

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES ELECTRIC	)	Docket Nos. 50-445
COMPANY, <u>et al.</u>	)	50-446
	)	OL
	)	OL
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

APPLICANTS' MOTION FOR SUMMARY  
DISPOSITION OF WESTINGHOUSE COMPONENTS  
COATINGS ISSUE

Pursuant to 10 C.F.R. §2.749, Texas Utilities Electric Company, et al. ("Applicants") submit this Motion for Summary Disposition of Westinghouse Components Coatings Issue. There is no genuine issue as to any material fact as to this matter, and Applicants are entitled to a decision in their favor as a matter of law.

I. BACKGROUND

Robert Hamilton testified that (CASE Ex. 653 at 55):

I'm concerned about the paint made by Westinghouse. Anything Westinghouse builds is painted with purple paint. Nobody says run any tests on it. \* \* \* I did an adhesion test on the paint myself and it failed the test.

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Mr. Hamilton did not identify the component that he tested, although it must have been painted purple, because Mr. Hamilton believes that all Westinghouse components are painted purple.

In its September 23, 1983 Memorandum and Order (at 22-23), the Board found that Applicants may not rely on Westinghouse's NRC-approved and monitored Quality Assurance/Quality Control program and procedures for safety-related coatings, which are designed to assure the integrity of coatings on Westinghouse-supplied equipment. Rather, the Board observed (id. at 23), "Applicant must have a reasoned basis for concluding that there is no safety problem related to" Mr. Hamilton's allegation.

In its subsequent October 25, 1983 Memorandum and Order (at 8), the Board commented that "[t]here needs to be some follow-up inspection to ascertain the truth and generality of" Mr. Hamilton's allegation.

II. THE BOARD SHOULD GRANT APPLICANTS' MOTION FOR SUMMARY DISPOSITION OF THE WESTINGHOUSE COMPONENTS COATINGS ISSUE

Attached is the affidavit of C. Thomas Brandt, which describes the coatings of Westinghouse-supplied components inside containment. As Mr. Brandt first explains, the "purple" coatings to which Mr. Hamilton referred in his testimony is apparently "Westinghouse blue," a deep blue paint with which Westinghouse coats some of its equipment (affidavit at 1). Because Mr.

Hamilton believed that all Westinghouse components are painted this color (CASE Ex. 653 at 55), it follows that he must have performed an adhesion test on a component painted that same color.

As explained by Mr. Brandt, the only Westinghouse components inside containment painted "purple" or blue are stud tensioning hoists and valve operators (affidavit at 4, 5). Applicants have exempted the coatings on these items of equipment from QA/QC requirements by placing them on the Protective Coatings Exempt Log maintained for that purpose pursuant to procedure CP-EP 16.4 (affidavit at 4-5 and Attachments F, G). When coatings are placed on the exempt log, Applicants assume that those coatings will fail for purposes of safe shutdown analysis. As Mr. Brandt therefore concludes as to Mr. Hamilton's adhesion test, "the success or failure of the test lacks safety significance" (affidavit at 5).

For the foregoing reasons alone, the Board should grant Applicants' motion for summary disposition on this issue. As suggested by the Board, however, Applicants have conducted additional analyses to confirm the quality of Westinghouse component coatings--whether painted blue or another color.

Westinghouse divides its NSSS equipment into four categories, for the purpose of evaluating protective coatings (affidavit at 2 and Attachment A). The fourth category includes

stainless steel or insulation-wrapped equipment with no exposed coated surfaces (affidavit at 5). The remaining three categories of equipment, which are coated, have a total exposed surface area of approximately 25,180 square feet (affidavit at 5-6).

In terms of total surface area, the largest items of equipment supplied by Westinghouse are the reactor coolant system supports, with a combined surface area of almost 15,500 square feet (affidavit at 2-3). When these supports were delivered to Comanche Peak, QC inspections showed their coatings to be unsatisfactory for a variety of reasons (affidavit at 2 and Attachment B). Accordingly, Applicants completely stripped and recoated the supports. Inspection Reports on these coatings reflect their satisfactory quality (affidavit at 2-3 and Attachment C).

Applicants have conducted adhesion tests on the coatings of the Westinghouse-supplied manipulator crane, with a surface area of 1,120 square feet, and one of the four large accumulator tanks, which have a total surface area of 2,580 square feet. As the inspection reports show, all tests were satisfactory. Indeed, the accumulator tank coatings tested to near the maximum capacity of the testing device (affidavit at 3 and Attachments D, E).

As explained by Mr. Brandt, Applicants have placed the coatings on all other Westinghouse equipment inside containment, which includes the components classified by Westinghouse as Intermediate and Small (Categories 1 and 2)--on the Protective coatings exempt log (affidavit at 4-5 and Attachment F). These components have a relatively small total surface area. Because Applicants assume the coatings on this equipment to fail for purposes of safe shutdown analysis, the coatings need not meet otherwise relevant quality requirements.

The total surface area of Westinghouse equipment with exposed protective coatings amounts to just over 25,000 square feet. Applicants have confirmed the integrity of over 17,200 square feet of these coatings by testing or rework, which has been fully documented. Including coatings placed on the exempt log, Applicants have accounted for the quality of 21,615 square feet, or 86%, of the total coated surface area of all Westinghouse equipment at Comanche Peak (affidavit at 6).

The Board has observed that Applicants "must have a reasoned basis for concluding that there is no safety problem related to" Westinghouse coatings (9/23/83 Memorandum and Order at 22-23), and suggested that "[t]here needs to be some follow-up inspection" of the Westinghouse coatings (10/25/83 Memorandum and Order at 8). Applicants have provided an ample independent basis on which to conclude that Westinghouse coatings present no safety problem.

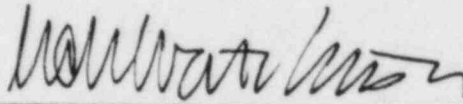
III. LEGAL STANDARDS GOVERNING  
SUMMARY DISPOSITION

Applicants discuss the legal requirements applicable to motions for summary disposition in their "Motion for Summary Disposition of Certain CASE Allegations Regarding AWS and ASME Code Provisions Related to Welding," filed April 15, 1984 (at 5-8). We incorporate that discussion herein by reference.

IV. CONCLUSION

The Board should grant Applicants' motion for summary disposition on this issue.

Respectfully submitted,



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