

10/19/84

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	)	Docket Nos. 50-445/2
Station, Units 1 and 2)	)	50/446/2

AFFIDAVIT OF VINCENT S. NOONAN

I, Vincent S. Noonan, being duly sworn, do depose and state as follows:

1. I am responsible for direction of the NRC Staff's ("Staff's") Project Task Force for CPSES in accordance with attached Memorandum dated October 17, 1984 from William J. Dircks, Executive Director for Operations. My affidavit addresses the Board's request for a status report and schedule for completing pending Staff action on hearing issues which are currently controlling the proceeding. My affidavit is based upon information provided to me by the Comanche Peak project staff and the former Comanche Peak Project Director.

2. The TRT was established to undertake a comprehensive review of many particularized issues relating to the adequacy of design and construction of CPSES. These issues encompass matters identified in the hearing as well as matters identified in allegations which were not

8410300315 841019  
PDR ADOCK 05000445  
G PDR

raised in the CPSES licensing hearings. The TRT's review and findings may bear directly on currently unresolved matters raised in the hearing, such as QA procedures in document control. In other areas the TRT effort in the course of addressing a broader issue may bear upon relatively narrow issues raised in the hearing. For example, the maximum surface roughness issue, raised in the hearing may itself be a relatively narrow issue but it is encompassed in the TRT consideration of the broader, more generic concern about the adequacy of protective coatings at CPSES. In still other areas, the TRT findings may bear on issues having some relevance to the overall programmatic QA issue in contention. The TRT is conducting a comprehensive evaluation of the Applicants' management of their QA and QC program. In all these areas, the TRT proposes to assess these factors in terms of their safety significance at CPSES as actually constructed. Thus, the TRT review will provide the Staff with a comprehensive appreciation and assessment of safety matters at CPSES.

Because of the many individual issues being addressed by the TRT, and because of the relevance of these individual issues to the broader issue of the overall adequacy of the Applicants' QA/QC program at CPSES, the Staff believes that an attempt to close out individual issues before the Staff have completed its review and developed its overall position can only result in an incomplete and possibly mistaken understanding of the actual situation at CPSES and a confused hearing record. In my view the most productive method of resolving the overall hearing issues is to permit the Staff to conclude its TRT effort, develop its overall position

on the basis of its review, and then present that overall position to the Board at an appropriate time.

Until the Staff is able to conclude its effort and develop an overall assessment of CPSES, it will not be able to effectively assist the Board in developing a comprehensive and coherent record and assessing the significance of the many individual matters raised in this proceeding, from the standpoints of facility safety and applicable regulatory requirements. Therefore, the Staff believes that the Board should await the completion of the TRT review before undertaking additional hearings.

The TRT expects to complete its identification of problem areas by the end of November 1984. Assuming a month for Applicants' responses to the TRT findings, the Staff should be able to evaluate the Applicants' responses and develop its position on the issues in controversy, including the overall programmatic QA issue encompassed in Contention 5, in late January 1985. That should enable the Board and parties to develop a schedule for promptly hearing these matters and the Board reaching its decision on the basis of a comprehensive and coherent hearing record.

3. The Staff has responded to CASE's Discovery Motion on October 16, 1984 by production of a portion of the requested documents. The Staff expects to produce the remaining documents requested by CASE on October 24, 1984. Further, the Staff has advised the other parties that the authors of the EG&G Report will be available in Bethesda, Maryland for a "Briefing Session" on November 8-9, 1984.

4. The Staff efforts on TDI diesel generators to date have been directed primarily at the technical questions involving the adequacy of

TDI diesel generators. To assist it in its review and evaluation of the adequacy of TDI diesel generators, the Staff retained Pacific Northwest Laboratories ("PNL") to review the Applicants' site-specific program for ensuring adequacy of the TDI diesel generators at CPSES. The Staff has completed its review of PNL's Report on Applicants' Program, and has issued a preliminary Supplemental Safety Evaluation Report ("SSER") on this subject. Copies of the preliminary SSER and the PNL Report were transmitted to the Board and parties on October 1, 1984.

The Staff is currently evaluating the adequacy of the Applicants' Vendor QA program. The Staff has also asked Applicants a set of questions regarding QA/QC with regard to TDI diesel generators and is currently beginning an inquiry into the adequacy of Applicants' Vendor QA program as applied to TDI diesel generators. The Staff expects to complete its inquiry on Applicants' Vendor QA program and its implementation with regard to TDI diesel generators by the end of November 1984.

5. The Staff currently projects to respond to the Board's "Memorandum (Concerns About Startup Quality Assurance) (October 1, 1984) by the middle of December 1984. The Staff intends to respond to "Applicants' Supplement to Motion for Authorization Pursuant to 10 CFR § 50.57(c)" (September 13, 1984) by November 2, 1984.

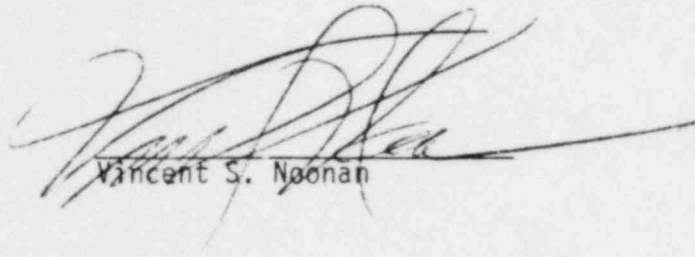
6. The Staff is currently reviewing the Applicants' September 24, 1984 partial response to a set of Staff questions raised during the technical meetings held on August 8, 9, and 23, 1984. The Staff is awaiting the Applicants' remaining responses to the Staff's questions. The Staff expects to be able to complete one summary disposition motion (ASW/ASME Codes Provisions on Weld Design) by early November 1984. The Staff expects

to file its responses on damping factors for OBE/SSE loading conditions, section property values, effects of gaps on seismic response, safety factors, use of generic stiffnesses, and friction forces due to small thermal movements by the end of November 1983. The Staff expects to file its responses to Applicants' summary disposition motions on U-bolts, Richmond inserts, stability of certain pipe support designs, the upper later restraint, wall-to-wall and floor to ceiling supports, force distributions in axial restraints, and local displacements and stresses by the end of December 1984.

The remaining summary disposition motion on the overall pipe and pipe support design QA and design control process cannot be completed until the Staff has finished its evaluation of the previously mentioned summary disposition motions, and also reviewed the findings of the TRT in the design QA/QC area. Accordingly, the Staff projects that its response on this subject will be able to be filed by mid January 1985.

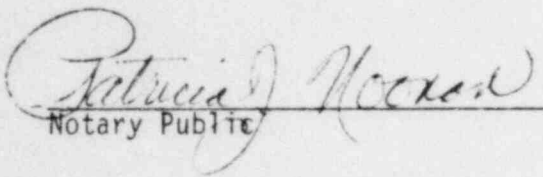
7. Applicants have filed motions for summary disposition on the maximum surface roughness issue (June 25, 1984) and on Westinghouse component coatings (September 4, 1984). The TRT is currently completing its review of the protective coatings area, and the Staff expects to be in a position to respond to Applicants' summary disposition motions on protective coatings by mid January 1985.

The above statements are true and correct to the best of my knowledge and belief.



Vincent S. Noonan

Subscribed and sworn to before me  
this 19th day of October, 1984



Patricia J. Noonan  
Notary Public

My Commission expires: July 1, 1986



VINCENT S. NOONAN

Project Director for Comanche Peak  
Division of Licensing  
Office of Nuclear Reactor Regulation

and

Chief, Equipment Qualification Branch  
Division of Engineering  
Office of Nuclear Reactor Regulation

Vincent S. Noonan is Chief, Equipment Qualification Branch, Division of Engineering. Mr. Noonan joined the AEC in 1974 as a Senior Mechanical Engineer, Division of Systems Safety. He served as both Section Leader and Chief of the Engineering Branch in the Division of Operating Reactors. He later served as Assistant Director, Materials and Qualifications Engineering in the Division of Engineering. Between April 1981 and October 1982 he was with EDS Nuclear, Inc., as Division Manager of the Engineering Analysis Division.

From 1959 to 1974, Mr. Noonan was a Structural Dynamic Group Engineer with the McDonnell Douglas Corporation in St. Louis, Missouri. He holds the Bachelor of Science degree in Aeronautical Engineering from St. Louis University and the Master of Science degree in Engineering from the University of Missouri-Rolla.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

October 17, 1984

MEMORANDUM FOR: Office Directors  
Regional Administrators

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: COMANCHE PEAK PROJECT DIRECTOR

I have appointed Vincent Noonan as the Comanche Peak Project Director effective immediately. He replaces Thomas Ippolito, who resigned on October 4, 1984. Mr. Ippolito's resignation was for personal reasons and not because of any concerns regarding the Comanche Peak project. Mr. Noonan will continue to coordinate and direct the overall licensing review effort that had been begun following the same organization as before. (See my memorandum dated March 12, 1984, copy attached). The technical review team will remain intact. Mr. Noonan will report to Darrell Eisenhut with regard to the overall adequacy of the Comanche Peak project.

Mr. Robert Martin, who has assumed the position of Regional Administrator for Region IV, will assure the continued review and coordination of construction and operation issues for the Comanche Peak project.

A handwritten signature in dark ink, appearing to read "William J. Dircks".

William J. Dircks  
Executive Director for Operations

Attachment:  
Memo, Dircks for Collins, Denton,  
& DeYoung, dated 3/12/84





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 12 1984

MEMORANDUM FOR: John T. Collins, Regional Administrator  
Region IV

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Richard C. DeYoung, Director  
Office of Inspection & Enforcement

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: COMPLETION OF OUTSTANDING REGULATORY ACTIONS ON  
COMANCHE PEAK AND WATERFORD

Construction of the Comanche Peak and Waterford facilities is nearing completion. There remain a number of issues that need to be resolved before the staff can make its licensing decisions. The issues remaining for these plants are quite complex and span more than one Office. In order to assure the overall coordination/integration of these issues and to assure issues are resolved on a schedule to satisfy hearing and licensing decision needs, I am directing NRR to manage all necessary NRC actions leading to prompt licensing decisions. Darrell Eisenhut, Director, Division of Licensing, NRR is being assigned the lead responsibility for this activity. He will coordinate the efforts of NRR, IE, and Region IV, and will coordinate this activity with OI and OELD. Prior to any of the affected Offices undertaking major activities (e.g., inspections) or making decisions on these plants, that activity should be concurred in by NRR.

We are presently in the process of assigning a dedicated senior manager to assist Mr. Eisenhut in the management of these activities.

The first phase of this program will be the identification of issues needed to be resolved for each plant prior to hearing and licensing decisions. Once the issues have been identified a Program Plan for resolution of each item should be developed and implemented. The Program Plan should address the scope of the work needed, the identification of the responsible line organization, and the schedule for completion. In principle, this effort will therefore be similar to the effort undertaken regarding the allegation review on Diablo Canyon except that this effort should encompass all licensing, inspection, hearing, and allegation issues.

Each affected Office will assign a full time senior manager to work with NRR to define, schedule and complete the issues. I expect these managers to be identified by each of you within a few days. All affected offices should provide dedicated resources and give their full support to this effort, to assure that all existing issues are expeditiously handled and all new issues are promptly provided to NRR so as not to delay the licensing decisions. In addition, copies of all information, documents, depositions, etc. should be promptly provided to NRR to ensure a coordinated approach.

I anticipate that the approach utilized here will be necessary for a number of upcoming OL projects, and am directing NRR to take the lead for carrying out this activity.



William J. Dircks  
Executive Director for Operations

cc: G. Cunningham, ELD  
B. Hayes, OI

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	)	Docket Nos. 50-445/2
Station, Units 1 and 2)	)	50-446/2

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF REPORT TO THE LICENSING BOARD ON STATUS AND SCHEDULE FOR ADDRESSING HEARING ISSUES" together with the Affidavit of Vincent S. Noonan in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or deposit the Nuclear Regulatory Commission's internal mail system (\*), or by express mail or overnight delivery (\*\*), or by hand delivery (\*\*\*), this 19th day of October, 1984:

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

Herbert Grossman, Alternate Chairman\*\*\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Walter H. Jordan\*\*  
Administrative Judge  
881 W. Outer Drive  
Oak Ridge, TN 37830

Dr. Kenneth A. McCollom \*\*  
Administrative Judge  
Dean, Division of Engineering,  
Architecture and Technology  
Oklahoma State University  
Stillwater, OK 74078

Mrs. Juanita Ellis  
President, CASE  
1426 South Polk Street  
Dallas, TX 75224

Renea Hicks, Esq.  
Assistant Attorney General  
Environmental Protection Division  
P. O. Box 12548, Capital Station  
Austin, TX 78711

Nicholas S. Reynolds, Esq.\*\*  
William A. Horin, Esq.  
Bishop, Liberman, Cook,  
Purcell & Reynolds  
1200 17th Street, N.W.  
Washington, DC 20036

Mr. James E. Cummins  
Resident Inspector/Comanche Peak  
Steam Electric Station  
c/o U.S. Nuclear Regulatory Commission  
P.O. Box 38  
Glen Rose, TX 76043

Robert D. Martin  
William L. Brown  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Mr. Michael D. Spence, President  
Texas Utilities Electric Company  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, TX 75201

Lanny Alan Sinkin  
114 W. 7th, Suite 220  
Austin, TX 78701

Atomic Safety and Licensing Board  
Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docketing and Service\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

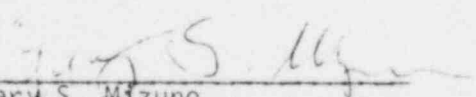
Billie Pirner Garde  
Citizens Clinic Director  
Government Accountability Project  
1901 Que Street, N.W.  
Washington, DC 20009

Robert A. Wooldridge  
Worsham, Forsythe, Sampels & Wooldridge  
2001 Bryan Tower, Suite 2500  
Dallas, TX 75201

Ellen Ginsberg, Esq.\*  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Atomic Safety and Licensing Appeal  
Board Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Anthony Z. Roisman, Esq.\*\*  
Trial Lawyers for Public Justice  
2000 P Street, N.W., Suite 611  
Washington, DC 20036

  
\_\_\_\_\_  
Geary S. Mizuno  
Counsel for NRC Staff