

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report Nos. 50-445/92-15  
50-446/92-15

Operating License No. NPF-87

Construction Permit No. CPPR-127

Licensee: TU Electric  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: CPSES, Glen Rose, Texas

Inspector: L. E. Ellershaw, Reactor Inspector, Materials and Quality Programs  
Section, Division of Reactor Safety

Approved: J. Barnes 5-21-92  
I. Barnes, Chief, Materials and Quality Programs Date  
Section, Division of Reactor Safety

Inspection Summary

Inspection Conducted May 4-7, 1992 (Report 50-445/92-15)

Areas Inspected: No inspection of Unit 1 was performed.

Results: Not applicable

Inspection Conducted May 4-7, 1992 (Report 50-446/92-15)

Areas Inspected: Routine, unannounced inspection of procurement and receiving inspection activities.

Results: No violations or deviations were identified during this inspection. The procurement and receiving inspection program criteria were well defined and were being effectively implemented. Organizationally and individually, there appeared to be a strong commitment to perform to the requirements of the written program. Material and parts verification efforts have been enhanced by the addition of on-site test lab equipment (e.g., hardness testers, bolt tester, alloy analyzer, carbon/sulfur analyzer, and electrical test equipment). A personnel qualification program was established to provide selected receipt inspectors and procurement compliance personnel with the necessary levels of training in the use of the test lab equipment.

DETAILS

1. PERSONS CONTACTED

TU ELECTRIC

- \*W. Cahill, Jr., Group Vice President
- \*E. Gully, Change Control Manager
- \*S. Harrison, Manager, Unit 2 Project Overview
- \*T. Hope, Unit 2 Licensing Manager
- \*J. Houchen, Unit 2 Deputy Project Manager
- \*C. Killough, Procurement Quality Assurance Manager
- \*D. Leigh, Procurement Compliance Supervisor
- \*G. Merka, Licensing Engineer
- \*S. Palmer, Stipulation Manager
- \*D. Pendleton, Unit 2 Regulatory Services Manager
- \*F. Powers, Procurement Engineering Manager
- \*T. Robertson, Unit 2 Materials Management Organization Manager
- \*D. Schmidt, Quality Completion Supervisor
- \*J. Simmons, Procurement Quality Engineering Supervisor
- \*J. Taylor, Plant Engineering Group Supervisor
- \*R. Walker, Manager of Nuclear Licensing

CASE

- \*O. Thero, Consultant

NRC

- \*D. Graves, Unit 2 Senior Resident Inspector

The inspector also interviewed other employees during the inspection.

\*Denotes those persons that attended the exit meeting on May 7, 1992.

2. QUALITY ASSURANCE PROGRAM CONTROLS OF PROCUREMENT (35746B)

The objectives of this area of the inspection were to determine whether the licensee had developed and implemented a quality assurance program relating to the control of procurement activities that is in conformance with regulatory requirements, licensee commitments, and industry guides and standards.

The inspector reviewed the last Operations Quality Assurance audit of the procurement and materials management function, which was performed September 16-26, 1991, and was identified as Audit Report No. QAA-91-135. The audit evaluated the process for procurement, receipt inspection, storage, and maintenance of commodities. The audit results showed the processes to be satisfactory with no conditions identified which would impact quality. The audit report highlighted the training and job knowledge exhibited by the contacted personnel.

The inspector reviewed the applicable procedures pertaining to procurement and vendor control activities (see Attachment 1). TU Electric purchases all safety-related parts, materials, and components to be used on site (i.e., contractors are not used for this activity). A six-level procurement system had been established and implemented for ease of identification and classification between safety and nonsafety-related items. This system provided for consistency with respect to defining quality requirements. A Pre-Engineered Item Data Sheet program had also been established in which all identified spare and replacement parts and their technical and quality requirements are delineated by item or by material grouping with common technical requirements. This is an automated program and is included in the Purchasing and Materials Management System Data Base computer system. This effort took place in order to reduce the repetitive research and potential errors that could occur each time the same item was ordered.

The inspector requested a printout from the data base computer program which showed the receipt of all safety-related items since the beginning of the year. From this list, a sample consisting of the 11 stock numbers identified in Attachment 2 was selected. The inspector requested the procurement documentation, including the initiating purchase requisitions, associated with these items. The inspector noted that each purchase order incorporated the applicable technical and quality requirements, and the documentation requirements through the use of various attachments (e.g., Technical & Quality Assurance Requirements, Summary of Required Documents, Pre-Engineered Item Data Sheets, and Equipment Specifications). Each purchase order was reviewed to assure that the applicable requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21 had been imposed and that documentation showing compliance was required. It was noted that three of the purchase orders (i.e., B0014271 060, S0042373 7S4, and S0045577 7D4) were for commercial grade items in which the licensee assumed responsibility for 10 CFR Part 21 reporting requirements and the verification/dedication of the applicable 10 CFR Part 50, Appendix B requirements. The inspector also verified that Procurement Quality Assurance had reviewed and approved the procurement documentation to assure the proper identification of technical, documentation, and quality requirements had been made, including the acceptability of the selected vendor. The inspector requested the applicable vendor files containing audit information and the basis for having and maintaining the vendor on the Approved Vendor List (AVL). Each of the vendors was on the AVL of record at the time the purchase order was placed. The inspector reviewed each of the vendor audits which formed the basis for the vendor being on the AVL. TU Electric is a member of the Nuclear Procurement Issues Group (NUPIC) and participates in, and takes credit for, vendor audits conducted by NUPIC. Each of the vendor files contained correspondence associated with NUPIC identified findings (i.e., vendor corrective action commitments and close out of findings). The inspector reviewed the applicable audit plans, audit checklists, frequencies, and schedules. The vendor audits were conducted with performance-based NUPIC plans and checklists and in accordance with the implementing procedures. The inspector noted that the AVL contained certain restrictions based upon findings identified during NUPIC performed vendor audits. While this was considered appropriate regarding future procurement from that vendor, the

inspector questioned whether evaluations had been performed on previously procured items which may have been impacted by the recent findings. Both Procurement Quality Assurance and Procurement Engineering have been active in evaluating current findings with respect to previously procured items. However, this activity is not articulated in any of the implementing procedures. Discussion with cognizant management personnel resulted in the issuance of a Memorandum to File (QVC-92346) dated May 7, 1992, in which a commitment was made to revise Procurement Quality Assurance Procedures NQA 3.07 and NQA 3.14, and issue Procurement Engineering Procedure MMO 6.02-07 to address the impact review and action process. The revisions and issuance of the new procedure are to become effective by July 1, 1992.

### 3. QUALITY ASSURANCE PROGRAM CONTROLS OF RECEIPT INSPECTION (35747B)

The objectives of this part of the inspection were to determine whether the licensee had developed and implemented a quality assurance program relating to the control of receipt inspection that is in conformance with regulatory requirements, licensee commitments, and industry guides and standards.

The inspector reviewed the latest annual Joint Utility Management Audit assessment of the quality assurance program, which included quality overview activities of receiving inspection and material control. This assessment was identified as Audit Report JUMA 92-01 and was performed February 24-28, 1992. The report noted that receiving inspection was staffed by well qualified and conscientious personnel, and that the quality assurance overview of receiving inspection was assessed to be adequate. The audit identified a discrepancy regarding the receiving inspection material testing program. At that time, the licensee had just purchased some laboratory test equipment; however, some of the equipment was not yet operational and appropriate training and qualification modules had not been established to provide the needed proficiency to Procurement Compliance personnel. The inspector verified that the equipment was operational and that a training program had been established and implemented. The laboratory test equipment consisted of electrical parameters measuring equipment, an alloy analyzer, hardness testers, a carbon/sulfur analyzer, and a bolt tester. The inspector verified the proficiency of one of the inspectors in the use of the hardness testing equipment. The audit also identified that Receipt Inspection Plans (RIPs) were not controlled. The RIPs contained engineering identified characteristics for the various commodities. Each characteristic and its accompanying discussion was identified by an alpha designator. The inspector verified that the RIPs issued to various locations were being controlled.

A verification plan program had been established for all procured safety-related items which provided for the identification of characteristics, which when verified, provided a reasonable assurance that the item received was the same as the item specified in the procurement documents. The current responsibility for establishing and maintaining verification plans fell within procurement engineering. The verification plan number was the number actually used to identify all documentation applicable to each stock number/purchase order combination, or in the case of multiple line items, to stock numbers of

common item groups/purchase order combinations. The inspector reviewed the receiving inspection documentation packages associated with each of the 11 samples, all of which had been accepted through receipt inspection. The verification plan referenced RIPs and the applicable alpha designated characteristics. The inspector verified the applicability of each of the designated characteristics for 8 of the 11 samples (3 of the samples had been issued and were no longer in stock). This was accomplished by comparing each of the specified characteristics with the applicable item (i.e., measurements, observations, and hardness checks), to assure that it was achievable. The verification plans and the RIPs were quite extensive and provided for a comprehensive receipt inspection activity. Discussions with several of the inspectors revealed that they were knowledgeable and had a good understanding of their job responsibilities.

In general, the quality assurance controls over the procurement and receipt inspection processes were found to be well defined and effectively implemented.

#### 4. EXIT INTERVIEW

The inspector conducted an exit interview on May 7, 1992, with those personnel denoted in paragraph 1, during which the inspector summarized the findings. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.

## ATTACHMENT 1

### DOCUMENTS REVIEWED

Chapter 17.1, Final Safety Analysis Report, Revision 83

CPSES Quality Assurance Manual, Revision 4

TU Electric Operations Quality Assurance Audit Report, QAA-91-135

Annual Joint Utility Management Audit, JUMA 92-01

### PROCEDURES

NQA 3.09-11.03, "Receiving Inspection," Revision 8 with Document Change Notice (DCN) 1

NQA 3.14, "Control of Vendor Activities," Revision 8 with DCN 1

NQA 6.02, "Quality Review of Procurement Documents," Revision 6 with DCN 1

MMO 4.09, "Receipt, Storage, Issue and Shipping of Construction Material, Parts, and Components," Revision 5 with Material Document Change Notices (MDCNs) 1 through 2

MMO 6.02, "Procurement Engineering Processing of Procurement Documents," Revision 3 with MDCN 1

MMO 6.02-01, "Procurement Levels," Revision 0 with MDCNs 1 through 2

MMO 6.02-02, "Procurement Engineering Review of Procurement Documents," Revision 5 with MDCN 1

MMO 6.02-05, "Technical and Quality Assurance Requirements," Revision 0 with MDCNs 1 through 6

MMO 6.02-06, "Preparation of Verification Plans," Revision 0 with MDCNs 1 through 5

ATTACHMENT 2

<u>TU STOCK NUMBER</u>	<u>DESCRIPTION</u>	<u>INSPECTION REPORT</u>	<u>PURCHASE ORDER</u>
364589	10" stainless steel pipe, ASME Section III, Class 2	RR07522	S0005704 7SA
299249	6" stainless steel pipe, ASME Section III, Class 2	RR07522	S0005704 7SA
292730	Welding electrodes, Type E309-16	RR11031	S00028585 7S2
332515	Nut, hex, 1-1/4 X 8 E Section III, Class 1	RR11175	B0014827 003
352350	Circuit breaker, 480VAC/250VDC	RR11305	S0028263 7S2
341404	1/2" copper fittings with brass nuts	RR11309	S0042373 7S4
373509	Bolt, H-Hex, 1-1/4", ASME Section III, Class NF-1	RR11318	B00115205 034
P110049	Resistors, 200 Ohm	RR11338	S0045660 7D2
P110029	Resistors, 200 Ohm	RR11340	S0045577 7D4
339058	Heater, overload, motor starter	RR11344	S0041591 7S2
353215	Washer, channel, hot dipped galvanized	RR11354	B0014271 060