

TEXAS UTILITIES GENERATING COMPANY  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

BILLY R. CLEMENTS  
VICE PRESIDENT, NUCLEAR OPERATIONS

May 22, 1984

Mr. John T. Collins  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

Dear Mr. Collins:

Enclosed is a copy of our final report dated May 15, 1984, regarding issues surrounding the "T-shirt incident" of March 8, 1984. I believe this report, together with its attachments, accurately reflects the seriousness with which senior management views such matters and the level of effort we put into their investigation and resolution.

Should you have any questions, please advise.

Very truly yours,

*Billy R. Clements*

BRC:ln

Enclosure

cc: Darrell G. Eisenhut w/attachment

8406010051 840525  
PDR ADOCK 05000445  
A PDR

TUQ-2134

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To D. N. Chapman Glen Rose, Texas May 22, 1984

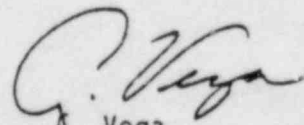
Subject Transmittal of Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will formally transmit the subject report dated May 15, 1984.

The report concludes that there was no intent on the part of the inspectors to convey any concerns or any message that would reflect adversely on an inspector's objectivity. Accordingly no repercussions and/or disciplinary actions have been or will be taken.

Of the six inspectors that I interviewed on March 9, 1984, two are still working in Unit No. 1 Safeguards Building; one is working in the Unit 1 Control Building; two have left of their own accord; and one is working in Unit 2. All reassignments have been made due to decreased activity in the Unit 1 Safeguards Building and a need for additional resources in the other areas.

We will continue our efforts to promote free expression of concerns without fear of retribution and to maintain a strong and effective QA/QC program at CPSES.



A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To D. N. Chapman Glen Rose, Texas May 15, 1984

Subject Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will document actions taken as a result of interviews with six (6) electrical inspectors who, on March 8, 1984, wore T-shirts with the phrase "I'm in the business of picking nits". Upon receiving a report of this, TUGCO site management decided to locate them in separate quarters to protect them from potential adverse reaction by other site personnel and to have them conveniently available for interviews. The inspectors were advised that these shirts reflected adversely on their professionalism and objectivity as inspectors.

Concurrent with this action, the inspector's work stations were examined to obtain and secure company property that might be compromised if disciplinary actions were taken. The items secured included copies of Non-Conformance Reports (NCR's) and Inspection Reports (IR's), and original IR's, Master Data Base Work Packages, controlled and "information" drawings, and miscellaneous notes and notebooks. The miscellaneous notes and notebooks were returned to the inspectors the next day. Immediately after, on the same day, an NRC representative confiscated the remaining documents. The following week, we requested the NRC representative to Xerox the original documents in their possession and return the originals to us so that we could proceed with our work. The NRC representative complied with our request.

The inspectors subsequently were interviewed separately by Mr. Boyce Grier on March 8 and 9, 1984, and by Mark Welch and myself on March 9, 1984. Mr. Boyce Grier's report is included as Attachment A. During these meetings several comments and concerns were voiced. Additional interviews with sixteen Electrical QC Inspectors were conducted to obtain as much information as possible in areas of concern.

The following salient points were made during the meetings with different degrees of concurrence among the inspectors interviewed:

1. The inspectors stated a strong displeasure at the publicity that had been given to their wearing of the T-shirts. They attributed a phone call to a newspaper to one person whom they described as "being intelligent but with very little common sense". The person who allegedly called the newspaper was also described as having coined the phrase, and they stated there was no connection between this phrase and any other previous incident at Comanche Peak. The inspectors stated there was no intent to convey a message or concern by wearing these T-shirts. They further pointed out that approximately twenty (20) inspectors had worn these shirts the previous Monday and that "nobody made a big deal about it".

2. They stated that up to about a week before then, there was "finger pointing" going on between building management personnel and QC. They believed QC was being described as uncooperative and causing unnecessary delays. They stated that the main reasons for the delays were inadequate inspection packages provided by the Paper Flow Group and the craft turning in work for inspection prematurely to obtain progress credit. They did note, however, an improvement in the inspection packages since the program was initially implemented as part of the Building Organization Concept.
3. Some inspectors voiced a concern with respect to inspection procedures. They believed that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements.
4. A concern was voiced over cable terminations. They stated their inspections were identifying problems with lighting terminations and had heard rumors that inspection procedures were being changed to delete such inspections.
5. Some inspectors voiced a disagreement with "use-as-is" dispositions on Non-Conformance Reports (NCR's), principally because of the number of such dispositions. Management's commitment to quality was questioned because a "use-as-is" disposition did not require craft to build it per the original requirement. Two examples were cited. The two NCR's are included as Attachments B and C.
6. Concerns were voiced on documentation. Some inspectors were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving Inspection Reports (IR's) has been a problem.

During our meeting, the following points were established:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management has been and remains totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. There was a need to place more emphasis on communicating information to inspectors, especially when inspection procedures are revised such that inspections are reduced in scope or deleted. The reasons for these actions, such as equipment declassification; alternate inspection programs; or inspection or test provisions (such as prerequisite or preoperational tests) during other project phases, should be communicated. Such communication was also necessary on certain NCR's dispositioned "use-as-is"

4. There was a need to promote more feedback and discussion, not only within QA and QC, but with the Engineering and Quality Engineering function.

On March 16, 1984, I was assigned to Comanche Peak as TUGCO Site QA Manager. Concurrently, Quality Engineering was organized also reporting to the Manager, Quality Assurance in Dallas. During meetings at the site on March 16, 1984, with QA and QC supervision, TUGCO's commitments to a safe and reliable plant; to a strong and effective QA/QC organization; to free and open communication at all levels in QA/QC; to an emphasis on QA/QC procedures that assure design commitments are being met; were communicated. Subsequent to that meeting, I issued a letter logged TUQ-1982 dated March 22, 1984, entitled "QA Policy" that reaffirms these commitments. A copy of that letter is included as Attachment D.

Since that letter, I have held meetings with every element of QA and QC organization here on site. TUGCO top management, including Mr. M. D. Spence and Mr. B. R. Clements, have attended some of these meetings with me. A memo to file dated April 30, 1984, reflecting top management involvement, is included as Attachment E.

In regard to the "finger-pointing", the QC inspectors cited inadequate inspection packages and premature submittal of work for inspection as reasons for delays.

The Inspectors stated that they had seen significant improvement in the quality of the packages, attributing the initial problems to "growing pains" with the Paper Flow Groups under the Building Management Concept. However, I have directed that a surveillance be conducted in these areas of concern. A copy of this directive is included as Attachment F. In addition to the above surveillance a task force (the CPSES Monitors Team) has been commissioned by the Assistant Project General Manager and myself to perform an oversight function on the entire records processing activity at Comanche Peak. The Paper Flow Group in each Building Task Force would be included within the inspection scope of the CPSES Monitors Team. The document commissioning this effort is included as Attachment G. This on-going effort will continue to assure QA records are being processed in an efficient and correct manner.

In regard to premature submittal of work for inspection, this matter had already been identified by our trending program. A Corrective Action Request (CAR), logged TUQ-1955, designated CAR-036, dated March 1, 1984, was issued requiring corrective action in four areas where a problem with "failure to assure work is completed correctly prior to a request for inspection" was identified. The Corrective Action Request is included as Attachment H.

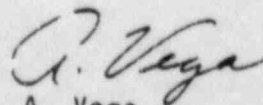
The concern on cable terminations has been addressed. On January 24, 1984, we verbally informed the NRC of a deficiency regarding cable terminations. On March 29, 1984, a final report was submitted in accordance with 10 CFR 50.55(e), describing actions taken. Supporting documentation is on record at CPSES.

Terminations used in junction boxes for power and control cable for 1E applications are qualified in accordance with IEEE 323-1974. The report has been reviewed and approved as meeting all requirements. Contrary to the rumors, Revision 16 to the procedure, which was issued on March 12, 1984 and remains in effect as of this date, continues to provide for removal of the covers of Class 1E power and control junction boxes, and for inspections.

In regard to the lighting terminations, the inspectors were advised that lighting fixtures are not Class 1E. Concerns related to failure of the lighting fixture terminations in the open-circuit and short-circuit mode were discussed with the inspectors involved. Engineering documentation addressing both failure modes was reviewed with them and discussed at length. The inspectors were satisfied that the integrity of the Class 1E power and distribution systems is not compromised.

The investigation clearly indicates that the T-shirts were worn in a spirit of levity, with no intent to convey messages or concerns. A greater number of inspectors had worn the shirts previously without incident. The investigation clearly indicates there was an unwarranted over-reaction on the part of management towards the wearing of the T-shirts on Thursday, March 8, 1984. This over-reaction in itself gave this incident inordinate and inappropriate attention.

Our efforts to encourage QA/QC personnel to voice their concerns is continuing. We continue to emphasize an open-door policy without fear of retribution. Mr. Boyce Grier is making every effort to provide greater visibility to his presence on site. We are continuing to place emphasis, during our training meetings, on reasons for procedural changes and continue to encourage inquiries on dispositions of NCR's, or on any other area of concern. We believe our efforts are being successful. We continue to maintain a highly effective Quality Assurance, Quality Control and Quality Engineering organization at Comanche Peak. We believe that our combined efforts continue to assure that we are building a safe and reliable plant that is in full compliance with all applicable requirements.



A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT A

## OFFICE MEMORANDUM

To R. G. Tolson Glen Rose, Texas March 15, 1984Subject Interviews of Electrical QC Inspectors  
Safeguards Building Task Force

On March 8 and 9, 1984, I conducted interviews of sixteen Electrical QC inspectors assigned to the Safeguards Building Task Force. A summary of the results of the individual interviews is attached. The following is a summary of my analysis of the results in the principal areas discussed during the interviews.

Procedures

Three-fourths of the inspectors interviewed have concerns with respect to inspection procedures. They believe that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements. It is their perception that requirements are being relaxed because inspectors have found too many problems that impact on schedule. They believe this is the reason that post construction inspections are being held up while the procedure is being revised. One inspector felt that inspectors should have more input into procedure changes and opportunity to comment on new procedures and proposed changes. Two inspectors had no problems with procedures and two were silent on the subject.

Documentation

Three-fourths of the inspectors interviewed have concerns about documentation. They were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving IR's has been a problem. Five of these inspectors believed that the situation with documentation is improving while two other inspectors said they saw no improvement. Three inspectors had no problems with documentation and one was silent on the subject.

Training

Three-fourths of the inspectors either have no problem with training or were silent on the subject. The remaining one-fourth felt that training could be improved. For the training currently being conducted they complained about the instructors who only read a procedure and answered questions during a training session. One felt the training would be more helpful if the instructors would discuss examples of inspection problems and describe how they were resolved.

R. G. Tolson  
Page 2  
March 15, 1984

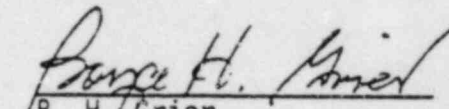
NCR's

None of the inspectors interviewed stated that they have any problem with issuing NCR's. One inspector did say that he had had some problems in the past but none now. One-half of the inspectors stated that they often disagree with the disposition of NCR's, principally because they feel that an excessive number are dispositioned "use-as-is".

Management

Two inspectors expressed concern because management did not seem to care about quality. Two other inspectors expressed the view that Area Management felt QC was overdoing inspections and causing delays in meeting schedules. Two other inspectors were concerned about pressure they perceived from management to meet turnover schedule, and one inspector felt the shutdown of inspections in the areas of post construction verification, separation and lighting was harassment by management.

If you have questions or wish to discuss this matter further, please let me know.

  
B. H. Grier

BHG/b11  
Attachment  
cc: B. R. Clements  
D. N. Chapman



Summary of Interviews With  
Electrical QC Inspectors - Safeguards Task Force

Inspector A

Did pre-post construction inspections. Found many problems in first room inspected. Room not ready for inspection. Followed procedure as written. Found 50-60% bad terminations. Noted evidence of rat damage to cables. Could not get SWA's to look at equipment. Only one SWA issued for pump motor. Training has been good. Documentation is a problem because of missing documents in folders. Three packages obtained today had nothing (DCA's, CMC's, IRN's) in folders. Feels situation with documentation is not improving. Has no problems with issuing NCR's when required. No problems with NCR dispositions.

Inspector B

Short time in Safeguards Task Force. Feels cooperation in Safeguards is not as good as in former group where everything went smooth. Regularly opened junction boxes during post construction inspections in former group. Training going good and has been helpful. Instructors mostly read procedures and respond to questions. Should bring up more examples of inspection problems encountered and discuss resolution. Has no problems with issuing NCR's. No problems with dispositions.

Inspector C

Concerned about newspaper article and statement about damage being done during inspection. Concerned about Area Management statements that QC inspectors are "overdoing their job". Feels that inspection procedures are changed too frequently. Believes terminal blocks which do not have lugs should not be used on safety equipment. Feels reaction when anyone goes to the NRC is intimidation. Believes Safeguard Electrical QC group is feeling heat because they spoke up about problems. Has no problems issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Believes inspectors need more freedom to do their job. Suggested that interviews of inspectors be conducted routinely with random selection of inspectors to be interviewed. Feels craft personnel were back of lock-up of inspectors wearing t-shirts and search of their personal effects. Has been unable to find some IR's in vault.

Inspector D

Feels Safeguard QC group has too many agreements with construction and doesn't follow inspection procedures because of informal arrangements. Concerned about newspaper article and statement about damage being done by inspectors. Finds this statement directed toward entire group to be intimidating. During training some of the QE's just read procedures and sometimes cannot respond to questions. Has problems with documentation packages with missing DCA's and IR's. Experience in the other Area groups is much better and sees no improvement in Safeguards PFG. Turned three packages back this morning because they were incomplete. No problem with issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Feels shutdown of PCV, separation and lighting inspections by Safeguards group when other area groups are not shut down is harassment by QA/QC and craft management.

Inspector E

Has no problem with inspections but feels procedures are changed too frequently. Feels training is alright. Has problems with documentation and receiving incomplete packages from PFG. Has spent more than half day looking for documents. Feels situation with documentation is improving. Has no problems with issuing NCR's but feels too many are dispositioned "use-as-is". Believes procedure changes are in direction of relaxing inspection requirements. Concerned that management doesn't care about quality. Would like to feel that he did a good job in his inspections.

Inspector F

Has concerns about lighting terminations where cable slack is not as prescribed. Inspected three rooms and found problems with 90% of terminations in two rooms but no problems in third room. Variation in results apparently due to difference in workmanship. Feels training is going well. Has had problems with incomplete document packages and IR lists not complete. Has no problems with issuing NCR's. Feels QC works well with engineers to resolve NCR's and has no problems with disposition.

Inspector G

Inspections have found problems with lighting terminations, also with power and control terminations and conduit identification. Feels procedure is being changed because inspectors have been looking too far. Understands Class 1E lighting is not to be inspected. Concerned because evidence of rat damage has been observed. Feels push from Area Management to meet turnover schedule. Has no problems with issuing NCR's. Has no problems with document packages.

Inspector H

Has had problems with interpretation of post construction inspection procedure. Procedure is being changed and feels problems are being resolved. Training will be conducted in revised procedure. Documentation has been a problem because of documents missing from packages. Feels situation is improving. Has no problem with issuing NCR's. Sometimes does not agree with NCR disposition.

Inspector I

Concerned that inspection procedures are being changed to eliminate removing of covers on junction boxes. Feels this may be compromising quality because inspections will be only a cosmetic look. Has problems with response from QE on questions. No problems with documentation. No problems with issuing NCR's. Sometimes does not agree when disposition is "use-as-is".

Inspector J

Has no problems with inspection procedures. Feels training being conducted is good. Has had problem with incomplete document packages but feels situation is improving. Has no problems now with issuing NCR's but has had problems in the past. Feels disposition "use-as-is" is excessive. Has gone to supervisor, QE and engineer to resolve disagreements on disposition. Feels post construction inspections are being limited. Concerned because QA management and Area Management don't seem to care about quality. Does not believe there is any way equipment is being damaged by inspection.

Inspector K

Concerned because of problems with procedures and shut down of inspections. Has no problems with training. Has problems with incomplete document packages.

Inspector L

Has found number of problems with lighting terminations during inspections. Feels inspections now being limited. Understands inspection procedure is being changed. Believed now procedure will not find problems. Training now going on is reading procedures and responding to questions. No problems with documentation. No problems with issuing NCR's but some problems with dispositions.

Inspector M

Concerned because inspection procedures are being changed frequently. Some procedures have been changed 3-4 times since Task Force was formed. One procedure was changed twice last week. Has found problems with documentation packages. Found four packages concerning same cable tray with different numbers assigned to the packages. Also problem getting DCA's. Previously had own prints but now can't get print when someone else has it checked out. No problems issuing NCR's.

Inspector N

Understands post construction inspection procedure is being revised to relax requirements. Concerned because of problems that have been identified with lighting terminations. Feels procedure requirement for STE or EE present when equipment is opened inhibits inspectors. Has no problems issuing NCR's. Feels electrical problems are not limited to the Safeguards Building. Training being conducted consists of instructor reading inspection procedures and answering questions. Feels documentation support is improving. Has had problem retrieving IR's. Concerned about promotion policy. Feels his pay increase is overdue.

Inspector O

Feels inspection procedures are a problem. There is no system for inspectors to request changes in procedures or for commenting on new procedures. Believes there should be system for feedback from inspectors. Feels there is pressure on craft to meet turnover schedule resulting in conflicts between craft, Area Management and QC. Feels PFG was not ready for Task Force operation. Has had problems with duplicate documentation packages and with retrieving IR's. Two people are assigned to the records vault to correct problems. Has no problems issuing NCR's or with dispositions. Believes inspector training should be improved. Feels testing for certifications is not strict enough.

Inspector P

Has no problems with inspection procedures. Believes Area Management feels that problems with delays are because of QC. Has no problems with training. Feels that documentation problems are being resolved. Has had problems retrieving IR's. Has no problems issuing NCR's. Believes separation was not built-in in the Safeguards Building. Feels that construction training in separation criteria was lacking.

FOR INFORMATION ONLY

284-00048

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Rm # 85 Safeguard	Class + E Conduit	C13612678	810'	N/A

NONCONFORMING CONDITION

The aluminum LB (vendor supplied) where flex conduit C13612678 attaches to CPI-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. # 01081 E, Item # 1. Location is East end of Diesel Generator on skid.

Hold tag applied.

ARMS  
INDEXED

QA RECORD

RTM	QA REVIEW
X	70 1/14/84
FILE NO.	151
SUBREQ NO.	NCR #

REFERENCE DOCUMENT: QI-QP 11.3-40 DATE: 13 11 REV: 13 11 PARA: 13 11

REPORTED BY: Eddie Snyder DATE: 1 15 184

DE REVIEW/APPROVAL: [Signature] DATE: 1 15 184

ACTION ADDRESSEE: Jozes/CONZATTI DEPARTMENT: LECT ENG

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

THE LOOSENESS OF THE VENDOR SUPPLIED AND INSTALLED LB, IS DUE TO THE LB BEING BACKED-OFF ENOUGH TO ALLOW POSITIONING FOR ALIGNMENT TO MEET FIELD CONFIGURATION. WORKMANSHIP AND SYSTEM INTEGRITY HAVE NOT BEEN COMPROMISED; THEREFORE, INSTALLATION IS ACCEPTABLE AS IS.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1 10 184

QE REVIEW APPROVAL: [Signature] DATE: 1 11 21 84

DISPOSITION VERIFICATION & CLOSURE: [Signature] DATE: 1 11 41 84

COMMENTS: FINAL IR E-1-0012896

REPORTING PERSONNEL

VERIFICATION PERSONNEL

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION
1	Km "35 Safeguard	Class 1 E Conduit	C1362678	810

NONCONFORMING CONDITION

The alum. num L.B (vendor supplied) where flex conduit (15612678) attaches to CPI-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. # 01081 E. Item # 1. Location is instead of Diesel Generator on skid.  
Hold to supplier.

REPORTING PERSONNEL

REFERENCE DOCUMENT: QI QP 11.3 40 REV 13 PARA

REPORTED BY: Eddie Snyder DATE: 1 15 84

QE REVIEW/APPROVAL: [Signature] DATE: 1 15 84

ACTION ADDRESSEE: James / [Signature] DEPARTMENT: [Signature]

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

ACTION ADDRESSEE

The looseness of the vendor supplied and installed L.B. is due to the L.B. being backed off enough to ~~be~~ allow positioning for alignment to meet field configuration. Workmanship and system integrity have not been compromised; therefore, installation is acceptable as-is.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1 16 84

QE REVIEW APPROVAL: Charlie Townsend DATE: 1 19 84

DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE: 1 1

COMMENTS: **FOR INFORMATION ONLY**

INSPECTION REPORT

NO. E-1-0012896

ITEM DESCRIPTION *Class 1E CO. Conduit* IDENTIFICATION NO. *C1351267F* SYSTEM / STRUCTURE DESIGNATION *99 810 SG #1 Rm. 85*

SPEC. NO. *ES-100* REV. *2* REF. Q.C. DOC. & REV. & CHANGE NO. *QI-QP 11.3-23 Rev 9* MEASURE OR TEST EQUIP. IDENT. NO. *NA*

IN PROCESS INSPECTION  PRE-INSTALLATION VERIFICATION  INSTALLATION INSPECTION  FINAL INSPECTION  PRE-TEST INSPECTION

INSPECTION RESULTS  
 INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY  
 INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW  
*James Whithead 1/12/84*  
QC INSPECTOR DATE

ITEM NO. INSPECTION ATTRIBUTES SAT. INSAT. DATE QC SIGNATURE

1. USE AS IS LAW disposition of NCR E84-00048. Dispositioned by Electrical Engineering and Quality Engineering approved.

PERM. PLT. RECORD

RTN *1* FILE LOC *17.T.99.21*  
SUBFILE LOC  
CONDUIT NO.

ARMS INDEXED  
DATE

\* Hold Tag Removed

REMARKS (DWGS, SPECS, ETC.)  
*This is the final IR.*  
*E84-00048*

RELATED NCR NO. *E84-00048* I.R. CLOSED *NA* DATE *1/12/84* SIGNATURE *NA* QC INSPECTOR

Reviewed by *James Whithead* Level *II* Date *1/12/84*

NONCONFIDENTIAL FOR INFORMATION ONLY

189-00049

REPORTING PERSONNEL

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 85 Safeguard	Class Conduit	C12604794	810'	N/A

NONCONFORMING CONDITION

The flex conduit for C12604794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 <sup>Item # 12</sup> DA Flex is located in Diesel Generator Room #85 at the F.O. Drip Return - CPI-DOAPDW-02m at the east end of the Diesel Gen. on the South side. Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA \_\_\_\_\_

REPORTED BY: Eddie Snyder DATE: 1/5/84

QE REVIEW/APPROVAL: [Signature] DATE: 1/15/84

ACTION ADDRESSEE: JONES/COMTATT DEPARTMENT: ELECT ENGR.

DISPOSITION: REWORK XXX REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

1. THE LOOSENESS OF THE FLEX AT THE EQUIPMENT END IS DUE ONLY TO THREAD-PLAY IN THE RE FITTING THAT BONNETS THE FLEX TO THE EQUIPMENT. THERE IS PROPER THREAD ENGAGEMENT, AND THE WORKMANSHIP HAS NOT BEEN COMPROMISED; THEREFORE INSTALLATION IS ACCEPTABLE AS IS.
2. WHERE FLEX CONNECTS TO THE EMBEDDED CONDUIT, REWORK TO TIGHTEN FLEX

QA RECORD

RTM	QA REVIEW
<u>[Signature]</u>	<u>[Signature]</u> 1/14/84
FILE NO.	<u>15.1</u>
SUBFILE NO.	<u>NCR #</u>

ARMS INDEXED

ENG. REVIEW/APPROVAL: [Signature] DATE: 1/10/84

QE REVIEW APPROVAL: [Signature] DATE: 1/12/84

DISPOSITION VERIFICATION & CLOSURE: [Signature] DATE: 1/14/84

COMMENTS: FINAL I.R. E-10013498

ACTION ADDRESSEE



NONCONFORMING

29700049

REPORTING PERSONNEL

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 55 Safeguard	Class II Conduit	C12604794	810	N/A

NONCONFORMING CONDITION

The flex conduit for C12604794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D # 01031 D/A Flex is located in Diesel Generator Room #55 at the F.O. Dr. Return CPI-DOAPDW-00m at the east end of the Diesel Gen. on the South. Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA \_\_\_\_\_

REPORTED BY: Eddie Smyler DATE: 1/5/84

QE REVIEW/APPROVAL: [Signature] DATE: 1/15/84

ACTION ADDRESSEE: Jones/CONTACT DEPARTMENT: Elec - 57102

DISPOSITION: REWORK (2) XXX REPAIR \_\_\_\_\_ USE AS IS (1) XXX SCRAP \_\_\_\_\_

ACTION ADDRESSEE

- (1) The looseness of the flex at the equipment end is due only to thread-play in the RE fitting that connects the flex to the equipment. There is proper thread engagement, and the workmanship has not been compromised; therefore, installation is acceptable-as-is.
- (2) Where flex connects to the embedded conduit, rework to tighten flex.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1/16/84

QE REVIEW APPROVAL: Charlie Townsend DATE: 1/19/84

DISPOSITION VERIFICATION & CLOSURE: DATE: 1/1

COMMENTS:



COMANCHE PEAK **NO INFORMATION ONLY**

INSPECTION REPORT

E-100/3498

ITEM DESCRIPTION <b>15 Conduit</b>	IDENTIFICATION NO. <b>C12664794</b>	SYSTEM/STRUCTURE DESIGNATION <b>SG#1 RM 815</b>
SPEC. NO. <b>ES100</b>	REV. <b>2</b>	REF. D.C. DOC. & REV. & CHANGE NO. <b>012P 11-3-23 R 9</b>
		MEASURE OR TEST EQUIP. IDENT. NO. <b>N/A</b>
<input type="checkbox"/> IN PROCESS INSPECTION	<input type="checkbox"/> PRE-INSTALLATION VERIFICATION	<input type="checkbox"/> INSTALLATION INSPECTION
		<input checked="" type="checkbox"/> FINAL INSPECTION
		<input type="checkbox"/> PRE-TEST INSPECTION

INSP. RESULTS

- INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY
- INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

*[Signature]* **1-13-84**  
QC INSPECTOR      DATE

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT	DATE	QC SIGNATURE
1.	Hold TAG removed per disposition of NCR E84-00049				

ARMS INDEXED DATE

PERM. PLT. RECORD

RTN	FILE LOC.
<b>L</b>	<b>17.1.99.21</b>
SUBFILE LOC.	
--- CONDUIT NO. ---	

REMARKS (DWG, SPEC, ETC.)

*This is the final IR*

RELATED NCR NO. **E84-00049** : I.R. CLOSED **NA** DATE **NA** SIGNATURE *[Signature]* QC INSPECTOR

Reviewed by *[Signature]* Level II Date 1/14/84

TUQ-1982

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984  
Subject QA Policy

Effective March 16, 1984, I assumed the position of TUGCO Site QA Manager at Comanche Peak.

I ask for your support in carrying out the following policies and objectives:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management is totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. TUGCO Management strongly supports and encourages QA/QC personnel to express quality related concerns. I wish to promote free discussion between inspectors, their "leads", QC supervisors and QA management. I wish to encourage the use of the Request for Information and Clarification (RFIC) as a means to communicate questions on procedures and instructions. I also wish to point out the availability of Mr. Boyce Grier to listen to any of your concerns. While your first recourse on concerns should be to your supervision, if you are not satisfied with the response from supervision, or for any reason you prefer not to go to supervision, Mr. Grier is available. I maintain an "open-door" policy. Please feel free to visit with me at any time. I encourage you to voice your concerns without fear of retribution. We will make every effort to address your concerns in a complete manner.
4. Quality Engineering is being reorganized reporting directly to the TUGCO Manager, Quality Assurance in Dallas. This provides an added measure of independence for that organization in order to assure that inspection procedures and instructions accurately reflect design requirements. Quality Engineering will also be working toward improving our program for training on inspection procedures and instructions.

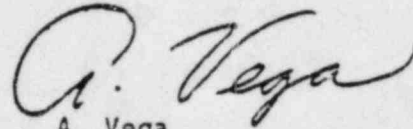
We intend to place more emphasis on systematically informing the affected inspection forces of changes to inspection procedures and instructions, especially when changes appear to relax or delete procedural requirements. Our objective is to communicate reasons for the above changes, such as declassifications, alternate inspection programs or inspections or test provisions during other project phases such as preoperational testing.

Our objective is to continue to promote a high degree of confidence that inspection procedures and instructions, which prescribe inspection work activities, accurately address design requirements.

-2-

I again request your support so that together we can continue to work toward a safe and reliable Comanche Peak Steam Electric Station.

Thank you,

A handwritten signature in cursive script that reads "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT E

## OFFICE MEMORANDUM

To File \_\_\_\_\_ Glen Rose, Texas April 30, 1984

Subject Top Management Participation in  
Site Meetings with QC Inspectors

This will document Mr. Mike D. Spence's involvement in meetings with QC Inspectors at Comanche Peak S.E.S. These meetings included both informal meetings and formal training classes. The attendance rosters for the formal meetings are attached. Mr. Spence, as President of TUGCO, presented top management's priorities and commitments as they apply to Comanche Peak.

The meetings between Site QA Management and the inspectors were undertaken to personally re-emphasize the QA policy elements documented in memorandum TUQ-1982, dated March 22, 1984, a copy of which is attached.

Mr. Spence stated that Texas Utilities because of its size has many important priorities. However, Texas Utilities has no higher priority than constructing Comanche Peak correctly.

Mr. Spence stated that Site QA Management's commitment to an open door policy and more informative communication is a reflection of his policies. As examples, he stated that inspectors have the right to ask for information and receive information on use-as-is dispositions on NCR's. He supported the intent to inform inspectors of underlying reasons for changes to inspection procedures.

Mr. Spence also emphasized TUGCO's responsibility for the safety of Comanche Peak. He stated his belief that this is a responsibility that TUGCO has accepted and which it cannot delegate to any organization. He stated his belief that quality cannot be legislated; that it must originate with top management support for quality. He further stated that quality cannot be inspected into the plant; that it must be built by the craftsman into the plant. He discussed the economics and the management support for "building it right the first time" as opposed to building it right on the second or third effort. Mr. Spence stated he saw Quality Assurance as an essential tool in assuring an effort is done correctly the first time.

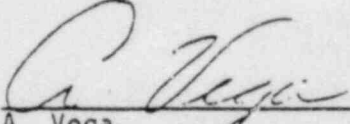
Mr. Spence then opened the meeting for questions, declaring an "open season on the President of TUGCO".

File  
Page 2  
TUQ-2046A

During this part of each meeting, the inspector's questions, concerns and comments were addressed. These included:

- The effect of security measures, in the permanent plant records vault, on inspector's accessibility to records.
- The review of QA records by non-QA organization personnel.
- Possibility of across-the-board salary increases.
- History/purpose of Component Modification Cards (CMC's).
- Plans related to the completion of Unit 2.
- Sources of financing for the project.
- Status of the licensing process.
- State of the nuclear industry, especially plans for new plants, in the present regulatory environment.
- Inquiries as to what TUGCO is doing to present the positive aspects of Comanche Peak.

I believe these meetings have made a significant contribution in improving communications with the inspection forces.

  
A. Vega  
TUGCO Site QA Manager

AV/b11  
cc: M. D. Spence  
B. R. Clements  
D. N. Chapman

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

CPK 11.4 - 29 - REV. 4

GIVEN BY: Will Kettle (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>Will Kettle</u>	<u>Will Kettle</u>	<u>165197</u>	<u>383626125</u>
<u>TRIF PAVINSKI</u>	<u>Trif Pavinski</u>	<u>6937</u>	<u>556 80 2656</u>
<u>Edmund J. Mc Gee</u>	<u>Edmund J. Mc Gee</u>	<u>2984</u>	<u>143-01-7030</u>
<u>D. B. Dionne</u>	<u>D. B. Dionne</u>	<u>TUGCO 667</u>	<u>465-92-2400</u>
<u>Paul Higgins</u>	<u>Paul Higgins</u>	<u>HQ-82</u>	<u>464-54-0233</u>
<u>Jack Gallagher</u>	<u>Jack Gallagher</u>	<u>D1665</u>	<u>196-36-5212</u>
<u>DANIEL LIND</u>	<u>Daniel Lind</u>	<u>112145</u>	<u>538-15-5602</u>
<u>Will Kettle</u>	<u>Will Kettle</u>	<u>165197</u>	<u>457-74-3111</u>

Will Kettle  
INSTRUCTOR'S SIGNATURE 1 hr 10 MIN.  
HOURS OF TRAINING: 45 MIN. NB  
TIME: 9:00A - 9:45A 4-17-84  
8:00A - 9:10A



TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

COMANCHE PEAK STEAM ELECTRIC STATION  
GIVEN BY: Bill Patten (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>Wm M. Underwood</u>	<u>Wm M. Underwood</u>	<u>E068</u>	<u>413-74-2588</u>
<u>Juan M. Lopez</u>	<u>J.M. Lopez</u>	<u>L-777</u>	<u>447-76-4159</u>
<u>Jerry Lamb</u>	<u>Jerry Lamb</u>	<u>HQ-210</u>	<u>452-25-3244</u>
<u>Jackie D. Brown</u>	<u>Jackie D. Brown</u>	<u>HQ-210</u>	<u>454-17-0429</u>

Bill Patten  
INSTRUCTOR'S SIGNATURE  
HOURS OF TRAINING: 1 hr. 10 min.  
TIME: 9:00A - 9:15A <sup>4/17-84</sup>  
8:00A - 9:10A

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

DI-OP 11.4-28. TCV. 4  
GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>David Miller</u>	<u>[Signature]</u>	<u>E894</u>	<u>463-11-9111</u>
<u>GENE JOHNSON</u>	<u>[Signature]</u>	<u>SL002</u>	<u>460-86-9602</u>
<u>Loren M. Scott</u>	<u>[Signature]</u>	<u>HQ.201</u>	<u>548-17-0601</u>
<u>RICHARD L. GIBSON</u>	<u>[Signature]</u>	<u>E125</u>	<u>536-42-5263</u>
<u>DAVID E. ETHRIDGE</u>	<u>[Signature]</u>	<u>V820</u>	<u>461-78-5530</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>	<u>[Signature]</u>

Neill Britton  
INSTRUCTOR'S SIGNATURE 4-17-84  
HOURS OF TRAINING: 45 min  
TIME: 9:20 AM - 10:05 AM

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

QI-QP 11.4-28 Rev. 4

GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>JOHNNY WASYLYSZYN</u>	<u>Johnny Wasylszyn</u>	<u>HQ-92</u>	<u>444-98-8964</u>
<u>Seacoth Corder</u>	<u>Seacoth Corder</u>	<u>HQ-67</u>	<u>401-74-9624</u>
<u>EDDIE NIEDECKEREN</u>	<u>Eddie Nuducken</u>	<u>2922</u>	<u>464-13-9708</u>
<u>JAMES UHLEIN</u>	<u>James Uehlein</u>	<u>E114</u>	<u>283-58-4324</u>
<u>Terry H. Webb</u>	<u>Terry H. Webb</u>	<u>E-116</u>	<u>234-86-5585</u>
<u>Marian Kiernan</u>	<u>M Kiernan</u>	<u>HQ95</u>	<u>223-74-7152</u>
<u>J. FAZI</u>	<u>J. Fazi</u>	<u>HQ169</u>	<u>047-22-0303</u>

Neill Britton  
INSTRUCTOR'S SIGNATURE

HOURS OF TRAINING: 45 min.

TIME: 9:20 AM - 10:05 AM

## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984  
Subject QA Policy

Effective March 16, 1984, I assumed the position of TUGCO Site QA Manager at Comanche Peak.

I ask for your support in carrying out the following policies and objectives:

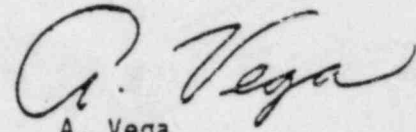
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Thank you,

A handwritten signature in cursive script that reads "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT F

## OFFICE MEMORANDUM

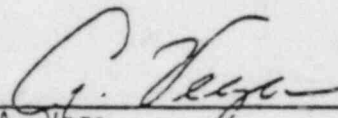
To C. H. Welch Glen Rose, Texas March 21, 1984  
Subject Inspector Interviews

CONFIDENTIAL

Concerns have been expressed related to document packages and duplicate packages with different numbers for the same components, presented to inspectors for their use in conducting inspections.

A concern has also been expressed on the retrieveability of IR's. The problem appears to have been observed during the establishment of work packages related to the integrated building management system. An improvement has been noted in some instances.

Please arrange for a surveillance of this activity and advise me by March 23, 1984, of your schedule for conducting this surveillance.

  
A. Vega  
TUGCO Site QA Manager

AV/b11

cc: B. R. Clements  
D. N. Chapman  
B. H. Grier

## TEXAS UTILITIES GENERATING COMPANY

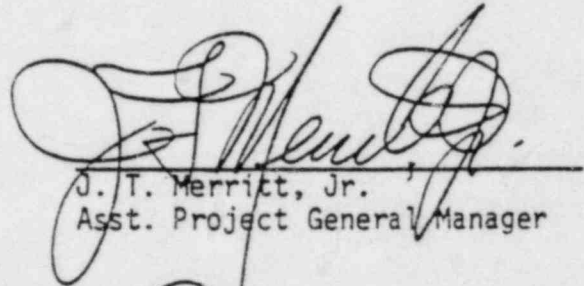
ATTACHMENT G

## OFFICE MEMORANDUM

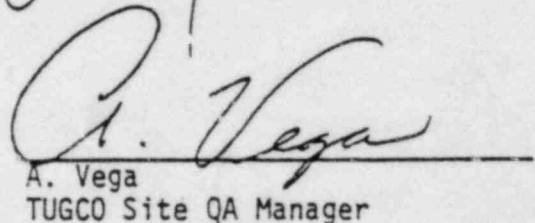
To Distributio. Glen Rose, Texas March 30, 1984  
Subject COMANCHE PEAK STEAM ELECTRIC STATION

The CPSES Monitors Team is established as a management oversight group under my direction. Its purpose is to monitor records processing activities as they relate to construction and startup activities. Initially, efforts will concentrate on records necessary to complete construction within security boundary of Unit 1 and common. The scope will include all of the departments cited on the attached flow diagram between the points labeled DCC and PPRV/BOP Vaults. Activity reports and recommendations will be made on a regular basis to me and the management of the groups affected.

This team is being chartered as a result of an already successful monitoring effort in DCC and requests made by several building managers. It supplements the existing QA internal audit program.



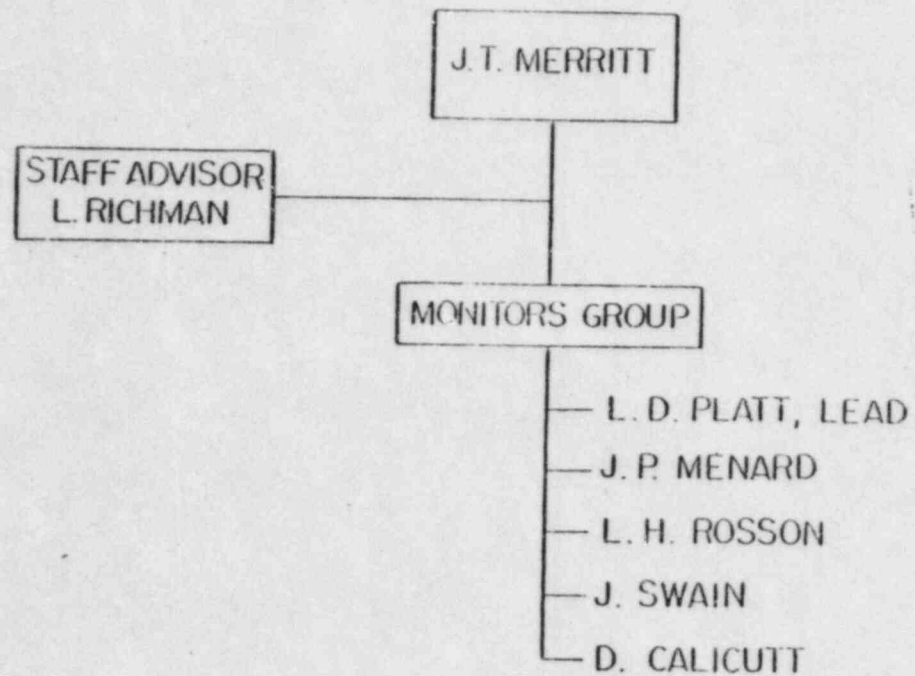
J. T. Merritt, Jr.  
Asst. Project General Manager



A. Vega  
TUGCO Site QA Manager

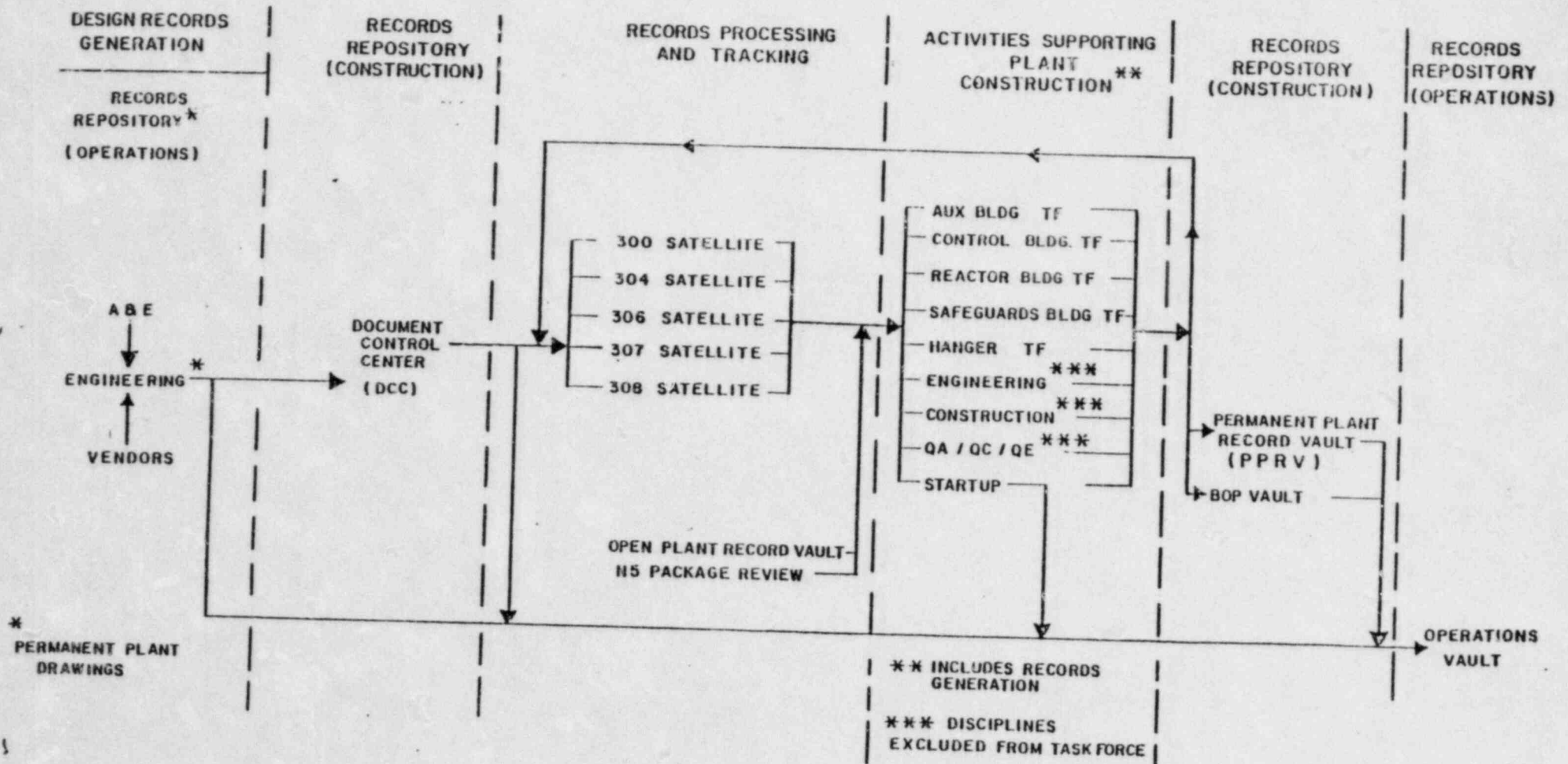
JTM:AV:pew

cc: B. J. Murray  
G. B. Crane  
F. L. Powers  
J. A. Dittmar  
R. D. Gentry  
H. A. Hutchinson  
C. Boyd  
C. Welch  
C. Osborne  
L. M. Richman  
L. D. Platt





# CPSES RECORDS FLOW PATHS



## OFFICE MEMORANDUM

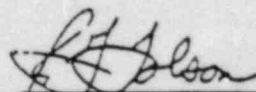
To J. T. Merritt Glen Rose, Texas March 1, 1984Subject Corrective Action Request (CAR-036)  
Control of Deficiencies  
RE: Corrective Action Report Fourth Quarter 1983 (Attachment)

A review of the fourth quarter trend report indicates that the percentage of inspection reports documenting deficiencies is unsatisfactory in several areas and appears to warrant corrective action.

The following shows the type of work inspected, the percentage of inspection reports documenting deficiencies, the major deficiency trend categories, and, based on discussions with inspection supervisors, the apparent causes for the deficiencies:

1. Electrical Cables showed an unsat rate of 14%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure the work is completed correctly prior to a request for inspection.
2. Electrical work other than cables and terminations (E) showed an unsat rate of 12.8%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure work is completed correctly prior to a request for inspection.
3. Miscellaneous Structural Steel (MS) showed an unsat rate of 14.2%. The major trend category is fabrication errors due to misdrilled holes, improper dimensions, and/or improper material. The apparent causes appear to be a lack of clear fabrication requirements and failure to assure work is completed correctly prior to a request for inspection.
4. Protective Coatings (PC) showed an unsat rate of 34.4%. The major trend category is inadequate surface preparation. The apparent cause is a failure to assure work is completed correctly prior to a request for inspection.

Please provide a written response to this office on or before March 16, 1984, describing the action you have taken or intend to take to correct these matters and prevent recurrence and your estimated date for completion of corrective action.



R. G. Tolson  
TUGCO Site QA Supervisor

RGT/BCS/GWP/GAS/pr  
Attachment

cc: J. D. Hicks  
D. N. Chapman