UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF DAVID E. DEVINEY
CONCERNING BOARD QUESTIONS REGARDING
COMPLETION OF QA/QC PROCEDURES

My name is David E. Deviney. My business address is Comanche Peak Steam Electric Station, P.O. Box 2300, Glen Rose, Texas 76043. I am the Operations Quality Assurance Supervisor for the onsite quality assurance section at Comanche Peak Steam Electric Station ("CPSES"). In that capacity I am responsible for quality control inspection, quality surveillance, and procedure review for operations. In addition, I am the quality assurance representative on the Station Operations Review Committee. A statement of my educational and professional qualifications is attached to this affidavit (Attachment A).

The purpose of this Affidavit is to respond to the Licensing Board's request for evidence "that appropriate QA/QC procedures have been completed for all phases of the activities for which a license is sought...." Licensing Board's "Memorandum (Request for Evidence Relevant to Fuel Loading)" (August 24, 1984) at p.2.

In response to the Board's request, a review of the status of the procedures to be used for the requested activities was conducted. This review indicates that all such procedures have been prepared, reviewed and are either approved or in the process of being approved. All will be approved and available for use prior to fuel load. The basic procedures to be used for these activities are the 11 initial startup procedures ("ISU") for fuel loading and precritical testing listed in

Attachment B. All but two of these procedures have received final approval. These two procedures, ISU-008A, Thermal Expansion, and ISU-009A, Simulated Rod Control System Test, have been prepared and are undergoing final review. They must be approved before fuel load. ISU procedures address specific plant activities (e.g., fuel loading) and detail in step-by-step fashion all actions and position assignments necessary to complete the activity in question. These procedures include appropriate hold points to provide independent verification by QA of critical data such as that used for test acceptance.

ISU procedures are prepared by test engineers in coordination with operations and QA personnel. Prior to acceptance, these procedures are independently reviewed by the Station Operations Review Committee, which includes Quality Assurance representation. In addition, each ISU procedure is reviewed by the NRC Staff, and those ISU procedures involving the nuclear steam supply system are also reviewed by cognizant Westinghouse personnel.

Other routine plant procedures which may be referenced in or provide support for the ISU procedures and associated activities include System Operation Procedures, Nuclear Engineering Procedures and Maintenance and Surveillance Procedures. These procedures have also undergone a rigorous review and approval cycle and are currently available for implementation. Also, appropriate Technical Specification requirements must be met for applicable plant operational mode.

While the ISU procedures form the core of procedures to be used during fuel loading and precritical testing activities, other coordinating/oversight procedures include QC inspection, QA surveillance and QA audit procedures which provide independent and additional assurance that plant activities, including those related directly to fuel loading and precritical testing, are properly conducted and documented. These additional coordinating/oversight procedures have also been completed, reviewed, approved and are currently in service.

In conclusion, based on a complete and thorough review, virtually all QA/QC procedures relating to fuel load and precritical testing are currently available for use. The remaining few are currently in the approval cycle and will be available in time to support fuel load and precritical testing activities.

David E. Deviney

County of Somervell)
) ss:
State of Texas)

Subscribed and sworn to before me this 13 day of September, 1984.

Notary Public

Commission expires: 09/04/85

ATTACHMENT A

DAVID E. DEVINEY

STATEMENT OF EDUCATIONAL
AND PROFESSIONAL QUALIFICATIONS

POSITION: Operations Quality Assurance Supervisor

FORMAL EDUCATION:

1967-1968 Texarkana Junior College
43 Semester Hours - Major: Mathematics

1968-1970 University of Texas at Arlington
35 Semester Hours - Major: Mathematics

1970-1971 U.S. Navy Electrician's Mata A School

1971-1972 U.S. Navy Nuclear Power School

1977-1979 Tarrant County Junior College
54 Semester Hours - Major: Electronics
Degree: AAS Electronic's Technology (Power)

1980-1981 Tarleton State University
21 Semester Hours - Major: Business

CERTIFICATION: Quality Engineer by American Society for Quality Control

EXPERIENCE:

1980 - Present Texas Utilities Generating Company

Title - Operations Quality Assurance Supervisor. Responsible for development and implementation of a Quality Assurance Surveillance Program and Quality Control Inspection Program to meet company and regulatory requirements for a commercial nuclear power plant. This also includes reviewing and approving purchase requisitions and representing the company in matters involving quality assurance.

1979 - 1980 Texas Utilities Generating Company

Title - Senior Technician, Maintenance. Work included developing a quality control program for the Maintenance Department, procurement of spare parts, developing a calibration program and technical support for all phases of maintenance.

1976 - 1979 Texas Utilities Generating Company

Title - Technician, Quality Assurance. Work included reviewing all nuclear safety-related electrical and protective coating procedures and instructions for construction of Comanche Peak Steam Electric Station (a nuclear power generating station) and "troubleshooting" quality problems in these areas of inspection. Also performed surveillances in all areas of construction to verify compliance with established requirements. Instrumental in developing a Quality Assurance Program for CPSES. Duties also included vendor audits, release inspections and quality control inspection for on-site machine shop.

EXPERIENCE - contd.

1970 - 1979 U.S. Navy

Electrician's Mate, First Class, with U.S. Navy on USS Grayling, a nuclear powered fast attach submarine. Key duties included maintenance and repair of all submarine electrical equipment, various watchstanding responsibilities on nuclear reactor and systems, planning and supervising scuba diving operations, maintenance and repair of oxygen analyzer and maintenance and updating of technical manuals. Also duties included training of new personnel in all of the above.

1969 - 1970 Recognition Equipment, Inc.

Work included inprocess and final inspection of precision machined parts for high speed data processing equipment. This required use of precision inspection equipment working to close tolerances.

1969 - 1969 Clarke-Aiken Company

Work included inprocess and final inspection of machined parts for the aircraft industry. This required use of various inspection equipment normally found in the machine shop.

1968 - 1969 Recognition Equipment, Inc.

Work included inprocess and final inspection of precision machined parts for high speed data processing equipment. This required use of precision inspection equipment working to close tolerances.

1966 - 1968 Lone Star Army Ammunition Plant

Work included receiving inspection, inprocess inspection, final inspection, and packaging and shipping inspection of parts, components, and high explosives. This required use of various inspection and test equipment.

ATTACHMENT B

INITIAL STARTUP PROCEDURES TO BE CONDUCTED
DURING FUEL LOAD AND PRECRITICAL TESTING

Procedure No.	Title
ISU-001A	Initial Fuel Load Sequence
ISU-003A	Core Loading Instrumentation and Neutron Source Checks
ISU-006A	RCS and Secondary Coolant Chemistry
ISU-008A	Thermal Expansion
ISU-009A	Simulated Rod Control System Test
ISU-010A	Post Core Load Precritical Test Sequence
ISU-012A	Control Rod Drive Operability Tests
ISU-013A	Rod Drop Time Measurement
ISU-014A	Rod Position Indication Tests
ISU-015A	Reactor Trip System Tests
ISU-016A	Incore Moveable Detector System Alignment
ISU-020A	Startup Adjustments of the Reactor Control System
ISU-021A	Pressurizer Spray and Heater Capability
ISU-022A	Reactor Coolant System Leakage Rate Test
ISU-023A	Reactor Coolant Flow Measurement
ISU-024A	Reactor Coolant System Flow Coastdown Tests
ISU-025A	RCCA Control System Test
ISU-206A	Auxiliary Feedwater Performance
ISU-211A	Loose Parts Monitoring Baseline Data
ISU-221A	Inverse Count Rate Ratio Monitoring
ISU-234A	Main Steam Isolation Valves Operability and Response Times