

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of)	Docket Nos. 50-445-OL
)	50-446-OL
TEXAS UTILITIES ELECTRIC)	
COMPANY, <i>ET AL.</i>)	
(Comanche Peak Steam Electric)	Docket No. 50-445-CPA
Station, Units 1 and 2))	

AFFIDAVIT OF WILLIAM D. JOHNSON REGARDING PLANT LABELLING

William D. Johnson, first being duly sworn, deposes and states:

1. My name is William D. Johnson. I am employed by the U.S. Nuclear Regulatory Commission as Chief, Project Section A in the Division of Reactor Projects, NRC Region IV. Until recently, I was employed as the senior Resident Inspector at Comanche Peak Unit 1. A statement of my professional qualifications is attached hereto as Attachment 1.

2. As part of my responsibilities, I participated in a number of inspections of the plant labeling program at Comanche Peak.

3. The purpose of my affidavit is to describe the labelling deficiencies which the NRC determined existed at Comanche Peak Steam Electric Station (CPSES), TU Electric's (Licensee) corrective action and why this action is adequate to protect the public health and safety.

4. On October 16 through 27, 1989 and January 22, February 2, 1990, an inspection of Units 1 and 2 of CPSES was performed. The results of this inspection were reported in Inspection Report Nos. 50-445/89-200; 50-446/89-200. The relevant portion of this report is attached hereto at Attachment 2.

5. During the first portion of NRC Inspection 50-445/89-200, the team found that an upgrade program initiated by the Licensee to improve the useability of the plant labeling throughout the plant had not been implemented. During the second portion of this inspection, the team learned that the applicant had reevaluated and re-prioritized the upgrade program. There was no violation of NRC requirements, but the metal label tags were difficult to locate and read and rooms and components other than valves were essentially not labeled. The team believed the labeling existing at that time presented a potential for operator errors.

6. The Applicant's response to the concern over labeling was to implement the upgrade program earlier than had been previously planned. They labeled the rooms prior to licensing. In addition, components in areas containing both Unit 1 and Unit 2 components were relabeled prior to licensing of Unit 1. The completion of the label upgrade program was scheduled for the first refueling outage in December 1991.

7. On May 29 through June 15, 1990, an inspection of Unit 1 of CPSES was performed. The results of this inspection were reported in Inspection Report Nos. 50-445/90-20; 50-446/90-20. The relevant portion of this report is attached hereto as Attachment 3.

8. During this inspection, the team found that about 43,000 labels had been installed, and that completion was still targeted for the first refueling outage.

9. During July 3 through August 13, 1991, an inspection of Unit 1 of CPSES was performed. The results of this inspection were reported in Inspection Report Nos. 50-445/91-32; 50-446/91-32. The relevant portion of this report is attached hereto as Attachment 4.

10. During this inspection, the inspectors reviewed a Licensee Quality Assurance audit report on the system and component labeling program. Approximately 50 component labels were verified by the NRC inspectors. The few deficiencies identified had been previously identified by the Licensee and were included in the Licensee's label deficiency tracking system.

11. During August 14 through September 24, 1991, an inspection of Unit 1 of CPSES was performed. The results of this inspection were reported in Inspection Report Nos. 50-445/91-41; 50-446/91-41. The relevant portion of this report is attached hereto as Attachment 5.

12. During this inspection a number of design change notices, technical evaluations, and master equipment list data input requests were reviewed. These documents reported and initiated corrective action for label problems and related drawing and database updates. They were the result of questions raised and errors detected during the implementation of the label upgrade program. They indicated a good working system for identification and resolution of label, drawing, and database problems. Label

installation was noted to be 87 percent complete, with the remainder to be installed during the refueling outage. Verification of labels by operators was in progress.

13. During December 20, 1991, through February 1, 1992, an inspection of Unit 1 of CPSES was conducted. The results of this inspection were reported in NRC Inspection Report Nos. 50-445/91-70; 50-446/91-70. The relevant portion of this report is attached hereto as Attachment 6.

14. During this inspection, the inspectors found that 95 percent of the 62,645 component labels in the upgrade program had been installed and all of the 25,000 system labels had been installed. The Licensee had declared the label upgrade program for Unit 1 and common areas to be completed with the remaining labels to be handled by the ongoing label maintenance program. Controls were in place to make required label changes in conjunction with design modifications. The inspectors concluded that the Licensee had implemented an excellent labeling program as the labels were easily legible with standardized component nomenclature and included color coded borders to indicate the unit and safety train of the component.

15. The Staff considers this to be a closed item because the Licensee's labeling program exceeds NRC requirements and could serve as a model for other plants desiring to enhance plant labeling. CPSES labeling does not pose a threat to the public health and safety because components and systems have been labeled with clear, informative, unambiguous, and legible labels which assist the plant operators and maintenance personnel to accurately identify plant equipment.

16. The Licensee is currently performing a label upgrade program on Unit 2 with a goal of completion prior to initial licensed operation of Unit 2. The NRC is monitoring the Licensee's implementation of the Unit 2 label upgrade program.

17. The matters stated above are true and correct to the best of my knowledge, information and belief.

William D Johnson
William D. Johnson

Subscribed and sworn to before
me this, ¹⁷ day of March, 1992

Constance Marie Spagnoli
Constance Marie Spagnoli

Notary Public

My commission expires: 09/02/94