

APPENDIX B

NOTICE OF DEVIATION

Texas Utilities Electric Company  
Comanche Peak Steam Electric  
Station (CPSES) Unit 1

Docket: 50-445/84-08  
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of November 14, 1983, through March 31, 1984, and in accordance with the NRC enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following deviation was identified:

Deviation from Design Information for Installation of Seismic Category I/  
Seismic Category II Structural Steel for the Bolted Connections Between  
the W16x40 and the Wall on Platform OP-11 in the Pressurizer Compartment.

1. CPSES FSAR Section 1A(B), on page 1A(B)-26, states, "The quality assurance program for design and construction at CPSES incorporates the intended objectives of ANSI N45.2.11." (Draft 2, Revision 2 - May 1973)

Contrary to the above, the licensee did not incorporate the intended objectives of ANSI N45.2.11 into the design of certain personnel access platforms at CPSES. A review of the design documentation, including Gibbs and Hill Drawing 2323-S1-0556, Revision 4, Design Change Authorization (DCA) 9764, Revision 3, and DCA 1090, indicated that the above platform was originally designed as nonsafety-related.

2. ANSI N45.2.11 (Draft 2, Revision 2 - May 1973), paragraph 3, requires that design input requirements be specified to the level of detail necessary to permit the design activity to be carried out in a correct manner and should include basic functions, loads, and physical interfaces. ANSI N45.2.11, paragraph 8, requires that design changes be subjected to design control measures commensurate with the above.

Contrary to the above, the design documentation was upgraded to Seismic Category II with the particular beams supporting safety-related instrument tubing for two channels of pressurizer level upgraded to Seismic Category I. DCA 1090 required that the bolted connections between the W16x40 and the wall be "hand tight only", but did not address any locking device or thread upset to prevent nut backoff.

3. AISC Manual for Steel Construction in the Specification for Design, Fabrication, and Erection of Structural Steel for Building in Section 1.23.5 addresses the need for tightening high strength bolted connections to prevent the nut from loosening and falling off.

In deviation from the above, DCA 9764 upgraded the platform to Category I and changeout of material, but did not change the connection requirements specified in DCA 1090.

This is a deviation (445/8408-03).

Texas Utilities Electric Company is hereby requested to submit to this office within 30 days of the date of this Notice of Deviation, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further deviation from commitments made to the Commission; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: July 26, 1984