

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNR

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

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Docket Nos. 50-445 ^{014:11}
and 50-446 ^{OL}

(Application for an
Operating License)

CASE'S ANSWER TO APPLICANTS' RESPONSE TO BOARD REQUEST
FOR INFORMATION REGARDING CINCHING DOWN U-BOLTS

in the form of

AFFIDAVIT OF CASE WITNESS JACK DOYLE

Q: Do you find it necessary to alter any of your statements in your Affidavit attached to CASE's 10/8/84 Answer to Applicants' Motion for Summary Disposition Regarding Consideration of Cinching Down of U-Bolts, in light of Applicants' 10/23/84 Response to Board Request for Information Regarding Cinching Down U-Bolts?

A: Yes. Even though this is not the raw data requested by the Board, it does affect my previous response. In my original response, the last answer beginning on page 3 contains (at the top of page 4) the statement "All that Applicants have proved is that within their limited sample (and this in all probability is a very limited sample) . . . " I now must qualify my position, since this latest information indicates that my remark was in fact an understatement.

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Q: What do you mean by that?

A: In my original statement, I assumed that the selectivity utilized by Applicants would be limited to specific U-bolts corrected to comply with their October 1982 criteria /1/ which was instituted in response to allegations contained in my deposition/testimony and attachments /2/.

It never dawned on me that while the majority of the allegations in reference to pipe support discrepancies involved Unit 1 and common areas, Applicants' "random" sample would be limited to Unit 2.

I find it incredible that Applicants would take a sample of 160 items exclusively in Unit 2 to prepare criteria for tests to answer allegations which were almost exclusively limited to Unit 1.

Applicants, for their part, have never expanded the allegations beyond Unit 1; see, for example, Applicants' Witness Mr. Finneran, who states /3/:

"We have identified 15 of these types of supports [modified to improve their stability] in Unit 1 and common areas."

Mr. Finneran at no time in these hearings stated that similar supports exist in Unit 2. The problem is therefore twofold: (1) The instability problems identified in Unit 1 exist in Unit 2 to the same

/1/ See Affidavit of Robert C. Iotti and John C. Finneran, Jr. Regarding Cinching Down of U-Bolts, page 9; see also SIT Report (NRC Staff Exhibit 207, bound in following Tr. 6289, received into evidence at Tr. 6402), page 32, citing Brown & Root Design Change Notice (DCN) Number 1, dated 10/8/82, to Construction Procedure No. 35-1195-CPM 9.10 Rev. 8.

/2/ CASE Exhibits 669 and 669A, Deposition/Testimony of CASE Witness Jack Doyle, and CASE Exhibit 669B, Attachments to Deposition/Testimony of CASE Witness Jack Doyle, all admitted at Tr. 3630.

/3/ See 6/17/84 Affidavit of John C. Finneran, Jr., Regarding Stability of Pipe Supports and Piping Systems, attached to Applicants' Motion for Summary Disposition Regarding Stability of Pipe Supports and Piping Systems, at page 18.

degree as was noted in Unit 1, in which case Applicants have been less than candid with the Board as relates to instability; and (2) in which case utilizing the torque values resulting from a change in criteria (10/8/82) prior to the major construction effort for pipe supports in Unit 2 is also deceptive.

I must also add that the manner in which I answer these U-bolt questions does not indicate that I agree with Applicants' numbers (15 total U-bolt instability problems with only 2 of this number on non-main steam run pipes), since I identified more than two U-bolt instability problems on non-main steam lines in my Exhibit 669B.

(As a matter of fact, I find it difficult to agree with much that Applicants have to say in reference to stability; for example, Applicants avoid the term "instability" like the plague and prefer to use the term "repaired to improve stability" (see, for example, Tr. 4895). For these supports outlined under box frames and U-bolts with gaps, the phrase "to improve stability" (emphasis added) is like the doctor telling your wife not to worry because she is only a little bit pregnant.)

Q: Do you have any further statements in regard to this new information?

A: Yes. In their random sample of specific supports, Applicants also included 35 Class 5 supports, 16 supports listed as Class 6 (balance of plant, non-safety related), and at least 1 Class 4 support. As far as testing ASME pipe supports, the inclusion of the condition for 52 of 160 supports which are not specifically ASME controlled is only

utilized as a means of creating an appearance of a large sample. The same is true for the 20 small bore and 16 3" diameter line U-bolts included in Applicants' "random" sample, which have nothing to do with the tests for 4", 10", and 32" lines. In fact, only 45 of the 160 U-bolts in the "random" sample are relevant. This is particularly misleading when Unit 1 has a large number of U-bolts cinched up that could have been used for the sample.

Finally, I must note that, while the new direction instituted by Applicants' 10/8/82 procedure gave the appearance of solving a problem by offering guidance for cinching as a means of obtaining stability, it obviously fell short. This fact may be noted in at least two areas relating to the effect of the torque spread, noted by Applicants in Table 2, on the mechanisms for problems:

- (1) For at least some in all sizes over 3" diameter to 30" diameter, lift-off would be a major problem, as was the case for stiff clamps, as noted in the Administrative Board Order on this subject.
- (2) The spread between minimum and maximum torque for this selective sample does not speak well for the procedure established by Applicants (10/8/82), nor does it address the probability for torques above or below the current scatter.

Q: Do you have anything further to state on this subject?

A: No, I do not. I believe the above will suffice to qualify and quantify my original "understatement" which resulted due to a lack of knowledge of Applicants' meaning of "random sample," which translates to "controlled sample."

I have read the foregoing affidavit, which was prepared under my personal direction, and it is true and correct to the best of my knowledge and belief.

Jack Doyle
Date: Oct 29 1984

STATE OF New York
COUNTY OF Suffolk

On this, the 29th day of October, 1984, personally appeared Reba M. - Jack Doyle, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he/she executed the same for the purposes therein expressed.

Subscribed and sworn before me on the 29th day of October, 1984.

IRVIN L. LERNER
NOTARY PUBLIC, State of New York
No. 52-231566D
Qualified in Suffolk County
Commission Expires March 30, 1985

Irvin L. Lerner
Notary Public in and for the State of New York

My Commission Expires: 3/30/85

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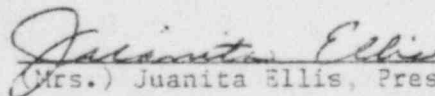
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