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CASE

1426 S. Polk
Dallas, Texas 75224

CONFIDENCE

(CITIZENS ASSN. FOR SOUND ENERGY)

214/946-9446 REGISTERED CORRESPONDENCE

August 15, 1984

DOCKETED
USNRC

Mr. William A. Horin
Bishop, Liberman, Cook, Purcell & Reynolds
1200 - 17th St., N. W.
Washington, D. C. 20036

'84 AGO 20 AIO:44

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Bill:

Subject: In the Matter of
Texas Utilities Electric Company, Et. Al.
Comanche Peak Steam Electric Station,
Units 1 and 2
Docket Nos. 50-445 and 50-446 OL

Discovery Requests regarding Applicants'
7/3/84 Motion for Summary Disposition
Regarding Allegations Concerning Quality
Assurance Program for Design of Piping
and Pipe Supports for Comanche Peak
Steam Electric Station

As discussed during the Applicants/Staff/CASE telephone conference call on 8/6/84, we are attaching a list of the documents which we believe are necessary in order for us to be able to adequately answer subject Motion for Summary Disposition. (We realize that the list is long, but so is the Motion. We really believe that it would have been better had Applicants included the requested documents when they filed the motion; however, we also realize that this would have been extremely bulky and can understand why you did not.) In this instance, two copies will be sufficient (Mark Walsh and I can work from one copy on this particular Answer).

In looking through Applicants' Motion, there are many questions which came to mind. However, we have not included all of them (just a few at the end) in this filing, because it may well be that when we get the requested documents, they will answer many of our questions. At some point in time, by mutual agreement of the parties, we feel that it will be necessary to have a conference call to discuss some of the questions we still have after reviewing the documents. We hope that we will be able to cut down on the number of questions and save everybody's time that way. We will be in touch about this later.

Sincerely,

CASE (Citizens Association for Sound Energy)

Juanita Ellis
(Mrs.) Juanita Ellis,
President

B40B200605 B40B15
PDR ADOCK 05000445
G PDR

cc: Service List (Express Mail to Applicants and Staff only; first class to rest)
Attachment

P. S. Sorry it took longer than anticipated on this; as you have probably noticed, I've had other previous commitments, such as answers to Motions for Summary Disposition, etc., to get out.

DS03

Please provide a complete copy of each of the following items requested:¹

1. The 1974 version of ANSI N45.2.11 (to which Westinghouse is committed). (Page 6, footnote 8).
2. The May, 1973 version of ANSI N45.2.11 (Draft 2, Rev. 2), "Quality Assurance Requirements for the Design of Nuclear Power Plants". (Page 10.)
3. Gibbs & Hill Specification MS-200 (all revisions). (Page 16).
4. Gibbs & Hill Specification MS-46A (all revisions). (Page 16).
5. Gibbs & Hill Analytical Engineering Guide AEG-501, "Thermal Stress Analysis for ASME Code Section III, Class 2 & 3, ANSI B31.1 Piping Systems" (all revisions). (Page 17, footnote 14).
6. Gibbs & Hill Analytical Engineering Guide AEG-502, "Seismic Analysis of Piping Systems in Nuclear Power Plants" (all revisions). (Page 18).
7. Gibbs & Hill Analytical Engineering Guide AEG-503, "Pressure and Dead-weight Analysis". (Page 18.) (All revisions.)
8. Gibbs & Hill Memorandum dated January, 1979, titled "Stress Analysis Procedures." (Page 19, footnote 17.)
9. Gibbs & Hill Memorandum AM-M-2179, dated November 14, 1979, titled "Hand Inputted Stress Intensification Factors." (Page 19, footnote 17.)
10. Gibbs & Hill Memorandum dated January 10, 1979, titled "Coding of Values for Stress Analysis." (Page 19, footnote 17.)
11. Gibbs & Hill Memorandum AM-M-694, dated March 3, 1979, titled "Procedures for Analyzing Seismic Anchor Movements." (Page 19, footnote 17).
12. Gibbs & Hill Memorandum, dated June 7, 1979, titled "Moment Restraint Modeling Procedure." (page 19, footnote 17.)
13. CPSES Engineering Instruction CP-EI-4.6-9, entitled "Performance Instruction for Piping Analysis by SSAG," (Revision 1 and all revisions). (Page 20.)
14. Gibbs & Hill Analytical Engineering Guide AEG-501. (Page 20). (All revisions)
15. Gibbs & Hill Memorandum Procedure AM-M-702. (Page 21.) (All revisions)
16. Gibbs & Hill Project Control Procedure PC-2 entitled, "Drawing Control Procedure." (Page 21, footnote 19.) (All revisions.)

¹NOTE: Concerning requests for documentation of audits the phrase "including responses and follow-ups" should be construed to include all documentation relating to any corrective action recommended and/or taken.

"All revisions" shall be construed to include the original and all subsequent revisions, including the most recent.

17. Gibbs & Hill Design Control Procedure DC-3 entitled, "Drawing Preparation, Checking and Approval Procedure." (All revisions) (Page 21, footnote 19).
18. Gibbs & Hill Procedure, "Seismic and Thermal Restraints - Release for Design and Fabrication" dated December, 1977 (all revisions). (Pages 21-22.)
19. Gibbs & Hill Design Control Procedure, DC-7, entitled "Technical Calculation Procedure" (all revisions). (Page 22.)
20. Gibbs & Hill Quality Assurance Procedure, QA-4, entitled "CPSES - Internal Audit Procedure", (all revisions). (Page 23.)
21. Gibbs & Hill Quality Assurance Department Instruction QAI-7, entitled "Audit Performance, Reporting, and Follow-Up," (all revisions). (Page 23.)
22. Gibbs & Hill Procedure QAI-3 (all revisions). (Page 23.)
23. A complete copy of each and every one of the 14 audits of Applied Mechanics done by Gibbs & Hill Quality Assurance (including all responses and follow-ups.) (Page 24.)
24. A complete copy of each and every external audit performed on Applied Mechanics by the NRC (i.e, by Region IV and by NRR) (including all responses and follow-ups). (Page 24.)
25. A copy of each and every external audit performed on Applied Mechanics by TUGCO (including all responses and follow-ups). (Page 24.)
26. A copy of each and every internal audit performed on the Gibbs & Hill Site Stress Analysis Group "within the past year" by Gibbs & Hill Quality Assurance (including all responses and follow-ups). (Page 24.)
27. A copy of each and every audit of the SSAG by TUGCO (including all responses and follow-ups). (Page 24.) (These should include the joint Gibbs & Hill and TUGCO QA audit mentioned on page 24.)
28. A complete copy of the seminar material (both instructor and student) used by Gibbs & Hill QA Department to indoctrinate Applied Mechanics engineers in the requirements and importance of DC-7, DC-8, 10 CFR Part 50, Appendix B and ANSI N45.2.11. (Page 24, footnote 20.)
28. Westinghouse Specification 955125, Rev. 1 (5/17/83) and attachments (plus all other revisions to this specification). (Page 25.)
29. A copy of each and every audit of Westinghouse by TUGCO QA from 1976 through 1983, dealing with design control (including all responses and follow-ups) (Page 26.)
30. NPS Work Procedure No. 3.0.1, "Owner's Design Specification Review." (all revisions). (Page 32.)
31. NPS Work Procedure No. 3.0.2, "Design Requirements Review." (All revisions) (Page 33.)

32. NPS Work Procedure 3.0.5, "Pipe Support Design Control New Design" (all revisions). (Page 33.)
33. Section 18.0 of the NPS Quality Assurance Manual (all revisions). (Page 37.)
34. NPS Work Procedure 18.0.1, "QA Program Audit Control." (All revisions.) (Page 37.)
35. A copy of each and every internal audit (11) performed by NPS with respect to design activities associated with Comanche Peak (including all responses and follow-ups). (Page 38.)
36. A copy of each and every audit (5) of NPS performed by NPSI (including all responses, and follow-ups). (Page 38.)
37. A copy of each and every audit (3) of NPS performed by TUGCO (including all responses and follow-ups). (Page 38.)
38. A copy of both of the 2 audits of NPS performed by the NRC (including all responses and follow-ups). (Page 38.)
39. A copy of each and every technical audit performed by NPS engineers that is documented in a "written report to the Engineering Manager" (including all responses and follow-ups). (Pages 38-39.)
40. Section QCH-2.0 of "ITT Grinnell Corp QA Manual - Pipe Hanger Division" (PHDQAM") (all revisions). (Page 39.)
41. Section QCES-2.3.0 of "ITT Grinnell Corp. Engineering Services Quality Assurance Manual" ("ESQAM"). (Page 39.) (All revisions.)
42. Procedure QAM 12.1 of PHDQUAM (All revisions.) (Page 42.)
43. Procedure QCES 2.18 of ESQAM (all revisions). (Page 42.)
44. QCH 10.1 of PHDQAM (all revisions.) (Page 42.)
45. QCES 2.16 of ESQAM (all revisions.) (Page 42.)
46. A copy of each and every ITTG internal audits with respect to CPSES (15) regarding design activities (including all responses and follow-ups). (Page 42.)
47. A copy of each and every internal audit of ITTG Engineering Department (including all responses and follow-ups). (Page 42.)
48. A copy of each of the 3 external audits and 1 surveillance conducted by TUGCO on ITT/ITTG (including all responses and follow-ups). (Page 42.)
49. A copy of the 2 ASME audits conducted on ITT/ITTG (including all responses and follow-ups). (Page 42.)

50. A copy of each of the 6 NRC audits performed on ITT/ITTG (including all responses and follow-ups). (Page 42.)
51. A copy of CPSES "Indoctrination Program," CP-EP-2.0 (all revisions). (Page 43.)
52. CP-EP-4.0, "Design Control." (All revisions.) (Page 44.)
53. CP-EP-4.5, "Design Verification." (All revisions.) (Page 45.)
54. CP-EP-4.6, "Design Change Control." (All revisions) (Page 45.)
(NOTE: Some later revisions may be titled "Field Design Change Control.")
55. CP EI-4.0-1, "Design and Design Verification Control for Pipe Support Engineering." (All revisions.) (Page 45.)
56. A copy of each and every audit of PSE performed by TUGCO QA from December 1979 to December, 1983 (11) (including all responses and follow-ups). (Page 48.)
57. A copy of the 2 technical audits of PSE performed by the NRC in addition to the SIT report (including all responses and follow-ups). (Page 48.)
58. A copy of each and every internal surveillance group "audit " done within PSE (i.e. each and every report given to Mr. Finneran) (including all responses and follow-ups) (Pages 48-49.)
59. CP-EI-4.6-8, "Design Change Control for Large Bore Pipe Supports." (All revisions.) (Page 51.)
60. CP-EI-4.6-10, "Design Change Control for Small Bore Pipe Supports" (All revisions) (Page 51.)
61. ITTG Procedure QCES-2.3.0 (all revisions). (Page 53.)
62. NPS W.P. 3.1.5 (all revisions). (Page 53.)
63. Procedure CP-EP-4.7, "Control of Engineering/Design Review of Field Design Changes." (All revisions) (Pages 53-54.)
64. The current copy of the Field Design Change and Review Status Log (and all previous editions). (Page 54.)
65. Procedure CP-QP-17.0, "Corrective Action." (All revisions.) (Page 54.)
66. NPS Work Procedure 3.0.9(b), "Design Control Procedures - Revisions" (All revisions). (Page 55.)
67. ITTG Procedure ESQAM - QCES-2.3.0, "Design Control" (all revisions). (Page 56.)
68. CP-EI-4.5-10, "Control of Approval and Design Verification of Large Bore Field Design Changes." (All revisions.) (Page 52.)

69. CP-EI-4.5-11, "Control of Approval and Design Verification of Small Bore Field Design Changes." (All revisions.) (Page 53.)
70. CP-EI-4.5-4, "Technical Services Engineering Instruction for Pipe Hanger Design Review and Certification." (All revisions.) (Page 53.)
71. CP-EI-4.0-1 (all revisions.) (Page 55.)
72. CP-EI-4.5-1, "General Program for As-Built Verification" (All revisions) (Page 56.)
73. Gibbs & Hill Procedure AB-1, entitled "As-Built Verification Instruction." (All revisions.) (Page 56.)
74. Design Control Procedure, DC-8, titled "Design Review Procedure - Calculations, Drawings, Specifications." (All revisions.) (Page 58.)
75. CP-EI-4.5-4, "Technical Services Engineering Instruction for Pipe Hanger Design Review and Certification" (all revisions). (Page 60.)
76. NPSI work procedure 3.1.6, "As-Built Design Review Procedure (ASME Class 2 & 3) (all revisions). (Page 60.)
77. NPSI work procedure 3.1.7, "As-Built Design Review Procedure (ASME Class 1) (all revisions). (Page 60.)
78. NPSI work procedure 3.1.8, "Procedure for Final Approval" (all revisions). (Page 60.)
79. CP-EI-4.0-37, "Control of Final Review of Pipe Support Engineering Design." (All revisions.) (Page 62.)
80. CP-EI-4.0-1, "Design and Design Verification Control for Pipe Support Engineering." (All revisions) (Page 73.)
81. CP-EP-16.3, "Control of Reportable Deficiencies." (All revisions). (Page 74.)
82. CP-QP-16.1, "Significant Construction Deficiencies." (All revisions.) (Page 74, footnote 27.)
83. CP-EP-2.0, "Indoctrination Program" (all revisions). (Page 76.)
84. A copy of each and every audit of CPPE activities, including but not limited to audits of design processes of CPPE (37 in the last 5 years; 11 of which were PSE)(including all responses and follow-ups). (Page 78.)
85. ITTG procedure QCES 2.16, "Corrective Action." (All revisions.) (Page 79.)
86. ITTG ESQAM procedure QCE-2.3.6.C.1.b (All revisions). (Page 82.)

87. NPS Work Procedure 15.0.3, "Control of Design Errors" (all revisions). (Page 83.)
88. NPS Work Procedure 15.0.1, "Identification and Control of Nonconformances." (All revisions.) (Pages 83-84.)
89. NPS Work Procedure 16.0.1, "Corrective Action Request." (All revisions.) (Page 84.)
90. NPS Work Procedure 15.0.2, "Control of Issued Nonconformances." (All revisions.) (Page 84.)
91. Westinghouse Procedure WRD-OPR-19.0 (all revisions). (Page 90.)
92. Gibbs & Hill Procedure PC-9 "Design/Engineering Change/Deviation Request Procedure" (all revisions.) (Page 94.)
93. Gibbs & Hill AB-4 (all revisions). (Page 99.)
94. ITTG's Procedure, QCES 2.2.1 (all revisions). (Page 99.)
95. NPS's procedure WP 2.0.1 (all revisions). (Page 99.)
96. Westinghouse procedure WCAP-9550 (all revisions).(Page 99.)
97. Westinghouse procedure WRD-OPR-2.0 (all revisions). (Page 99.)
98. Westinghouse procedure WRD-OPR-19.0 (all revisions). (Page 99.)
99. Westinghouse procedure WCAP 9805, S&EED 1.2 (all revisions). (Page 99.)
100. Gibbs & Hill Procedure QA-5, "Procedure for Indoctrination and Training" (all revisions). (Pages 99-100.)
101. Gibbs & Hill procedure OPD-1 "Reporting Safety-Related Defects and Noncompliance Pursuant to 10 CFR 21" (all revisions). (Page 100.)
102. A copy of each and every audit of Westinghouse by ASME from 1976 through the date on which you supply your answer (including all responses and follow-ups). (Page 26.)
103. A copy of each and every audit of Westinghouse by the NRC (from 1975 to the date in 1984 on which you supply your answer, including all responses and follow-ups). (Page 26.)
104. PSE Engineering Guidelines (original and all revisions). (Page 43.)
105. A copy of the form (DHE-6). (Page 47.)
106. CP-EI-4.5-10, "Control of Approval and Design VERification of Large Bore Field Design Changes." (All revisions.) (Page 52.)
107. CP-EI-4.5-11, "Control of Approval and Design Verification of Small Bore Field Design Changes." (All revisions.) (Page 53.)

108. CP-EI-4.5-4, "TEchnical Services Engineering Instruction for Pipe Hanger Design Review and Certification." (all revisions.) (Page 53.)
109. Provide a listing of all specifications and procedures (including informal procedures, by whatever name they are called) utilized in the ASME N-5 certification program. (All revisions.) (Page 89.)
110. Provide copies of all documents listed in 109 above. (Page 89.)
111. Provide a listing of all specifications, procedures, instructions (or other working documents, by whatever name they are called) utilized by or in regard to the Authorized Nuclear Inspectors (ANI's). (Page 89.)
112. Provide copies of all documents listed in 111 above. (Page 89.)
113. Provide copies of all ANI Reports, ANI Records, ANI Audits, and any and all other inspection reports, etc. (by whatever name they are called) utilized by or in regard to the ANI's. (Page 89.)
114. A copy of each and every internal audit conducted by Westinghouse Nuclear Technology Division QA Systems and Compliance (or by any other Westinghouse internal organization). (Page 92.)
117. If any additional audits referenced in the following questions have been performed (in addition to those referenced in the questions), provide a copy of each and every such audit. (If the audit has not yet been responded to, do not wait for the answer, but supply the audit itself now.):

Questions: 23
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118. List each and every method used (NCR's, IR's, CMC's, etc.) at Comanche Peak to identify and/or correct nonconformances. (Used both now and in the past.)
119. How many (total) of each reporting mechanism answered in 118 above have been generated through the time you answer this request? And what is the combined total of all of these reporting mechanisms?

120. For each of the following organizations, provide a copy of the complete log (or other listing method) for each of the methods in your answer to 118 preceding: PSE; NPSI; ITT Grinnell; Westinghouse. (Include in your answer sufficient information so that we can understand the meaning of each column; include an identification of what each column and abbreviation means or represents.)
121. Is trending of nonconforming conditions done by each of the following organizations:
 - (a) PSE
 - (b) NPSI
 - (c) ITT Grinnell
 - (d) Westinghouse
122. If the answer to 121 is yes, what is the purpose of each organization's trending?
123. Is trending of nonconforming conditions (in regard to design) done by TUGCO or other Texas Utilities organizations?
124. If the answer to 123 is yes, what is the purpose of such trending?
125. Provide copies of all documents in which the trending referenced in 121 and 123 above is discussed or included.
126. Provide copies of all documents in which the results of the trending referenced in 121 and 123 above are discussed or included. (i.e., if an adverse trend is identified, what is done about it? Provide the documents which document what is done about it, including CAR's, SDAR's, etc., for each organization).
127. Who hired and who pays the ANI's at Comanche Peak? (Organization and person.)
128. Who decides upon the number of ANI's employed at Comanche Peak? (Organization and person.)
129. Who set up the specifications, procedures, instructions or other working documents utilized by or in regard to the ANI's (answer for each such document in your response to 111 preceding). (Include organization and person's name.)
130. If not already discussed specifically, what document and what individual and organization tells the ANI's what, how, and when they will inspect?
131. Provide a copy of each such document listed in your answer to 130 preceding.
132. What procedures are in place for upgrading supports from class 2 to class 1? (Answer for each of the design organizations at Comanche Peak.)
133. Provide a copy of each such procedure referenced in 132 preceding.
134. Have there ever been instances of upgrading supports from class 2 to class 1?
135. If the answer to 134 preceding is yes, provide complete details, including all documents (of any kind) regarding such upgrading.

136. What organization was responsible for the design of the Unit 1 Polar Crane bracket and seismic connections (see NRC Inspection and Enforcement Report 84-08/84-04, under cover letter of July 26, 1984)?
137. Provide complete details, including Applicants' response to the NRC, regarding the violation identified in regard to 136 preceding. Include copies of all documents relevant to this matter (including procedures, etc.)
138. What organization was responsible for the design and inspection of the Unit 1 Main Coolant System Crossover Leg Restraints (see NRC Inspection and Enforcement Report 84-08/84-04, under cover letter of July 26, 1984)?
139. Provide complete details, including Applicants' response to the NRC, regarding the violation identified in regard to 138 preceding. Include copies of all documents relevant to this matter (including procedures, etc.)
140. Provide copies of all nonconformance reports (or other method identified in your answer to 118 and 120 preceding) for each design organization (NPSI, ITT Grinnell, PSE).
141. What kind and how many management reviews or audits have been done for each of the design organizations?
142. Provide copies of all such reviews or audits referenced in 141 preceding.