UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF GORDON R. PURDY REGARDING EVALUATION AND DISPOSITION OF ITEMS IDENTIFIED DURING FUEL BUILDING INSPECTION

I, Gordon R. Purdy, being first duly sworn, do depose and state as follows: I am employed as the Brown & Root (ASME) Site Quality Assurance Manager at Comanche Peak. As such, I am familiar with the QA Program for ASME activities at Comanche Peak, including the applicable 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 14B. This affidavit addresses Applicants' evaluation and disposition of items identified in NRC I&E Report 83-23 regarding the NRC inspection of the Fuel Building at Comanche Peak which relate to ASME activities.

The findings in I&E Report 83-23 are divided into two categories. These categories relate to findings concerning ASME activities as to which the NRC determined there to be a violation of 10 C.F.R. Part 50, Appendix B, Criterion X concerning the QC inspection program and an item as to which the NRC determined there to be a violation of 10 C.F.R. Part 50, Appendix B, Criterion V concerning QC instructions. I address each of the findings in these areas below.

INSPECTION PROGRAM

1. Large Bore ASME Pipe Supports

Of fifty large bore ASME pipe supports inspected by the Staff, six supports were identified as containing discrepancies relating to QC inspection. These six supports involved four types of discrepancies. Applicants evaluated each discrepancy and determined that no concern relating to the safety of the support was raised by these findings and that no significant programmatic deficiencies were indicated. Certain inspection checklists were revised, however, to assure attention to the specific details identified by the Staff. Each of the Staff's findings are addressed below.

a. Undersized weld

One undersized fillet weld on a support was identified by the NRC. This weld was less than 1/16" undersized from the 1/2" weld specified on the support drawing. (I&E Report 83-23, Appendix B at 5.) Applicants evaluated this undersized condition and determined it not to be significant for that support. Accordingly, the support drawing was revised to indicate the existing weld size.

- 2 -

b. Dimensions not per drawings

The NRC identified two supports on which discrepancies were identified between the design drawing dimension and the as-built configuration, for one measurement on each support (I&E Report 83-23, Appendix B at 5). Applicants investigated both of these items, and determined that neither raised any safety concern. The first example involved a design dimension of 2' 3" from a member of the support to the centerline of the pipe. Applicants determined that the actual dimension was 2' 4-9/16". In that this variance from design dimension is within the specified pipe location tolerances (± 2"), no further evaluation was necessary. The other support involved a variation in dimension between wall plates of 3' 0-3/4" (actual) versus a 2' 4-3/8" specified on the drawing. Applicants' engineering evaluation determined that this as-built condition was acceptable, as it was more conservative than the original design, and the drawing was revised to reflect the as-built condition.

c. Materials not per drawings

The Staff identified two supports on which an item was found not to comply with the material specified on the drawing. These items involved a variation in tube steel member thickness and the length of a threaded rod (I&E Report 83-23, Appendix B at 5). Both items were evaluated by Applicants' engineers and found to raise no safety concern regarding the adequacy of the supports. In the first

- 3 -

example, the draftsman made an error by incorrectly transposing the identified dimension. As the change was an error, and not an Engineering initiated change, he did not annotate the drawing to trigger the QC reinspection to confirm the dimension. Applicants consider this instance to be an isolated drafting anomoly not warranting further action, and the drawing was accordingly corrected to reflect the as-built condition. On the other support, it was determined that the installed threaded rod was longer than required by design. However, the installed rod, although acceptable for the application, was removed and the rod specified on the drawing was installed. In addition, Applicants revised inspection checklists to assure inspector attention to the embedment of concrete expansion anchors/inserts.

d. Broken cotter pin

The staff identified a broken cotter pin on one support, a condition contrary to applicable inspection procedures (I&E Report 83-23, Appendix B at 6). In response to this finding, Applicants replaced the broken cotter pin and revised the procedure applicable to final ASME certification inspections to include documented verification of installed hardware, <u>i.e.</u>, nuts, bolts, cotter pins, etc. These items will continue to be the subject of in-process inspections.

2. Small Bore ASME Pipe Supports

The Staff identified three (of thirty-five inspected) small bore ASME pipe supports which contained discrepancies from the

- 4 -

design drawing. Applicants' evaluation of these discrepancies determined that even had they not been identified there would have been no safety concern as to the adequacy of the supports. Applicants also determined that these items raised no significant adverse implications for the QA/QC program. Where appropriate, Applicants have increased the detail of the inspection checklist to provide greater assurance of identifying these types of discrepancies.

a. Dimensions not per drawing

The NRC identified a support as having a 1' 6" spacing between 11/16" holes, rather than the 1' 6.5" indicated on the drawing (I&E Report 83-23, Appendix B at 6). Applicants performed an Engineering evaluation of this discrepancy and found it not to raise any safety concerns. Accordingly, the drawing was revised to reflect the as-built condition.

b. Shim not per drawing

The actual location of shims is not specified by Engineering on the design drawing, other than the annotation of "field shim to suit". QC indicates actual shim location during walkdown inspection only for verification of material compatibility and weld acceptability. QC revised the drawing annotation to properly show shim location on the support and no further action was necessary.

c. Materials not per drawing

One support was identified to have a base plate dimension of 7/8" thickness rather than the 1" thickness specified by the design drawing (I&E Report 83-23, Appendix B at 6). Applicants

- 5 -

performed an engineering evaluation of this discrepancy and found the support to be acceptable without modification. In addition, Applicants revised their inspection checklist to include specific verification of base plate dimensions.

INSTRUCTIONS FOR QUALITY-RELATED ACTIVITIES

In its inspection of large bore ASME pipe supports, the Staff identified five supports which had loose jam nuts, contrary to the provisions of applicable inspection procedures (I&E Report 83-23, Appendix B at 6). In response to this finding, Applicants tightened the nuts identified in the inspection and revised the inspection checklist to include specific criteria for inspecting snug tight conditions for these nuts. The checklist will be used during the final ASME certification inspection, which had not been performed in the Fuel Building at the time of the NRC inspection.

County of Somervell State of Texas

Subscribed and sworn to before me this $2\sqrt{2^{t}}$ day of September, 1983.

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- 6 -

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(Comanche Peak Steam Electric) Station Units 1 and 2)	(Application for Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Motions (1) To Cancel Evidentiary Hearings And (2) For Expedited Consideration" in the above-captioned matter were served upon the following persons by deposit in the United States mail, firstclass postage prepaid or express delivery (*) on the 22nd of September, 1983, or hand delivery (**) on the 23rd of September, 1983.

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