



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

August 30, 1978

In Reply Refer To:
RIV
Docket No. 50-445
50-446

Texas Utilities Generating Company
ATTN: Mr. R. J. Gary
Executive Vice President
and General Manager
2001 Bryan Tower
Dallas, Texas 75201

Gentlemen:

This refers to the inspection activities performed by our resident inspector, Mr. R. G. Taylor, and other members of our staff, of activities authorized by NRC Construction Permit Nos. CPPR 126 and 127 for the Comanche Peak Steam Electric Station, Units 1 and 2, and to the discussion of the findings by the inspectors with members of your staff on August 25.

During the inspection, it was found that certain activities under your license appear to be in noncompliance with Appendix B to 10 CFR 50 of the NRC Regulations, "Quality Assurance Criteria for Nuclear Power Plants." The items of noncompliance and references to the pertinent requirements are identified in the enclosed Notice of Violation. Details of these items will be included in inspection reports to be issued in the near future.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 30 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

7810110235

Enclosure:
Notice of Violation

cc: w/enclosure

Texas Utilities Generating Company
Attn: Mr. H. C. Schmidt, Project Manager
2001 Bryan Tower
Dallas, Texas 75201

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Appendix A

NOTICE OF VIOLATION

Based on results of NRC inspections on August 21-25, 1978, it appears that certain of your activities were not conducted in full compliance with Appendix B to 10 CFR 50 as indicated below:

1. Failure to Follow Welding Procedures

Criterion V of Appendix B requires that established instructions, procedures, or drawings be followed for all activities affecting quality.

Brown and Root Weld Procedure 88025 Revision 0, requires that welders weld such that a minimum of two inches of weld bead be deposited each minute.

Contrary to the above:

The inspector observed on August 23, 1978, that two welders depositing weld bead in weld joint FW-16, of the Reactor Coolant piping, as identified on drawing RC-1-520-1, were welding such as to deposit bead at a rate of 1.1 and 1.9 inches per minute.

This item of noncompliance is an infraction.

2. Failure to Follow Weld Monitoring Procedures

Criterion V of Appendix B requires that established instructions, procedures, or drawings be followed for all activities affecting quality.

Brown and Root document 35-1195-WCP-3 Revision 8, dated November 7, 1977, titled "Administration and Organization of Field Welding Technical Center," requires in paragraph 4.3 that each welder be monitored, as a minimum, every ten working days and the results recorded on "parameter logs."

Contrary to the above:

The inspector observed during a review of the parameter logs that three welders identified as welding on the reactor coolant system had been monitored last on June 20, 1978; June 26, 1978, and December 6, 1977, respectively. This matter has been discussed with licensee representatives who have confirmed that the facts outlined are essentially correct.

This item of noncompliance is an infraction.

3. Failure to Adequately Control and Tag Nonconforming Items

10 CFR Part 50, Appendix B, Criterion XV, requires that measures be established to prevent inadvertent use or installation of nonconforming items which include identification and segregation.

Brown and Root Procedure QAP-15.1, Section 5.1.1 requires that nonconforming items be tagged, segregated and/or marked.

Contrary to the above:

Although measures have been established for identification and segregation of items which are nonconforming, the IE inspector found, at 9:30 a.m., on August 25, 1978, that nonconforming cable tray supports were not adequately tagged and segregated.

The inspector specifically found:

- 1) the barrier separating nonconforming cable tray supports from acceptable supports was broken and fallen to the ground;
- 2) the nonconformance tag, No. E-1105, was attached to the barrier tape which had fallen to the ground and was obscured by dust;
- 3) the individual nonconforming items were not marked as to their status; and
- 4) the Nonconformance Report, NCR E-1105, did not identify by item number or count the nonconforming cable tray supports.

This item of noncompliance is an infraction.