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NOT ADMITTED IN D.C.

January 29, 1988

Peter B. Bloch, Esquire
Chairman
Atomic Safety and Licensing
Board

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

Dr. Walter H. Jordan
c/o Carib Terrace Motel
522 N. Ocean Boulevard
Pompano Beach, Florida 33062

Dr. Kenneth A. McCollom
Administrative Judge
1107 West Knapp
Stillwater, Oklahoma 74075

Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box X, Building 3500
Oak Ridge, Tennessee 37830

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

Dear Administrative Judges:

Enclosed herewith please find Applicants' fifth submission in response to the Board's request of August 12, 1987, for copies of Applicants' responses to "Notices of Violation" and Notices of Deviations" issued by the NRC Staff. The enclosed responses cover the period December 28, 1987 to January 27, 1988.

Sincerely,

George L. Edgar

8802020009 880129
PDR ADOCK 05000445
G PDR

Enclosures

cc: Service List

DS03



Log # TXX-7119
File # 10130
IR 86-03
IR 86-02

William G. Council
Executive Vice President

December 31, 1987

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. 50-445/3603 AND 50-446/8602
REVISED DATE OF FULL COMPLIANCE FOR
NOTICE OF VIOLATION ITEM D.1 (446/8602-V-21)

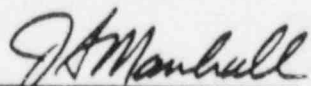
- REF: (1) TU Electric Letter TXX-6089 from W. G. Council to
NRC dated January 12, 1987
- (2) TU Electric Letter TXX-6394 from W. G. Council to
NRC dated May 6, 1987.

Gentlemen:

Reference 2 transmitted our revised response to Notice of Violation Item D.1 (446/8602-V-21). Our revised response stated that completion of the design verification of the subject Unit 2 conduit supports and closure of the associated NCR-87-3742 was expected by December 31, 1987. In order to more efficiently utilize the resources available to CPSES, we have found it necessary to reschedule the completion of these activities. Accordingly, our date for completion of the design verification and closure of NCR-87-3742 is hereby revised to be no later than June 1, 1989.

Very truly yours,

W. G. Council
W. G. Council

By: 
J. S. Marshall
Supervisor, Generic Licensing

RDD/grr

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



Log # TXX-7120
File # 10130
IR 86-26
IR 86-22

William G. Council
Executive Vice President

December 31, 1987

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 NRC INSPECTION REPORT
NOS. 50-445/86-26; 50-446/86-22

REF: (1) TU Electric Letter TXX-6562 from W. G. Council to
NRC dated July 13, 1987

Gentlemen:

The referenced letter transmitted our response to Notice of Violation Item A (445/8626-V-02). As a result of changes in the structure of our electrical construction and inspection procedures, further evaluation of the effects of pull ropes in conduit, and further development of our Post Construction Hardware Validation Program, we have determined that our original response requires revision. Our response to Notice of Violation Item A is hereby revised accordingly.

Where revised responses are provided, the revised sections 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
Supervisor, Generic Licensing

RDD/grr

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

NOTICE OF VIOLATION
ITEM A (445/8626-V-02)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO Quality Assurance Plan (QAP), Section 5.0, Revision 3, 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 3.1.2.e of TUGCO Procedure QI-QP-11.3-40, Revision 14, dated January 9, 1984, states, in part, "Verify that ...all cable pulling aids have been removed (i.e., fish tape, tape rope, etc.)."

Paragraph 3.1.1.2.c of the above procedure, Revision 18, dated May 18, 1984, states, "Verify that ...pulling aids (i.e., rollers, fish tape, tag rope) have been removed from raceway."

Contrary to the above, TUGCO inspectors performing post construction inspections failed to identify cable pulling ropes remaining in Class 1E conduit C12018896 and Class 1E cable tray T130ACG57 located in the Unit 1 reactor building and auxiliary building, respectively (445/8626-V-02).

REVISED RESPONSE TO ITEM A
(445/8626-V-02)

TU Electric accepts the alleged violation and the requested information follows:

1. Reason for Violation

Regarding cable tray T130ACG57, construction procedures controlling cable pulling activities performed subsequent to QC acceptance of raceway systems did not require QC reverification of pulling aid removal.

Regarding conduit C12018896, Revision 14 of QI-QP-11.3-40 in effect at the time of post construction inspection required QC inspectors to identify visible pulling aids but did not require the removal of junction box, pull box or conduit covers to verify that pulling aids had been removed.

2. Corrective Steps Taken and Results Achieved

Nonconformance Report (NCR) E-86-103883S and Construction Deficiency Report (CDR) 87-4746EC (previously NCR E-86-103981) were issued to address pull ropes in conduit C12018896 and cable tray T130ACG57, respectively. Both documents have been dispositioned "rework" by directing the removal of the pull ropes. NCR E-86-103883S has been closed.

Corrective Action Request (CAR) 87-59 has been initiated which will address the generic implications of this violation and will define appropriate corrective actions.

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

On July 24, 1987, Procedure EEI-7, "Cable Pulling," was revised to require removal of all pulling aids (pull ropes, fish tape, etc.) after cable pulls into covered cable trays or conduit are completed. After further evaluation it was determined that, with certain restrictions, it is acceptable to leave pull ropes in conduit runs. On October 28, 1987, Design Change Authorization (DCA) 58763 Rev. 0 to 2323-ES-100 was issued providing this allowance and detailing the restrictions.

A DCA to revise 2323-ES-100 is being prepared which will emphasize that pull ropes are to be left in conduits only when their removal may result in damage to adjacent cables.

Quality Instruction QI-QP-11.3-40, "Post Construction Inspection of Electrical Equipment and Raceways," has been deleted. In process inspections for pulling aids are performed in accordance with procedures NQA-3.09-3.02, "Electrical Raceway-Cable Tray," and NQA-3.09-3.03, "Electrical/Raceway Conduit Procedure." These procedures provide inspection criteria commensurate with the requirements contained in Specification 2323-ES-100.

On November 6, 1987 the Director of Construction issued a directive requiring that all visible metal fish tapes be removed from Unit 1 and Unit 2 raceways, or if removal was not feasible an MCR was to be written. This action was reported complete on December 18, 1987.

A walkdown of existing Unit 1 installations will be performed as part of our Post Construction Hardware Validation Program (PCHVP). The walkdown will be performed as directed by procedure CPE-SWEC-FVM-EE/ME/IC/CS-90 and Quality Instructions NQI 3.09-E-002, "PCHVP Reinspection of Electrical Conduit," and NQI 3.09-E-003, "PCHVP Reinspection of Electrical Equipment." These procedures provide inspection criteria for pulling aids that are commensurate with the requirements contained in Specification 2323-ES-100. A similar walkdown will be performed for existing installations in Unit 2.

4. Date When Full Compliance Will be Achieved

The DCA revising 2323-ES-100 will be issued no later than January 29, 1988.

The Unit 1 walkdown per CPE-SWEC-FVM-EE/ME/IC/CS-90 will be completed no later than May 15, 1988.

The Unit 2 walkdown will be performed no later than Fuel Load.



Log # TXX-7131
File # 10130
IR 86-03
86-02
Ref. # 10CFR50.201

William G. Council
Executive Vice President

December 31, 1987

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 50-445/86-03 AND 50-446/86-02
BASE MATERIAL DEFECT

REFERENCE: TU Electric Letter TXX-6964 from W. G. Council
to NRC dated November 20, 1987

Gentlemen:

The referenced letter provided supplemental information concerning base material defects. TU Electric Engineering personnel discussed with the NRC (Ellershaw and Graham) the Field Verification Method (CPE-CPE-FVM-ME-114) that will be used to validate (for base material defects due to grinding) welds from a representative sample of 60 pipe supports. Completion of this work activity has taken longer than the original estimated completion date of December 31, 1987. Accordingly, our date for completion of this work is hereby revised to February 12, 1988.

Very truly yours,

W. G. Council

W. G. Council

By: *J. S. Marshall*

J. S. Marshall

Supervisor, Generic Licensing

BSD/mlh

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



Log # TXX-7132
File # 10130
IR 87-16
87-13
Ref. # 10CFR2.201

William G. Council
Executive Vice President

December 31, 1987

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
DEVIATION (445/8716-D-01)

REFERENCE: TU Electric Letter TXX-6937 from W. G. Council to
NRC dated November 23, 1987

Gentlemen:

The referenced letter provided our response to Notice of Deviation (445/8716-D-01). In Section 4 (Date When Full Compliance Will Be Achieved) of our response we stated that: 1) Procedures delineating the Pre-Start Test Program will be issued by December 31, 1987 and 2) Revisions on changes to existing work control procedures will be complete by December 31, 1987.

Please extend the commitment dates in our response to March 1, 1988.

Very truly yours,

W.G. Council

W. G. Council

By: *J. S. Marshall*

J. S. Marshall
Supervisor,
Generic Licensing

RDD/mlh
Attachment

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



Log # TXX-7139
File # 10130
IR 87-18
87-14
Ref. # 10CFR2.201

William G. Council
Executive Vice President

December 31, 1987

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. 50-445/87-18 AND 50-446/87-14
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF
VIOLATION (NOV) ITEM B (445/8718-V-09) AND
NOV ITEM C (445/8718-V-08)

REF: TU Electric Letter TXX-6939 from W. G. Council
to NRC dated December 7, 1987

Gentlemen:

The referenced letter provided our response to Notice of Violation (NOV) Item B (445/8718-V-09) and NOV Item C (445/8718-V-08). In that response we stated that the review of pipe support packages placed in the Interim Records Vault prior to November 15, 1987 would be completed by December 31, 1987. Completion of this review has taken longer than expected. Accordingly, our date for completion of this review activity is hereby revised to be no later than February 5, 1988. Additionally, CAR 87-78, NCRs M-87-A01921, M-87-A10852 and DRs C-87-3884 and C-87-3885 will be closed by February 19, 1988.

Very truly yours,

W.G. Council

W. G. Council

By: J. S. Marshall

J. S. Marshall
Supervisor,
Generic Licensing

RDD/mlh

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



Log # TXX-88030
File # 10130
IR 85-18
IR 85-15
Ref. # 10CFR2.201

William G. Council
Executive Vice President

January 11, 1988

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. 50-445/85-18 AND 50-446/85-15
REVISED RESPONSE FOR NOTICE OF VIOLATION (NOV)
445/8518-V-15 (ITEM C)

REF: TU Electric Letter TXX-6692 from W. G. Council to the
NRC dated August 31, 1987

Gentlemen:

Our referenced letter stated that we would provide an updated response to NOV 445/8518-V-15 by January 15, 1988. Our investigation of methods for evaluating fire effects on instrument tubing is not yet complete. We are currently attempting to ascertain the expected maximum temperature in affected areas during fire conditions. We are also pursuing a design modification which will eliminate the zinc embrittlement hazard for a substantial number of instruments. Accordingly, our date for submission of an updated response to NOV 445/8518-V-15, is hereby revised to be no later than May 30, 1988.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

RSB/grr

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



Log # TXX-88079
File # 10130
IR 87-30
IR 87-22
Ref. # 10CFR2.201

William G. Council
Executive Vice President

January 15, 1988

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. 50-445/87-30 AND 50-446/87-22

Gentlemen:

We have reviewed your letter dated December 16, 1987, concerning the inspection conducted by Mr. P. C. Wagner during the period from November 4 through December 1, 1987. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter was a Notice of Violation.

On January 12, 1988, per a telephone conversation with Mr. R. F. Warnick, we requested and received an extension as follows: Item B (445/8730-V-07) extended until February 15, 1988.

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

Very truly yours,

W. G. Council
W. G. Council

RDD/mlh
Attachment

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

NOTICE OF VIOLATION
ITEM A (445/8730-V-06)

- A. Criterion III of Appendix B to 10 CFR Part 50, as implemented by Section 3.0, Revision 3, dated July 31, 1984, of the TU Electric Quality Assurance Plan (QAP), requires in part, that measures must be established to assure that applicable regulatory requirements and design bases, as defined in Part 50.2 and as specified in the license application, for those structures, systems and components to which this appendix applies, are correctly translated into specifications, drawings, procedures, and instructions. The design control measures must provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. In addition, design changes, including field changes, must be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, the NRC inspector identified two capacitors connected in parallel with a relay coil located in both Unit 1 emergency diesel generator control panels that were not shown on facility electrical drawings nor described in any associated documents (445/8730-V-06).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8730-V-06)

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

1. Reason for Violation

No documentation could be found which indicated that the capacitors were installed subsequent to receipt of the panels at CPSES. The wire markers and lugs used for the capacitor installations are identical to those used elsewhere in the vendor (IMO Delaval) supplied control panel. A vendor representative has stated that the capacitors could have been vendor installed. However, the personnel who designed the circuit are no longer with Delaval and Delaval had no records of the capacitors being installed. For the above reasons, TU Electric believes that the capacitors were vendor installed, and that the vendor failed to show the capacitors on the applicable drawings as required by the diesel generator purchase specification.

2. Corrective Steps Taken and Results Achieved

The subject capacitors were originally identified by our Startup Group during a point to point verification of control panel wiring performed as part of diesel generator functional testing. The Startup engineer noted that capacitors were not shown on the electrical drawings. He relocated the capacitors outside their cable bundle for easier visibility intending to further evaluate the apparent discrepancy. Subsequently, the NRC inspector observed the capacitors and informed TU Electric of his concern. Test Deficiency Report (TDR) 5597 and Nonconformance Report (NCR) 87-02828 were written to document the discrepancy. The point to point verification of the wiring in both Unit 1 diesel generator control panels did not identify any other design discrepancies. The Unit 2 diesel generator panels were checked for the same capacitor installations and none were found. Our startup group will perform a complete verification of the Unit 2 diesel generator control panels as part of the diesel generator functional test.

Our initial evaluation determined that, although the capacitors did not adversely affect operation of the diesel generator, they do not appear to serve a necessary function. As part of the disposition of NCR 87-02828, a functional test of a Unit 1 control circuit will be performed with the capacitors removed. Appropriate actions will be taken based on the results of this test. We have determined that failure (shorting) of the capacitors would not adversely affect starting, running, or stopping the diesel generator.

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

We have determined that, except for the diesel generator sets, no other safety related components have been supplied by IMO Delaval. Our Authorized Vendor List now requires the responsible engineering organization to evaluate Delaval safety related purchase orders and specify additional quality verification/inspection by TU Electric QA for critical processes/activities. This measure should provide increased assurance of Delaval compliance with purchase specification requirements.

Issue Specific Action Plan (ISAP) VII.a.9 has been implemented to address concerns regarding vendor compliance with procurement requirements. A report detailing the results of ISAP VII.a.9 is expected to be issued by February 15, 1988. By March 15, 1988 we will provide a description of additional corrective actions (if any) planned as a result of the ISAP VII.a.9 Results Report.

4. Date When Full Compliance Will be Achieved

The functional test of a Unit 1 control circuit with capacitors removed will be completed by January 29, 1988.

Unit 2 diesel generator functional testing, including a point to point verification of both Unit 2 diesel generator control panels, is scheduled for completion prior to Plant Hot Functional Testing.

A description of additional corrective actions (if any) planned as a result of the ISAP VII.a.9 Results Report will be provided by March 15, 1988.

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-EI-0067, Sheet 96. (445/8730-V-07).

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

Response will be provided by February 15, 1988.



Log # TXX-88080
File # 10130
IR 87-29
IR 87-21
Ref. # 10CFR2.201

William G. Council
Executive Vice President

January 13, 1988

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. 50-445/87-29 AND 50-446/87-21

Gentlemen:

We have reviewed your letter dated December 16, 1987, concerning the inspection conducted by Mr. C. J. Hale and NRC consultants during the period from November 4 through December 1, 1987. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter was a Notice of Deviation.

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

Very truly yours,

W. G. Council
W. G. Council

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

RDD/mlh
Attachment

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

NOTICE OF DEVIATION
(445/8729-D-01)

Section 4 of CPRT Project Procedure CPP-027, Revision 2, "Reinspection/Documentation Review of Purchased Safety-Related Material and Equipment," states, in part, "The inspector is responsible for performing the reinspection/documentation review, and completing the specific checklist attributes contained in each reinspection/documentation review verification package."

Attribute 20.2 of the CPRT checklist for Verification Package I-M-VII.a.9-082, requires the CPRT inspector to verify that a 3/4" NPT was provided as identified on Drawing 102202E.

Contrary to the above, checklist attribute 20.2 was incorrectly verified by the CPRT inspector as being 3/4" NPT. NRC inspection in this area determined that the actual size of this item was 1/2" NPT (445/8729-D-01).

RESPONSE TO NOTICE OF DEVIATION
(445/8729-D-01)

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

1. Reason for Deviation

The CPRT inspector incorrectly verified the nonconforming condition.

2. Corrective Steps Taken and Results Achieved

Verification Package I-M-VII.a.9-082 was reissued on November 18, 1987 for reinspection of attribute 20.2. The inspection checklist was corrected and deviation report I-M-VII.a.9-082-01-DR5 was issued to identify the incorrect connection size.

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

The CPRT Inspection Supervisor has determined, based on the inspector's past performance, that this deviation was an isolated occurrence. Furthermore, the affected CPRT inspector is no longer employed by CPRT. Therefore, no further action is required.

4. Date When Full Compliance Will be Achieved

Full compliance was achieved on November 19, 1987 with the validation of the subject deviation report.



Log # TXX-88081
File # 10130
IR 87-31
IR 87-23
Ref. # 10CFR2.201

William G. Council
Executive Vice President

January 18, 1988

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. 50-445/87-31 AND 50-446/87-23

Gentlemen:

We have reviewed your letter dated December 18, 1987, concerning the inspection conducted by Mr. L. E. Ellershaw and consultants during the period from November 4 through December 1, 1987. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter was a Notice of Violation and a Notice of Deviation.

We hereby respond to these notices in the attachment to this letter.

Very truly yours,


W. G. Council

RDD/mlh
Attachment

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

NOTICE OF VIOLATION
ITEM A (445/8731-V-01)

- A. 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), states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. . . ."

Section 7.7.1 of Revision 2 to 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." Further, paragraph N states that the walkdown engineer will redline ". . . any HKB/HSKB spacing violation per Table 2."

Contrary to the above, the following conditions were identified:

1. For support C13007808-04, which is a 2323-S-0910 Type CA-1a support, the anchor bolts identified as bolts A, E, and F were lined out. This implied that anchor bolts did not exist at these locations for this unique support. During a subsequent walkdown by the NRC inspector, however, an anchor bolt was found to exist at the location designated for anchor bolt A. This bolt was determined to be a 1/4" Hilti Kwik bolt with the letter designation "D" and a projection of 1". While the existence of this additional anchor bolt will not have a detrimental effect on the structural integrity of the support, the fact that it was not identified during the EBASCO walkdown is of significance relative to the adequacy of the walkdown itself.
2. On support C14621398-03 the walkdown engineer failed to record one of the dimensions required to fully locate the structural tubing on the base plate. This information is required in order to calculate base plate stress and anchor bolt loads. This dimension is one of the dimensions required to be reported for this type of support (2323-S-0910 sh. CSM-18 type support).

NOTICE OF VIOLATION (CONT'D)
ITEM A (445/8731-V-01)

3. On support C14B13125-02, the walkdown engineer failed to note a spacing violation between the 1/4" Hilti Kwik bolt designated as Bolt F on the support in question, and a 3/8" HKB on an adjacent conduit support. The NRC inspector found these anchor bolts to be 2 1/4" apart; while the FVM required a spacing of at least 3 1/8" (445/8731-V-01).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8731-V-01)

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

1. Reason for Violation

The violation resulted from errors on the part of personnel recording and checking walkdown data.

2. Corrective Steps Taken and Results Achieved

The discrepant conditions described in the Notice of Violation have been examined by Ebasco personnel. In each case the NRC inspectors observation was confirmed. The information contained on the applicable walkdown forms have been revised. None of the discrepancies affected the structural integrity of the support. Deficiency Reports (DRs) C-87-04771 and C-87-05411 have been written to document the discrepancies and resolutions.

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

All appropriate Ebasco walkdown personnel will be retrained on the importance of documenting walkdown data completely and accurately.

NRC inspectors have informed TU Electric of additional apparent Ebasco walkdown discrepancies. We are investigating these discrepancies and will formulate appropriate actions to address any generic implications that are found. An update to this response will be submitted describing any additional actions.

4. Date When Full Compliance Will be Achieved

The retraining of walkdown personnel will be completed by January 29, 1988.

An update to this response describing any additional actions will be submitted no later than April 1, 1988.

NOTICE OF VIOLATION
ITEM B (445/8731-V-02; 446/8723-V-01)

- B. Criterion XVI of Appendix B to 10 CFR Part 50, as implemented by Section 16.0, Revision 0, of the TU Electric QAP, states, in part, "Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected . . . and corrective action taken to preclude repetition."

Nuclear Engineering and Operation Procedure MEO 3.06, "Reporting and Control of Deficiencies," requires deficiencies (principally programmatic and not directly related to hardware problems) to be identified, the cause established, and action taken to prevent repetition.

Contrary to the above, the "rework" dispositions of NCRs I-85-101890SX and C-86-200378X were incorrectly revised to "Use-As-Is" dispositions, subsequent to engineering becoming aware that the conditions which created the need for the NCRs had been corrected outside of the scope and control of the NCRs. By revising the dispositions and closing out the NCRs, actions were not taken to determine the cause of the deficiency (uncontrolled work) or to prevent repetition (445/8731-V-02; 446/8723-V-01).

RESPONSE TO NOTICE OF VIOLATION
ITEM B (445/8731-V-02; 446/8723-V-01)

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

1. Reason for Violation

Personnel responsible for dispositioning and subsequent review and approval of NCRs I-85-101890SX and C-86-200378X erred by not initiating a Deficiency Report (DR) in accordance with MEO 3.06 upon identification of the condition noted in this violation.

2. Corrective Steps Taken and Results Achieved

DRs C-88-00041 and P-88-00054 have been initiated to document the correction of the identified items outside the scope and control of NCRs CC-87-8190X (previously C-86-200378X) and I-85-101890SX respectively. Additionally, DR C-88-00040 has been initiated to address the failure of personnel responsible for revising the dispositions of these NCRs to "Use-As-Is" including Quality Engineering review and approval, to comply with the requirements of MEO 3.06. Since the "Use-As-Is" dispositions resolve the hardware concerns relative to these items no further action is deemed necessary.

RESPONSE TO NOTICE OF VIOLATION (CONT'D)
ITEM B (445/8731-V-02; 446/8723-V-01)

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

Engineering and Quality Engineering personnel responsible for MCR dispositions, including review and approval, shall be reinstructed in the requirements of NEO 3.06 relating to DR initiation when similar conditions occur. Additional corrective measures may be taken as required by the disposition of CR-C-88-00040.

4. Date When Full Compliance Will be Achieved

Full compliance will be achieved upon completion of the reinstruction described above and closure of DRs C-88-00040, C-88-00041 and P-88-00054 which is anticipated to be on or before March 18, 1988.

NOTICE OF DEVIATION
(445/8731-0-03)

Section 4.1, "Walkdown Guidelines" of Revision 2 to Impell Project Instruction (PI) 0210-052-004 states, in part, "The Walkdown information will be documented using the checklists provided in Attachment B Table 1 provides the acceptable tolerances to be used in the walkdown process.

"Guidelines for performing the conduit support and conduit routing walkdowns are provided below:

"Item 5. Support Configuration

- Draw an as-built sketch
- Identify all structural/Unistrut member sizes, lengths . . ."

"Item 7. Hilti Kwik Anchor Bolt Information

- Identify letter stamp and projection length of all anchor bolts on supports . . ."

"Conduit Routing Checklist"

"Item 1 Conduit Isometrics

- Draw an as-built sketch showing conduit routing . . .
- Determine span lengths"

Section 4.1.4, "Seismic Evaluation of Train C Conduit Supports," of Revision 3 to Impell PI 02310-052-003, states, in part, ". . . SSE support loads are generally calculated by multiplying the conduit tributary mass times the equivalent static acceleration" Paragraph 4.3.4 further states, ". . . for interaction of . . . loads, the following interaction . . . equation shall be used"

The following examples, identified by the NRC during inspection and review of the post construction hardware validation program (PCHVP) module, Train C Conduit Less Than or Equal to 2", are in deviation from the above criteria:

1. On the Type 7 support A-02456/NQ-16508, the NRC inspector identified several discrepancies. The baseplate was reported to be 8" long but was found by the NRC inspector to be 9" long. Impell also reported that the anchor bolts were 1/2" Hilti Kwik bolts; however, they were found to be 1/2" Hilti Super Kwik bolts. Impell reported that the Nelson studs were 1/4" diameter while the NRC inspector determined these bolts to be 3/8" diameter.

NOTICE OF DEVIATION (CONT'D)
(445/8731-D-03)

2. On the support identified as detail "B", a Type 7 support, Impell reported that the anchor bolts were Hilti Kwik bolts; however, the NRC inspector determined that they were Hilti Super Kwik bolts.
3. On the isometric provided on page 4 of 8 in Appendix A of Calculation/Problem No. A-02603, Impell reported a length of conduit between the Type 5 support identified as A-02628 and an adjacent Type 5 support as 21"; however, the NRC inspector determined this length to be 12 1/2".
4. In Calculation/Problem No. A-02454, while performing the load calculation for the northeast/southwest direction for support A-02605, the engineer neglected to include a 14" length of conduit between the support being evaluated and an adjacent support.
5. On the Type 5 support evaluation for support A-02605-NQ-16507, the calculated embedment length for the Hilti Kwik bolt was found to be incorrect. Furthermore, the interaction check for the "finger" clamp exceeded the allowable and was justified by adding a note which stated that the calculation is conservative; however, this support is the same support mentioned in paragraph 4 above for which the load calculation is incorrect (445/8731-D-03).

RESPONSE TO NOTICE OF DEVIATION
(445/8731-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 resulted from inaccurate recording, checking and calculating of Train C (non-safety related) 2 inch and under conduit walkdown data on the part of personnel involved.

2. Corrective Steps Taken and Results Achieved

The discrepant conditions described in the Notice of Deviation were examined in the field by Impell personnel. The results of the examination confirmed the NRC inspectors observation in each case. The information in the applicable walkdown forms and calculations have been revised accordingly. In each case, the qualification status of the conduit system did not change. Deficiency Report C-87-4800 has been written to document walkdown discrepancies.

RESPONSE TO NOTICE OF DEVIATION (CONT'D)
(445/8731-D-03)

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.

Similar discrepancies have been identified in previous NRC Inspection Reports (50-445/87-18; 50-446/87-14 and 50-445/87-25; 50-446/87-19). We are assessing the generic implications of Train C conduit walkdown errors and will provide an update to this response describing the results of our assessment.

4. Date When Full Compliance Will be Achieved

The correction of identified walkdown discrepancies was completed by December 30, 1987.

An update to this response describing the results of our assessment will be submitted no later than January 29, 1988.



Log # TXX-88092
File # 10130
IR 87-16
IR 87-13
Ref. # 10CFR2.201

January 13, 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
ITEM C (445/8716-V-12)

REFERENCE: TU Electric letter TXX-6937 from W. G. Council
to NRC dated November 23, 1987

Gentlemen:

The referenced letter provided our response to Notice of Violation Item C (445/8716-V-12). In that response we stated that an update describing the additional corrective action specified by Corrective Action Report (CAR) 87-075 would be submitted no later than January 15, 1988. Resolution of CAR 87-075 has taken longer than expected. Accordingly our date for submission of a response update is hereby revised to be no later than February 15, 1988.

Very truly yours,

W.G. Council
W. G. Council

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

RDD/mjh

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

UNITED STATES OF AMERICA

DOCKETED
USNRC

NUCLEAR REGULATORY COMMISSION '88 JAN 29 P2:43

before the

ATOMIC SAFETY AND LICENSING BOARD OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing Notices of Violations and Notices of Deviations were served this 29th day of January 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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Thomas A. Schmutz

Dated: January 29, 1988