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RELATED CORRESPONDENCE

June 7, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

SECOND SUPPLEMENT TO NRC STAFF RESPONSE
TO CASE'S REQUEST FOR ADMISSIONS

I. INTRODUCTION

On February 4, 1985, Intervenor Citizens Association for Sound Energy (CASE) filed a request for admissions in which it asks the Staff to admit certain facts purportedly found by the Staff's Technical Review Team (TRT) during the course of its review and evaluation of Applicants' construction and quality assurance/quality control activities at Comanche Peak Steam Electric Station (CPSES). In its March 1, 1985 Response the Staff indicated that the TRT's findings and conclusions regarding the matters within its jurisdiction are set forth in applicable Supplemental Safety Evaluation Reports (SSERs). See Staff Response at 2-3. At the time the Staff's March 1 Response to CASE'S Admission requests was filed only the SSER concerning Electrical/Instrumentation and Test Program issues had been published. Subsequently, the Staff issued SSER No. 10, which addresses Mechanical/Piping issues. Consequently, the Staff is now

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in a position to respond to CASE admission requests 28-33 which relate to these matters. The Staff's responses are set forth below.

II. NRC STAFF RESPONSE TO SPECIFIC ADMISSION REQUESTS

28. The TRT found that no fillet weld inspection criteria existed for certain types of skewed welds. The TRT found that Brown & Root weld inspection procedures CP-QAP-12.1 and QI-QAP-11.1-28 for NF supports did not address some types of skewed welds. Although [the] TRT was told by Brown & Root personnel that procedure QI-QAP-11.1-26 for piping weld inspection was used, no evidence documenting the use of this inspection procedure was provided to the TRT. The lack of inspection criteria and lack of verification of proper inspection procedures being conducted for some types of skewed welds [is] a violation of ASME Code for NF supports committed to by TUEC in FSAR Section 5.2.1 and violation of Criterion XVII in Appendix B of 10 C.F.R. 50.

STAFF RESPONSE: Admit. See SSER No. 10 at N-204, 205.

29. The TRT found that, although the small sample of welds inspected by the TRT are acceptable, due to deficiencies in inspection records and the apparent lack of inspection criteria [for NF supports], the TRT is not certain whether some types of skewed welds were inspected properly. The lack of documented inspections and criteria for some types of skewed welds in NF supports represents a safety concern regarding the possible existence of under-sized welds in supports which are required to resist various design load.

STAFF RESPONSE: Admit. See SSER No. 10 at N-204, 205.

30. The TRT attempted to review TUEC records for ultrasonic (UT) measurement results and general installation practices. The TRT was told that ultrasonic testing of these types of bolts was not a procedural requirement; however, TUEC was unable to provide any other installation records for TRT review. The TRT concludes that this lack of installation inspection records is a violation of QA procedures and Criterion XVII in Appendix B of 10 C.F.R. 50.

STAFF RESPONSE: Admit only that CASE Admission Request 30 fairly reflects paragraph V-(b) of the Staff's November 29, 1984 letter to TUEC which requested the firm to provide additional information.

In the course of evaluating the allegation that the bolts used to install the upper steam generator lateral supports were cut to conform to applicable thread engagement requirements, the TRT found that "TUEC was unable to provide an inspection record or traveler package documenting the installation of the bolts. . . ." SSER No. 10 at N-149. Although the TRT found that the cutting of bolts "had no technical merit," id. at N-150, the TRT concluded "that the absence of installation inspection records creates a potential safety and QA/QC concern, since these beams are required for restraint of the [steam generator] during a seismic and pipe rupture event." Id. at N-151. Accordingly, the TRT required TUEC to find the original QA/QC inspection and installation records for the restraint in question. Id. If TUEC was unable to retrieve the records in question, TUEC was required by the TRT to "provide evidence such as

ultrasonic measurement results, to verify acceptable bolt length." Id. (emphasis added).

31. The TRT, in reviewing the SRT findings in the area of piping design considerations, has discovered that piping systems, such as Main Steam, Auxiliary Steam and Feedwater, are routed from the Electrical Control Building (seismic category I) to the Turbine Building (non-seismic category I) without any isolation. To be acceptable, each seismic category I piping system should be isolated from any non-seismic category I piping system by separation, barrier or constraint.

STAFF RESPONSE: Admit. See SSER No. 10 at N-238.

32. Region IV inspections have confirmed the existence of plug welds in cable tray supports located in the Unit 2 Cable Spreading Room.

STAFF RESPONSE: Admit. See SSER No. 10 at N-64.

33. The TRT determined that the alleged incident pertained to restoration of the Unit 1, loop 1 main steam line to its initial, correct installation position. (The line had shifted during flushing operations due to the weight of the added water and because the temporary supports sagged.) The TRT also determined that the modifications to permanent pipe supports were necessary to provide proper support to the main steam line in its restored position (initial designs for and construction of the supports had been based on the shifted position of the line) and, although the alleged vibrations could not be confirmed, their associated stresses might not have damaged the main steam line. The TRT review of a

TUEC analysis, performed 1 year after the incident, concluded that the analysis was incomplete. An evaluation for the full sequence of events leading up to the incident had not been performed. The TRT review of Gibbs & Hill Specification No. 2323-MS-100 indicated that there were inadequate requirements and construction practices for the support of the main steam line during flushing, and for temporary supports for piping and equipment in general. In particular, evaluations to assure the adequacy of temporary supports during flushing and installation were not required.

STAFF RESPONSE: Admit. See SSER No. 10 at N-107-108.

Respectfully submitted,

Gregory Alan Berry
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 7th day of June, 1985

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CERTIFICATE OF SERVICE

I hereby certify that copies of "SECOND SUPPLEMENT TO NRC STAFF RESPONSE TO CASE'S REQUEST FOR ADMISSIONS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 7th day of June, 1985:

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