

6035

RELATED CORRESPONDENCE

NEWMAN & HOLTZINGER, P.C. DOCKETED  
USNRC

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202-955-6600

'88 APR -6 P4:01

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April 6, 1988

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Re: Texas Utilities Electric Company, et. al.  
Docket Nos. 50-445-OL and 50-446-OL

Dear Administrative Judges:

Enclosed herewith please find Applicants' seventh submission in response to the Board's request of August 12, 1987, for copies of Applicants' response to "Notices of Violation" and "Notices of Deviations" issued by the NRC Staff. The enclosed responses cover the period of February 25, 1988 to March 29, 1988.

Respectfully submitted,

George L. Edgar

Enclosures

cc: Service List

8804110017 890406  
PDR ADOCK 05000445  
G PDR

DS03



Log # TXX-88221  
File # 10130  
IR 87-16  
IR 87-13  
Ref. # 10CFR2.201

March 15, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/87-16 AND 50-446/87-13  
UPDATED RESPONSE TO NOTICE OF VIOLATION (NOV)  
ITEM C (445/8716-V-12)

REFERENCE: 1) TU Electric letter TXX-6937 from W. G. Council to  
NRC dated November 23, 1987  
2) TU Electric letter TXX-88092 from W. G. Council to  
NRC dated January 13, 1988

Gentlemen:

Reference (1) provided our response to Notice of Violation Item C (445/8716-V-12). In that response we stated that an update would be provided no later than January 15, 1988. Reference (2) extended that date to February 16, 1988.

On February 16, 1988, per a telephone conversation with Mr. R. F. Warnick, we requested and received an extension as follows: Item C (445/8716-V-12) extended until March 15, 1988.

Attached is our updated response. Those portions of the response which have been revised are denoted by a revision bar in the right margin.

Very truly yours,

*W. G. Council*

W. G. Council

By: *D. R. Woodlan*

D. R. Woodlan  
Docket Licensing Manager

RDD/ck  
Attachment

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION  
ITEM C (445/8716-V-12)

- C. Criterion XVI of Appendix B to 10CFR Part 50, as implemented by Section 16.0, Revision 0, of the TU Electric QA Plan, states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition..."

TU Electric, in response to Corrective Action Report (CAR) 65X, which identified a missing cotter pin as a Construction Deficiency, established the Hardware Validation Program (HVP) for safety-related pipe supports. Included in this program is a required verification that locking devices are present and correctly installed.

Contrary to the above, the sway strut rear bracket load pin on safety-related pipe support CC-1-295-006-C53R, Revision 4, was observed on August 21, 1987, to have two missing cotter pins although this support had been reworked by craft and accepted by QC in accordance with the HVP (445/8716-V-12).

UPDATED RESPONSE TO VIOLATION  
ITEM C (445/8716-V-12)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The subject pipe support was inspected and accepted in accordance with the Hardware Validation Program (HVP) in May of 1987. Although our findings cannot be confirmed, TU Electric believes that the subject cotter pins may have been removed during painting activities which are known to have occurred subsequent to the HVP inspection and prior to the NRC inspectors observation of missing cotter pins.

2. Corrective Steps Taken and Results Achieved

On August 26, 1987, Non-Conformance Report (NCR) 87-A01243 was written documenting the missing cotter pins. To determine the extent of the problem, a reinspection was initiated of 10% of the approximately 3000 pipe supports which had been inspected per the HVP. On September 4, 1987, after reinspecting 45 pipe supports, a loose jam nut was found on pipe support CC-X-079-004-A43R. NCR 87-A01446 was written and the reinspection effort was terminated. Based on the identification of an additional discrepancy relating to configuration control, further sampling was not considered necessary and Corrective Action Request (CAR) 87-075 was initiated.

UPDATED RESPONSE TO VIOLATION  
ITEM C (445/8716-V-12) (Cont'd)

3. Corrective Steps Which Will be Taken to Avoid Further Violations

On September 9, 1987, the Director of Construction directed that the missing/loose pipe support hardware be investigated and personnel retrained as required.

On September 14, 1987, the Director of Construction ordered that painting, insulating, and cleaning of safety related systems and components be stopped pending retraining of appropriate Construction Department personnel.

On September 15, 1987, Corrective Action Request (CAR) 87-075 was issued to document the generic concerns raised by the discovery of the loose/missing hardware.

On September 18, 1987, following completion of the required training, the Work hold of September 14, 1987, was lifted.

On October 27, 1987, a training memo was issued for sign-off by all Comanche Peak Engineering personnel. This memo included instructions on the protection of permanent plant equipment, and was transmitted to all engineering contractors for training of their personnel.

On February 1, 1988, operations procedure STA-606, "Work Requests and Work Orders," was revised to require specific instructions for the removal and restoration of interferences.

On February 1, 1988, startup administrative procedures CP-SAP-13, "Temporary Modifications," and CP-SAP-6, "Control of Work on Station Components After Release from Construction to Startup," were revised to contain a cautionary statement indicating that only the work contained in the work documents is permitted.

On February 4, 1988, the Construction Department issued ECC Policy Statement No.2, "Maintaining Component Integrity," which emphasized the responsibility of individuals concerning component integrity.

A Nuclear Engineering and Operations (NEO) policy statement will be issued to site personnel with badges permitting them to enter the plant. This policy statement will reiterate that alteration must only be accomplished in accordance with approved procedures and documents. Documented reading of this policy statement will become a formal part of the badging process.

A program will be established whereby a team will observe ongoing work activities in the field and inspect work documents to assess whether activities are strictly within the scope of work documents provided.

The team will also assess whether damage is occurring to equipment in the area of work activities. Appropriate actions will be taken based on the results of the team's observations. An update to this response will be submitted providing additional details of the teams composition and methodology.

Construction Procedure CP-CPM-7.1 "Package Flow Control" will be revised to require that work instructions contain specific direction to only perform those activities within the scope of the authorized documentation. The requirements of procedure CP-CPM-6.10, "Inspected Item Removal Form," are being revised and incorporated into new procedure ECC 2.13-5, "Construction Travelers," and ECC 2.13-5A " Construction Traveler Generation" which will include appropriate guidance for working on or around accepted hardware.

The twelve CPE procedures that require personnel to enter Category I buildings will be revised to include cautionary statements regarding the alteration of installed and accepted equipment.

Painting Specifications 2323-AS-30 & 31 are being revised to include guidance for working on or around installed and accepted safety related equipment.

To determine the extent of missing or loose pipe support hardware, we have reinitiated sampling of pipe supports which have been inspected per the HVP. Additional actions will be taken as required, based on the results of this sample. We will provide an update to this response describing the results of the sample and any additional actions planned.

4. Date When Full Compliance Will be Achieved

Except as noted below the actions described above will be completed no later than May 15, 1988.

Procedures ECC 2.13-5 and 2.13-5A will be issued by May 1, 1988.

The revisions to Specification 2323-AS-30 and 2323-AS-31 will be completed by June 16, 1988.

An update to this response describing the work observation teams and the sample results including any additional actions planned will be provided by July 1, 1988.



Log # TXX-88263  
File # 10130  
IR 85-13/86-09  
IR 85-18/85-15  
IR 86-15/86-12  
REF. # 10CFR2.201

William G. Council  
Executive Vice President

March 1, 1988

U. S. Nuclear Regulatory Commission  
Atten: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED DATE OF FULL COMPLIANCE ON NOTICE OF  
VIOLATION (NOV) 445/8513-V-01 (ITEM D),  
445/8518-V-01 (ITEM B) AND 446/8612-V-03 (ITEM C)

Gentlemen:

TU Electric letter logged TXX-6770 dated September 23, 1987, stated that the date of full compliance for NOV 445/8513-V-01 (Item B) for the final validation of conduit sleeve identification for Unit 1 and Common systems would be by March 1, 1988. This validation effort has been incorporated in our Post Construction Hardware Validation Program (PCHVP) and is not yet complete. Accordingly, our date for completion of the Unit 1 and Common conduit sleeve identification final validation is hereby revised to be no later than October 20, 1988.

TU Electric letter logged TXX-6692 dated August 31, 1987, stated that the date of full compliance for NOV 445/8518-V-01 (Item B) for Unit 1 and Common systems would be by March 1, 1988. It has been necessary to reschedule completion of our corrective actions for CAR-063. Accordingly, the date of full compliance of the Unit 1 and Common corrective actions for CAR-063 is hereby revised to be no later than October 20, 1988.

TU Electric letter logged TXX-6856 dated October 15, 1987, stated that the issuance of instructions, examination of enclosures and resolution of NCR's on NEMA enclosures for NOV 446/8612-V-03 (Item C) for Unit 1 and Common systems would be by March 1, 1988. The issuance of instructions (FVM CPE-SWEC-FVM-EE/ME/IC/CS-089) has been completed. The examination of enclosures and

resolution of NCR's has been incorporated into our PCHVP. Accordingly, our date of full compliance for the examination of enclosures and resolution of NCR's for Unit 1 and Common systems is hereby revised to be no later than October 20, 1988.

Very truly yours,

*W. G. Council*

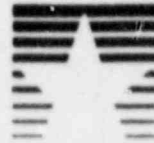
W. G. Council

By: *J. S. Marshall*  
J. S. Marshall  
Supervisor, Generic Licensing

RSB/clk

c-Mr. R. D. Martin, Region IV  
Resident Inspector, CPSES (3)





TU ELECTRIC

Log # TXX-88264  
File # 10130  
IR 84-16  
Ref. # 10CFR2.201

February 26, 1988

William G. Council  
Executive Vice President  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED DATE OF FULL COMPLIANCE FOR  
NOTICE OF VIOLATION ITEM A (445/8416-V-01)

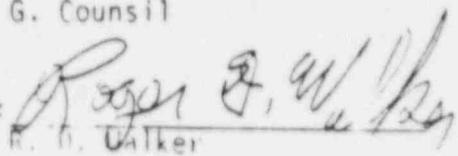
- REF: 1) TUGCO Letter TXX-4346 dated November 1, 1984  
 2) TUGCO Letter TXX-4369 dated November 28, 1984  
 3) TUGCO Letter TXX-4393 dated January 14, 1985  
 4) TU Electric Letter TXX-6440 dated May 8, 1987  
 5) TU Electric Letter TXX-6614 dated July 31, 1987  
 6) TU Electric Letter TXX-6888 dated November 2, 1987  
 7) TU Electric Letter TXX-88011 dated January 7, 1988

Gentlemen:

Reference (7) stated that the required modification and rework of Unit 1 cable tray hangers was scheduled for completion by February 26, 1988. This effort has been incorporated in our Post Construction Hardware Validation Program (PCHVP). Our scheduled completion of modification and rework of Unit 1 cable tray hangers is hereby revised to be no later than August 11, 1988.

Very truly yours,

W. G. Council

By:   
R. D. Walker  
Manager, Nuclear Licensing

DAR/grr

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)





Log # TXX-88298  
File # 10130  
IR 87-35  
IR 87-26  
Ref. # 10CFR2.201

March 14, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC INSPECTION REPORT NOS. 50-445/87-35  
AND 50-446/87-26

Gentlemen:

TU Electric has reviewed your letter dated February 12, 1988, concerning the inspection conducted by Mr. L. E. Ellershaw and NRC consultants during the period December 2, 1987 through January 5, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter were a Notice of Violation and a Notice of Deviation.

We hereby respond to the Notice of Violation and Notice of Deviation in the attachment to this letter.

Very truly yours,

W. G. Council

RDD/clk

Attachment

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION  
(445/8735-V-02)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, of the TU Electric Quality Assurance Plan (QAP), requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Section 7.7.1 of Revision 2 of Ebasco's Field Verification Method (FVM) CPE-EB-FVM-CS-033, states, in part, "The Walkdown Engineer will identify each type of support by comparison with Supplement I and/or 2323-S-0910 sketches or drawings, and will as-built the support on the applicable sketch or drawing . . . ." Paragraph K of this section of the FVM further states, "All dimensions and/or attributes shown will be verified . . . . If the designed dimensions/attributes are incorrect they shall be lined out and the actual dimension/attribute recorded." Also, Section 13.1, of this FVM further states, "Deficiencies identified in conjunction with the implementation of this procedure shall be documented on a Nonconformance Report (NCR) . . . ." Examples of deficiencies are: . . . D. Missing washers on Hilti Bolts . . . ."

Comanche Peak Engineering Procedure CPE-EB-FVM-CS-029, "Procedure For Seismic HVAC Duct and Duct Hanger As-Built Verification in Unit 1 and Common Areas," Revision 5 dated September 21, 1987, requires that welding shall be identified for type of weld (fillet, flare bevel, groove, etc.), weld length, and weld size.

Comanche Peak Engineering Specification 2323-MS-85, Revision 5 dated September 15, 1987, Appendix K, paragraph 4.6, requires that a galvanized coating shall be applied to areas where galvanizing has been removed due to welding or other fabrication/installation operations.

Engineering and Construction Procedure ECC 1.04, "Preparation, Issuance, and Control of Construction Department Procedures and Instructions," Revision 0 dated August 27, 1987, requires that any change to controlled construction procedures be made by formally revising the existing procedure.

Contrary to the above, the following conditions were identified:

1. On Conduit Support C13G04860-02, the walkdown engineer failed to note that there were no washers installed under the hex nuts on the Hilti Kwik bolts. Because of this, there was no NCR written to correct the situation as required by the FVM.
2. For Conduit Support C14G20243-01, the walkdown engineer reported the length of the support baseplate to be 9 7/8". The NRC inspector measured this dimension to be 9 1/2".
3. Conduit Support C14G11447-03, a No. 2323-S-0910 Type 1A support utilizing P5000 Unistrut members with one main member and three outriggers, supports two 3/4" conduits. For the westernmost end of the main Unistrut member to the centerline of the west conduit, the walkdown engineer reported this dimension to be 5 1/8" and the NRC inspector measured this dimension to be 5 7/8". For the center outrigger, the walkdown engineer reported 7 1/8" and the NRC inspector measured this dimension to be 8 5/8". For the

- easternmost outrigger, the walkdown engineer reported it to be located 15/16" from the end of the main Unistrut member and the NRC inspector measured this dimension to be 1 1/4".
4. For Conduit Support C14G11447-04, the dimension locating the center outrigger was reported by the walkdown engineer to be 6 5/8" from the westernmost end of the main Unistrut member. The NRC inspector measured this distance to be 7 1/2".
  5. On Conduit Support C14G11447-14, the walkdown engineer reported a total of eight Hilti Kwik bolts (HKBs) - two 1/4" HKBs in each of the three outriggers and two 3/8" HKBs in the main Unistrut member. The NRC inspector noted that there were actually nine HKBs (there were three 3/8" HKBs in the main Unistrut member and not two as reported).
  6. A fillet weld 3/16" x 5/8" long, which exists at the location identified by note 3 on seismic duct hanger Drawing DH-1-844-1K-4F, Revision 1, was incorrectly identified by engineering personnel during the Post Construction Hardware Validation Program as a tack weld.
  7. Five finished welds located on seismic Duct Hanger DH-1-844-1K-WP13 and portions of three welds located on seismic Duct Hanger Drawing DH-1-844-1K-1R did not have the required galvanized coating.
  8. Administrative and technical information corrections were made to figure 7.6 of Construction Procedure CHV-106, Revision 1, a form used to document the results of an engineering qualitative walkdown of Duct Segment B-1-658-016 without performing a formal revision to the procedure (445/8735-V-02).

RESPONSE TO NOTICE OF VIOLATION  
(445/8735-V-02)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

Items 1 through 5

These items resulted from errors on the part of personnel recording and checking conduit walkdown data.

Item 6

Walkdown Procedure CPE-EB-FVM-CS-029, Rev. 5, "Field Verification Method Procedure for Seismic HVAC Duct and Duct Hanger As-built Verification in Unit 1 and Common Areas," describes tack welds as including fillet welds less than 1/2 inch long. The procedure does not address welds that are longer than 1/2 inch. The walkdown engineer took a conservative approach and designated the subject weld as a tack weld, knowing that no credit is taken for tack welds during structural analysis.

1. Reason for Violation (cont'd)

Item 7

The failure to apply galvanized coating to five welds on hanger DH-1-844-1K-WP13 occurred because the craft workers misinterpreted a note concerning inspection requirements on the associated drawing. The failure to apply coating to portions of three welds on hanger DH-1-844-1K-1R resulted from inadequate painting by the craft workers and failure of the QC inspector to note the inadequate coating.

Item 8

The improperly controlled changes to figure 7.6 of procedure CHV-106, "Qualitative Walkdown of HVAC Supports & Ducts," were the result of errors on the part of personnel initiating the change. Although the changes were minor and technically acceptable, they were promulgated via a memo rather than a formal procedure revision as required by ECC 1.04, "Preparation, Issue and Control of Construction Department Procedures and Instructions."

2. Corrective Steps Taken and Results Achieved

Items 1 through 5

The discrepant conditions described in Items 1 through 5 of the NOV have been examined by Ebasco personnel and the NRC inspector's observations have been confirmed. The information contained on the applicable walkdown forms has been revised accordingly. None of the discrepancies affected the structural qualification of the support. Nonconformance Report (NCR) 87-04505 was written on the missing washers discussed in Item 1. Deficiency Report (DR) C-88-01176 has been initiated to document the discrepancies.

Item 6

Revision 6 to CPE-EB-FVM CS-029 has been issued stating that welds longer than 1/2 inch may be designated as tack welds. Based on this revision, no change to the subject walkdown data sheet was required.

Item 7

Nonconformance Reports (NCRs) 87-04198 and 88-00962 were written on the discrepancies on hangers DH-1-844-1K-WP13 and DH-1-844-1K-1R, respectively. The NCR on hanger DH-1-844-1K-WP13 was dispositioned "use-as-is" since the uncoated welds are not structural welds. It was determined that seven other hangers are covered by drawings containing the same note. These seven hangers were field checked and three of them were found to have uncoated non-structural welds. NCRs were written on these welds and were also dispositioned "use-as-is." The NCR on hanger DH-1-844-1K-1R was dispositioned to recoat all welds on the subject hanger.

2. Corrective Steps Taken and Results Achieved (cont'd)

Item 8

Deficiency Report (DR) C-87-0593 was issued to document the improperly controlled procedure change. Revision 2 has been issued to procedure CHV-106 to formally change figure 7.6.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

Items 1 through 5

Appropriate Ebasco walkdown personnel have been retrained on the importance of documenting walkdown data completely and accurately. Similar walkdown discrepancies were identified in a previous Inspection Report (50-445/87-31; 50-446/87-23). We are investigating the generic implications of these discrepancies and will determine if any other actions are necessary. An update to this response will be submitted describing any additional actions.

Item 6

Appropriate walkdown personnel have been trained on Revision 6 to CPE-EB-FVM-CS-029.

Item 7

Appropriate craft personnel have been reinstructed on the need to apply adequate coating to all welds specified by the controlling document and that an exemption from inspection requirements on nonstructural welds does not constitute an exemption from coating requirements. The QC inspector has been made aware of the error by copy of the NCR.

Item 8

The personnel involved in the improperly controlled change to procedure CHV-106 will be reinstructed in the requirements of procedure ECC 1.04 regarding procedure changes.

4. Date When Full Compliance Will be Achieved

An update to this response describing any additional actions regarding conduit walkdown discrepancies (Items 1 through 5) will be submitted no later than May 15, 1988.

Full compliance has been achieved for Item 6.

Recoating of welds per Item 7 will be completed no later than May 15, 1988. Reinstruction of personnel described in Item 8 will be completed no later than May 15, 1988.

NOTICE OF DEVIATION  
ITEM A (445/8735-D-01)

- A. Appendix A to Project Instruction (PI) PI-0210-053-001, Revision 6, "Checking Procedures," states, in part, "The purpose of an engineering check is to provide assurance that a task is performed and documented thoroughly and that the results are correct and reasonable . . . ."

Further, Section F of this appendix to the PI, states, in part, "Once an item has been checked and approved, it should not be altered without issuing a revision of the item."

Contrary to the above,

1. In the calculation package for the Level 5 support evaluation A02454, on pages 15 and 16 of 39, the person checking the calculations dated them March 10, 1987, prior to the date of the calculations (March 11, 1987). The support load calculations in this package were performed on March 20, 1987, and checked on March 23, 1987. The summary of loads on page 19 of 39 was dated March 9, 1987, and checked on March 10, 1987, which is before the date indicating when the calculations were performed.
2. On page 1a of 63, of Calculation A-02151 for Room 148B, entitled "Open Items", the checker indicated that his work was completed on January 6, 1987; however, the preparer signed and dated this document on January 7, 1987 (445/8735-D-01).

RESPONSE TO NOTICE OF DEVIATION  
ITEM A (445/8735-D-01)

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason for Deviation

Regarding the discrepancies on the Level 5 calculation and check dates (NOD Item 1, first part and NOD Item 2), the individuals involved in the checking process are no longer on site. We believe that the personnel checking the calculations inadvertently entered the wrong date at the time the check was performed.

Regarding the discrepancy between the support load calculation dates and the load summary sheet dates (NOD Item 1, second part), additions were made to support load calculation data after the load summary sheet had been initially prepared and reviewed. The load summary sheet was updated to reflect these changes, but the preparation and check blocks were not updated.



2. Corrective Steps Taken and Results Achieved

Deficiency Report C88-01174 has been written to document the discrepancies.

Calculation A-02454 was re-reviewed and no technical discrepancies were identified. The support load calculation data sheets and the load summary sheet have been annotated to indicate this re-review. Calculation A-02151 was re-reviewed and no technical discrepancies were identified. The open item sheet has been annotated to indicate this re-review.

3. Corrective Steps Which Will be Taken to Avoid Further Deviations

The importance of checking for inconsistencies in dates has been re-emphasized to all Train C personnel in the Impell Structural Integrity Group. Adherence to procedures for data review as set forth in Appendix I-A of Impell Project Instruction PI-0210-053-001, "Multi-Level Screening Criteria for Train C Conduit (2-in and under) at CPSES," has been stressed.

To identify similar inconsistencies in dates, as well as other similar administrative concerns, Impell has developed and implemented a comprehensive administrative checklist. This checklist is being used to perform a 100 percent review of previously approved structural integrity calculations as part of Impell's record turnover process. For new calculations, this checklist will be used to identify administrative inconsistencies prior to calculation approval. If discrepancies are identified, appropriate actions will be taken.

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.



NOTICE OF DEVIATION  
ITEM B (445/8735-C-03)

3. Section 4.1, "Walkdown Guidelines," to Project Instruction PI 0210-052-004 provides checklists for documentation, tolerances for dimensions, and guidelines for performing the conduit routing walkdowns. The instruction requires an as-built sketch be drawn, lengths and sizes of structural members be identified, and supports be identified.

Contrary to the above,

1. In Room 76, RFI-E5-1-0118, Appendix A to Calculation A-00628, page 4 of 4 of this appendix is the as-built drawing which forms the basis of this calculation. On this drawing, the engineer who performed the walkdown reported that the Unistrut bolts being used to secure the junction box to the Unistrut member were 3/8" in diameter; however, the NRC inspector found these bolts to be 1/2" in diameter. Also, on the same drawing, the walkdown engineer reported that the HKB on the north side of the junction box was located 1 1/2" away from the junction box. The NRC inspector measured this distance to be 1 1/8".
2. In Room 148B on the isometric drawn to depict the conduit runs being evaluated as part of calculation A-02151, and shown on page 24 of 43 of this calculation, the dimensional data and orientation for Conduits C-1PA-CR2 and C-1FD-A180, south of the Type 6 support tagged NQ-19688/A-02156 have been reversed, therefore, the isometrics for both conduit runs are incorrectly depicted. The dimension north of the Type 6 support tagged NQ-06005/A-02157 to the change in elevation is not shown on the isometric for the Conduit Run C-1PA-A265.
3. In Room 148B, the distance from the Type 6 support tagged NQ-06004/A-02158 to the rise in elevation of the conduit to the bolted junction box tagged NQ-08650 was documented by the walkdown engineer to be 22". The NRC inspector measured this length to be 13".
4. In Room 148B, the overall length of the P1001 Unistrut member of the Type 7 support tagged NQ-06002/A-02160, shown on page 26 of 43 for calculation A-02151 was documented by the walkdown engineer to be 10". This length was measured to be 8" by the NRC inspector (445/8735-D-03).

RESPONSE TO NOTICE OF DEVIATION

ITEM B (445/8735-D-03)

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason for Deviation

The discrepancies identified in the Notice of Deviation (NOD) resulted from inaccurate recording and checking of Train C (non-safety related) two-inch and under conduit walkdown data on the part of personnel involved.

2. Corrective Steps Taken and Results Achieved

Impell personnel examined the discrepant conditions described in the NOD and confirmed the NRC inspectors observation. The applicable walkdown forms and calculations have been revised to correct the identified discrepancies. In all cases the revisions to the calculations did not alter the qualification status of the associated conduit supports. Deficiency Report (DR C-88-01191) has been written to document the walkdown discrepancies.

3. Corrective Steps Which Will be Taken to Avoid Further Deviations

Those engineers that are still onsite and are involved in the subject walkdowns, as well as all other personnel involved in the Impell structural integrity group have been retrained on this subject, emphasizing the importance of error free walkdown data.

The Comanche Peak Manager of Civil Engineering has met with several groups involved in structural walkdowns, including the Impell Train C personnel. Examples of recently identified walkdown discrepancies were presented and the importance of accurate recording and checking of walkdown data was reemphasized.

Impell Train C project instructions have been reviewed for areas that could be misinterpreted which potentially affect the accuracy of field measurements. Clarifications have been made to instructions to improve measurement consistency when measuring spans with bends. Instruction has also been given to Train C project personnel regarding the need for documenting the use of conservative values when exact values are difficult or impossible to obtain.

To assess the generic implications of walkdown discrepancies identified by the NRC, Impell has conducted a study and issued a report on the accuracy and adequacy of Train C walkdown data. The study included a review of audits and surveillances performed by various independent organizations. It was noted that no major deficiencies have been identified and that none of the deficiencies affected the qualification status of any Train C supports. The study also included a sample reinspection which covered 78 supports and encompassed a total of 5,271 attributes. The attribute discrepancy rate was found to be approximately 1.9% of which only 0.7% were unconservative. None of the discrepancies resulted in the

3. Corrective Steps Which Will be Taken to Avoid Further Deviations (cont'd)

disqualification of the affected conduit systems. Furthermore, it was demonstrated that Train C conduit systems generally exhibit large safety margins between actual loading and ultimate capacity. Based on these results TU Electric does not consider additional reinspection to be warranted. However, we are concerned with such errors and are endeavoring to reduce personnel errors through the training described above.

4. Date When Full Compliance Will be Achieved

The correction of identified walkdown discrepancies was completed by February 24, 1988.

The Impell retraining of Train C walkdown personnel was completed by December 18, 1987.

The meeting of walkdown personnel with the Manager of Civil Engineering was held January 20, 1988.

The Impell Accuracy and Adequacy of Walkdown Information Report was issued January 26, 1988.



Log # TXX-88308  
File # 10130  
IR 86-31  
IR 86-25  
Ref. # 10CFR2.201

March 15, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/86-31 AND 50-446/86-25  
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF VIOLATION  
(NOV) 445/8631-V-01

- REF:
- 1) TU Electric Letter TXX-6150 from W. G. Council  
to NRC dated June 30, 1987
  - 2) TU Electric Letter TXX-6596 from W. G. Council  
to NRC dated July 28, 1987

Gentlemen:

Reference (1) provided our response to Notice of Violation NOV 445/8631-V-01. In that response we stated that SDAR CP-86-48 had been initiated to address the adequacy of Nonconformance Report (NCR) dispositions and that full compliance would be achieved by March 1988. Reference (2) provided our revised response to NOV 445/8603-V-04. In that response we stated the NCR review program conducted as part of SDAR CP-86-48 would be completed by Unit 1 fuel load for Unit 1 and Common NCR's and by Unit 2 fuel load for Unit 2 NCR's. To provide consistency with our response to NOV 445/8603-V-04 and to reflect our current completion schedule, our date of full compliance for NOV 445/8631-V-01 is hereby revised to be no later than Unit 1 fuel load for Unit 1 and Common NCR's and no later than Unit 2 fuel load for Unit 2 NCR's.

Very truly yours,

*W. G. Council*

W. G. Council

By: *D. R. Woodlan*

D. R. Woodlan  
Docket Licensing Manager

RDD/clk

c-Mr. R. D. Martin, Region IV  
Resident Inspectors CPSES (3)



Log # TXX-88310  
File # 10130  
IR 87-11; 87-09  
IR 87-30; 87-22  
Ref. # 10CFR2.201

March 15, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/87-11; 50-446/87-09  
AND 50-445/87-30; 50-446/87-22  
REVISED DATE OF FULL COMPLIANCE FOR  
NOTICE OF VIOLATION (NOV) 445/8711-V-02;  
446/8709-V-02 AND (NOV) 445/8730-V-06

- REF:
- 1) TU Electric Letter TXX-88158 from W. G. Council to NRC dated January 29, 1988
  - 2) TU Electric Letter TXX-88079 from W. G. Council to NRC dated January 15, 1988
  - 3) TU Electric Letter TXX-88269 from W. G. Council to NRC dated February 29, 1988

Gentlemen:

Reference (1) and (2) provided our response to Notice of Violation (NOV) Item A (445/8711-V-02; 446/8709-V-02) and Notice of Violation (NOV) Item A (445/8730-V-06), respectively. In those responses we stated that by March 15, 1988 we would provide a description of additional corrective actions (if any) planned as a result of the ISAP VII.a.9 Results Report. The Results Report was transmitted to the NRC via Reference (3). As a result of this report, several additional project evaluations are underway. These evaluations are documented in Site Corrective Action Requests (CAR) 88-003, 88-004, 88-008, and 88-011. These CARs will be dispositioned and information will be available for your inspectors review no later than June 15, 1988.

Very truly yours,

*W. G. Council*

W. G. Council

By:

*D. R. Woodlan*

D. R. Woodlan  
Docket Licensing Manager

RDD/clk

c-Mr. R. D. Martin, Region IV  
Resident Inspectors CPSES (3)



Log # TXX-88324  
File # 10130  
IR 87-31  
IR 87-23  
Ref. # 10CFR2.201

March 18, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT 50-445/87-31 AND 50-446/87-23  
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF  
VIOLATION (NOV) ITEM B (445/8731-V-02; 446/8723-V-01)

REFERENCE: TU Electric letter TXX-88081 from W. G. Council to NRC dated  
January 18, 1988

Gentlemen:

The referenced letter provided our response to Notice of Violation Item B (445/8731-V-02; 446/8723-V-01). In that letter we stated that reinstruction to NEO 3.06 would be complete for Engineering and Quality Engineering personnel responsible for NCR dispositions and that DRs C-88-00040, C-88-00041 and P-88-00054 would be closed by March 18, 1988. Currently, the reinstruction of Quality Engineering personnel has been completed, however, reinstruction of Engineering personnel and closure of DRs C-88-00040, C-88-00041 and P-88-00054 have taken longer than anticipated. Consequently, our date for completion of the reinstruction of Engineering personnel and closure of the DRs is revised to May 20, 1988.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'W. G. Council', is written over the typed name.  
W. G. Council

RDD/clk

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)



Log # TXX-88325  
File # 10130  
IR 87-30  
IR 87-22  
Ref. # 10CFR2.201

March 18, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED RESPONSE TO NOTICE OF VIOLATION (NOV)  
ITEM B (445/8730-V-07)

REFERENCE: TU Electric Letter TXX-88220 from W. G. Council  
to NRC dated February 16, 1988

Gentlemen:

The referenced letter provided our response to Notice of Violation (NOV) 445/8730-V-07. In that response we stated that Sheet 3 of the vendor (Delaval) supplied drawing 09-500-76001 was the only sheet that had been replaced by a TNE drawing. We have subsequently determined that Sheets 1 and 2 of the vendor drawing had also been replaced by TNE drawings. Sheets 1 and 2 depict instrument tubing isometric layouts and were overlooked because our interest was focused on the wiring diagrams which were the subject of the violation. Since the violation resulted from Sheet 3 being kept active, but not current, the replacement of Sheets 1 and 2 (which were made inactive in 1986) by TNE drawings does not materially affect our response. Our response has been revised to accurately reflect the status of Sheets 1 and 2 of the vendor drawing.

Additional information regarding the point to point wiring verification was requested by the NRC inspector. This information has also been provided in our revised response.



TXX-88325  
March 18, 1988  
Page 2 of 2

Attached is our revised response. Those portions of the response which have been revised are denoted by a revision bar in the right margin.

Very truly yours,

*W. G. Council*

W. G. Council

By: *J. S. Marshall*

\_\_\_\_\_  
J. S. Marshall  
Generic Licensing Manager

RDD/clk  
Attachment

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION  
ITEM B (445/8730-V-07)

- B. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric QAP dated July 31, 1984, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Paragraph 2.1.3. of TNE Procedure TNE-DC-7, Revision 16, dated February 14, 1986, "Preparation and Review of Design Drawings," requires that completed drawings shall be checked for accuracy and compliance. Paragraph 2.1.4 also requires an engineering review for technical accuracy upon completion of the drafting/design check.

Contrary to the above, drawings were not appropriately reviewed/checked for accuracy as evidenced by the differences which existed between the two sets of electrical schematic drawings for the emergency diesel generator control panels. Examples of these differences were most evident in the circuitry for solenoids 6A and 6B and relay contact numbers and arrangements (i.e., RX/1B and 10X) on Drawings 09-500-76001, Sheet 3 and TNE-E1-0067, Sheet 96 (445/8730-V-07).

RESPONSE TO NOTICE OF VIOLATION  
ITEM B (445/8730-V-07)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

Sheet 96 of Drawing TNE-E1-0067 was prepared by our engineering contractor and issued in 1984. Sheet 96 of the TNE drawing was intended to be a replacement for Sheet 3 of the vendor (Delaval) supplied drawing 09-500-76001. Except for Sheets 1 and 2 (which were made inactive in 1986), Sheet 3 of the vendor drawing was the only sheet of that drawing replaced by a TNE drawing. Since Sheet 3 of the vendor drawing was to be replaced it was not kept current. However, except for the period from October 1986 to October 1987, Sheet 3 of the vendor drawing was kept as an active drawing even though it was not kept current.

2. Corrective Steps Taken and Results Achieved

We have conducted a detailed comparison of Sheet 3 of the vendor drawing and Sheet 96 of the TNE drawing. This comparison determined that discrepancies between the two sheets, including those described in the Notice of Violation, are accounted for by engineering changes and Design Change Authorizations (DCAs) that were incorporated in the original issue of Sheet 96 of the TNE drawing, or DCAs that are currently outstanding against Sheet 96 of the TNE drawing. The results of the comparison provide assurance that Sheet 96 of the TNE drawing has been kept current and accurate.

As part of diesel generator functional testing, a point to point wiring verification was performed on the diesel generator control panel. This verification was performed using Sheet 96 of the TNE drawing. Except for an unrelated discrepancy discussed in Item A of this Notice of Violation (undocumented capacitors found in DG control panel) no wiring discrepancies were identified. This indicates that the failure to keep Sheet 3 of the vendor drawing current did not result in any hardware discrepancies.

Sheet 3 of the vendor drawing will be made inactive. There are ten additional vendor drawings associated with the diesel generator control circuitry that may not have been kept current because of replacement TNE drawings. These ten drawings will also be reviewed and dispositioned as appropriate. A Vice Presidential directive was issued July 17, 1986, stating that where design and vendor documents conflict, the design document takes precedence. This directive provides assurance that the TNE drawings will take precedence while the vendor drawings are being reviewed. Note that "TNE", as a drawing designator, is being replaced by the "ECE" designator. New documents are designated as "ECE", but the "TNE" designator will remain effective for previously issued drawings unless subsequently revised for technical reasons.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

We have determined that there are other vendor drawings that have equivalent TNE drawings and that may not have been kept current with all design changes. Examples of such drawings are the Westinghouse elementary wiring drawings and the Westinghouse fluid system flow diagrams. Deficiency Report (DR) C-88-00872 has been written to provide corrective action for this condition.

Our procedure for drawing control is being revised and renumbered. The new procedure ECE-5.05, "Preparation, Review and Approval of Design Drawings," will contain measures to assure that vendor drawings are voided if replacement ECE drawings are issued.

4. Date When Full Compliance Will be Achieved

Sheet 3 of the vendor drawing will be made inactive no later than April 15, 1988.

The review and dispositioning of the ten additional diesel generator control vendor drawings will be completed no later than May 15, 1988.

ECE-5.05 will be issued no later than April 15, 1988.

DR C-88-00872 will be dispositioned no later than June 15, 1988.



Log # TXX-88334  
File # 10130  
IR 88-01  
IR 88-01  
Ref # 10CFR2.201

March 24, 1988

William G. Council  
Executive Vice President

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-445/88-01 AND 50-446/88-01

Gentlemen:

TU Electric has reviewed your letter dated February 23, 1988, concerning the inspection conducted by Mr. C. J. Hale and other inspectors and NRC consultants during the period January 6, 1988 through February 2, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

*W. G. Council*

W. G. Council

By: *J. S. Marshall*

J. S. Marshall  
Generic Licensing Manager

RDD/clk  
Attachment

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION

(445/8801-V-02; 446/8801-V-02)

Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures, of a type appropriate to the circumstances, and shall be accomplished in accordance with these procedures.

Paragraph 6.7.3 of Procedure NQA 1.03 stated that NDE and inspection procedures require the approval of the discipline Level III inspector. Paragraph 6.5.1 of Procedure NQA 1.03 stated, in part, that a document change notice (DCN) shall be forwarded to the appropriate Level III (if applicable), the Section Manager, and the Director, Quality Assurance for approval.

Contrary to the above, DCM 3 to Procedure NQA 3.09-5.01, "Inspection of Instrumentation Components," an inspection procedure, was issued without the approval of the discipline Level III inspector. DCM 3 revised the technical content of inspection Procedure NQA 3.09-5.01 (445/8801-V-02; 446/8801-V-02).

RESPONSE TO NOTICE OF VIOLATION

(445/8801-V-02; 446/8801-V-02)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The reason for this violation was insufficient procedural guidance regarding the need for appropriate Level III approval of DCNs which affect inspection and NDE activities.

2. Corrective Steps Taken and Results Achieved

Deficiency Report (DR) C-88-00591 was initiated to identify DCNs which were implemented without Level III approval. Those DCNs which were implemented without Level III approval will be reviewed for technical adequacy by the Discipline Level III. Those DCNs which are determined adequate will be accepted by the Level III and this approval will be documented in the historical file associated with the procedure. If the Level III review identifies procedural inadequacies, they will be identified and addressed via DRs.

Procedure NQA 1.03, Revision 4 was issued on February 11, 1988, to clarify the need for appropriate Level III approval of DCNs.

3. Corrective Steps Which Will be Taken to Avoid Future Violations

NQA 1.03 will be further revised to incorporate a matrix which will identify the appropriate approval requirements for each NQA procedure and revisions thereto.

4. Date When Full Compliance Will be Achieved

The revision to NQA 1.03 and the review of DCNs described above will be completed by May 1, 1988.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

'88 APR -6 P4:01

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing letter was served this 6th day of April 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

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Assistant Director for  
Inspection Programs  
Comanche Peak Project Division  
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\*/ Asterisk indicates service by hand or overnight courier.



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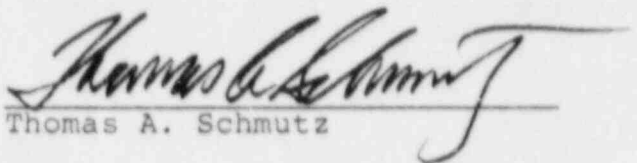
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Dallas, Texas 75201

  
Thomas A. Schmutz

Dated: April 6, 1988