

827

LAW OFFICES OF

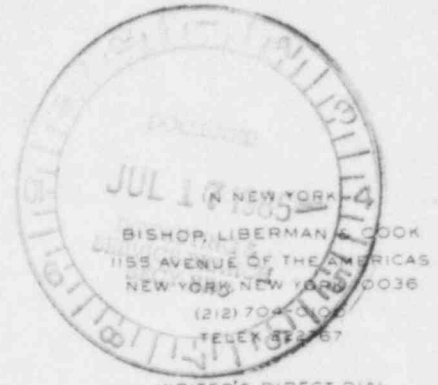
BISHOP, LIBERMAN, COOK, PURCELL & REYNOLDS

1200 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 857-9800

TELEX 440574 INTLAW UI



July 17, 1985

Peter B. Bloch, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Herbert Grossman, Esquire
Alternative Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Walter H. Jordan
Administrative Judge
881 West Outer Drive
Oak Ridge, Tennessee 37830

Elizabeth B. Johnson
Oak Ridge National Laboratory
Post Office Box X, Bldg. 3500
Oak Ridge, Tennessee 37830

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

Re: Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station, Units 1 & 2);
Docket Nos. 50-445-1, 50-446-1, 50-445-2 and 50-446-2

Dear Administrative Judges:

Enclosed is a chart which identifies outstanding issues and cross-references those issues to pertinent TRT findings and associated responses. Applicants indicated in their Management Plan (at 47) that this chart would be provided following issuance of the CPRT Program Plan and issue-specific action plans. Applicants presented in the Management Plan their position regarding the status in the proceeding of each outstanding issue identified in the enclosed chart.

Sincerely,

William A. Horin
Counsel for Applicants

B507180444 B50717
PDR ADOCK 05000445
G PDR

Enclosure

cc: Service List (see attached Certificate of Service)

DS03

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-445-1,
)	50-446-1,
TEXAS UTILITIES ELECTRIC)	50-445-2 and
COMPANY, ET AL.)	50-446-2
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' "Cross-References Between Unresolved Issues and Applicants' Responses" in the above-captioned matter were served upon the following persons by express mail (*) or deposit in the United States mail, first class, postage prepaid or by hand delivery (**) on the 17th day of July, 1985.

**Peter B. Bloch, Esquire
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety
and Licensing Appeal
Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, Tennessee 37830

**Mr. William L. Clements
Docketing and Service
Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Dr. Kenneth A. McCollom
Dean, Division of
Engineering, Architecture
and Technology
Oklahoma State University
Stillwater, Oklahoma 74074

**Stuart A. Treby, Esquire
Office of the Executive
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety
and Licensing Board
Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Robert D. Martin
Regional Administrator,
Region IV
U.S. Nuclear Regulatory
Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

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

Nancy Williams
Cygn Energy Services, Inc.
101 California Street
Suite 1000
San Francisco, CA 94111

**Herbert Grossman, Esquire
Alternative Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Elizabeth B. Johnson
Oak Ridge National
Laboratory
Post Office Box X
Building 3500
Oak Ridge, Tennessee 37830

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

Lanny A. Sinkin
3022 Porter Street
Suite 304
Washington, D.C. 20008

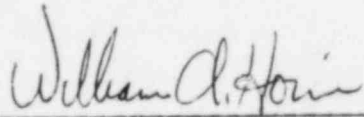
**Ms. Billie P. Garde
Citizens Clinic Director
Government Accountability
Project
1555 Connecticut Avenue, N.W.
Suite 202
Washington, D.C. 20036

**Ellen Ginsberg, Esquire
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

**Anthony Z. Roisman, Esquire
Trial Lawyers for Public
Justice
Suite 611
2000 P Street, N.W.
Washington, D.C. 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, Texas 76043

Joseph Gallo, Esquire
Isham, Lincoln & Beale
Suite 840
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036



William A. Horin

cc: John W. Beck
Robert A. Wooldridge, Esq.

CROSS-REFERENCE BETWEEN
UNRESOLVED ISSUES
AND APPLICANTS' RESPONSE

The following chart lists specific unresolved questions which may warrant Board findings. See Applicants' Management Plan (June 28, 1985). The matters listed herein are derived from issues remaining unresolved from the Board's March 15, 1984 Memorandum (Clarification of Open Issues), individual findings made by the NRC Staff's TRT, and the results of the Cygna review. For each topic Applicants cross-reference specific relevant information (TRT disposition, CPRT Action Plan) proposed to form the basis for disposition.

ISSUE¹

TRT²

APPLICANTS' RESPONSE³

CONSTRUCTION QUALITY ASSURANCE

Welding -

misdrilled holes⁴

SSER 10, Mech and Piping Cat. 4 (N-18, N-57)

CPRT ACTION PLAN:

ISAP V.d.

1/ The Issue column sets forth a short label for each topic. Notes provided for each topic identify the most recent Board action identifying or describing the matter, and the most recent filings of the parties.

2/ The TRT column cross-references between the issue and TRT findings related in whole or in part, or otherwise applicable investigations. For completeness, references to TRT evaluations are included irrespective of whether those evaluations are finished or, even if finished, the TRT requests specific actions by Applicants.

3/ The Applicants' Response column cross-references between each topic and Applicants' proposed plan to address the issue (either the CPRT Action Plan item (ISAP or DSAP) addressing the matter or other information considered to be dispositive).

4/ Memorandum (Concerning Welding Issues), LBP-84-55, 20 NRC 1646, 1690 (1984).

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
preheat temperature ⁵	SSER 10, AW-88 (N-34)	ISAP VII.c
<u>Protective Coatings</u> ⁶		
Lipinsky trip report ⁷	SSER 9	CASE MANAGEMENT PLAN at 48-52: Declassification of protective coatings in SSER 9 moots each technical coatings issue. <u>See</u> CPRT Quality of Construction Program.
reactor core cavity coatings ⁸	SSER 9, (M-61)	
cigarette filters in spray guns ⁹	SSER 9, (M-95)	
use of detergent ¹⁰	SSER 9, (M-87)	
maximum roughness ¹¹	SSER 9	

5/ Id. at 1692.

6/ By Memorandum issued October 10, 1984 (Memorandum (CASE's Motion Regarding J.J.Lipinsky)), the Board deferred action on coatings issues pending issuance of the TRT report on coatings allegations.

7/ Id., CASE Motion (November 9, 1983); see App. Mot. for Sum. Disp. (9/28/84).

8/ Allegation of C. Allen, ASLB hearings (September 18, 1984).

9/ Allegation of C. Allen, ASLB hearings (September 18, 1984).

10/ Allegation of C. Allen, ASLB hearings (September 18, 1984).

11/ Memorandum (Clarification of Open Issues), March 15, 1984, at 7 (item E); see also Appl. Mot. for Sum. Disp. (6/25/84).

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
Westinghouse components ¹²	SSER 9	
near white blast ¹³	SSER 9	
<u>Records Retrieval/Document Control</u> ¹⁴	SSER 11, QA/QC Cat. 2, 8 (AQ-135) (0-45, 0-267) ¹⁵	CPRT ACTION PLAN: ISAPs VII.a.2., VII.a.3., VII.c.
<u>Polar Crane Shims</u> ¹⁶	SSER 8, Misc. Cat. 11 (K-121)	CPRT ACTION PLAN: ISAP VI.b
<u>CB&I/NPSI</u> ¹⁷	SSER 10, Mech. & Piping Cat. 44 and 47 (N-289, N-301) SSER 11, QA/QC Cat. 7, (0-215)	CPRT ACTION PLAN: ISAP VII.b.3
<u>Traceability of Materials</u> ¹⁸	SSER 10, Mech. & Piping Cat. 33 (N-217) SSER 11, QA/QC Cat. 5B and 5E (0-143, 0-175)	CPRT ACTION PLAN: ISAPs VII.a.1., VII.b.1., VII.c.

12/ Id.; see also Appl. Mot. for Sum. Disp. (9/5/84).

13/ Id.; see also Appl. Mot. for Sum. Disp. (5/14/84).

14/ Memorandum (Records Retrieval), January 30, 1984; Memorandum (Clarification of Open Issues) at 17-18 (item FF); see also Applicants' Response (6/29/84).

15/ These portions of SSER 11 present results of the TRT investigation into a number of construction and design document control allegations. As noted in the Management Plan (at 52-53), these investigations, collectively, are more comprehensive than, but also include activities responsive to, the relatively narrowly focussed questions left open in the proceeding.

16/ Memorandum (Clarification of Open Issues) at 6 (item B); see also Applicants' Response (4/9/84).

17/ Memorandum (Clarification of Open Issues) at 12-13 (items S and T); see also Applicants' Responses to technical questions (4/16/84, 6/28/84).

18/ Id. at 10-11 (item P); see Applicants' Response (4/12/84).

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
<u>Undocumented Removal of Cable Trays/ Staff Walkdowns</u> ¹⁹	SSER 11, QA/QC Cat. 8 (0-256)	CPRT ACTION PLAN: ISAPs VII.b.5, VII.c.
<u>QA/QC Supervisory Personnel/ Qualifications</u> ²⁰	SSER 7, Elec. & Inst. Cat. 6, (J-55) SSER 11, QA/QC Cat. 4 and 7, (0-107, 0-217)	CPRT ACTION PLAN: ISAPs I.d.1, VII.c.
<u>Component Modification Cards</u> ²¹	SSER 11, QA/QC Cat. 2 (0-45)	CPRT ACTION PLAN: ISAPs VII.a.2., VII.a.3., VII.c.
<u>Reactor Vessel Mirror Shield</u> ²²	SSER 8, Misc. Cat. 2, AM-3, (K-99)	CPRT ACTION PLAN: ISAP VI.a
<u>Liner Plate Travelers</u> ²³	SSER 10, Mech. and Piping Cat. 43 (N-271) SSER 11, QA/QC Cat. 6 (0-199)	CPRT ACTION PLAN: ISAPs VII.a.8, VII.c.
<u>Stanford/Neumeyer NCR</u> ²⁴	SSER 10, Mech. and Piping Cat. 2, AQ-30 (N-43)	No response necessary

19/ Id. at 9, 19 (items I, II).

20/ Id. at 12 (item R).

21/ Id. at 15 (item X).

22/ Id. at 17 (item EE).

23/ Testimony of Sue Ann Neumeyer (Deposition, August 1-2, 1984); "CASE's Evidence of a Quality Control Breakdown", September 27, 1984; "CASE's Further Evidence of a Quality Control Breakdown in the Construction, Installation and Inspections of the Stainless Steel Liner Plate", November 14, 1985.

24/ Testimony of Sue Ann Neumeyer (Deposition, August 1-2, 1984).

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
<u>Startup Test Engineering</u> ²⁵	SSER 7, Elec. & Inst. Cat. 3 (J-37)	ISAPs 1.b.1, 1.b.2, 1.b.3, 1.b.4
<u>Valve Discs</u> ²⁶	SSER 11, QA/QC Cat. 5A (0-125)	ISAP VII.b.2
<u>DESIGN QUALITY ASSURANCE</u>		
<u>Applicants' Motions for Summary Disposition</u> ²⁷	SSER 11, QA/QC Cat. 1 (0-9, P-27); A comprehensive assessment of the overall design process will be included in future SER supplements dealing with the NRC's review of findings from the Cygnus Independent Assessment Program.	CPRT ACTION PLAN: DSAP IX
Friction Forces (5/16/84)		ISAP V.a., DSAP IX
AWS/ASME Weld Design (5/16/84)		DSAP IX
Damping Factors (5/16/84)		DSAP IX
Section Property Values (5/18/84)		DSAP IX
Effect of Gaps (5/18/84)		DSAP IX
Upper Lateral Restraints (5/20/84)		ISAP V.b, DSAP VIII (SECTIONS 2.2., 4.1.2.2)
Safety Factors (5/20/84)		DSAP IX
Generic v. Actual Stiffness (5/23/84)		DSAP IX
U-Bolts Acting As Two-Way Restraints (5/23/84)		DSAP IX

^{25/} Memorandum (Concerns About Start-up Quality Assurance), October 1, 1984.

^{26/} Testimony of Linda Barnes (Deposition, July 28, 1984).

^{27/} As noted in the Management Plan (at 59-60), Applicants intend to withdraw these motions upon a determination of mootness.

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
Richmond Inserts (6/2/84)		CPRT ACTION PLAN: DSAP IX
Stability (6/17/84)		DSAP IX
Local Displacements (6/18/84)		DSAP IX
Wall-To-Wall Supports (6/22/84)		DSAP IX
Cinching of U-Bolts (6/29/84)		DSAP IX
Design QA for Piping and Supports (7/3/84)		DSAP IX
Axial Restraints (7/9/84)		DSAP IX
A500 (4/11/84)		DSAP IX

CYGNA REVIEW²⁸

Phases 1&2

Piping

Pipe Supports

Design Control

SSER 11, QA/QC Cat. 1 (0-9);
An in-depth assessment of the Cygna
Independent Assessment Program will
be included in a future SSER

CPRT ACTION PLAN:

ISAP IX

ISAP IX

Entire CPRT Design Adequacy Program

^{28/} The categories of open issues described herein are derived from the Cygna Review Issues List (RIL), dated April 23, 1985. This list is Cygna's summary of all findings and open items "to date". In many instances the RIL does not identify specifically in which phase of Cygna's review an issue arose. Accordingly, unless otherwise specified in the RIL, the issues are listed under the Phase 3 report.

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
<u>Phase 3</u>		
Piping		ISAP IX
Pipe Supports		ISAP IX
Cable Tray Supports		DSAP VIII
Conduit Supports		DSAP VIII
Electrical (Power and I&C)		DSAP XI
Mechanical Systems		DSAP X
Design Control		✓ Entire CPRT Design Adequacy Program
<u>Phase 4</u>		
Pipe Supports		DSAP IX
Design Control ²⁹		Entire CPRT Design Adequacy Program
Mechanical Systems		DSAP X

^{29/} These issues are to be addressed in the Phase 4 report. Cygna will consider at that time the implications of related findings in Phases 1-3.

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
	<u>TECHNICAL REVIEW TEAM/COMANCHE PEAK RESPONSE TEAM:</u> ³⁰	<u>CRRT ACTION PLAN:</u>
Heat Shrinkable Sleeves	SSER 7, Elec. & Inst. Cat. 1 (J-31 (d(p)))	ISAP 1.a.1
Inspection Reports on Butt Splices	SSER 7, Elec. & Inst. Cat. 1 (J-31 (b))	ISAP 1.a.2
Butt splice qualification	SSER 7, Elec. & Inst. Cat. 1 (J-31 (b))	ISAP 1.a.3
Drawings/Terminations	SSER 7, Elec. & Inst. Cat. 1 (J-31 (c))	ISAP 1.a.4
NCRs on AMP Terminal Lugs	SSER 7, Elec. & Inst. Cat. 1 (J-31 (a))	ISAP 1.a.5
Flex/Flex Separation	SSER 7, Elec. & Inst. Cat. 3 (J-43 (a,b,d))	ISAP 1.b.1
Flex/Cable Separation	SSER 7, Elec. & Inst. Cat. 3 (J-43 (a,b,d))	ISAP 1.b.2
Conduit/Cable Tray Separation	SSER 7, Elec. & Inst. Cat. 3 (J-44 (e))	ISAP 1.b.3
Barrier Removal	SSER 7, Elec. & Inst. Cat. 3 (J-44 (c))	ISAP 1.b.4
Conduit Supports	SSER 7, Elec. & Int. Cat. 4 (J-47 (a))	ISAP 1.c
QC Inspector Qualifications	SSER 7, Elec. & Inst. Cat. 6 (J-58 (3))	ISAP 1.d.1
Administration of Inspector Tests	SSER 7, Elec. & Inst. Cat. 6 (J-58 (1,2))	ISAP 1.d.2
Reinforcing Steel in Cavity	SSER 8, Civil & Structural Cat. 6 (K-56)	ISAP 11.a
Concrete Compressive Strength	SSER 8, Civil & Structural Cat. 8 (K-65)	ISAP 11.b
Air Gap	SSER 8, Civil & Structural Cat. 11 (K-77 (1,2))	ISAP 11.c

^{30/} Applicants include this information for the convenience of the parties.

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
		CPRT ACTION PLAN:
Control Room Ceiling	SSER 7, Elec. & Inst. Cat. 4 (J 47) (nonseismic)	ISAP II.d
	SSER 8, Civil & Structural Cat. 14 (K-85 (1-5)) (seismic)	
Rebar in fuel handling building	SSER 8, Civil & Structural Cat. 15 (K-91 (1,2))	ISAP II.e
HFT Data Packages	SSER 7, Test Program Cat. 1 (J-77 (a))	ISAP III.a.1
JTG Approval of Test Data	SSER 7, Test Program Cat. 1 (J-77 (b))	ISAP III.a.2
Tech Specs for Deferred Tests	SSER 7, Test Program Cat. 1 (p. J-77 (b))	ISAP III.a.3
Traceability of test instruments	SSER 7, Test Program Cat. 1 (p. J-77 (c))	ISAP III.a.4
Conduct of CILRT	SSER 7, Test Program Cat. 3 (p. J-83)	ISAP III.b
Prerequisite Testing	SSER 7, Test Program Cat. 4 (p. J-89)	ISAP III.c.
Preoperational Testing	SSER 7, Test Program Cat. 5 (p. J-96)	ISAP III.d
Surveillance Program for Coatings	SSER 9, Whole SSER	None
Skewed Welds in NF Supports	SSER 10, Mech. & Piping Cat. 31 (N-206)	ISAP V.a
Shortening of Anchor bolts	SSER 10, Mech. & Piping Cat. 18 (N-151)	ISAP V.b
Piping Between Buildings	SSER 10, Mech. & Piping Cat. 36 (N-239)	ISAP V.c
Plug Welds	SSER 10, Mech. & Piping Cat. 4 (N-64 (a,b))	ISAP V.d

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
Installation of Main Steam Piping	SSER 10, Mech. & Piping Cat. 1 (N-42)	ISAP V.e
	SSER 10, Mech. & Piping Cat. 11 (N-109 (1-8))	ISAP V.e
Insulation/Shield Wall Gap	SSER 8, Misc. Cat. 2 (K-101 (1)), (K-102 (2,3,4 & 1,2,3))	ISAP VI.a
Polar Crane Shims	SSER 7, Misc. Cat. 11 (K-122)	ISAP VI.b
Material Traceability	SSER 10, Mech. & Piping Cat. 33 (N-217)	ISAP VII.a.1
NCR and Corrective Action Systems	SSER 11, QA/QC Cat. 5D (0-171 and N-30)	ISAP VII.a.2
Document control	SSER 11, QA/QC Cat. 2 (0-45, P-27)	ISAP VII.a.3
Audit program and auditor qualification	SSER 11, QA/QC Cat. 7 (0-233, P-31)	ISAP VII.a.4
Management Assessment	SSER 11, QA/QC Cat. 7 (0-233, P-31)	ISAP VII.a.5
Exit Interviews	SSER 11, QA/QC Cat. 7 (0-233, P-31)	ISAP VII.a.6
Housekeeping & System Cleanliness	SSER 11, QA/QC Cat. 5C (0-159)	ISAPs II.c., VI.a, VII.a.7
Fuel Pool Liner	SSER 10, Mech. & Piping Cat. 43 (N-187)	ISAP VII.a.8, VII.c.
Onsite Fabrication	SSER 11, QA/QC Cat. 5B (0-151)	ISAP VII.b.1
Valve Disassembly	SSER 11, QA/QC Cat. 5A (0-125)	ISAP VII.b.2
Pipe Support/Inspections	SSER 10, Mech & Piping Cat. 18,31, 32, 33,37,38,44,47 (N-149, 199, 209, 217, 241, 245, 289 and 301)	ISAP VII.b.3, DSAP IX

<u>ISSUE</u>	<u>TRT</u>	<u>APPLICANTS' RESPONSE</u>
Hilti Anchor Bolts/Installation	SSER 10, Mech & Piping Cat. 17 (N-139)	CPRT ACTION PLAN: ISAPs VII.b.4
Electrical Raceway Support Inspections	SSER 11, QA/QC Cat. 8 (O-256)	ISAP VII.b.5, DSAP XI
Construction Sample Reinspection Plan	None	VII.c