



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

January 8, 1985

Docket Nos. 50-445/446

Mr. M. D. Spence, President
Texas Utilities Generating Company
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Comanche Peak Review

On July 9, 1984, the Comanche Peak Technical Review Team (TRT) began an intensive onsite effort to complete a portion of the reviews necessary for the NRC staff to reach its decision regarding the licensing of Comanche Peak Unit 1. The onsite effort covered a number of areas, including the review of allegations of improper construction practices at the facility.

On September 18, 1984, the NRC met with you and other Texas Utilities Electric Company representatives to provide you with a request for additional information in the electrical and instrumentation, civil and structural, and test program areas having potential safety implications. On November 29, 1984, we reported to you on the status of our technical review in the protective coatings area and requested additional information in the mechanical, and miscellaneous areas. TRT reviews of construction QA/QC allegations and technical issues have progressed to the point where we can now provide you with the status of our efforts in the construction QA/QC area and a request for a program plan specifically addressing our concerns. Further background information regarding these allegations and technical issues will be published in Supplements to the Comanche Peak Safety Evaluation Report (SSER), which will document the TRT's detailed assessment of the significance of all issues examined.

The TRT effort constitutes one element in the process of the agency's review of the Comanche Peak license application. The QA review group on the TRT was comprised of about 20 individuals having a total of over 300 years experience in nuclear engineering, QA, and related fields. This group spent several months at the Comanche Peak site examining the construction QA program in depth.

The TRT findings are provided in the enclosure to this letter. We have not proposed specific TUEC corrective actions as we have in previous reports from the TRT. We request that you evaluate the TRT findings and consider the implications of these findings on construction quality at Comanche Peak. We request that you submit to the NRC, in writing, a program and schedule for completing a detailed and thorough assessment of the QA issues presented in the enclosure to this letter.

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A PDR

January 8, 1985

Your programmatic plan and the plans for its implementation will be reviewed and evaluated by the staff before NRC considers the issuance of an operating license for Comanche Peak Unit 1. The TRT considers the construction QA/QC findings to be generic to both Units 1 and 2 and your program plan and schedule should address both units. This program plan shall: (1) address the root cause of each finding and its generic implications on safety-related systems, programs, or areas, (2) address the collective significance of these deficiencies, and (3) propose an action plan from TUEC that will ensure that such problems do not occur in the future. Your actions should consider the use of management personnel with a fresh perspective to evaluate the TRT's findings and implement your corrective actions. Finally, you should consider the use of an independent consultant to provide oversight to your program.

The findings of TRT with respect to QA/QC allegations, along with the TRT's assessments of your response to this letter, will be provided to the Senior Management Panel on Contention 5 established by the Executive Director on December 24, 1984. The Senior Management Panel will determine an overall NRC staff position on Contention 5 based on an integrated review of a number of sources of information concerning QA/QC at Comanche Peak in addition to the TRT findings, including information from the CAT team, the SRT team, OI, Region IV and the Hearing Board.

The TRT's overall evaluation of the technical issues and allegations is nearing completion. As we finalize information received in conversations with allegers, and further assess the implications of our findings we will inform you of additional concerns, as they arise. In the mean time, your examination of the potential safety implications of the TRT findings should include, but not be limited to the areas or activities selected by the TRT.

In order to fully discuss these concerns with you we are scheduling a meeting for January 17, 1985 which will be held in our office in Bethesda, Maryland. This meeting will provide an opportunity to ask questions regarding these concerns prior to formulating your program plan. Additional meetings will be held at NRC request as your program plan is formulated.

This request is submitted to you in keeping with the NRC practice of promptly notifying applicants of outstanding information needs that could potentially affect the safe operation of their plant. Future requests for information of this nature will be made, if necessary, as TRT technical reviews continue.

Distribution

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Sincerely,

RKeimig
JCalvo
CMcCracken
Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/enclosure:
See next page

CPTTR
RWessman
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DGEisenhut
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CPTRT
H. Livermore
1/8/85

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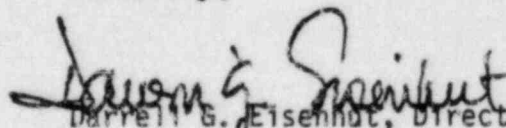
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Sincerely,


Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/enclosure:
See next page

COMANCHE PEAK

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive St., L.B. 81
Dallas, Texas 75201

cc: Nicholas S. Reynolds, Esq.
Bishop, Liberman, Cook,
Purcell & Reynolds
1200 Seventeenth Street, N. W.
Washington, D. C. 20036

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

Mr. Homer C. Schmidt
Manager - Nuclear Services
Texas Utilities Generating Company
Skyway Tower
400 North Olive Street
L. B. 81
Dallas, Texas 75201

Mr. H. R. Rock
Gibbs and Hill, Inc.
393 Seventh Avenue
New York, New York 10001

Mr. A. T. Parker
Westinghouse Electric Corporation
P. O. Box 355
Pittsburgh, Pennsylvania 15230

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

Mrs. Juanita Ellis, President
Citizens Association for Sound
Energy
1426 South Polk
Dallas, Texas 75224

Ms. Nancy H. Williams
CYGNA
101 California Street
San Francisco, California 94111

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

Mr. Robert D. Martin
U. S. NRC, Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

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

B. R. Clements
Vice President Nuclear
Texas Utilities Generating Company
Skyway Tower
400 North Olive Street
L. B. 81
Dallas, Texas 75201

William A. Burchette, Esq.
1200 New Hampshire Avenue, N. W.
Suite 420
Washington, D. C. 20036

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

David R. Pigott, Esq.
Orrick, Herrington & Sutcliffe
600 Montgomery Street
San Francisco, California 94111

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

cc: Mr. Dennis Kelley
Resident Inspector - Comanche Peak
c/o U. S. NRC
P. O. Box 1029
Granbury, Texas 76048

Mr. John W. Beck
Manager - Licensing
Texas Utilities Electric Company
Skyway Tower
400 N. Olive Street
L. B. 81
Dallas, Texas 75201

Mr. Jack Redding
Licensing
Texas Utilities Generating Company
4901 Fairmont Avenue
Bethesda, Maryland 20014