APPENDIX D

CONSTRUCTION INSPECTION REPORT

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/85-14
50-446/85-11

Permit: CPPR-126
CPPR-127

Dockets: 50-445
50-446

Category: A2

Applicant: Texas Utilities Electric Company (TUEC)
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: Glen Rose, Texas

Inspection Conducted: October 1-31, 1985

Inspectors: H. S. Phillips — 2-28-86

H. S. Phillips, Senior Resident Reactor Inspector (SRRI), Construction, Region IV CPSES Group (paragraphs 1, 2, 3, 4, 5, 6, 9, 10) — Date

D. L. Kelley — 2/28/86

D. L. Kelley, SRRI, Operations, Region IV CPSES Group (paragraph 8) — Date

D. E. Norman — 2/28/86

D. E. Norman, Reactor Inspector Region IV CPSES Group (paragraph 7) — Date

Consultants: EG&G - J. H. McCleskey
Parameter - T. H. Young

Reviewed By: J. Barnes 3/3/86
I. Barnes, Group Leader, Region IV CPSES Group Date

Approved: T. F. Westerman 3/3/86
T. F. Westerman, Chief, Region IV CPSES Group Date

Inspection Summary

Inspection Conducted: October 1-31, 1985 (Report 50-445/85-14)

Areas Inspected: Routine, unannounced inspections of Unit 1 which included plant tours, applicant actions on construction deficiencies, applicant actions on previous NRC inspection findings, and storage and handling of QA records. The inspection involved 204 inspector-hours onsite by two NRC inspectors and two consultants.

Results: Within the four areas inspected, one violation (failure to establish written procedures for control and accountability of the shipment of original design records to Stone & Webster Engineering Corporation (SWEC), paragraph 5.b) was identified.

Inspection Conducted: October 1-31, 1985 (Report 50-446/85-11)

Areas Inspected: Routine, announced and unannounced inspections of Unit 2 which included plant tours; applicant actions on construction deficiencies; applicant actions on previous inspection findings; storage, protection, and handling of QA records; audit of QA records; welding material control; and electrical cable tray/equipment walkdown. The inspection involved 227 inspector-hours by three NRC inspectors and two consultants.

Results: Within the seven areas inspected, three violations (a repeat failure to document minimum wall pipe violations on a nonconformance report (NCR), paragraph 4.c; a repeat failure to control issue of design documents, paragraph 4.g; failure to establish written procedures for control and accountability of shipment of design records to SWEC, paragraph 5.b) were identified.

DETAILS

1. Persons Contacted

Applicant Personnel

J. Merritt, Assistant Project General Manager
P. Halstead, Manager, Quality Control (QC)
C. Welch, QC Supervisor
R. Spangler, Corporate Quality Assurance (QA) Supervisor
J. Walker, Corporate QA Auditor
J. Marshall, Licensing
J. Hicks, Licensing
M. Strange, Supervising Engineer, Support & Project, TUGCO Nuclear Engineering (TNE)
J. Ryan, Technical Service, Supervisor
S. Ali, TNE QA Staff Engineer
B. Jones, Unit 2 Supervising Engineer, Civil/Structural
R. Hooten, Project Discipline Engineer, Civil/Structural
J. Hodgson, Computer Operator Supervisor, PMCS

Contractor Personnel

W. Baker, Welding Engineer, Brown & Root (B&R)
W. Wright, Welding Engineer, B&R
G. Purdy, Site QA Manager, B&R
J. Gore, Subcontract Supervisor, B&R
K. Thornton, Warehouse Superintendent, B&R
C. Osborne, QA Vault Supervisor, B&R
D. Leach, TNE-QA-B&R
K. Norman, Central Operations Supervisor, DDC-B&R
D. Bleeker, DCTG Supervisor, B&R
R. C. Iotti, Project Manager, Ebasco
A. Smithey, Supervisor IRV, B&R
R. Walters, ASME QA Supervisor, B&R
G. Maedgen, Welding Engineer, B&R
T. Gray, Document Control Manager
P. Patel, Unit 1 Civil Lead, TNE Design, Gibbs & Hill
B. Jones, Expediting Supervisor, B&R
L. Barnard, PMG File Clerk, B&R
T. McCormack, Fire Protection Engineer, Impell
S. Felman, Assistant Project Engineer, SWEC
H. Moscow, Supervisor Projects & Services, NY, SWEC
J. Tate, 304 DU Satellite Supervisor, B&R
J. Junge, 311 DU Satellite Supervisor, B&R
J. Womack, 300/301 DU Satellite Supervisor, B&R

R. Flaherty, 307 DU Satellite Supervisor, B&R
S. Hazle, 310 DU Satellite Supervisor, B&R
J. Day, 308 DU Satellite Supervisor, B&R
J. Dickey, DCC Area Supervisor, Engineer Satellites, B&R
S. Bruce, DCC Area Supervisor, Craft Satellites, B&R

2. Plant Tours

At various times during the inspection period, NRC inspectors conducted general tours of the reactor building, safeguards building, and the electrical and control building. During the tours, the NRC inspector observed ongoing construction work and discussed various subjects with personnel engaged in work activities.

No violations or deviations were identified.

3. Action on 10 CFR Part 50.55(e) Deficiencies Identified by the Applicant

a. The applicant's procedures pertaining to Significant Deficiency Analysis Reports (SDARs) were reviewed to determine how the process of deficiency identification through completion and signoff is controlled. Reviews were performed of site Procedures CP-QP-15.6, Revision 3, "SDAR Status Tracking"; CP-QP-16.1, Revision 6, "Significant Construction Deficiencies"; CP-QP-17.0, Revision 1, "Corrective Action"; and TUGCO Procedures DQP-CQ-4, Revision 1, "Reporting of Significant Deficiencies"; DQP-QA-12, Revision 2, "Administration and Tracking of Significant Deficiency Analysis Reports"; and DQP-QA-11, Revision 1, "Corrective Action." Procedures CP-QP-15.6, CP-QP-16.1, DQP-CQ-4, and DQP-QA-12 do not address the SDAR file contents or provide a method for completion and signoff of the required corrective action. Procedures CP-QP-17.0 and DQP-QP-15.6 address the documentation required for closing deficiencies, but there is no cross reference between SDAR/corrective action with respect to SDAR file contents. This is an unresolved item pending completion of NRC review of SDAR procedural adequacy (445/8514-U-02; 446/8511-U-01).

b. The applicant classified the following reportable SDAR files as "Licensee Action Complete": SDARs CP-84-27, CP-84-29, CP-85-04, CP-85-05, CP-85-11, CP-85-12, CP-85-13, and CP-85-14. The above files did not document or reference the location of documentation which would support the reported status of corrective actions being complete. Consequently, the NRC inspector did not perform a field verification for any of these files.

c. The following nonreportable SDAR files were selected for review, since the applicant classified these as "Licensee Action Complete":

(1) (Closed): The NRC inspector reviewed the following SDARs: CP-84-05, CP-84-22, CP-84-23, CP-84-24, CP-84-26, CP-84-32, CP-85-02, CP-85-08, and CP-85-09. The applicant's evaluation and decision that these SDARs are not reportable appeared to be correct.

(2) (Open): The NRC inspector reviewed SDARs CP-84-30, CP-84-34, and CP-85-06. The files for these SDARs did not contain sufficient information or documentation to determine whether or not the SDAR was nonreportable.

The status of the files is an unresolved item pending the completion of a TUGCO effort to make the files complete and subsequent NRC review (445/8514-U-03; 446/8511-U-02).

4. Applicant Action on Previous NRC Inspection Findings

a. (Closed) Unresolved Item (445/8422-U-02): Inverter transformer common failure. The NRC inspector reviewed the applicant's handling of the defective transformers and concluded that the actions taken to evaluate and correct the deficiency were correct and adequate.

The applicant's handling and reporting of significant deficiencies will continue to be monitored by the NRC inspectors.

b. (Closed) Violation (445/8307-V-01): Excessive welding gap. In 1983, the NRC inspector identified an unacceptable fitting on pipe support Mark No. SW-1-102-106-Y33K. Recently, the NRC inspector followed up and reviewed NCR M5123-5, RPS 751947, WDC80668, related sketches, and inspection reports (IRs). Corrective work was accomplished and QC performed required inspections. An engineering analysis of the installation which was performed in response to the violation showed strength was far in excess of minimum design requirements, even though it violated the procedure. In B&R memo -IM 325,208 dated April 13, 1983, supervision reemphasized the requirement to follow procedures to all affected personnel.

c. (Closed) Violation (445/8315-01): Failure to write an NCR on base metal repair. This violation concerned an instance where the NRC inspector observed a minimum wall violation for which a NCR had not been written. On October 8 and 9, 1985, another NRC inspector reviewed this violation of paragraph 3.3.3 of site Procedure QI-QAP-16.1-2, Revision 4, dated May 20, 1982. The scope of this procedure was changed to make further reference to system walkdown and the item in question was accomplished near this time frame. However, the applicant responded by documenting the questioned minimum wall violation and the repair of the adjacent weld on a

common NCR (M6611). These conditions had been found by separate NDE methods, one before and one after the base metal repair. The NRC inspector reviewed two more recent base metal repairs to verify that the problems had been corrected. One repair performed in 1984 was found to have been in compliance with the then current procedures. The second repair was completed, reviewed, accepted, and documentation sent to the vault during September and October of 1985. This second report showed an original weld completed, reviewed, and accepted in January and February 1985. Rework was performed on this weld in September 1985 due to interference with a hanger installation which resulted in a minimum wall violation. Further work to repair the hanger was classified as a "Major Weld Repair" in accordance with paragraph 3.3 of B&R Procedure CP-CPM-6.9G; however, no NCR was generated. This failure to document a minimum wall violation on an NCR is a repeat violation of Criterion XV of Appendix B to 10 CFR Part 50 (446/8511-V-01).

It was noted that the inspector and the preparer of the repair process sheet had recently received training on the newly revised procedures involved which required the NCR be generated. The Assistant Project Welding Engineer who reviewed the repair process sheet had not been so trained on the procedure, as he had been exempted from the training by virtue of his position.

d. (Closed) Unresolved Item (446/8502-01): Responsible welding supervisors not familiar with welding rod control procedures. In 1985, the NRC inspector interviewed supervisors who were not familiar with welding rod control procedures which their crew of welders were responsible for implementing. The training program for supervisors was conducted in May 1985 and covered helpers through general foremen.

In 1984/85, the NRC Technical Review Team (TRT) extensively reviewed and inspected weld rod control and documented their findings in NUREG-0797, Supplemental Safety Evaluation Report (SSER) 10, Category 9. In addition, the RIV inspector inspected weld rod control during this inspection period and identified no violations or deviations.

e. (Closed) Unresolved Item (445/8323-07): Incomplete Class V(5) pipe supports record package. In 1983, the NRC reviewed packages which had been combined into finalized packages. In 1984, the TRT reviewed a random sample of 11 Class V(5) support record packages. This review showed that packages with IRs (by qualified inspectors) were in proper order. The TRT found the records satisfactory as reported on page N-252 of NUREG-0797, SSER 10 dated April 1985.

f. (Closed) Unresolved Item (445/8347-01): Containment surface area coating. This item addressed sloughing of protective coatings on

Westinghouse supplied items. In SSER 9, NRR staff state they have reasonable assurance that debris generated by the failure of all coatings inside the containment building under design basis accident conditions will not unacceptably degrade the performance of post-accident fluid systems. This was based on TUGCO and other studies referenced in NUREG-0797, SSER 9 on pages L-17 and L-18. NRR requires in SSER 9 that a preoperational and postoperational coatings program be proposed by TUGCO, but this specific issue of sloughing of coatings on Westinghouse items is closed based on the SSER 9 conclusions.

g. (Closed) Violation (445/8416-V-02): Failure to provide controlled issuance of design documents and changes thereto. Between May and June 20, 1984, an NRC inspector found that design documents and changes were not controlled by Operations Document Control Center (DCC). On October 11 and 14, 1985, the NRC inspector confirmed that the computer system and terminals referred to in the TUGCO November 1, 1984, response were in place and in use.

The NRC inspector reviewed 12 Design Change Authorizations (DCAs) and Component Modification Cards (CMCs) and followed the distribution of 25 packages to 9 locations for various disciplines and verified corrective action. These DCAs and CMCs were traced in their routing at the central DCC and then on to the Paperflow Group or satellite DCCs and a review performed of how they are distributed from those locations. All items checked were distributed per DCP-3, Revision 18 (with Document Change Notices (DCNs) 1, 2, and 3), with the following exceptions:

(1) CMC 96181, Revision 1, was issued on October 8, 1985, and satellite DCC 307 (craft) picked it up at central DCC. The CMC was not signed for as required by paragraph 3.1.1.1 of DCP-3, Revision 18, with DCNs 1, 2, and 3. There was a similar occurrence on CMC 75003, Revision 2, as issued to satellite DCC 202/211 (TUGCO). Further, DCA 21446, Revision 1, was issued October 8, 1985, and satellite DCC 307 was in possession of it on October 14, 1985. One of two packages for Drawing 2323-E1-1702, Sht 002, Revision 2, had both Revision 0 and Revision 1 of DCA 21446 in it, with the other having only Revision C in it. Both Revision 0s were not stamped "VOID" as required in paragraph 3.2.2.5 of DCP-3.

On October 14, 1985, satellite DCC 307 issued Drawing 2323-E1-1702, Sht. 002, Revision 2, to an electrician for Class IE field work with Revision 0 of DCA 21446, rather than the current Revision 1, which is contrary to the requirements of paragraph 3.2.1.2 of DCP-3. On October 14, 1985, TUGCO and B&R supervision contacted the electrician who indicated he had

gotten sheet 002 rather than sheet 001 by mistake and had returned it immediately without installing anything to it.

These failures to follow design document control procedures are a violation of Criterion V of Appendix B to 10 CFR Part 50 (446/8511-V-02).

(2) The following examples were noted of practices being followed that were not covered in controlled procedures:

(a) The method used to issue drawing packages from the satellites to the field (e.g., crafts and QC) was not addressed in DCP-3. The actual practice is that a DCC person and the recipient sign for receipt of all the proper documents (e.g., DCAs) and the proper revisions on the computer printed "Open Design Change Log."

(b) Another practice of the DCC group is to log into the computer the status of the DCAs and CMCs. This status is classifed as open, void, or not included (NI) and indicates whether a change is affecting all items built to a drawing, a single item utilizing the drawing, or no further use of the change. Drawing 2323-5-0910, Sht. CSR-2A, Revision 12, had CMC 75003 issued against it. This CMC had status NI on Revisions 0 and 01 because it affected a single hanger utilizing the above drawing. However, Revision 02 did not have NI input and it showed as open on the terminals. This would require it to be included with the drawing package in error. This was corrected on the terminal. This process of statusing the computerized document information is not described in DCP-3.

DCC supervision stated and showed that the practices are described in internal uncontrolled guidelines. This item is unresolved pending incorporating the guidelines into a controlled procedure (446/8511-U-03).

h. (Closed) Violation (84-08-01): Gaps on Unit 1 polar crane bracket and seismic connections. In November 1984, a NRC inspector found that the gaps between the bracket and connectors exceeded the design tolerance. This item is addressed in NUREG-0797, SSER 8, along with related problems with polar cranes. Discussion, conclusions, and actions to be taken are included in pages K-14, 15, 18 and 121-123 of Appendix K to SSER 8. Since these actions will address the specific concerns of item 84-08-01, this item is closed.

5. QA Records System Review

The NRC inspector reviewed the applicant's record keeping system after ascertaining that records were being shipped off site without proper

control and inventory. In Appendix IA(N) and 1A(B) of Final Safety Analysis Report (FSAR) Volume 1, Section 1.0, the applicant commits to Regulatory Guide 1.88 (i.e., Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records) and to American National Standard, Institute (ANSI) N45.2.9, 11th Draft, Revision 0, dated January 17, 1973. On page 1A(B)-36 in the Discussion, the applicant makes no exceptions to this standard. A brief description of QA records is contained in FSAR Section 17.1.17 (Amendment 50 dated July 13, 1984). The description does not address the current QA records facilities and storage; i.e., temporary storage of records for the Paper Flow Group, Interim Record Vault (IRV), Permanent Plant Record Vault (PPRV), procurement records storage area (Warehouse A) and the TUGCO Records Center.

The applicant has not revised FSAR Section 17.1.17 to describe and reflect the current QA record system. This is unresolved pending the applicant's actions on the item described in paragraph a below (445/8514-U-04; 446/8511-U-04).

a. Review of Corporate QA Manuals and Implementing Construction Procedure: The NRC inspector reviewed the TUGCO Corporate QA Program Manual, Revision 14, dated April 30, 1985, and Quality Assurance Plan, Revision 14, dated August 30, 1984, to determine if ANSI N45.2.9 was referenced and if its requirements were translated into these documents. Only TUGCO construction Procedure CP-QP-18.4, Revision 5, was found to reference ANSI N45.2.9. Operations and TUGCO Nuclear Engineering procedures were not included in the scope of this inspection. Procedure CP-QP-18.4, Revision 5, does not address all aspects of ANSI N45.2.9 such as (1) definitions; (2) all facility locations; (3) method for maintaining control of and accountability for records removed from the site storage facility to organizations located on or off site; (4) temporary storage facilities (fire rated cabinets versus duplicates in remote, separated locations); and (5) special process records such as photographs, negatives, and microfilm. The permanent facilities are discussed with respect to ANSI N45.2.9 requirements described in paragraph 5.6; however, the drain system and dry chemical/gas fire protection system is not discussed. The IRV system is a permanent records vault for Unit 2 records until such records can be transferred to the construction PPRV where Unit 1 records are now stored. TUGCO Procedure CP-QP-18.6, Revision 2, discusses records turnover from B&R IRV to TUGCO PPRV but does not address the issues raised above. Also, these issues are not addressed in the B&R QA Manual, Section 17.0 dated October 31, 1984, or CP-QAP-18.1, Revision 3, dated July 11, 1984.

TUGCO management stated that all of their QA manuals are in revision to improve their written program. This item is unresolved pending the completion of that review (445/8514-U-05; 446/8511-U-05).

b. Storage and Transmittal of Design Records to SWEC, New York: On October 16, 1985, an NRC inspector was inspecting an open item previously identified as unresolved item 8226-U-07. As a result, the requalification package for pipe support CC-1-107-008-E23R was requested and the NRC inspector was informed that this design records package had been included in a total of 5702 (4654 for Unit 1, 1048 for Unit 2) hanger packages that had been shipped to SWEC, New York, for a complete reevaluation.

The NRC SRRI interviewed the TUGCO engineering supervisor who answered questions about whether procedures controlled such shipment, the number of records per package, and how the records were to be protected during shipment. He stated that a first transmittal was controlled by Procedure CP-EI-18.0-4, Revision 0, dated July 25, 1985, until Comanche Peak Project Engineering became a part of TNE on September 1, 1985, at which time the procedure was deleted. The SWEC project manager stated that Procedure CPPP-3 covers the receipt and indexing of these packages; however, CPPP-11 that will control the distribution of these packages to SWEC offices at Cherry Hill, New Jersey; Boston, Massachusetts; Denver, Colorado; Houston, Texas; and Toronto, Canada, will not be completed until late October or early November 1985, according to SWEC Supervisor Project Services, New York. The utility has taken corrective action that includes (1) making duplicate copies prior to shipping, and (2) all records initially sent to SWEC are being copied and a copy returned to the site. Region IV is pursuing with IE Headquarters, QA Branch the minimum protection that should be afforded records in shipment. The failure to have site procedures to maintain control and accountability of the shipment of records is a violation of Criterion V of Appendix B to 10 CFR Part 50 (445/8514-V-02; 446/8511-V-03).

c. Storage and Transmittal of Construction Records to Chicago Bridge and Iron (CBI): As a result of knowledge of an earlier shipment of CBI records off site, the NRC inspector has asked the utility to provide records to demonstrate the CBI record controls that were implemented. It is CBI practice to ship all records off site for copying. This matter is considered unresolved (445/8514-U-06; 446/8511-U-06).

The utility has indicated that the receipt of records from CBI was handled in the same manner as the receipt of records from any vendor. Region IV will inspect the receipt of vendor records and this matter is considered an open item (445/8514-0-01; 446/8511-0-01).

d. Inspection of Storage Facilities: The NRC inspectors visited all site storage facilities to determine if storage, preservation, and safe keeping of records are as required by Criterion XVII of Appendix B to 10 CFR Part 50 and ANSI N45.2.9, Draft 11, Revision 0, paragraph 5, "Storage, Preservation and Safe Keeping." The facilities inspected included TUGCO Records Center, which is committed by the FSAR to ANSI N45.2.9-1974 and not the Draft 11, Revision 0 version; PPRV; IRV; Paper Flow Group storage areas for Unit 2 mechanical and electrical; and the procurement records storage area. The facilities for the Paper Flow Group and procurement records are not identified or described in TUGCO or B&R procedures; however, these facilities and the PPRV and IRV were evaluated with the following results:

(1) TUGCO Records Center - This vault is the final repository for: (a) Unit 1 records which describe completed construction, and (b) Unit 2 record packages for systems that have been completed and turned over to operations. This facility was completed about March 1983. The NRC inspector found that this vault had access control and records were stored in closed containers, open face shelves, or in binders on top of furniture. Radiographs and other special process records are protected by controlling temperature and humidity. The NRC inspectors noted that a water sprinkler system had been installed in this facility.

This presents a concern because those plant records which are stored in folders or binders in open faced cabinets will be deluged with water and will likely deteriorate. An additional consideration is that records stored in a manila folder may be washed out and possibly clog the drain in this facility, leading to flooding of the facility. This item is considered unresolved pending applicant review of the facility with respect to the above observations (445/8514-U-07; 446/8511-U-07).

(2) PPRV - This vault served as the sole permanent vault from approximately 1975 until March 1983. This permanent records facility has controlled access. It meets the design features for a permanent facility, as described in Section 17.1.17 of the FSAR; however, the NRC inspector had the following comments:

(a) There is no fire suppression system inside this vault. Two hand-held extinguishers and a 2-inch fire hose are located outside the vault. One hand-held extinguisher is located

inside the vault. Fire detectors and alarms are inside to alert the onsite fire department if a fire occurs.

(b) If the 2-inch fire hose is used to extinguish a fire, the vault may flood because there are no fire drains and the floor is not sloped. Therefore, water may potentially enter the bottom cabinet drawers.

(c) NCRs and corrective action reports were stored in binders in bookcases. If fire hoses are used, these documents would probably be subjected to the force of water from the hose and damaged. Therefore, it would be desirable to store these records in closed containers. All other records were stored in nonfire rated cabinets which is acceptable if located in a permanent facility that meets ANSI N45.2.9 requirements.

The failure to install a fire suppression system, drains, and a sloped floor appears to be a deviation from ANSI N45.2.9 requirements. However, this item is unresolved because this facility is described in FSAR Section 17.1.17. Region IV is forwarding this issue to IE Headquarters, QA Branch for clarification (445/8514-U-08; 446/8511-U-08).

(3) IRV - This area is not a separate building, but is actually part of the permanent vault that has been set aside as an interim storage area prior to placing records in the area designated for permanent records. This area has an access point that is separate from the permanent area and is controlled. The facility is the same as the permanent area, except a wall separates the two. They share the same forced air system. This facility generally meets the requirements of 10 CFR Part 50, Appendix B, and ANSI N45.2.9; however, the NRC inspector had the following comments:

(a) Water had been leaking through the forced air system and beside a support girder. In a second location, approximately 2-3 gallons of water had leaked in through the forced air ventilation duct and was caught by a container placed under the duct. This is considered an open item (445/8514-O-02; 446/8511-O-02).

(b) The NRC inspector observed a coffee pot, sugar, and evidence of food on a table adjacent to the vault area. These were immediately removed from the vault by the utility.

(4) Paper Flow Groups - The NRC inspectors visited trailers where the electrical and mechanical Paper Flow Groups are located to determine if QA records are stored there.

In SSER No. 11, the TRT considered the documents in the paper flow groups to be inprocess; however, SSER No. 11 also indicated that the records are maintained in fire-proof cabinets. The NRC inspectors found that there are some records stored in nonfire-rated file cabinets. This matter is considered unresolved (445/8514-U-09; 446/8511-U-09).

(5) Storage of Procurement Records - In Warehouse A, procurement records were stored both in nonfire-rated and fire-rated cabinets. The NRC inspector found no master index of these records and the facility is not described in the FSAR or procedures. There was no way to determine whether duplicates of these records exist and if they must be stored in fire-rated cabinets. This item is unresolved pending identification and description of this facility and indexing of records recently received from the TUGCO, Dallas, Texas, office to determine what records must be in fire-rated cabinets (445/8514-U-10); 446/8511-U-10).

6. Audit of QA Record Systems/Facilities

The NRC inspector asked if the unacceptable QA records storage and control conditions identified above in paragraphs 5.a and 5.d had been identified by TUGCO or B&R audits. TUGCO audited (TCP-85-20 dated January 16, 1985) the PPRV but failed to identify any of the problems noted above. Two auditors audited this area from December 17 through December 20, 1984, and their report did not identify any storage facility problems. ANSI N45.2.9 requires that periodic audits shall be performed to assure facilities are in good condition and temperature/humidity controls and protective devices are functioning properly.

An Ebasco review or study dated June 16, 1981, page 4 of 25, item g, states with respect to the PPRV, "It is an established fact that the QAR vault does not meet the requirements for a single storage facility and that duplicate files are not maintained in lieu of single storage." On October 23, 1985, the NRC inspector requested documentation which would show action taken in response to the Ebasco finding. TUGCO's Project and QC organizations had no such documentation. This item is unresolved pending review of the response to this audit finding (445/8514-U-11; 446/8511-U-11). The NRC inspector asked PPRV personnel if B&R had audited the record keeping/facility system and was informed that it has been several years since B&R had performed such audits. This item is unresolved pending the review of B&R audits (445/8514-U-12; 446/8511-U-12).

7. Control of Weld Filler Material

This inspection was performed to determine whether safety-related weld filler material purchase, storage, and distribution are in accordance with the applicant's work and QA procedures, and applicable ASME code requirements. Implementation of the following procedures was examined during the inspection:

- CP-QAP-8.1, Revision 9, dated October 15, 1984, "Receiving Inspection";
- CP-CPM-6.9B, Revision 2, dated September 21, 1984, "Weld Filler Material Control"; and
- CP-CPM 8.1, Revision 3, dated July 2, 1985, "Receipt, Storage, and Issuance of Items."

The following areas were examined:

a. Procurement: Four purchase order packages which consisted of the purchase order, procurement specification, and field requisitions were inspected to verify that orders were properly approved and included required technical, packaging, and documentation requirements as specified in site procedures pertaining to weld filler material purchases.

No violations or deviations were identified.

b. Receiving Inspection: Receiving inspection records, for the filler material purchased to the procurement documents inspected, were examined to verify that all items required by Attachment 11 (Receiving Checklist) to CP-QAP-8.1 had been inspected. In each case, the checklist and a receiving inspection report had been completed and signed by a Level II QC inspector. In several instances, NCRs had been completed and material returned to the vendor as required by procedures. Certified Material Test Reports (CMTRs) for each purchase were also reviewed to verify that required inspections and tests had been performed and that material had been purchased from a vendor with a current ASME certification. It was also verified that heat codes and quantities of material shown on the Material Receiving Reports corresponded to what was shown on the CMTR.

No violations or deviations were identified.

c. Main Storage Areas: Two filler material storage areas located in Warehouse A were inspected for compliance with the above listed procedures. One area was designated as a Quality (Q) area and the

other one was both a Q and Non-Q area. The Non-Q material was segregated as required from the Q material. Procedures in the storage areas appeared to be adequately implemented; however, the NRC had the following observation:

Paragraph 3.2.1 of CP-CPM 6.9B requires that Q weld filler material original containers be marked upon receipt and during storage with the material classification, size, and heat/lot number. In the Q area, labels on several containers of Sandvik welding products (weld rod) had fallen off and others were loose. The material was still identifiable, because of the storage bin marking and marking on the shipping carton; however, a loss of identification is possible when material is removed from the storage area. There were also several unopened cartons of Sandvik material whose status could not be determined. Loose or missing labels were identified on the following material; Lot 101172-2, 1/8 inch, AWS/ASME SFA 5.4; and Lot 10149-1, 5/32 inch AWS/ASME SFA 5.4. This matter has been referred to B&R Welding Engineering for followup.

d. Distribution Stations: Weld rods used in safety-related applications are distributed from three areas (Rodhouse 2, 3, and 4). Each distribution station was inspected to verify compliance with requirements of CP-CPM 6.9B in the following areas:

- Storage facility (Level B);
- Identification of material;
- Controlled access into storage areas;
- Control of stationary and portable rod ovens;
- Issuance, return, and accountability of material; and
- Completion and control of records.

Label problems were also noted in Rodhouse 4 during this inspection.

8. Cable Tray and Equipment Walkdown

During this inspection period, the NRC inspector performed a walkdown inspection of selected electrical components and cables to determine the degree of protection of class IE items from surrounding construction activities. The general level of protection appears adequate with the exception of the B Safety Train Diesel engine control panel (2DG02A). The visqueen covering had come loose in several spots allowing concrete dust from above to filter into the panel and settle on some of the installed relays.

In the area of cables, it was noted that cable ends were neatly coiled and the ends taped, cable tags were in place and cable jacket repairs were clearly marked. At one point in the Safety Train B switchgear room, a cable exiting a tray and entering the switchgear (cable No. C23G 06070 above the HVAC chiller No. 14.) appeared to be bearing hard on the square section of the cable tray side ladder at its exit point. In other places where cable exits tray, a piece of discarded cable jacket is used as a buffer. The observed point had no such buffer.

No violations or deviations were indentified.

9. Unresolved Items

Unresolved items are matters for which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Twelve unresolved items disclosed during the inspection are discussed in paragraphs 3.a, 3.c, 4.g, 5, 5.a, 5.c, 5.d, and 6.

10. Exit Interview

An exit interview was conducted November 1, 1985, with the applicant representatives identified in paragraph 1 of Appendix E. During this interview, the NRC inspectors summarized the scope and findings of the inspection. The applicant acknowledged the findings.