

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
JAN 30BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' RESPONSE TO CASE'S DISCOVERY
REQUESTS REGARDING CROSSOVER LEG RESTRAINTSI. INTRODUCTION

On October 18, 1984 Citizens Association for Sound Energy ("CASE") filed discovery requests to Applicants regarding inspection of the Unit 1 crossover leg restraint installations.^{1/} At the time, Applicants had a Motion for Reconsideration of the Board's order allowing CASE discovery on the crossover leg restraints pending before the Board.^{2/} On November 7, 1984, the Board issued a Memorandum and Order denying Applicant's Motion for Reconsideration.^{3/} Applicants' responses to the discovery requests are provided herein.

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^{1/} "CASE's Discovery Requests to Applicants Regarding Cross-Over Leg Restraints" (October 18, 1984).

^{2/} "Applicants' Motion for Reconsideration of Board Order Granting Discovery on Crossover Leg Restraints" (October 19, 1984).

^{3/} "Memorandum (Reconsideration: Cross-Over Leg Restraints)" (November 7, 1984).

DS03

II. PRELIMINARY STATEMENT

In accordance with our obligation to keep this Board apprised of information related to matters before the Board, attached as Attachment 1 is a copy of a letter from B. R. Clements to D. R. Hunter, Chief Reactor Project Branch 2, NRC (TXX #4370) (November 28, 1984). The letter responds to questions raised in a letter from Hunter to M. D. Spence (November 2, 1984), which is also attached as Attachment 2 for your information. The letter also admits a mistake in and withdraws the September 7, 1984 supplemental response to Region IV regarding Notice of Violation 445/84-08-02⁴/ as it relates to crossover leg restraints.

The mistake in that supplemental response has been mirrored in Applicants' legal filings in this proceeding which relied upon the supplemental response. In Applicants' original response to CASE's discovery motion regarding the crossover leg restraints,⁵/ and in the subsequent motion for reconsideration of the Board's ruling, Applicants referred to outstanding construction work on the restraint installations which would have to be completed prior to required inspections. Consistent with the supplemental response, we explained that this work involved installation of shims and tightening of the anchorage bolts. Applicants reported that this construction work would not be completed until the

⁴/ TXX #4294, B. R. Clements to R. L. Bangart (September 7, 1984).

⁵/ "Applicants' Response to CASE Motion for Discovery Regarding Inspections of Main Coolant System Crossover Leg Restraints" (September 14, 1984).

pipes are in a hot condition in order that final shim clearances can be determined. As reported in the November 28 letter from Clements to Hunter, this explanation, however, was based upon mistaken assumptions.

As is now clear (see Attachment 1), there was confusion between two potential locations for shim placement on each crossover leg restraint installation. First, there could be shims associated with the baseplates and the anchor bolts for the restraints. These baseplate shims would be installed, if necessary, to level the restraint prior to tightening the anchor bolts. Inspections of work related to baseplate leveling and bolt tightening were not completed and therefore were the subject of the Notice of Violation. As explained below, this construction work and the associated inspections have now been completed (as committed to in the August 23, 1984 response to Region IV).^{6/}

The baseplate shimming attribute was confused with piping shims, which are to be installed between the pipes and the restraint structures. These piping shims are not related to the anchorage of the crossover leg restraints. They are located at the piping rather than at the baseplates. It is these latter shims referred to in Applicants' supplemental response to NRC Region IV which must be monitored with the pipes in a hot condition in order that proper clearances can be determined. This thermal monitoring was not completed during hot functional

^{6/} TXX #4271, B. R. Clements to R. L. Bangart (August 23, 1984).

testing and will not be completed until the next heat-up of the pipes. The piping shims, however, are unrelated to anchorage of the restraints and do not need to be installed or monitored for thermal expansion prior to tightening the anchor bolts and completing the baseplate inspections. The piping shims therefore are not relevant to the Notice of Violation and the previously incomplete inspections of the baseplates.

In the November 28 letter, Applicants have withdrawn the supplemental response and therefore the discussion of piping shims. The distinction between the shims should be kept in mind in reviewing the following discovery responses. Because the discovery requests were based in part upon the September 7 supplemental response, many are not directly relevant to the baseplate work or the Notice of Violation.^{7/}

III. DISCOVERY RESPONSES

INTERROGATORY

1. In Applicants' Attachment 1 to their 9/14/84 Response to CASE Motion for Discovery Regarding Inspections of Main Coolant System Crossover Leg Restraints (8/23/84 TXX #4271, response to NRC), Applicants state:

"The installations shall be inspected to current design documents in accordance with the established QA/QC Program."

Provide the "current design documents" referenced, and the original design documents and all revisions including any and all applicable specifications, procedures, guidelines, etc.

^{7/} We wish to state our recognition of the obligation we have to notify the Board if facts relied upon in pleadings to the Board are later found to be incorrect. This obligation would have arisen regarding the instant matter when the mistake was realized by Applicants, regardless of whether or not the matter had been closed by the Board.

RESPONSE

1. The following applicable, current documents are provided:

Drawing 2323-S1-0550, Rev. 4
Drawing 2323-S1-0551, Rev. 6
Drawing 2323-S1-0519, Rev. 4
DCA # 3265, Rev. 1
DCA # 11,312, Rev. 2
DCA # 21,128, Rev. 3
Specification 2323-SS-16B
Procedure QI-QP-11.14-1, Rev. 18

The following applicable prior revisions of the documents are provided:

Drawing 2323-S1-0550, Revs. 1-3
Drawing 2323-S1-0551, Revs. 1-5
Drawing 2323-S1-0519, Revs. 0-3
DCA # 3265, Rev. 0
DCA # 11,312, Revs. 0-1
DCA # 21,128, Revs. 0-3

INTERROGATORY

2. On page 3 of Applicants' Attachment 1, they state:

"A review of this issue showed that documentation does exist on the installation, however, it was found to be incomplete to substantiate the acceptability of the installation under the quality program. It should be noted that craft and QC had recognized the need for the components to be inspected, however, the documentation was not completed. Therefore, this situation appears to be isolated in its occurrence and no further action outside of the re-inspection is anticipated."

- (a) Provide the documentation which exists on the installation (as referenced in first sentence above).

RESPONSE

2. (a) The following documents are provided:

CP-QCP-3.1
Installation Checklists (4) for inspections of the crossover leg restraints.

INTERROGATORY

- (b) In what way was the documentation found to be incomplete: i.e., what specifically was necessary to complete the documentation?

RESPONSE

- (b) Part C of each of the installation checklists is incomplete. This reflects an inspection open item for one or more of the following: "item positioned properly"; "item leveled properly"; "item shimmed properly"; "bolts torqued properly". These checklists refer to construction/inspection activities related to the baseplates and the anchor bolts for the crossover leg restraints.

INTERROGATORY

- (c) Provide a list of the specific QA/QC procedures which would be applicable to the inspections of the installations of the crossover leg restraints.

RESPONSE

- (c) The applicable QA/QC procedure at the time the crossover leg restraints were originally installed was CP-QCP-3.1. This procedure was implemented by the 4 Inspection Checklists provided in response 2(a). The procedure currently applicable to the installations is QI-QP-11.14-1, Rev. 18.

INTERROGATORY

- (d) Provide copies of the specific QA/QC procedures which would be applicable to the inspections of the installations of the crossover leg restraints.

RESPONSE

- (d) Copies of the documents referred to in response 2(c) are provided in response to requests 1 and 2(a), above.

INTERROGATORY

- (e) Provide the basis, and any and all supporting documentation, for the statement that "craft and QC had recognized the need for the components to be inspected."

RESPONSE

- (e) This statement was based upon the fact that the inspection checklists (see 2(a), above) existed for the crossover leg restraints.

INTERROGATORY

- (f) Applicants stated that "this situation appears to be isolated in its occurrence and no further action outside of the re-inspection is anticipated." Provide a list, and copies of, the specific QA/QC procedures which would be applicable to the inspections of: the upper lateral restraint; and the moment restraint (referenced in CASE's 8/22/83 Proposed Findings of Fact and Conclusions of Law (Walsh/Doyle Allegations) beginning at page XIX - 18).

RESPONSE

- (f) The procedure applicable to inspection of these restraints is QI-QAP-11.1-28, Rev. 27, and is provided. The procedure does not relate to the subject of inspections of the crossover leg restraint installations.

INTERROGATORY

- 3. On page 3 of Attachment 1, Applicants state:

"The inspections shall be completed no later than August 24, 1984." (Although this seems to have been changed in Attachment 2.)

- (a) Have the inspections now been completed?
- (b) If the answer to (a) above is no, when will they be completed?
- (c) If the answer to (a) above is yes, provide any and all documentation regarding such inspections.

RESPONSE

- 3. (a) Yes.
- (b) N/A
- (c) The following Travelers documenting the inspections are provided:

CE-84-131-8902
CE-84-132-8902
CE-84-133-8902
CE-84-134-8902

INTERROGATORY

4. Provide the following information regarding Applicants' Attachment 2 to their 9/14/84 Response to CASE Motion for Discovery Regarding Inspections of Main Coolant System Crossover Leg Restraints (9/7/84, TXX-4294, supplementary response to NRC):

- (a) Provide copies of the original and all revisions of NCR-M84-100281.

RESPONSE

4. (a) NCR-M-84-100281 is provided.

INTERROGATORY

- (b) Applicants stated:

"Approximately two years ago, a decision was made to intentionally postpone completion of the installation (shimming and torquing) of the crossover leg restraints until after completion of Hot Functional Testing."

- (1) Who specifically made or had input into such decision (name, company affiliation, title, and job responsibility)?
- (2) Provide any and all documentation for Applicants' statement above.
- (3) What was the reason for the postponement of the testing until after completion of Hot Functional Testing and/or until power ascension testing?
- (4) Provide any and all documentation of the reasons for such postponement.
- (5) Is it Applicants' current intention to postpone this testing until during power ascension testing?
- (6) If the answer to (5) above is yes, what is the reason for such postponement?
- (7) If the answer to (5) above is yes, provide any and all documentation of the reasons for such postponement.

RESPONSE

- (b) The decision referred to in the quoted statement was made at a routine startup meeting and is not documented. The decision related to installation of the shims between the pipe and the restraint structures and did not relate to tightening anchor bolts at the baseplates. As explained in the November 28 letter from Clements to Region IV (TXX #4370), work on the piping shims is not relevant to the NRC's Notice of Violation.

INTERROGATORY

- (c) Provide the original and all revisions of Test Instruction/Procedure Deviation (TPD) Report No. 12 on the Reactor Coolant System.

RESPONSE

- (c) Test Instruction/Procedure Deviation (TPD) No. 12 is provided. There have been no revisions. The document is not relevant to the baseplate inspections cited in the Notice of Violation.

INTERROGATORY

- (d) Provide any and all documentation that thermal monitoring of the shims will take place during power ascension testing (i.e., specific procedures which so state, memoranda, etc.).

RESPONSE

- (d) Post Fuel Load Deffered Test Packages #5 and #12 are provided. The piping work described in the documents is not relevant to the baseplate inspections cited in the Notice of Violation.

INTERROGATORY

- (e) Provide any and all documentation that the "work required to be completed during plant heat-up after fuel load is identified as a known work item on the Master System Punchlist."

RESPONSE

- (e) The quoted statement has been withdrawn. However, a printout from the Master System Punchlist is provided. The punchlist includes an entry for the baseplate work and the inspections performed to close NCR-M-84-100281.

The Punchlist also contains an entry for installation of piping shims which was also completed after return to ambient temperature pursuant to TPD-12.

INTERROGATORY

- (f) Provide the original and all revisions of NCR-M84-100182.

RESPONSE

- (f) NCR-M-84-100182 was referred to in the September 7 supplemental response only as a result of a typographical error. The NCR relating to this subject is NCR-M-84-100281 and has been provided in response to interrogatory 4(a).

INTERROGATORY

- (g) Provide any and all documentation that "Further work required by TPD-12 has been carried as an open item in the Test Deferral Package since the issuance of TPD-12 on May 25, 1983."

RESPONSE

- (g) Documentation of further work is provided by TPD-12 itself, and Deferred Test Packages #5 and #12. These documents have been provided in response to interrogatories 4(c) and 4(d) above. This work is not relevant to the baseplate inspections cited in the Notice of Violation.

INTERROGATORY

- (h) Have Applicants performed any testing regarding the torquing of the bolts for the crossover leg restraint installations, especially in light of the results of Applicants' tests regarding the torque used for U-bolts (see CASE's Answer to Applicants' Statement of Material Facts As To Which There Is No Genuine Issue Regarding Consideration of Cinching Down of U-Bolts, in the form of Affidavit of CASE Witness Jack Doyle, at page 10)?

RESPONSE

- (h) No. Crossover leg restraint anchor bolts have nuts installed snug tight and are not torqued in the sense that U-bolts are torqued.

INTERROGATORY

- (i) If the answer to (h) above is yes, provide all such tests and test results.

RESPONSE

- (i) N/A

INTERROGATORY

- (j) If the answer to (h) above is no, do Applicants anticipate performing any such tests? (If not, why not?)

RESPONSE

- (j) No. Because the bolts are not torqued, no tests are necessary.

INTERROGATORY

- (k) If the answer to (h) above is no, what assurance is there that the bolts will perform in a predictable manner throughout the life of the plant?

RESPONSE

- (k) The snug tight condition on the anchor bolts is consistent with design requirements in a current DCA. Double nuts have been provided to prevent nut loosening. No design consideration requires that the anchor bolts be other than snug tight. The considerations involved in torquing of U-bolts and addressed in Applicants' motion simply are irrelevant to baseplate bolts. CASE may note that the crossover leg restraint base plate is designed with shear lugs embedded in concrete, which provides for shear transfer at the base.

INTERROGATORY

- (l) Provide any and all documentation for your answer to (k) above.

RESPONSE

- (l) See the design documents provided in response to interrogatory 1 above. In particular, see DCA #11, 312, Rev. 2.

INTERROGATORY

(m) Applicants state:

"We will conduct the necessary inspections when an engineering determination indicates the timeliness for completing the inspections."

- (1) Provide any and all procedures which state that such an engineering determination will be made.
- (2) Provide any and all procedures which set forth the criteria for such engineering determination.

RESPONSE

(m) The statement referenced in the request has been withdrawn. The incomplete inspections of the baseplates cited in the Notice of Violation have been completed as described in response 3 above.

INTERROGATORY

(n) Applicants state:

"It is unclear whether the inspector saw the QC inspector's checklists for the crossover leg restraints. TPD-12 was not presented to the inspector."

(1) Why would the NRC inspector not have seen the QC inspector's checklists for the crossover leg restraints (i.e., where would the QC inspector's checklists have been if not with the documentation which the NRC inspector saw)? Include in your answer, in detail, what steps Applicants have taken to discover the answer to these questions and the results of Applicants' efforts in this regard, and the answers to the following questions:

- (i) How could this have occurred?
- (ii) What assurance is there (including any and all documentation for such assurance) that this has not and will not also be the case in other instances?
- (iii) What steps have Applicants taken to assure themselves (and the Board) that this is an isolated instance and not a generic (to Comanche Peak) problem?

RESPONSE

- (n) (1) Applicants believe that the NRC inspector did see the QC inspector's checklists. The recollection of the responsible QC inspector maintaining the open checklists is that he presented the checklists to the NRC inspector for his review in November 1983. The situation was referred to as "unclear" in the referenced statement because the NRC Notice of Violation (84-08-02) indicates that no documents requiring inspection of the restraints could be found.

As described in response to request 3, the incomplete inspections have now been performed.

INTERROGATORY

- (n) (2) (i) Why was TPD-12 not presented to the NRC inspector?
- (ii) Why would TPD-12 not be included in the package for the crossover leg restraints?
- (iii) Is there a procedure which states that such TPD's shall be included in the packages for the respective items to which they pertain (and, if so, provide any and all such procedures)?
- (iv) Include in your answer, in detail, what steps Applicants have taken to discover the answer to these questions and the results of Applicants' efforts in this regard, and the answers to the following questions:
- (aa) How could this have occurred?
- (bb) What assurance is there (including any and all documentation for such assurance) that this has not and will not also be the case in other instances?
- (cc) What steps have Applicants taken to assure themselves (and the Board) that this is an isolated instance and not a generic (to Comanche Peak) problem?

RESPONSE

- (n) (2) As described in the November 28 letter from Clements to Hunter, the September 7 supplemental response with respect to TPD-12 and piping shim work has been withdrawn as irrelevant to the baseplate issue.

INTERROGATORY

- (o) Provide any and all documentation (if not already provided in response to the preceding) to support Applicants' statement that:

"(1) the completion of the inspections of the restraints were intentionally postponed, and
(2) testing documentation does demonstrate the need for the inspections."

RESPONSE

- (o) As explained in the response to Region IV, the quoted statement has been withdrawn.

INTERROGATORY

- (p) (1) Were any of the QC inspectors involved in any way with inspections of the crossover leg restraints who quit or were terminated (including being laid off) in connection with or because of the recently identified drug-related problems at Comanche Peak?
- (2) If the answer to (1) above is yes, give complete details, including the name(s), title(s), specific areas and systems on which the individual(s) worked at any time (and specifically when, for what period of time, and specifically what part such individual(s) had regarding on the inspections of the crossover leg restraints), and any other pertinent details.
- (3) If the answer to (1) above is no, describe in detail what steps Applicants have taken to ascertain the information requested in (1) above.

RESPONSE

- (p) (1) No
- (p) (2) N/A
- (p) (3) The Applicants have reviewed the files for all QC inspectors involved with the installation of the crossover leg restraints. None of the individuals was connected with the subject drug-related problems.

INTERROGATORY

- (q) How much of the information requested in the preceding was:
 - (1) Requested by the NRC representative at the CPSES site?
 - (2) Provided to the NRC representative at the CPSES site prior to this pleading?

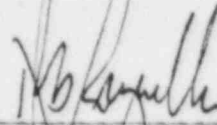
RESPONSE

- (q) (1) As described in response to interrogatory 4(n)(1), the NRC inspector had access to all documents referenced above related to the baseplate installations at the time of the inspections in November 1983.

At the time of the inspection, the NRC did not seek information with respect to the piping shims, and there is no reason why it should have done so. This information was volunteered and made available by Applicants at the time of the September 7, 1984 supplemental response to the Notice of Violation.

- (q) (2) All information relevant to the Notice of Violation referenced in these discovery responses has previously been made available to the NRC representative at the Comanche Peak site.

Respectfully submitted,



Nicholas S Reynolds
David A. Repka
BISHOP, LIBERMAN, COOK,
PURCELL AND REYNOLDS
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 857-9800

Counsel for Applicants

November 30, 1984

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
)	
(Comanche Peak Steam Electric)	Application for
Station, Units 1 and 2)	Operating Licenses)

AFFIDAVIT OF CLAIRE H. WELCH


I, Claire H. Welch, having first been duly sworn, hereby depose and state:

1. I am employed by Texas Utilities Generating Co. at Comanche Peak Steam Electric Station as a Site QA Supervisor.
2. I have been responsible for providing the information contained in "Applicants' Responses to CASE's Discovery Requests regarding Crossover Leg Restraints." I have reviewed the responses and they are true and correct to the best of my knowledge and belief.


Claire H. Welch

STATE OF TEXAS
COUNTY OF SUMNER

Subscribed and Sworn to before me
this 29th day of November, 1984


Notary Public Bill J. Hodges
my COMMISSION EXPIRES MARCH 28, 1988

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 100 NORTH OLIVE STREET, L.B. #1 • DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

November 23, 1984
TXX-4370

Mr. D.R. Hunter, Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission, Region IV
Office of Inspection and Enforcement
Parkway Central Plaza Building
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Docket No: 50-445

COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC LETTER OF NOVEMBER 2, 1984
INSPECTION REPORT NO. 50-445/84-08
FILE NO: 10130

Dear Mr. Hunter:

This letter and the enclosure respond to your letter of November 2, 1984 relative to the Severity Level IV Violation (445/8408/02), Failure to Perform Inspections of Installation Activities Related to Unit 1, Main Coolant System Crossover Leg Restraints.

Upon further review of this matter, we have determined that the information contained in our letter No. TXX-4294, dated September 7, 1984 was incorrect. We therefore withdraw that portion of our September 7, 1984 letter dealing with the crossover leg restraints. The attached information is responsive to your November 2 letter and provides the current status of corrective actions relative to the Notice of Violation.

In conclusion, I wish the staff to know that I am concerned that our September 7, 1984 supplemental response was not totally accurate. To my knowledge, this is the first time that this has occurred. I am taking measures to assure that confusion such as contained in that supplemental response will not recur.

If you have any further questions, please advise.

Very truly yours,

Billy R. Clements

BRC/brd

cc: NRC Region IV (0 + 1 copy)
Director, Inspection & Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Vincent S. Noonan

RECEIVED

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TUGCO QA
DALLAS

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Comanche Peak Steam Electric Station
Response to NRC Questions Concerning
Notice of Violation 445/8408-02

Failure to Perform Inspections of Installation Activities of
Unit 1, Main Coolant System Crossover Leg Restraints

In our initial response to this Notice of Violation (B.R. Clements to R.L. Bangart, August 23, 1984, TXX-4271) we stated that some QC documentation for the crossover leg restraint installations had been identified, but that it had not been completed to establish the acceptability of the installation under the quality program. At that time we committed to reinspect the installations and to complete any necessary work.

On September 7, 1984, in TXX-4294, we submitted a supplemental response on this Notice of Violation which indicated that we had determined why the QC inspections for the crossover leg restraints had not been completed. In that response we stated that certain construction work had not been completed and therefore that the necessary inspections could not be performed.

In a memorandum dated November 2, 1984 from Mr. D.R. Hunter, Chief Reactor Project Branch 2, Nuclear Regulatory Commission, to M.D. Spence, President, Texas Utilities Generating Company, additional questions dealing with our response to this Notice of Violation were raised. Upon further review of the facts underlying the Notice of Violation, our previous responses and your additional questions, we have determined that our September 7, 1984 supplemental response was incorrect. The following information is provided to clarify this issue and to respond to your specific questions.

The Notice of Violation relates to inspection of shimming of the crossover leg restraints and torquing of bolts securing these restraints to baseplates at their foundations. (For ease of reference we refer to that work as "baseplate work.") In our September 7, 1984 supplemental response, we confused this baseplate work with other shimming that is to be performed between these restraints and the piping which they are designed to restrain. (For ease of reference we refer to this work as "piping work.") In that response, we discussed in the same paragraph both the baseplate work and the piping work. For example, the Test Instruction/Procedure Deviation Report No. 12 on the Reactor Coolant System discussed in our response related to the piping work. We also discussed NCR-M84-100281, which documented the need to conduct inspections of the baseplate work. The discussion of the piping work was not appropriate because the Notice of Violation does not relate to the piping work. We therefore wish to withdraw our September 7, 1984 response dealing with the crossover leg restraints including our assertion that the Notice of Violation was incorrect.

With regard to the baseplate work, the reinspection of the baseplate shims and bolt tightening committed to in our August 23, 1984 response have been completed. This closes NCR-M84-100281. With regard to the Staff's additional questions, we provide the following responses:

Question 1

What document (i.e., operational traveler, etc.) implemented Procedure CP-QCP-3.1 for inspection of the crossover leg restraint?

Response

The inspection checklists which were attached to NCR-M84-100281 were the documents that implemented CP-QCP-3.1.

Question 2

How was the intentional postponement of the required inspection documented?

Response

The activity discussed in our September 7 response that was intentionally postponed was the shimming on the top of the crossover leg restraint, related to piping work. Accordingly, as noted above, we withdraw that discussion as not relevant to the Notice of Violation.

Question 3

Was the individual that signed the QC inspection checklist for the crossover leg restraints (attached to NCR M84-100281) certified to make these inspections at the time the inspections were made?

Response

No. The individual who signed the inspection checklists in question was certified Level II for visual examination on January 28, 1978 in accordance with Brown & Root Incorporated Personnel Training Manual. He was not, however, certified to perform the full scope of the inspections covered by the checklists until September, 1978. Considering the individual's inspection background, there should be no question relative to his qualifications for performing all of the inspections.

Question 4

Why were the required inspections related to positioning, leveling and bolt torquing of the floor mounted crossover leg restraint postponed, since the gap measurements to determine shim requirements taken during hot functional testing would be based on the permanent location of this restraint?

Response

As noted above, the statement in our September 7, 1984 supplemental response confused piping-related shims on top of the crossover leg restraints with a shimming attribute on a checklist used to install the Crossover Leg Restraints. The shimming attribute on the checklist was provided in case baseplate leveling shims were used. There would be no reason to await hot functional testing before performing the baseplate work.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
PARKWAY CENTRAL PLAZA BUILDING
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

NOV 02 1984

In Reply Refer To:
Dockets: 50-445/84-08

Texas Utilities Electric Company
ATTN: M. D. Spence, President, TUGCO
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Gentlemen:

Thank you for your letters of August 23, 1984, and September 7, 1984. We have reviewed your replies, and the supplemental information you provided in your letter of September 7, 1984, raised some questions concerning the Severity Level IV Violation (445/8408-01), Failure to Perform Inspections of Installation Activities Related to Unit 1, Main Coolant System Crossover Leg Restraints. In addition to reviewing your response, an NRC inspector also reviewed your Tracking Item #135 package of related information, and discussed the subject with cognizant TUGCO representatives. The questions that arose out of these reviews and discussions are delineated below:

1. What document (i.e., operational traveler, etc.) implemented Procedure CP-QCP-3.1 for inspection of the crossover leg restraint?
2. How was the intentional postponement of the required inspections documented?
3. Was the individual that signed the QC inspection checklists for the crossover leg restraints (attached to NCR-M84-100281) certified to make these inspections at the time the inspections were made?
4. Why were the required inspections related to positioning, leveling, and bolt torquing of the floor mounted crossover leg restraint postponed, since the gap measurements to determine shim requirements taken during hot functional testing would be based on the permanent location of this restraint?

We request that you provide your response to the above questions within 20 days.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

NOV 02 1984

Texas Utilities Electric Company

2

Should you have any question regarding this matter, please contact Mr. J. E. Cummins (817)/897-2201).

Sincerely,



D. R. Hunter, Chief
Reactor Project Branch 2

cc:

Texas Utilities Electric Company
ATTN: B. R. Clements, Vice
President, Nuclear
Skyway Tower
400 North Olive Street
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Dallas, Texas 75201

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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 and
COMPANY, <u>et al.</u>)	50-446
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Response to CASE's Discovery Requests Regarding Crossover Leg Restraints" in the above-captioned matter were served upon the following persons by hand delivery,* or by Federal Express**, or by deposit in the United States mail***, first class, postage prepaid, this 30th day of November, 1984:

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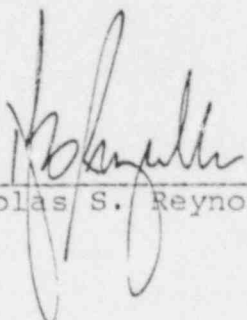
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