

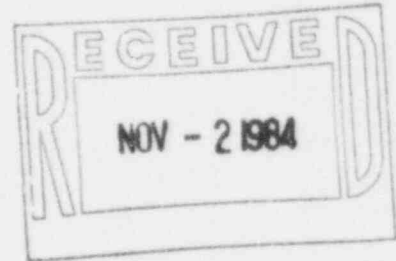
TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

November 1, 1984
TXX #4346

Docket No.: 50-445



Mr. Richard L. Bangart, Director
Region IV Comanche Peak Task Force
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Dear Mr. Bangart:

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NO. 84-16

We have reviewed your letter dated October 4, 1984 on the inspection conducted by Mr. L. E. Martin and other members of your staff of activities authorized by NRC Construction Permit CPPR-126 for Comanche Peak, Unit 1. We are hereby responding to the Notice of Violation listed in Appendix A of that letter.

To aid in the understanding of our response, we have repeated the Notice of Violation followed by our response. We feel the enclosed information to be responsive to the Inspectors' findings. If you have any questions, please advise.

Yours truly,

BRC:kh

c: NRC Region IV - (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. V. S. Noonan

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APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station

Docket: 50-445/84-16
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of May 14 through June 20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 8583, dated March 9, 1984, the following violations were identified:

A. Failure to Properly Inspect Cable Tray Hangers (CTHs)

10 CFR Part 50, Appendix B, Criterion X requires that the inspection program of activities affecting quality shall be established and conducted in a manner to verify conformance with the documented instructions, procedures, and drawings.

Procedure QI-QP-11.10-2, Rev. 27, "Cable Tray Hanger Inspection," specifies the inspection attributes for inspecting assembly, configuration, base plate grouting, welding, etc., for conformance with design drawings and documents.

Contrary to the above:

1. The NRC inspectors identified two cases where three supports shared common clip angle attachments to the concrete wall. CTHs 6503, 6504, and 6505 shared a common clip angle that was not called for on Drawing 2323-S-903, Detail D for Case SP4 or on Component Modification Card (CMC) 11097. CTHs 6576, 6577, and 6578 shared common clip angles that were not called for on Drawing 2323-S-903, Detail D for SP4.
2. The NRC inspectors identified two hangers where the dimensions did not agree with the drawings. CTHs 6632 and 6638 both have installed dimensions that are more than the $\pm 1/4$ inch allowed tolerance from those specified in the appropriate design documents. The dimensional errors are specifically documented on Nonconformance Report M84-01834. The dimensional errors of the members varied from $7/8$ of an inch to $1 1/8$ of an inch shorter than those shown on the FSE-00159 drawing.
3. The NRC inspectors identified two cable tray hangers that did not have the weld configuration specified on the design drawings.

CTH 6642 and CTH 6645 both had horizontal welds at the clip angle to support connection and the design drawings specified vertical welds.

4. The NRC inspectors identified five cable tray hangers that had wall/floor connections that did not conform to those specified by the design drawings. CTH 6657 had a beveled washer that was improperly installed so that it actually decreased the bearing surface between the nut and the clip angle. CTH 5519 did not have 1 inch of grout under base plate as specified on Drawing 2323-S-913, Detail 6. CTHs 5491, 5498 and 5499 had clip angles that utilized a combination of welding to embed plates and Hilti bolts for the wall or beam attachment for which there was no detail.

The above are examples identified by the NRC inspectors where cable tray hangers were installed by the craft to conditions other than those specified by the identified design documents and the QC inspectors failed to identify and document these conditions.

Corrective Action

This item identifies instances where cable tray hangers were installed by craft to conditions other than those specified by design documents and inspections performed by QC did not identify and document these conditions. The following actions have been taken to address this item of non-compliance:

1. The specific problems with the cable tray hangers (CTH) have been resolved by the issuance and completion of corrective actions for NCR's M 84-01834, M 84-01835 and M 84-01836.
2. The details associated with this item of non-compliance indicate that 92 CTHs were inspected by the NRC with comments being provided on 15 of these supports. Of the 15 CTHs identified in this item, 12 were dispositioned use-as-is and 3 hangers were reworked.
3. To determine if other CTHs had problems similar to those identified in this item of non-compliance, all CTHs in the Unit 1 Reactor Building having a design where a combination of welding to embed plates and Hilti bolts was used for attachments were re-inspected. This attachment design was selected for inspection since a common element existed with CTHs 5491, 5498 and 5499, identified in the inspection report. The results of this walkdown inspection indicated that all CTHs were installed in accordance with specific engineering approval and met drawing requirements.

Since the balance of problems identified in this item of non-compliance are diverse, an evaluation to address generic implications, if any, on Unit 1 CTHs is in progress. It is anticipated that this evaluation will be completed by November 30, 1984, at which time an additional response, including preventive actions regarding this item of non-compliance will be provided.

B. Failure to Provide Controlled Issuance of Design Documents and Changes Thereto

10 CFR Part 50, Appendix B, Criterion VI, "Document Control," requires that documents, such as instructions, procedures and drawings, including changes thereto, be controlled and properly distributed to the location where activities affecting quality are conducted. ANSI N45.2.11, Section 7 requires that documented procedures be used to control the issuance of design documents and changes thereto and that these procedures shall assure that documents are properly distributed.

Contrary to the above, it was determined that issuance of design documents and changes thereto were not being controlled by Operations Document Control Center (DCC). Specifically, the actual status of design drawings in the control room, file 003, could not be determined. The list of CMCs and design change authorizations identified by Operations DCC to be applicable did not agree with the Construction DCC list. In addition, the effective revision of Drawings 2323-M1-0301 (CP-5), M1-0261 (CP-4) and M1-0262 (CP-4) were not found in the control room file.

Corrective Action

The following corrective action has been taken. The manual method of maintaining the list of applicable CMCs and design change authorizations has been replaced with a computerized system. Computer terminals were installed in the Control Room May 18, 1984 and became operational June 27, 1984. Terminals are also in operation in the Operations DCC and other plant locations. As the list of CMCs and design change authorizations is updated, this information is immediately available to Operations personnel. The list is updated on the computer by TUGCO Nuclear Engineering and is utilized by both Construction DCC and Operations DCC. This change enables Operations DCC to effectively and accurately determine the status of changes to design drawings.

The control and distribution of drawings by Operations DCC has been improved by several changes. Reproduction equipment has been replaced by more efficient equipment to enable Operations DCC to keep up with the number of drawings they need to produce and control in the field. A log system has been implemented for drawings received from Construction DCC to monitor the length of time it takes to get new drawing revisions issued to the control room and other field locations. These changes will ensure that revisions of controlled drawings are issued to the field in a timely manner.

Preventive Action

The above corrective measures will prevent any further document control violations of this nature.

Date of Corrective Action Implementation

Action was taken on June 18, 1984 to ensure revisions of controlled drawings are issued to the field in a timely manner. Computer terminals are now installed and in operation to status design charges. A weekly status printout will be available at each terminal by November 1, 1984 to provide additional preventive measure.