicable. This item is closed.

9.2 (Closed) Open Item 446/8513-12: Locations and sizes of concrete Richmond inserts out-of-tolerence.

This item was identified as a result of the licensee's inspection activities associated with the CPRT. During that inspection, the licensee identified a deficient condition involving the location and sizes of Richmond inserts. Specifically, the inserts were located too close to embedded plates.

Subsequent to the licensee's identification of this deficiency, the NRC initiated this open item to track the licensee's actions in resolving this issue. During the present inspection period, the inspectors reviewed the manner in which the licensee addressed this issue. Essentially, the licensee has stated that the inserts in question were installed in a grid pattern as spares. Additionally, the licensee stated that, if it becomes necessary to use any of these inserts, the potential impact on the surrounding concrete will be evaluated at that time. This response adequately addressed the identified deficiency; therefore, this item is closed.

9.3 (Closed) Open Item 446/8921-03: Secondary chemistry sampling system.

This item originated from the results of an NRC inspection of the licensee's secondary sampling system for Unit 1. Specifically, this issue was identified as open for both units pending the completion of the following actions:

- Installation of a sample sink at the condensate storage tank sample panel.
- Construction completion in the vicinity of the secondary chemistry sample panels.
- Startup testing of the various secondary sample panels and subsequent NRC review and approval of the completed startup test procedures.

These three actions were satisfactorily completed and this item was closed for Unit 1 as documented in NRC Inspection Report 50-445/89-77. During the present inspection period, the inspectors closed this item for Unit 2 based on the licensee's plan to perform preoperational and startup testing for the Unit 2 secondary sampling system. Therefore, this item is closed for Unit 2.

10. EXIT MEETING

An exit meeting was conducted on March 12, 1991, with the persons identified in paragraph 1 of this report. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspectors during this inspection. During this meeting, the NRC inspectors summarized the scope and findings of the inspection.

ATTACHMENT A

Procedures

2EP-5.11, "Preparation of Engineering Assessment Procedures," Revision 0

APQ-11.5, "ASME Component Installation Verification," Revision 5

2-EAP-017, "Procedure for Gathering Input for Design of New Seismic Category I HVAC Duct and Duct Hanger," Revision 0

2EP-5.05, "Preparation, Approval and Control of Project Drawings," Revision 1

ECC-9.09-1, "Red-Lined Field Condition Drawings and Constructability Reviews," Revision 1

2PP-3.06, "Advance Design Change Program," Revision 0

ACP-11.5, "Component Support Fabrication and Installation," Revision 5

2-EAP-021, "As-Built Verification of Seismic Category I HVAC Air Handling Units, Plenums, and Equipment Supports," Revision 0

CP-SAP-20, "Guidelines for System Walkdowns Inspections," Revision 3

CP-SAP-03A, "Release of Station Component from Construction to Startup," Revision 1

CP-SAP-03B, "Turnover of Station Components from Construction to Startup," Revision 3

2EP-2.04, "Evaluating Unit 1 Post-Construction Hardware Validation Program (PCHVP) Results for Applicability to Unit 2," Revision 1

2EP-5.08, "Preparation, and Control of Calculations," Revision 2

CPSP-12, "As-Built Verification," Revision 8

2EP-5.22, "I&C Tubing Supports Evaluation and Design Criteria," Revision 0

CQP-IC-202, "Installation of Piping/Tubing and Instrumentation," Revision 0

Drawings

DO-2-090-403-D65R, Sheet 1 & 2 (PIPE SUPPORTS)

BRHL-AF-2-SB-011 (AUXILIARY FEEDWATER)
BRP-AF-2-SB-011 (AUXILIARY FEEDWATER)

BRP-CC-2-SB-020 (COMPONENT COOLING WATER)

BRP-CH-2-SB-003 (CHILLED WATER)
GHH-CH-2-SB-003 (CHILLED WATER)

2323-M1-0652 (HVAC)
M2-0652, Sheet A & B (HVAC)

Plenums

P-2-844-1K-INT-B
P-2-844-2K-INT-A

Audit/Surveillance Reports

QAS-91-006, "Unit 2 Attribute Analysis Matrix"
QAS-90-552, "Unit 2 Specification Commitments"
QAS-90-540, "Unit 2 PCHVP Attributes"
QAA-90-055, "Unit 2 Scope C Engineering Mechanics and Quality Technical Reviews"
QAA-90-065, "Scope B Electrical"

Stress Calculations

CS-2-301-001-A53R, Revision 1
H-PS-2-RB-006-012-2, Revision 2

ATTACHMENT B

Procedure No.	Title
RTP-(74-2427/8), Rev. 8	Radio Graphic Examination (CBI)
SRK 74-2428, Rev. 0	Special Repair Procedure (CBI) (Containment Liner)
QAS-351, Rev. 0	Quality Assurance Specification (Nuclear Power Plant Components Standards)
Issue No. 4	Nuclear Quality Assurance Manual for ASME Class 1, 2, 3 and U C Products
74-2427/28, Issue No. 2	Supplemental Q.A. Requirements
74-2427/28U No. 1 and 2	Supplemental Q.A. Requirements for Customer Issue Furnished Material
Issue No. 6	Nuclear Quality Assurance Manual
BUP-11B, Rev. 0	Build-up Procedure for Penetration Weld Edge Penetration
DRP-2427/28, Rev. 6	Dimensional Rec d Procedure
EFE-(74-2427/28)-1, Rev. 2	Procedure for Extent and Frequency of Examination for Welders for Butt-Welded Liner Weld Joints
GRI-13L, Rev. 4	General Repair Instructions for Dimensional Nonconformities
GRP-74-2427/28-C, Rev. 0	General Repair Procedure
HCT-74-2427/28-1, Rev. 1	Hydrostatic Test Procedure
SNT-TC-1A	Examination Personnel Training Qualification and Certification Manual
MTP-10, Rev. 8	Nondestructive Examination Performance Qualification and Certification

Audits

"Texas Utilities Services, Inc., Comanche Peak Steam Electric Station 1980-822300MW Installation, Quality Assurance Audit of CBI Activities dated April 4 1977."

"Comanche Peak Steam Electric Station TUGCo QA Audit Report, Chicago Bridge & Iron, Inc., QA Audit File: TCB-5 dated March 21, 1985."

Drawing No.	Title
2323-M2-0503, Rev. 1	Reactor Containment Penetrations
BRP-CH-2-RB-036, Rev. 1	Chilled Water
BRP-CH-2-RB-037, Rev. 1	Chilled Water
BRHL-CH-2-5B-033, Rev. 1	Chilled Water
BRHL-CH-2-5B-035, Rev. 3	Chilled Water
M2-0307, Rev. CP-4	Flow Diagram - Ventilation Chilled Water System
2323-S2-0511, Rev. 6	R. B. Containment Liner Details, Sheet No. 1
M1-0225, Rev. CP-11	Flow Diagram, Fire Protection System Main Loop, Sheet 06
MX-0225, Rev. CP-7	Flow Diagrams, Fire Protection Treated Water Supply System, Sheet CP-7

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