

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

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APPLICANTS' STATEMENT OF MATERIAL
FACTS REGARDING TRIP REPORT OF
J.J. LIPINSKY AS TO WHICH THERE
IS NO GENUINE ISSUE

1. Applicants' QA/QC program and procedures appropriately ensure the identification, inspection, traceability and control of safety-related protective coatings materials from the time that such materials arrive on site until they are actually used.

2. Applicants' quality procedures appropriately address and control sags and runs in applied coatings materials.

3. To be certified to apply protective coatings materials at Comanche Peak, a painter must be certified by product and application method. To become certified, a painter must receive classroom instruction, must pass a written examination, and must satisfactorily apply coatings materials to a test panel. QC inspectors oversee the painter qualification process.

4. Applicants maintain Painter Qualification Records for each certified painter. Applicants' Painter Qualification Record form is based on the sample form included in ANSI 101.4-1972, and fully meets ANSI standards.

5. Applicants utilize standard form Inspection Reports (IR's) to document quality inspection of coatings work. Applicants' IR include all pertinent information recommended for inclusion by ANSI 101.4-1972 and fully meets ANSI standards.

6. Applicants' practice is that cured Carbo-Zinc 11 primer coatings may be abraded to achieve acceptable dry film thicknesses. This procedure has been specifically approved by the manufacturer of Carbo-Zinc 11 as fully consistent with the standards of ANSI 101.4-1972.

7. When a primer coat of Carbo-Zinc 11 has cured, Applicants' practice is to seal the CZ-11 with a thin coat of Phenoline 305, a topcoat, in order to avoid potential "bubbling" of the primer coat. When Applicants later apply a full topcoat of Phenoline 305, in this situation, Applicants prepare the existing seal coat with a solvent wipe. Each of these practices has been specifically approved by the manufacturer of the coatings systems.

8. Any other concerns noted in the August 8, 1983 Trip Report of Joseph J. Lipinsky regarding the Comanche Peak coatings program are either without merit, or have no effect on the quality of safety-related protective coatings.