

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Dockets Nos. 50-445 and
TEXAS UTILITIES GENERATING)	50-446
COMPANY, <u>et al.</u>)	
)	(Application for
(Comanche Peak Steam Electric)	Operating Licenses)
Station, Units 1 and 2))	

AFFIDAVIT OF RONALD G. TOLSON
REGARDING EVALUATION AND DISPOSITION OF ITEMS
IDENTIFIED DURING FUEL BUILDING INSPECTION

I, Ronald G. Tolson, being first duly sworn, do depose and state as follows: I am employed as the TUGCO Site Quality Assurance Supervisor at Comanche Peak. As such, I am familiar with the QA Program at Comanche Peak, including the QC inspection processes. I have previously testified in this proceeding regarding the QA program at Comanche Peak. A statement of my educational and professional qualifications was received into evidence as Applicants' Exhibit 20. This affidavit addresses Applicants' evaluation and disposition of items identified in NRC I&E Report 83-23 regarding the NRC Staff inspection of the Fuel Building at Comanche Peak which relate to non-ASME activities.

I address each of the findings in the non-ASME areas below. As described below, none of these findings raised either significant safety concerns or warranted significant changes in the QA/QC program.

1. Cable Tray Supports

Two findings were made regarding particular components of two cable tray supports. These findings concerned the size of a steel angle wall connection and the size of a horizontal support member on another support. (I&E Report 83-23, Appendix B at 11-12). In response to these findings, Applicants conducted an evaluation of the specific determinations made by the Staff.

With respect to the steel angle wall connection, it was determined that the original design of the hanger utilizing this connection permitted either a 5x5 or 6x6 connection. The drawing to which the support was inspected by the Staff incorrectly referenced the 6x6 connection as having been installed. A revision to the drawing was issued to reflect the installed connection.

As for the horizontal support member, Applicants determined that the specification for this support member calls for a "Detail L" support, "similar to an SP-7 w/brace". The basic difference between a Detail L and an SP-7 member is the material (channel) size. An SP-7 utilizes a 6" channel (as used here), while a Detail L employs a 4" channel (reflected on the drawing). In response to this finding, the support drawing was revised to reflect the existing condition.

In addition, each of these supports was evaluated by Project Engineering and found not to present any concern for the adequacy of the installed components. Applicants determined that no programmatic adjustments were necessary as a result of these findings.

Installation of Hilti Bolts

The Staff identified one instance in which an installed Hilti bolt was less than 1" from an unused cut-off embedded anchor bolt, contrary to the procedure which specified a 1" separation (I&E Report 83-23, Appendix B at 8). Applicants' reinspection of this support determined that the separation was 7/8" between the installed bolt and the cut-off embedded bolt. This condition was identified on an unsatisfactory Inspection Report and evaluated by Project Engineering. That evaluation determined that no safety function of the support was impaired by this spacing. Applicants also determined that the particular bolt in question was partially obscured by components on the support and thus was difficult to inspect. In any event, Applicants agree with the Staff (I&E Report 83-23, Appendix B at 12) that this is an isolated case, and believe that it has no systemic

implications. Accordingly, Applicants concluded that no programmatic change was necessary as a result of this finding.

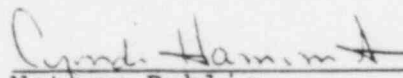


Ronald G. Tolson

County of Somervell)

State of Texas)

Subscribed and Sworn to before me this 20th day of September,
1983.



Notary Public