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WRITER'S DIRECT DIAL  
(202)

October 26, 1984

Peter B. Bloch, Esq.  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Walter H. Jordan  
881 West Outer Drive  
Oak Ridge, TN 37830

Herbert Grossman, Esq.  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Re: Texas Utilities Electric Company, et al.  
(Comanche Peak Steam Electric Station,  
Units 1 and 2), Docket Nos. 50-445-2,  
50-446-2

Gentlemen:

In his testimony in this proceeding on September 19, 1984, Cory Allen identified an NCR that he wrote regarding reactor core cavity coatings. The Board admitted the NCR package (tr. 17044-47) into evidence (tr. 17,052).

During Mr. Allen's examination regarding the NCR, the Board Chairman suggested that one of the draft NCR's may have been altered by erasures on the signature and date entries under "disposition" (tr. 17059). The Chairman accordingly requested that Applicants supply the originals of the NCR documents.

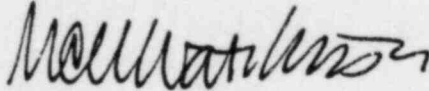
We enclose the affidavit of C. Thomas Brandt, to which is attached the original NCR document package from the Permanent Plant Record Vault. Mr. Brandt will be available for cross-examination, if any, regarding these documents at his next appearance in this proceeding.

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PDR ADOCK 05000445  
G PDR

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A copy of this letter and Mr. Brandt's affidavit are being served on all parties, albeit, for obvious reasons, without the original NCR package. For ease of identification, the parties are being served with copies of the NCR package.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "McNeill Watkins II".

McNeill Watkins II  
Counsel for Applicants

cc: Service List

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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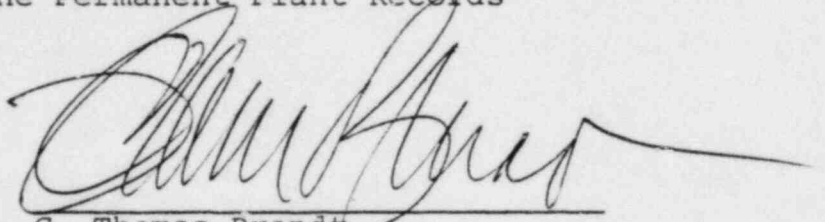
OFFICE OF SECRETARY  
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In the Matter of: )  
 )  
TEXAS UTILITIES ELECTRIC ) Docket Nos. 50-445-2 and  
COMPANY, et al. ) 50-446-2  
 )  
(Comanche Peak Steam Electric ) (Application for  
Station, Units 1 and 2) ) Operating Licenses)

AFFIDAVIT OF C. THOMAS BRANDT

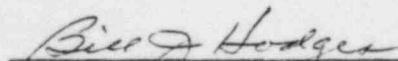
My name is C. Thomas Brandt. I have testified several times in this proceeding.

Attached to this affidavit is the original NCR package for NCR C-83-00461 which includes: (1) a hand-written draft by Cory Allen, dated February 11, 1983; (2) the typed version of that draft, dated February 11, 1983; (3) Revision 1 dated February 15, 1983; (4) a telex to J.B. George from R.E. Ballard dated March 10, 1983; and (5) the NCR showing disposition of Rev. 1. This is the entire NCR package that previously has been filed in the Permanent Plant Records vault.

  
C. Thomas Brandt

STATE OF TEXAS  
COUNTY OF SOMERVELL

Subscribed and sworn to before me this 25<sup>th</sup> day of October, 1984.

  
Notary Public  
MY COMMISSION EXPIRES MARCH 28, 1988.

UNIT 1&2	STRUCTURE/SYSTEM Reactor Containment Building	ITEM/COMPONENT Reactor Core Cavity	TAG/ID NUMBER N/A	LOCATION OR ELEVATION 783'-7" to 834'-0"	RIR NO. N/A
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REPORTING PERSONNEL

NONCONFORMING CONDITION

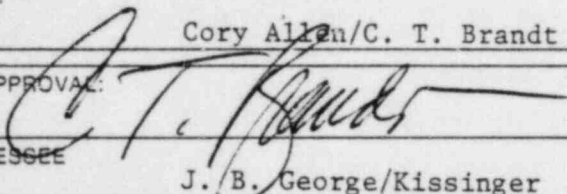
Xi Test Control - "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. ...test results shall be documented and evaluated to assure that test requirements have been satisfied."

Coatings applied on concrete and steel surfaces located in the reactor core cavity and extending up the core wall, Elev. 834'-0", have not been proven to perform satisfactorily to the combined 40-year dosages of gamma and neutron radiation.

No hold tag applied. Work may continue in affected area.

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: Cory Allen/C. T. Brandt (Rev. 1) DATE: 2 / 11 / 83

QE REVIEW/APPROVAL:  DATE: 2/15/83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Engineering

Q

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

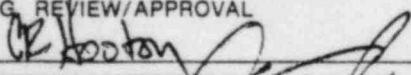
See attached.

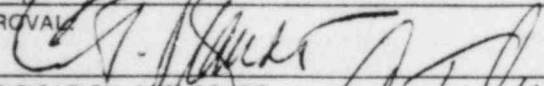
ACTION ADDRESSEE

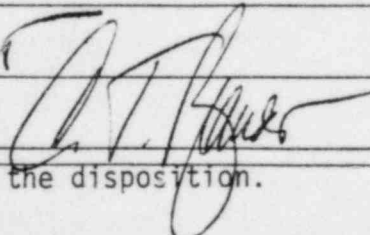
**ARMS  
INDEXED**

DATE: \_\_\_\_\_

**QA RECORD 1**  
RTN. L QA REVIEW 453288  
FILE NO. 15.1  
SUBFILE NO. NCR NO.

ENG. REVIEW/APPROVAL:  DATE: 3/25/83

QE REVIEW APPROVAL:  DATE: 3/28/83

DISPOSITION VERIFICATION & CLOSURE:  DATE: 3/28/83

QE

COMMENTS: R. 1 issued to add to the disposition.

TUCCO GRSE

429769 GHNY UI  
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RME  
NW-425*

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MARCH 10, 1983

TUSSI SITE  
TX NO. 9108908660

CTT-9572

J.R. GEORGE/M.R. MCPAY/R.M. KISSINGER/M. WELLS

SUB: GIPPS AND HILL RESPONSE TO REACTOR CAVITY COATING  
NCR C-83-00461, FEBRUARY 11, 1983

THIS NCR ESSENTIALLY STATES THAT A TEST PROGRAM HAS NOT BEEN ESTABLISHED FOR COATINGS IN THE REACTOR CORE CAVITY.

COATINGS IN THIS AREA SERVE NO SAFEGUARD FUNCTION. THEY ARE NOT NECESSARY TO PROTECT SAFETY-RELATED EQUIPMENT, OR TO ASSIST IN IT CARRYING OUT ITS SAFEGUARD FUNCTION. SINCE THE ATMOSPHERE IN THIS AREA IS MAINTAINED DRY AND AT LESS THAN 50C BY AN HVAC SYSTEM, CORROSION OF CARBON STEEL SURFACES WILL NOT BE PERCEPTIBLE. THE CONCRETE NEEDS NO PROTECTION.

CONCERN HAS BEEN EXPRESSED THAT FAILED COATINGS WILL INTERFERE WITH POST-ACCIDENT OPERATION OF THE SAFETY INJECTION SYSTEMS AND THE CONTAINMENT SPRAY SYSTEM, WHICH UTILIZE WATER DRAWING FROM THE CONTAINMENT SUMP (NOT THE REACTOR CAVITY SUMP). SUCH CONCERNS FORM THE BASIS FOR COATING TESTS FOR OTHER LOCATIONS IN THE CONTAINMENT; HOWEVER, IN SUCH OTHER LOCATIONS, THE RADIATION DOSE IS SIGNIFICANTLY LOWER. SUCH CONCERNS DO NOT EXIST IN THE REACTOR CORE CAVITY LOCATION, SINCE THE REACTOR CORE CAVITY IS NOT IN DIRECT COMMUNICATION WITH THE CONTAINMENT SUMP. IN CASE OF A LOCA, WATER WILL FLOW INTO, NOT OUT OF, THE REACTOR CORE CAVITY.

IF YOU HAVE ANY FURTHER QUESTIONS, PLEASE ADVISE.

R.E. BALLARD/M. CHIRUVOLU/K. FALK

GIPPSHILL, N.Y.

429769 GHNY UI

TUCCO GRSE

\*\*\*\*\*  
429769 GHNY UI

*Also Kissinger*

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1&2	Reactor Containment Building	Reactor Core Cavity	N/A	783'-7" to 824'-0"	N/A

NONCONFORMING CONDITION

XI Test Control - "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. ...test results shall be documented and evaluated to assure that test requirements have been satisfied."

Coatings applied on concrete and steel surfaces located in the reactor core cavity and extending up the core wall, Elev. 834'-0", have not been proven to perform satisfactorily to the combined 40-year dosages of gamma and neutron radiation.

No hold tag applied. Work may continue in affected area.

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: Cory Allen/C. T. Brandt (Rev. 1) DATE: 2 / 11 / 83

QE REVIEW/APPROVAL: *[Signature]* DATE: 2/15/83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Engineering

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS  SCRAP \_\_\_\_\_

*see attached*

ENG. REVIEW/APPROVAL: *[Signature]* / *[Signature]* DATE: 3-17-83

QE REVIEW APPROVAL: *[Signature]* DATE: 3/23/83

DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE: \_\_\_\_\_

COMMENTS:

REPORTING PERSONNEL

QE

ACTION ADDRESSEE

QE

COMANCHE PEAK STEAM ELECTRIC STATION  
NONCONFORMANCE REPORT (NCR)

NCR No.  
C-83-00461

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1 & 2	Reactor Containment Building	Reactor Core Cavity	N/A	783'-7" to 834'-0"	N/A

NONCONFORMING CONDITION

X1 Test Control - "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. ...test results shall be documented and evaluated to assure that test requirements have been satisfied."

Coatings applied on concrete and steel surfaces located in the reactor core cavity and extending up the core wall, Elev. 834'-0" have not been proven to perform satisfactorily to the combined 40-year dosages of gamma and neutron radiation.

REPORTING PERSONNEL

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: Cory Allen DATE: 2, 11, 83

QE REVIEW/APPROVAL: [Signature] DATE: 2, 11, 83

ACTION ADDRESSEE: J. B. George/Kissinger Mike McBay DEPARTMENT: Engineering

O

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS \_\_\_\_\_ SCRAP \_\_\_\_\_

ACTION ADDRESSEE

ENG. REVIEW/APPROVAL \_\_\_\_\_ DATE: / /

QE REVIEW APPROVAL \_\_\_\_\_ DATE: / /

DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE: / /

QE

COMMENTS:

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID/NUMBER	LOCATION OR ELEVATION	RIR NO.
1#2	REACTOR CONTAINMENT BUILDING	REACTOR CORE CAVITY	N/A	783'-7" TO 834'-0"	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION XI. TEST CONTROL  
 "A TEST PROGRAM SHALL BE ESTABLISHED TO ASSURE THAT ALL TESTING, REQUIRED TO DEMONSTRATE THAT STRUCTURES, SYSTEMS, AND COMPONENTS WILL PERFORM SATISFACTORILY IN SERVICE IS IDENTIFIED AND PERFORMED IN ACCORDANCE WITH WRITTEN TEST PROCEDURES WHICH INCORPORATE THE REQUIREMENTS AND ACCEPTANCE LIMITS CONTAINED IN APPLICABLE DESIGN DOCUMENTS. . . . TEST RESULTS SHALL BE DOCUMENTED AND EVALUATED TO ASSURE THAT TEST REQUIREMENTS HAVE BEEN SATISFIED."  
 COATINGS APPLIED ON CONCRETE AND STEEL SURFACES LOCATED IN THE REACTOR CORE CAVITY AND EXTENDING UP THE CORE WALL, EL. 834'0" HAVE NOT BEEN PROVEN TO PERFORM SATISFACTORILY TO THE COMBINED 40-YEAR DOSAGES OF GAMMA AND NEUTRON RADIATION.  
 REFERENCE DOCUMENT: 10CFR 50, APPENDIX B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: CORY ALLEN DATE: 2/11/83

QE

QE REVIEW/APPROVAL: [Signature] DATE: 2/11/83  
 ACTION ADDRESSEE: [Signature] DEPARTMENT: \_\_\_\_\_

ACTION ADDRESSEE

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS \_\_\_\_\_ SCRAP \_\_\_\_\_

QE

ENG. REVIEW/APPROVAL: \_\_\_\_\_ DATE: / /  
 QE REVIEW APPROVAL: \_\_\_\_\_ DATE: / /  
 DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE: / /

COMMENTS:



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document in the above-captioned matter was served upon the following persons by deposit in the United States mail, first class, postage prepaid, this 26th day of October, 1984:

\*Peter B. Bloch, Esq.  
Chairman, Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

\*\*Dr. Walter H. Jordan  
881 West Outer Drive  
Oak Ridge, Tennessee 37830

\*Herbert Grossman, Esq.  
U. S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

\*\*\*Mr. John Collins  
Regional Administrator  
Region IV  
U.S. Nuclear Regulatory  
Commission  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

\*\*\*Chairman, Atomic Safety and  
Licensing Appeal Panel  
U. S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

\*Mr. William L. Clements  
Docketing & Services Branch  
U. S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

\*Stuart A. Treby, Esq.  
Office of the Executive  
Legal Director  
U. S. Nuclear Regulatory  
Commission  
7735 Old Georgetown Road  
Room 10117  
Bethesda, MD 20814

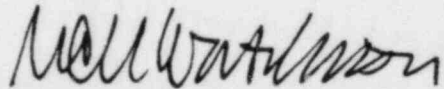
\*\*\*Chairman, Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
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\*Ellen Ginsberg, Esq.  
Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory  
Commission  
Washington, D. C. 20555



---

McNeill Watkins II

cc: Homer C. Schmidt  
John W. Beck  
Robert Wooldridge, Esq.