



Log # TXX-88135  
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**TU**ELECTRIC

William G. Council  
Executive Vice President

February 1, 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  
STATUS OF RESPONSE TO NRC COMMENTS  
ON CPSES CORRECTIVE ACTION EFFORTS

REF: Letter from W. G. Council to the NRC, logged TXX-7099  
dated December 18, 1987

Gentlemen:

Attached is the status of actions identified in our December 18, 1987 response to comments on the CPSES corrective action effort made by the NRC Staff during the December 9, 1987 public meeting (see referenced letter).

Very truly yours,

W. G. Council

By: John W. Beck  
John W. Beck  
Vice President,  
Nuclear Engineering

JDS/grr  
Attachment

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

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COMMENT 1:

The NRC Staff indicated that TU Electric will be required to submit an evaluation of the nature of design deficiencies identified in the Corrective Action Program (CAP) to better enable the NRC Staff to reach conclusions concerning project corrective and preventative actions.

RESPONSE 1:

We are continuing our evaluation of the nature of the design deficiencies identified in the Corrective Action Program and anticipate submitting the results of that evaluation by February 26, 1988.

COMMENT 2:

The NRC Staff indicated that the Post Construction Hardware Validation Program (PCHVP) logic (as described in the July 29 and 30, 1987 meeting) relies on previous findings to determine the attributes requiring reinspection. Attributes not being reinspected during the Post Construction Hardware Validation Program (PCHVP), should be grouped and justification provided.

RESPONSE 2:

Attributes not reinspected during Post-Construction Hardware Validation Program are being grouped by engineering specification. Documentation for accepting an attribute that has not been reinspected will be available on site as the technical disposition is completed.

COMMENT 3:

The NRC Staff indicated that in order to clearly understand changes at CPSES, TU Electric should establish a procedure for early identification of potential FSAR changes and provide the staff with prompt notification when a change to the CPSES licensing basis is needed.

RESPONSE 3:

TU Electric has completed a review of procedures used to process FSAR Change Requests and has identified an improved method for tracking potential changes to the FSAR. A summary list of potential changes to the FSAR will be available on site beginning February 15, 1988 and will be updated periodically. TU Electric will also keep the NRC Staff apprised as to the status of upcoming Amendments to the FSAR.

COMMENT 4:

The AISC and ACI codes allow the user, in certain instances, to either meet a specific requirement or to establish an alternative basis for acceptance. The NRC Staff indicated that TU Electric should develop a catalogue to track all code exceptions or alternative approaches to facilitate NRC review.

RESPONSE 4:

A review of the code and standards applicable to the electrical, instrumentation and control and equipment qualification portion of the Corrective Action Program is complete. Enclosure 1 provides the results of that review. TU Electric believes that the enclosed results along with the results of the review of code requirements conducted on Cable Tray Hangers and Conduit portions of the Corrective Action Program (submitted in letter logged TXX-7068, dated December 15, 1987) provides the information requested.

COMMENT 5:

The NRC Technical Review Team previously raised issues concerning CPSES in the Safety Evaluation Report (NUREG-0797) Supplements 7 through 11 along with a number of specific requirements. The NRC Staff indicated that TU Electric should develop a matrix of each issue and identify where the resolution of the issue is addressed within the Comanche Peak Response Team (CPRT) program documentation or the Corrective Action Program (CAP) documentation.

RESPONSE 5:

Enclosure 2, "Comanche Peak Steam Electric Station (CPSES) TRT Issues--SSERs 7, 8, 10 and 11" is a listing of open TRT items (SSERs 7, 8, 10 and 11) and provides the results of our review. Documentation supporting the results will be available on site.

COMMENT 6:

The NRC Staff indicated that TU Electric should repeat the pre-operational tests for CPSES Unit 1 unless specific justification is established for not retesting or for an alternative approach.

RESPONSE 6:

TU Electric's response to this comment was provided in a previous submittal. See Attachment to TXX-7099 dated December 13, 1987.

COMMENT 7:

The NRC Staff indicated that TU Electric should provide written confirmation that corrective actions identified as a result of NRC Staff inspections of CPRT activities have been applied to CPRT activities conducted prior to such NRC Staff inspections.

RESPONSE 7:

The NRC Staff began inspecting CPRT activities in June 1985, as evidenced by NRC inspection reports 445/85-11 and 446/85-06.

The corrective actions taken by CPRT as a result of NRC Staff inspection findings have been documented in TU Electric's responses to NRC Notices of Deviation (NOD). The majority of corrective actions and actions taken to prevent recurrence have been verified by the NRC and subsequently closed.

To assure that corrective actions resulting from issues identified through the aforementioned NRC Staff inspections have been applied to prior CPRT activities, CPRT again reviewed all CPRT NODs, categorizing the findings and identifying the corrective action implemented. As a result of this review, a database was developed that related the NRC finding and subsequent corrective action to the applicable CPRT Issue-Specific Action Plan (ISAP).

Based on the responses to NODs and the NOD review discussed above, CPRT has concluded that corrective actions resulting from NRC Staff inspections have been applied to CPRT inspection activities predating such NRC Staff inspections. Documentation supporting this conclusion is available at CPSES.

COMMENT 8:

The NRC Staff indicated that TU Electric should explain the applicability of the Corrective Action Program (CAP) to CPSES Unit 2. Specifically, the Staff sought an explanation concerning corrective actions that are applied directly to Unit 2 and corrective actions that are incorporated as part of the formal construction management process given the current construction status of Unit 2.

RESPONSE 8:

The preparation of TU Electric's response is in progress. TU Electric expects to complete and submit the response by March 31, 1988.

COMMENT 9:

The NRC Staff indicated they are looking into the basis for corrective and preventive actions with respect to design. Regarding implementation and adequacy of corrective and preventative actions for the TU Electric corrective action effort, the NRC Staff indicated they will monitor, audit, and inspect administrative and procedural controls to ensure proper implementation of corrective and preventative actions including training activities for new organizations that will be assuming responsibility for design from engineering contractors, testing from vendors and similar activities.

RESPONSE 9:

TU Electric's response to this comment was provided in a previous submittal. See Attachment to TXX-7099 dated December 18, 1988.

ENCLOSURE 1 TO TXX-88135

FEBRUARY 1, 1988

ITEM	STANDARD ACCEPTANCE PARAMETERS CORE REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETERS CORE REG. GUIDE	REFERENCE DOCUMENT(S)	REVIEWED IN PSR, RIL, DRP	REMARKS
E.G. CAPACITY	R.G. 1.9		FSAR 1A(B)		THE CPSES DIESEL GENERATOR SETS COMPLY WITH THE REQUIREMENTS OF SAFETY GUIDE 9 WITH THE FOLLOWING COMMENT: THE VOLTAGE MAY DIP BELOW 75% OF NOMINAL VOLTAGE WHEN THE D-G BREAKER CLOSSES AND ENERGIZES THE TWO 2000/2666 KVA, 6.8KV/430V UNIT SUBSTATION TRANSFORMERS. THE VOLTAGE DIP IS DUE TO MAGNETIZING IN RUSH CURRENT WHICH EXISTS FOR TWO TO THREE CYCLES. THE D-G SETS ARE DESIGNED TO RECOVER TO 90% OF NOMINAL VOLTAGE WITHIN 10 CYCLES.
QUALITY GRIP CLASSIFICATION AND STANDARDS FOR WATER, STEAM, AND RADIOACTIVE WASTE CONTAINING COMPONENTS OF NUCLEAR POWER PLANTS	R.G. 1.26		FSAR 1A(B)-14		COMPONENTS OF THE ACCUMULATOR SUBSYSTEM AND THE REFUELING WATER SUBSYSTEM ARE PLACED IN A HIGHER CLASSIFICATION. THE EFFECT OF THIS HIGHER CLASSIFICATION IS TO PRODUCE THE SAME QUALITY LEVELS FOR ALL COMPONENTS AS IS ACHIEVED BY THE APPLICATION OF THE 1973 VERSION OF N18.2, AS FINALLY ACCEPTED BY ANSI.
CONTROL OF THE USE OF SENSITIZED STAINLESS STEEL	R.G. 1.44		FSAR 1A(B)-25 FSAR 1A(B)-19		UPPER LIMIT TEMPERATURE FOR DISSOLVED OXYGEN CONCENTRATION ABOVE 0.1 PARTS PER MILLION (PPM) SHOULD BE INCREASED TO 250F FROM 200F, TO PROVIDE FOR MUCH QUICKER REDUCTION OF THE OXYGEN CONCENTRATION BY REACTION WITH HYDRAZINE. THE INTERGRANULAR CORROSION TESTS ARE ELIMINATED BECAUSE THE WELD ABC HEAT INPUT IS CONTROLLED AS DESCRIBED IN FSAR SECTION 6.18.1.1.2, ITEM 1e. EXCEPTION TO THIS REGULATORY POSITION IS ALSO TAKEN FOR SOME EQUIPMENT AS DESCRIBED IN FSAR SECTION 6.18.11.2, ITEM 2.
ELECTRIC PENETRATION ASSESSMENTS	R.G. 1.63		FSAR 1A(B)		COMPLIES WITH THE INTENT OF R.G. 1.63. THE ELECTRICAL DESIGN INCORPORATES BACKUP PROTECTION DEVICES FOR ALL POWER CIRCUITS. CONTROL CIRCUITS HAVE ALSO BEEN PROVIDED WITH BACKUP PROTECTION DEVICES WHEN REQUIRED.

ITEM	STANDARD ACCEPTANCE PARAMETER		ALTERNATIVE ACCEPTANCE PARAMETER		CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REMARKS
	CODE	REQ.	CODE	REQ.			
QUALIFICATION TESTING OF VALVE OPERATORS	R.G. 1.73		IEEE 382-1972			FSAR 1A(B)-42 FSAR 1A(B)-43	FUSES OF FUSIBLE LINKS WITHIN PENETRATION ASSEMBLIES ARE NOT INCORPORATED IN THE DESIGN BECAUSE OF THE PHYSICAL LIMITATIONS OF THE STANDARD PENETRATION DESIGNS AVAILABLE.  SAFETY RELATED MOTOR OPERATED VALVES INSIDE CONTAINMENT COMPLY WITH THE GUIDANCE OF R.G. 1.73 (1/74) WITH THE EXCEPTION THAT STEM-MOUNTED LIMIT SWITCHES ARE TESTED SEPARATELY IN ACCORDANCE WITH THE REQUIREMENTS OF IEEE 382-1972.
	R.G. 1.75 IEEE-384					FSAR 1A(B)	THE CPSES ELECTRICAL SEPARATION CRITERIA MEETS THE INTENT OF R.G. 1.75 AND IEEE-384-1974 WITH THE EXCEPTIONS/CLARIFICATIONS LISTED IN FSAR APPENDIX 1A(B).
QUALIFICATION APPROACH	R.G. 1.89				WCAP-9587	FSAR 1A(N)-48	THE WESTINGHOUSE APPROACH TO SATISFY THESE GUIDELINES OF R.G. 1.89 ARE DOCUMENTED IN WCAP-9587. THIS IS BEING CURRENTLY SERVICED. UPON RESOLUTION OF THE OUTSTANDING ISSUES, THIS PROGRAM WILL BE IMPLEMENTED FOR THE CPSES.
ANALYSIS OF PRIMARY COOLANT (ACCIDENT SAMPLING)	R.G. 1.97 REV. 2					FSAR TABLE 002.110-4	RESULTS ARE OBTAINED BY ANALYSIS OF SAMPLES OR FROM PORTABLE MONITORS. DIRECT DISPLAY IN THE CONTROL ROOM IS NOT PRACTICAL FOR CPSES.
AREA RADIATION LEVELS ADJACENT CONTAINMENT	R.G. 1.97 REV. 2					FSAR TABLE 002.110-4	AN EQUIVALENT MEASURE OF CONTAINMENT BREACH IS INDICATED IN THIS AREA BY MEANS OF A PROCESS MONITOR WITH A RANGE OF 10(-4) TO 10(0) uCi/cc.  THE SPENT FUEL POOL AREA MONITORS FUNCTION AS NORMAL AREA MONITORS IN THE FUEL BUILDING. THE RANGE OF THESE MONITORS (10(-1) TO 10(4)uCi/hr) IS SUITABLE FOR MONITORING AREAS ADJACENT TO THE CONTAINMENT BUILDING.

ITEM	STANDARD ACCEPTANCE PARAMETER CODE REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CONTRACTOR CODE REG. GUIDE DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PSR RIL, DAF	REMARKS
ATMOSPHERIC STABILITY	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		TABLE 2 TO REG. GUIDE 1.97 REV. 2, DESIGNATES THE VARIABLE, AREA RADIATION LEVELS ADJACENT TO CONTAINMENT, AS CATEGORY 2 AND AS A TYPE C VARIABLE UNDER CONTAINMENT. IN THE CPSES FLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5) THE KEY TYPE C VARIABLES FOR CONTAINMENT BOUNDARY ARE CONTAINMENT PRESSURE (MR) AND CONTAINMENT HYDROGEN CONCENTRATION. ADJACENT BUILDING RADIATION IS CONSIDERED A SAC'UP VARIABLE FOR MONITORING THE CONTAINMENT BOUNDARY. THEREFORE TR.'S VARIABLE IS CATEGORY 3.  THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
BORIC ACID CHARGING FLOW	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		TABLE 2 TO REG. GUIDE 1.97, REV. 2, LISTS THE VARIABLE, BORIC ACID CHARGING FLOW, AS A TYPE C VARIABLE UNDER SAFETY INJECTION SYSTEMS "LONG WITH THE OTHER VARIABLES SUCH AS FLOW IN HE1 SYSTEM AND FLOW IN L21 SYSTEM. THE EQUIPMENT FOR THESE THREE VARIABLES AT CPSES ARE CENTRIFUGAL CHARGING PUMP FLOW, SAFETY INJECTION PUMP FLOW AND RHR PUMP FLOW. THESE THREE VARIABLES ARE INCLUDED IN THE CPSES ACCIDENT MONITORING DECISION. FOR THE CPSES DESIGN, BORIC ACID CHARGING FLOW IS NOT A MEASURE OF SAFETY INJECTION AND THEREFORE IS NOT AN ACCIDENT MONITORING VARIABLE.
CHECKING, TESTING, CALIBRATION AND CALIBRATION VERIFICATION	R.G. 1.97 REV. 2 R.G. 1.118 POSITION (3.45)		FSAR TABLE 032.110-4		COMPLIANCE WITH REG. GUIDE 1.118 IS AS DISCUSSED IN SECTION 1A(B) OF THE CPSES FSAR. THE SURVEILLANCE REQUIREMENTS FOR ACCIDENT



ITEM	STANDARD ACCEPTANCE PARAMETER CODE REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CONTRACTOR CODE REG. GUIDE	REFERENCE DOCUMENT S)	REMARKS
	REG. GUIDE 1.97, REV. 2			MONITORING CHANNELS WILL COMPLY WITH THE CFSES TECH. SPECS (3.3.1.6 AND 4.3.3.6) AS IMPLEMENTED BY CFSES TEST PROCEDURES (SEE FSAR SECTION 11.5.2.2.5)
CONDENSER OFF-GAS RADIATION	R.G. 1.97 REV. 2		FSAR TABLE 012.110-4	THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CFSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CFSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCURRENCES AND ACCIDENT CONDITIONS.
CONTAINMENT WATER LEVEL	R.G. 1.97 REV. 2		FSAR TABLE 012.110-4	THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CFSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CFSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCURRENCES AND ACCIDENT CONDITIONS.
CONTAINMENT ISOLATION VALVE STATUS	R.G. 1.97 REV. 2		FSAR TABLE 012.110-4	ADDITIONAL INFORMATION IS NOT AVAILABLE AS CONTAINMENT WATER LEVEL TRANSMITTERS ARE MULTIPOLY SENSORS AND FAILURE OF ANY ONE SENSOR WOULD NOT CAUSE AMBIGUITY AND HENCE WILL NOT HAVE ANY ADVERSE EFFECT ON THE MONITORING OF CONTAINMENT WATER LEVEL.

TABLE 2 TO REG. GUIDE 1.97, REV. 2,  
DESIGNATES THE VARIABLE, CONTAINMENT  
ISOLATION VALVE POSITION, AS CATEGORY 1 AND  
AS A "TYPE B" VARIABLE UNDER MAINTAINING  
CONTAINMENT INTEGRITY. IN THE CFSES PLANT  
SPECIFIC ANALYSIS (SEE THE CFSES FSAR,  
SECTION 7.5) THE KEY TYPE B VARIABLES FOR  
CONTAINMENT ENVIRONMENT ARE CONTAINMENT  
PRESSURE (MR), CONTAINMENT RADIATION LEVEL,  
CONTAINMENT WATER LEVEL, AND CONTAINMENT  
HYDROGEN CONCENTRATION. CONTAINMENT

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	REFERENCE DOCUMENT(S)	REFERENCED IN FSR, RIL, DAP	REMARKS
CONTAINMENT PRESSURE (P <sub>a</sub> )	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		ISOLATION VALVE STATUS WAS CONSIDERED A TYPE C BACKUP VARIABLE FOR MONITORING CONTAINMENT BOUNDARY INTEGRITY. THEREFORE, CONTAINMENT ISOLATION VALVE STATUS IS CATEGORY 2 FOR CPSES. EACH PENETRATION INTO THE CONTAINMENT HAS TWO ISOLATION BOUNDARIES.  REUNDANCY DIVERSITY IS NOT REQUIRED BASED ON THE CATEGORY ASSIGNED BY THE CPSES PLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5).  THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCS, AND ACCIDENT CONDITIONS.
CONTAINMENT ATMOSPHERIC TEMPERATURE	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		CONTAINMENT PRESSURE WIDE RANGE HAS QUALIFIED REDUNDANT CHANNELS BUT ADDITIONAL INFORMATION IS NOT AVAILABLE TO RESOLVE AMBIGUITIES OVER THE FULL RANGE OF THE INSTRUMENTS. THE ADDITIONAL INFORMATION PROVIDED BY THE CONTAINMENT PRESSURE NARROW RANGE IS SUFFICIENT.  THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCS AND ACCIDENT CONDITIONS.
CONTAINMENT SUMP WATER TEMPERATURE	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		THE VARIABLE, CONTAINMENT SUMP WATER TEMPERATURE, IS NOT MONITORED AT CPSES AND WAS NOT CONSIDERED A REQUIRED VARIABLE PER

STANDARD ACCEPTANCE PARAMETER CODE REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CONTRACTOR CODE/REG. GUIDE	REFERENCE DOCUMENT (S)	REMARKS
CONTAINMENT RADIATION	R.G. 1.97 REV. 2	FSAR TABLE 012.110-4	THE CPSES FLANT SPECIFIC ACCIDENT MONITORING ANALYSIS (SEE THE CPSES FSAP, SECTION 7.5). IN ADDITION, IT SHOULD BE NOTED THAT DIVERSE INFORMATION CAN BE OBTAINED BY MONITORING CONTAINMENT ATMOSPHERIC TEMPERATURE AND RHR HEAT EXCHANGER DISCHARGE TEMPERATURE.
CR AREA RADIATION	R.G. 1.97 REV. 2	FSAR TABLE 012.110-4	CONTAINMENT RADIATION HAS REDUNDANT CHANNELS BUT ADDITIONAL INFORMATION IN THE FORM OF A DIVERSE CHANNEL DOES NOT EXIST. AMBIGUITIES CAN BE RESOLVED USING PORTABLE INSTRUMENTS OUTSIDE CONTAINMENT AND PROMPT COMMUNICATIONS TO THE CONTROL ROOM. AMBIGUITIES WILL NOT LEAD OPERATORS TO DEFEAT OR FAIL TO ACCOMPLISH A REQUIRED SAFETY FUNCTION.
CB VENT LAMPER POSITION	R.G. 1.97 REV. 2	FSAR TABLE 012.110-4	THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
T WATER LEVEL	R.G. 1.97 REV. 3	FSAP TABLE 012.110-4	THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
			CST WATER LEVEL HAS REDUNDANT CHANNELS BUT ADDITIONAL INFORMATION IN THE FORM OF ANOTHER IDENTICAL CHANNEL OR A DIVERSE CHANNEL DOES NOT EXIST AS A QUALIFIED DISPLAY IN THE CONTROL ROOM. LOCAL INDICATION, SUCH AS INDICATION GUNGE LEVEL AND PUMP SUCTION PRESSURE INDICATIONS ARE AVAILABLE TO RESOLVE

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PSR, RIL, DAF	REMARKS
ENVIRONMENTAL QUALIFICATION (EQ)	R.G. 1.97 REV. 2 R.G. 1.89 AND NUREG-0588 (POSITIONS C1.3.1a AND C1.3.2a)			FSAR TABLE 032.110-6		<p>AMBIGUITIES. SUFFICIENT TIME IS AVAILABLE TO RESOLVE AMBIGUITIES BEFORE THE OPERATOR MUST ACT ON CST WATER LEVEL INFORMATION.</p> <p>EQ AT CPSES IS DISCUSSED IN THE CPSES FSAR, SECTION 1.11 AND APPENDIX 3A. DEVIATIONS ARE MINOR AND ARE BEING REVIEWED BY THE NRC STAFF AS PART OF THE CPSES OL REVIEW.</p>
ENVIRONM RADIATION	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		RESULTS ARE OBTAINED BY ANALYSIS OF SAMPLES OF FROM PORTABLE MONITORS. DIRECT DISPLAY IN THE CONTROL ROOM IS NOT PRACTICAL FOR CPSES.
EQ FOR CATEGORY 2 VARIABLES	R.G. 1.97 REV. 2 (POSITION C1.3.2a)			FSAR TABLE 032.110-6		CATEGORY 2 INSTRUMENTATION IS ENVIRONMENTALLY QUALIFIED WHEN IT IS SUBJECTED TO ADVERSE ENVIRONMENTS CAUSED BY THE CLAs DURING THE TIME IT MUST SERVE ITS INTENDED FUNCTION. THIS POSITION IS COMPATIBLE WITH THE EQ RULE, 10 CFR 50.49.
HEAT REMOVAL BY CONTAINMENT FAN HEAT REMOVAL SYSTEM	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THE CPSES DESIGN DOES NOT INCLUDE A FAN HEAT REMOVAL SYSTEM, INSIDE CONTAINMENT, THAT IS DESIGNED TO OPERATE FOLLOWING A DESIGN BASIS ACCIDENT.
HIGH-LEVEL RADIOACTIVE LIQUID TANK LEVEL	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THE ONLY IMMEDIATE CONCERN OF THE CONTROL ROOM OPERATOR FOLLOWING AN ACCIDENT WITH RESPECT TO THE LEVEL IN THE HIGH LEVEL RADIOACTIVE GAS HOLDUP TANK AND THE PRESSURE IN THE RADIOACTIVE GAS HOLDUP TANK IS INADVERTENTLY OVER-FILLING THESE TANKS. THIS IS PREVENTED BY PROVIDING AN ALARM IN THE CONTROL ROOM WHEN THERE IS A POTENTIAL FOR OVER-FILLING ONE OF THE TANKS.
HOT LAB AREA RADIATION	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN FOR, EIL,CAP	REMARKS
INSTRUMENT IDENTIFICATION	P.G. 1.97 REV. 2 (POSITION C1.4b)			FSAR TABLE 032.110-6		RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.  ALL CATEGORY 1 INDICATORS IN THE CONTROL ROOM HAVE UNIQUE COLOR CODING. UNIQUE IDENTIFICATION OF CATEGORY 2 INDICATION IN THE CONTROL ROOM WOULD VIOLATE HUMAN FACTOR GUIDELINES AND MAY EVEN REDUCE SAFETY.
ISOLATION DEVICES	P.G. 1.97 REV. 2 (POSITION C1.4a)			FSAR TABLE 032.110-6		THE CPSES DESIGN MEETS THIS REQUIREMENT WHEN THE POWER SOURCE FOR THE CHANNEL IS CLASS 1E. THE USE OF ISOLATION DEVICES IS ONLY JUSTIFIED FOR CLASS 1E CIRCUITS.
MAIN STEAMLINE PRESSURE	P.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
MAIN STEAMLINE RADIATION	P.G. 1.57 REV. 2			FSAR TABLE 032.110-4		TABLE 2 TO REF. GUIDE 1.97, REV. 2, INCLUDES VENT FLOW RATE AS A VARIABLE TO BE MEASURED FOR ALL IDENTIFIED RELEASE POINTS. CPSES COMPLIES WITH THIS REQUIREMENT EXCEPT FOR THE STEAM GENERATOR RELIEF AND SAFETY VALVE DISCHARGE PATH. FOR THIS PATH, MAIN STEAMLINE RADIATION IS MEASURED AND THE VOLUME RELEASED IS CALCULATED BASED ON THE DURATION FOR WHICH THE VALVES ARE OPEN AND THE PHYSICAL PARAMETERS INVOLVED. THIS IS THE BEST WAY TO MEASURE SUCH AN INTERMITTENT, HIGH ENERGY RELEASE.
OPERABILITY	P.G. 1.97 REV. 2 IEEE STANDARD 279 FOR CAT. 1 (OR TECH SPECS) (POSITION			FSAR TABLE 032.110-6		CATEGORY 2 INSTRUMENTATION IS ENVIRONMENTALLY QUALIFIED WHEN IT IS SUBJECT TO ADVERSE ENVIRONMENTAL CONDITIONS CAUSED BY THE DRA DURING THE TIME IT MUST SERVE ITS INTENDED FUNCTION.

ITEM	STANDARD ACCEPTANCE PARAMETER CODE, REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE, REG. GUIDE	COMPLIANCE DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PER, RIL, DAP	REMARKS
	C1.3.14)					THIS POSITION IS COMPATIBLE WITH THE EQ RULE, 10 CFR 90.49.
PASS ROOM AREA RADIATION	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
PLANT VENT STACK AREA RADIATION	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
POST ACCIDENT SAMPLING SYSTEM	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THE DEVIATION SHOWN IS DUE TO THE FACT THAT AN ANALYSIS PROCESS HAS A MINIMUM VALUE BASED ON THE SENSITIVITY OF THE PROCESS AND EQUIPMENT. THE CPSES RANGES REFLECT THIS MINIMUM VALUE.
						THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
PRESSURIZER LEVEL	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		RESULTS ARE OBTAINED BY ANALYSIS OF SAMPLES OR FROM PORTABLE MONITORS. DIRECT DISPLAY IN THE CONTROL ROOM IS NOT PRACTICAL FOR CPSES. THESE INSTRUMENT RANGES DEVIATE FROM THE

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PER, REL. DAP	REMARKS
PRESSURIZER RELIEF TIME TEMPERATURE	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIC RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
QUALITY ASSURANCE	R.G. 1.97 REV. 2 SPECIFIC LIST OF REGULATORY GUIDES (POSITIONS CI.3.1e & CI.3.3d)			FSAR TABLE 032.110-6		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIC RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
RADIATION LEVEL IN CIRCULATING PRIMARY COOLANT	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THE CPSES QUALITY ASSURANCE PROGRAM AND THE APPLICABLE REGULATORY GUIDES ARE ADDRESSED IN T.1 CPSES FSAR AND IN PARTICULAR IN CHAPTER 17. THIS PROGRAM IS UNDER REVIEW AS PART OF THE CPSES OL REVIEW.  TABLE 2 TO REG. GUIDE 1.97, REV. 2, DESIGNATES THE VARIABLE, RADIATION LEVEL IN PRIMARY COOLANT, AS CATEGORY 1 AND AS A TYPE C VARIABLE UNDER FUEL CLADDING. IN THE CPSES PLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5) THE TYPE C KEY VARIABLE FOR MONITORING IN-CORE FUEL CLAD INTEGRITY IS CORE EXIT TEMPERATURE WITH THE PRIMARY BACKUP VARIABLE REACTOR VESSEL WATER LEVEL INDICATING SYSTEM (RWLIS) AND THE BACKUP VARIABLE POST ACCIDENT SAMPLING SYSTEM (PASS). THE PASS IS USED TO MEASURE THE VARIABLE RCS RADIOACTIVITY CONCENTRATION (SAMPLING). THEREFORE, RADIATION LEVEL IN PRIMARY COOLANT IS REPLACED BY THE CATEGORY 3 VARIABLE FOR CPSES.  REDUNDANCY IS NOT REQUIRED BASED ON THE

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	REFERENCE DOCUMENT(S)	REFERENCED IN FSR, RIL, DAP	REMARKS
RADIATION EXPOSURE METERS	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		CATEGORY ASSIGNED BY THE CPSES PLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5).  THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.  RESULTS ARE OBTAINED BY ANALYSIS OF SAMPLES OR FROM PORTABLE MONITORS. DIRECT DISPLAY IN THE CONTROL ROOM IS NOT PRACTICAL FOR CPSES.  RADIATION EXPOSURE METERS ARE NOT RECEIVED AT CPSES. RADIATION MONITORING FOLLOWING AN ACCIDENT IS COVERED BY THE CPSES EMERGENCY PLAN. IMPLEMENTATION OF THE REQUIREMENT FOR RADIATION EXPOSURE METERS WAS POSTPONED INDEFINITELY BY THE ERRATA DATED JULY 1981 TO R.G. 1.97, REV. 2.
RADIOACTIVE GAS HOLDUP TANK PRESSURE	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4		THE ONLY IMMEDIATE CONCERN OF THE CONTROL ROOM OPERATOR FOLLOWING AN ACCIDENT WITH RESPECT TO THE LEVEL IN THE HIGH LEVEL RADIOACTIVE GAS HOLDUP TANK AND THE PRESSURE IN THE RADIOACTIVE GAS HOLDUP TANK IS UNADVERTENTLY OVER-FILLING THESE TANKS. THIS IS PREVENTED BY PROVIDING AN ALARM IN THE CONTROL ROOM WHEN THERE IS A POTENTIAL FOR OVER-FILLING ONE OF THE TANKS.  THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL



ITEM	STANDARD ACCEPTANCE PARAMETER CODE, REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE, REG. GUIDE DOCUMENT	REFERENCED IN PSR, P.I.L., DAP	REMARKS
RCS SOLUBLE BORON CONCENTRATION	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4	<p>OCCURRENCES AND ACCIDENT CONDITIONS.</p> <p>THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.</p> <p>RESULTS ARE OBTAINED BY ANALYSIS OF SAMPLES OR FROM PORTABLE MONITORS. DIRECT DISPLAY IN THE CONTROL ROOM IS NOT PRACTICAL FOR CPSES.</p> <p>NOT IN CPSES DESIGN</p>
REACTOR SHIELD BUILDUP ANGLES EFFLUENT	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4	<p>THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.</p>
REACTOR VESSEL WATER LEVEL	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4	<p>THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.</p>
RER HEAT EXCHANGER DISCHARGE TEMPERATURE	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4	<p>THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.</p>
SI ACCUMULATOR TANK LEVEL	R.G. 1.97 REV. 2		FSAR TABLE 032.110-4	<p>TABLE 2 TO REG. GUIDE 1.97, REV. 2, DESIGNATES THE VARIABLE, ACCUMULATOR TANK LEVEL, AS CATEGORY 2 AND AS A TYPE D VARIABLE UNDER SAFETY INJECTION SYSTEMS. IN THE CPSES FLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR,</p>

ITEM	STANDARD ACCEPTANCE PARAMETERS CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PSP, RIL, IAP	REMARKS
						SECTION 7.5) THE TYPE D KEY VARIABLES FOR MONITORING ECCS ARE RWST LEVEL, SAFETY INJECTION PUMP FLOW, RHR PUMP FLOW, CENTRIFUGAL CHARGING PUMP INJECTION FLOW, CONTAINMENT WATER LEVEL, ECCS VALVE STATUS, SI ACCUMULATOR ISOLATION VALVE STATUS, AND SI ACCUMULATOR TANK PRESSURE. THE BACKUP VARIABLE IS SI ACCUMULATOR TANK LEVEL. THEREFORE, SI ACCUMULATOR TANK LEVEL IS CATEGORY 3 FOR CPSES.
						THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
						QA AND QUALIFICATION IS NOT REQUIRED BASED ON THE CATEGORY ASSIGNED BY THE CPSES PLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5).
SI ACCUMULATOR TANK PRESSURE	R.G. 1.97 REV. 2			FSAR TABLE 012.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
SI ACCUMULATOR ISOLATION VALVE STATUS	R.G. 1.97 REV. 2			FSAR TABLE 012.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S

ITEM	STANDARD ACCEPTANCE PARAMETER CODE REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE REG. GUIDE	ACTIVATOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PWR, RLL, DAF	REMARKS
STEAM GENERATOR WATER LEVEL (WR)	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
T (COOLD) RCS (WR)	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		STEAM GENERATOR WATER LEVEL (WR) IS ONLY USED AS A BACKUP VARIABLE TO DETERMINE LOSS OF SECONDARY HEAT SINK AND LOW STEAM GENERATOR LEVEL. FOR THESE EVENTS STEAM GENERATOR WATER LEVEL (WR) AND AUXILIARY FEED FLOW ARE USED AS THE SET VARIABLES. THEREFORE STEAM GENERATOR (WR) IS A DV VARIABLE.  ADDITIONAL INFORMATION IS NOT REQUIRED BASED ON THE CATEGORY ASSIGNED BY THE CPSES PLANT SPECIFIC ANALYSIS (SEE THE CPSES FSAR, SECTION 7.5).
T (HOT) RCS (WR)	R.G. 1.97 REV. 2			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
REDUCING TEMPERATURE D.G. UNITS	R.G. 1.97 REV. 1			FSAR TABLE 032.110-4		THESE INSTRUMENT RANGES DEVIATE FROM THE SPECIFIC RANGES LISTED IN TABLE 2 OF REG. GUIDE 1.97, REV. 2, BUT HAVE BEEN FOUND ACCEPTABLE FOR CPSES'S SPECIFIC REQUIREMENTS BASED ON THE FINDING THAT THE CPSES SPECIFIED RANGES COVER THE ANTICIPATED RANGES FOR NORMAL OPERATION, ANTICIPATED OPERATIONAL OCCURRENCES AND ACCIDENT CONDITIONS.
						THE REQUIREMENTS OF POSITION C.1.B.4 ARE SATISFIED AS DESCRIBED IN FSAR APPENDIX 1A.8)

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN FSR, PIL,DPF	REMARKS
PERIODIC TESTING OF ELECTRIC PUMP & PROTECTION SYSTEMS	P.G. 1.118		FSAR 1A.8)			1A.8). THE IMPLEMENTATION OF THE REG. GUIDE DATED JUNE 1976 DOES NOT INCLUDE CPSES. THE CPSES ELECTRICAL POWER SYSTEMS ARE TESTABLE TO THE EXTENT DESCRIBED IN FSR SECTION 8.3.1.2.2, 8.3.1.1.11 ITEM 3 AND 8.3.2 ITEM 6.
QUALIFICATION TESTS OF ELECTRIC CABLES, FIELD SPLICES, AND CONNECTIONS	P.G. 1.131		FSAR 1A.8)			THE IMPLEMENTATION OF THIS REG. GUIDE, DATED AUGUST 1976, DOES NOT INCLUDE CPSES. HOWEVER, CPSES MEETS MOST OF THE REQUIREMENTS, EXCEPT FOR THOSE NOTED IN FSR APPENDIX 1A(8).
STRUCTURAL STEEL SHAPES FOR INSTRUMENT IMPULSE TUBING, VALVES AND FITTING SUPPORTS.	AISC 7TH EDITION 1989	AISC 6TH EDITION 1979	SMC	LOCK F1.9B-10		SMC ENGINEERS CALCULATION DATA AS SHOWN ON 2323-I-001/002.
IMPULSE TUBING VALVES AND FITTING SUPPORTS.	ASME III SUBSECTION NB, SA 4000, SA 5000, AND SA 8000.	SEISMIC CATEGORY I 10CFRS, APP. B	SMC	SPECIFICATION 2323-SG-20, EED-EE-015		SMC ENGINEERS CALCULATION DATA AS SHOWN ON 2323-I-001/002.
ELECTRICAL PENETRATION ON-LINE TESTABILITY	IEEE-279			FSAR 8.3.1.2.1 ITEM 6.		INCORPORATION OF ONLINE TESTABILITY, EXPANSION, MANUAL INITIATION, AND OTHER REQUIREMENTS OF IEEE 279 FOR EVERY ELECTRICAL PENETRATION ASSEMBLY CIRCUIT IS EXTREMELY DIFFICULT TO IMPLEMENT AND IS NOT REQUIRED. THE APPLICATION OF BACKUP PROTECTION DEVICES IS SUFFICIENT TO ENSURE THAT THE PENETRATION ASSEMBLY INTEGRITY IS NOT VIOLATED IF ONE DEVICE FAILS TO OPERATE.
CONTROL INTERLOCKS	IEEE 276-1971			FSAR AMENDMENT II 7.1.1.1.5		CONTROL INTERLOCKS ARE NOT SAFETY-RELATED. THEREFORE, THEY HAVE NOT BEEN SPECIFICALLY DESIGNED TO MEET THE REQUIREMENT OF IEEE.
MAIN FEEDWATER PUMP CONTROL	IEEE 276-1971			FSAR 7.7-21		THE TRIPPING OF THE MAIN FEEDWATER PUMP INTERACTS WITH THE PROTECTION SYSTEM BY STARTING THE MOTOR DRIVEN AUXILIARY FEEDWATER

ITEM	STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REMARKS
					<p>PUMPS. THE CIRCUIT IS DESIGNED IN ACCORDANCE WITH IEEE STANDARD 279-1971 WITH THE EXCEPTION THAT THE SENSORS AND ASSOCIATED WIRING BEING LOCATED BY NECESSITY IN NON-SEISMIC CATEGORY I STRUCTURES WILL NOT BE SEISMICALLY QUALIFIED.</p>
MANUAL OVERRIDE	IEEE 279-1971			<p>FSAR AMENDMENT 56 7.3-13</p>	<p>THE COMPONENT LEVEL MANUAL OVERRIDE DOES NOT INTERFERE WITH THE PROTECTIVE FUNCTION. THIS ELEMENTARY MANUAL OVERRIDE FEATURE IS NOT INDICATED ON THE SAFETY SYSTEM IMPERABLE INDICATION SYSTEM BECAUSE IT IS APPARENT TO THE CONTROL ROOM OPERATOR WHO IS, IN FACT, PERFORMING THE OVERRIDE FUNCTION. AN EXCEPTION TO THE ABOVE IS FOR PUMPS AUTOMATICALLY STARTED BY AN SIS SIGNAL. THEIR IMPERABLE STATUS IS INDICATED ON A MONITOR LIGHT BOX.</p>
SINGLE FAILURE CRITERIA (CONTAINMENT SPRAY)	IEEE 279-1971			<p>FSAR AMENDMENT 11 7.3.2.2.1</p>	<p>FOR CONTAINMENT SPRAY, THE FINAL BISTABLES ARE ENERGIZED TO TRIP TO AVOID SPURIOUS ACTUATION. IN ADDITION, MANUAL CONTAINMENT SPRAY REQUIRES A SIMULTANEOUS ACTIVATION OF TWO MANUAL CONTROLS. THIS IS CONSIDERED ACCEPTABLE BECAUSE SPRAY ACTUATION ON HI-3 CONTAINMENT PRESSURE SIGNAL PROVIDES AUTOMATIC INITIATION OF THE SYSTEM VIA PROTECTION CHANNELS MEETING THE CRITERIA IN SECTION 3 OF CPSES FSAR AMENDMENT 11, JULY 31, 1980.</p>
BATT * TESTING INSPECTION	IEEE-608	IEEE-450 E.G. 1.129		<p>FSAR 9.1.1.1.1 ITEM 10</p>	<p>ALL ASPECTS OF THE ELECTRICAL STATION DESIGN COMPLY WITH IEEE-308-1974</p>
PERIODIC TESTING OF BVS AND BVS/2	IEEE 136-1971			<p>FSAR 7.1.2.11</p>	<p>BATTERY TESTING AND INSPECTION ARE IN ACCORDANCE WITH IEEE-450 AND E.G. 1.129.</p>
PERIODIC TESTING OF EOC MAINTAINING	IEEE STD. 136-1971				<p>PLEASE REFER TO 7.1-41, 42, 43 OF FSAR FOR DETAILS.</p>
PERIODIC TESTING OF EOC MAINTAINING	IEEE STD. 136-1971				<p>THE DESIGN OF THE CORE EXIT THERMOCOUPLE</p>

STANDARD ACCEPTANCE PARAMETER CODE/REG. GUIDE	ALTERNATIVE ACCEPTANCE PARAMETER CODE/REG. GUIDE	CONTRACTOR DOCUMENT	REFERENCE DOCUMENT(S)	REFERENCED IN PSR, RIL, DAP	REMARKS
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8.5. 1.116 REV. 7	SUBMIT TO S.J. YOUNGBLOOD DTD. 5/21/84 YJG-4173 (ATTACH)				SYSTEM REQUIRES THE LIFTING OF SOME LEADS FOR TESTING.
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IEEE-494			FSAR 6.3.1.4		THIS DEVIATION WAS CONSIDERED ACCEPTABLE BY THE NRC AS DOCUMENTED IN NUREG-0797 SUPP. 6, PG. 22-13.
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IDENTIFICATION OF DOCUMENTS RELATED TO CLASS 1E EQUIPMENT

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 AND 11

ENCLOSURE 2 TO TXX-88135

FEBRUARY 1, 1988

### EXPLANATION OF TRT ISSUES MATRIX

The attached matrix contains a listing of the issues not closed by the TRT in SSER's 7, 8, 10 and 11. SSER 9 (protective coatings) addresses a non-safety related subject and, therefore, is not included in this matrix.

The matrix consists of four columns. The first column, Issue Source, contains a computer code (e.g. \*\*07, 07.01, \*\*07 07.04A-2) utilized for sorting purposes, the SSER number, allegation number, and associated item number. The item number is used within the computer data base for referencing purposes, and is not sequential due to the exclusion of issues closed by the TRT within the subject SSER's.

The second column, Issue, is a restatement of the allegation/concern from the associated SSER.

The third column, TRT Issue Summary, is a restatement of the test from the associated SSER relative to the TRT conclusion/position regarding the allegation/concern.

The fourth column, TUE/CPRT Resolution Documents, is a listing of the principle documents that address the issue.

#### TUE/CPRT RESOLUTION DOCUMENT ACRONYMS

CAR	Corrective Action Request
CER	Collective Evaluation Report
DIR	Discrepancy/Issue Report
FSAR	Final Safety Analysis Report
ISAP	Issue Specific Action Plan
NCR	Nonconformance Report
PSR	Project Status Report
SDAR	Significant Deficiency Analysis Report
STIR	Specific Technical Issue Report



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 07.01 SSER: 07 ALLEG: AQE-12 ITEM: 07.01	AQE-12 FAILURE TO FOLLOW PROCEDURES, SPECIFICATIONS AND DMGS. (AQE-25, AQE-40, AND PART OF AQE-12). REF. PG. J-40.	TRT --- BASED ON REVIEWS OF PERTINENT DOCUMENTATION, EXAMINATION OF MCR's, AND INFORMATION OBTAINED FROM INTERVIEWS, TRT CONCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCONFORMANCE AS RELATED TO THE CONCERNS RAISED BY THE ALLEGATIONS. THE FINAL ACCEPTABILITY OF THIS ITEM BY TRT WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE PROGRAMMATIC REVIEW OF QA/QC CATEGORY 5, NONCONFORMANCE REPORTS, AND QA/QC CATEGORY 6, QC INSPECTION.	(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE "RT PROGRAMMATIC CATEGORIES")

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SCSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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\*\* 07 07.01A AQE-12  
SCSER: 07 CABLE TERMINATIONS NOT IN  
ALLEG: AQE-12 CONFORMANCE WITH DRAWINGS WERE  
ITEM: 07.01A ACCEPTED BY QUALITY CONTROL (QC)  
PERSONNEL. REF. PG J-27

TRT

TRT INSPECTED 1600 TERMINATIONS AND FOUND SIX CABLES, FIVE OF WHICH WERE SAFETY-RELATED, NOT TERMINATED IN ACCORDANCE WITH CURRENT DRAWINGS. TRT CONCLUDED THAT CONCERNS EXISTED ABOUT SAFETY RELATED TERMINATIONS NOT BEING IN CONFORMANCE WITH CURRENT DRAWINGS.

ACTION REQUIRED

TO ELECTRIC SHALL REINSPECT ALL SAFETY-RELATED AND ASSOCIATED TERMINATIONS IN THE CONTROL ROOM AND IN THE TERMINATION CABINETS IN THE CABLE SPREADING ROOM TO VERIFY THAT THEIR LOCATIONS ARE IN ACCORDANCE WITH ALL CURRENT DESIGN DOCUMENTS. SHOULD THE RESULTS OF THIS REINSPECTION REVEAL AN UNACCEPTABLE LEVEL OF NONCONFORMANCE TO DESIGN DOCUMENTS, THE SCOPE OF THIS REINSPECTION EFFORT SHALL EXPANDED TO INCLUDE ALL SAFETY-RELATED AND ASSOCIATED TERMINATIONS AT COMANCHE PEAK STEAM ELECTRIC STATION (CPSES).

ISAP(s) VII.C.3; I.A.1; I.A.2; I.A.4; I.D.1  
PSP: ELECTRICAL  
CAR(s) 87-076, 87-079, 87-079, 104  
SDAR(s) CP-85-37, 87-81, 87-49, 87-96

TO ELECTRIC SHALL PROVIDE ADDITIONAL QC INSPECTOR TRAINING WITH RESPECT TO THE AREAS IN WHICH NUCLEAR HEAT-SINKABLE SLEEVES ARE REQUIRED ON SPLICES AND ENSURE THAT (1) SUCH SLEEVES ARE INSTALLED WHERE REQUIRED, (2) ALL QC INSPECTIONS REQUIRING WITNESSING FOR SPLICES HAVE BEEN PERFORMED AND PROPERLY DOCUMENTED, AND (3) ALL BUTT SPLICES ARE PROPERLY IDENTIFIED ON THE APPROPRIATE DESIGN DRAWINGS AND ARE PHYSICALLY IDENTIFIED WITHIN THE APPROPRIATE PANELS.

TO ELECTRIC SHALL EVALUATE THE ADEQUACY OF THE QC INSPECTOR PROGRAM AS RELATED TO THE EFFICIENCIES IDENTIFIED TO ESTABLISH ROOT CAUSES AND APPROPRIATE CORRECTIVE ACTIONS. THESE ACTIONS SHALL BE INTEGRATED WITH OTHER ACTIONS ADDRESSED UNDER QA/QC CATEGORY 6, AS BUILT.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 07 07.01B SSER: 07 ALLEG: AQE-12 ITEM: 07.01B	AQE-12 SOME ELECTRICAL TERMINATIONS WERE ACCEPTED BY INADEQUATELY QUALIFIED INSPECTORS THESE TERMINATIONS DID NOT CONFORM WITH THE DRAWINGS. REF. PG J-55	See 7.07A	PSR: ELECTRICAL (REFER TO ITEM 11.84C AND 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 06, 10 and 11

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ISSUE SOURCE: AE-15  
ISSUE: INSTALLED SAFETY RELATED CABLE AND CONDUITS IN THE REACTOR CONTROL PANEL IN THE CONTROL ROOM DID NOT CONFORM TO SEPARATION CRITERIA. REF. PAGE 3-37.  
TRT ISSUE SUMMARY: TST

\*\* 07 07.02A AE-15  
SSER: 07  
ALLEG: AE-15  
ITEM: 07.02A

ISAP(s) I.B.1; I.B.2; I.B.4; VII.C, APPENDIX 1; VII.C, APPENDIX 2  
FOR: ELECTRICAL  
SDAR(s) CP 87-092, 87-102  
CAR(s) 87-005, 102, 103  
STIR CPRT-E-006

TST  
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TST CONCLUDED THAT THE INSTALLATIONS REVIEWED, IN GENERAL, MET ESTABLISHED SEPARATION REQUIREMENTS, EXCEPT FOR CERTAIN SAFETY-RELATED CABLES AND FLEXIBLE CONDUITS INSIDE CONTROL ROOM PANELS WHICH DID NOT MEET MINIMUM SEPARATION REQUIREMENTS. THE TST FOUND NO EVIDENCE THAT THE LACK OF SEPARATION WAS JUSTIFIED BY ANALYSIS. THE LACK OF ANALYSIS TO SUBSTANTIATE THE ADEQUACY OF SEPARATION MAY BE AN INDICATION OF WEARINESS IN THE QA/QC PROGRAM CONCERNING DESIGN CONTROL. THIS AREA IS ADDRESSED IN QA/QC CATEGORY 1, DESIGN CONTROL.

ACTIONS REQUIRED

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TO ELECTRIC SHALL:

1. EVALUATE THE ADEQUACY OF THE QA/QC PROGRAM AS RELATED TO THE DEFICIENCIES IDENTIFIED ABOVE TO ESTABLISH ROOT CAUSES AND APPROPRIATE CORRECTIVE ACTIONS. THESE ACTIONS SHALL BE INTEGRATED WITH OTHER ACTIONS ADDRESSED UNDER ELECTRICAL AND INSTRUMENTATION CATEGORY 6, ELECTRICAL QC INSPECTOR TRAINING AND QUALIFICATIONS, QA/QC CATEGORY 8, AS BUILT, AND QA/QC CATEGORY 1, DESIGN PROCESS.

2. TAKE CORRECTIVE MEASURES TO PROVIDE A BARRIER IN AUXILIARY FEEDWATER PANEL CFI-EC-PRCB-09 SEPARATING REDUNDANT FLOW AND PRESSURE INSTRUMENTS.

3. TAKE CORRECTIVE ACTION TO ENSURE THAT THE REQUIRED MINIMUM SEPARATION OF THE REDUNDANT FIELD WIRING IDENTIFIED INSIDE PANEL CFI-EC-PRCB-03 IS MAINTAINED WITHIN BY DISTANCE OR BY AN ACCEPTABLE BARRIER.

4. REINSPECT ALL PANELS AT COMANCHE PEAK STEAM ELECTRIC STATION, IN ADDITION TO THOSE IN THE MAIN CONTROL ROOM FOR UNITS 1 AND 2, THAT CONTAIN (1) REDUNDANT SAFETY-RELATED CONDUITS, OR (2) SAFETY-AND NONSAFETY-RELATED CONDUITS, TO ELECTRIC SHALL EITHER CORRECT EACH VIOLATION OF THE SEPARATION CRITERIA OR

THE/CPRT RESOLUTION DOCUMENTS

COMPACHE PEAK STEAM ELECTRIC STATION (CPSES)

TRE ISSUES -- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRE ISSUE SUMMARY

TRE/CPST RESOLUTION DOCUMENTS

DEMONSTRATE BY ANALYSIS THE ACCEPTABILITY OF THE CONDUIT AS A BARRIER FOR EACH CASE WHERE THE MINIMUM SEPARATION IS NOT MET. THIS ANALYSIS SHALL BE ACCOMPLISHED IN ACCORDANCE WITH THE REQUIREMENTS SPECIFIED IN SECTION 5.6.2 OF IEEE STANDARD 384-1974. FURTHERMORE, IN THE EVENT THAT THE ACCEPTABILITY OF THE CONDUIT AS A BARRIER CANNOT BE DEMONSTRATED, THE ELECTRIC SHALL CORRECT THE ENGINEERING DRAWINGS AND RELATED DOCUMENTS TO INDICATE THE REVISED MINIMUM SEPARATION OF CONDUITS INSIDE THE PANEL FOR EACH CASE.

5. EITHER CORRECT EACH OF THE VIOLATIONS OF SEPARATION CRITERIA CONCERNING SEPARATE CABLES AND CABLES WITHIN FLEXIBLE CONDUITS FOUND IN CONTACT WITH EACH OTHER INSIDE MAIN CONTROL ROOM PANELS OR DEMONSTRATE BY ANALYSIS THE ADEQUACY OF THE FLEXIBLE CONDUIT AS A BARRIER. THE ELECTRIC SHALL ALSO REINSPECT ALL REMAINING PANELS IN THE CONTROL ROOM AND OTHER AREAS OF THE PLANT CONTAINING SEPARATE CABLES AND CABLES WITHIN FLEXIBLE CONDUIT AND SHALL MAINTAIN SEPARATION CRITERIA OR DEMONSTRATE BY ANALYSIS THE ADEQUACY OF THE FLEXIBLE CONDUIT AS A BARRIER. THIS ANALYSIS SHALL BE ACCOMPLISHED IN ACCORDANCE WITH SECTION 5.6.2 OF IEEE STANDARD 384-1974. IN THE EVENT THAT THE ACCEPTABILITY OF THE CONDUIT AS A BARRIER CANNOT BE DEMONSTRATED, THE ELECTRIC SHALL SEPARATE CABLES AND CABLES WITHIN FLEXIBLE CONDUITS BY A MINIMUM DISTANCE OF 6 INCHES, AS REQUIRED BY SECTION 5.6.2 OF IEEE STANDARD 384. FURTHERMORE, THE ELECTRIC SHALL CORRECT ALL APPROPRIATE DRAWINGS AND DOCUMENTS TO INDICATE THE REVISED MINIMUM SEPARATION.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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\*\* 07 07 02B-1 AE-20  
 SSER: 07 SEPARATION REQUIREMENTS IN ELEC  
 ALLEG: AE-20 ERECT SPEC FOR CABLE SPREAD BR  
 ITEM: 07 02B-1 WERE INCONSISTENT W/POINTS OF REG  
 GUIDE (NG) 1.75. INSTAL OF IREEP  
 SAFETY-RELATED CABLE TRYS &  
 CONDUIT BTWN SAFETY-RELATED &  
 W/ SAFETY-RELATED RACEWAY DIDNT  
 CONFORM W/R.G. 1.75. REF PG  
 J-37.

TBT  
 ---  
 TBT FOUND NO EVIDENCE THAT THE EXISTING GIBBS & HILL  
 (GAR) ANALYSIS FOR ESTABLISHING THE CRITERIA FOR A  
 1-INCH SEPARATION BETWEEN RIGID CONDUIT AND CABLE  
 TRAYS, AS STATED IN CPSES ELECTRICAL ERECTION  
 SPECIFICATION 2323-ES-100, HAD BEEN EVALUATED BY THE  
 NRC STAFF FOR COMANCHE PEAK. THIS ANALYSIS SHOULD  
 HAVE BEEN REFERENCED IN THE FSAR.

ISAF(s) 1.8.3  
 FSAR ELECTRICAL  
 FSAR APPENDMENT 6A  
 GAR(s) 87-005, 06A, 102, 103  
 SDAR(s) CP 86-83, 87-082, 87-102  
 STIR CPRT-E-006

ACTION REQUIRED

TO ELECTRIC SHALL SUBMIT TO THE NRC THE ANALYSIS  
 SUBSTANTIATING THE ACCEPTABILITY OF THE CRITERIA  
 STATED IN GAR ELECTRICAL ERECTION SPECIFICATION  
 GOVERNING THE SEPARATION BETWEEN SEPARATE CONDUITS AND  
 CABLE TRAYS. THIS ANALYSIS SHALL BE SUPPORTED WITH THE  
 NECESSARY DOCUMENTATION IN SUFFICIENT DETAIL TO  
 PERFORM AN INDEPENDENT EVALUATION OF HOW THESE  
 CRITERIA WERE ESTABLISHED BASED ON THE ANALYSIS.

COMPACTE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES - SERS 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TBT ISSUE SUMMARY ----- TBT/CPST RESOLUTION DOCUMENTS -----

\*\* 07 07.02B-2 AE-20  
SER: 07 SEPARATION CRITERIA BETWEEN  
ALLEG: AE-20 REDUNDANT CABLE TRAYS AND  
ITEM: 07.02B-2 CIRCUITS IN THE CABLE SPREADING  
ROOMS WERE NOT CONSISTENT WITH  
THE REQUIREMENTS OF THE  
IN-PROCESS INSPECTION PROCEDURES  
FOR VERIFYING ELECTRICAL  
SEPARATION. REF. PG. J-63.

TBT  
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BASED ON THE REVIEW OF PROCEDURES FOR IN PROCESS,  
POST-CONSTRUCTION AND TURNOVER INSPECTIONS, TBT  
CONCLUDED THAT NO SIGNIFICANT CONCERNS EXISTED WITH  
ELECTRICAL PROCEDURES. HOWEVER, EQUIPMENT INSTALLATION  
PROBLEMS, AS RELATED TO NONCONFORMANCE WITH  
PROCEDURES, ARE BEING ADDRESSED IN THE  
HARDWARE-RELATED ELECTRICAL AND INSTRUMENTATION  
CATEGORIES. TBT, THEREFORE, CONCLUDED THAT THESE  
ELECTRICAL PROCEDURE-RELATED ALLEGATIONS COULD NOT BE  
SUBSTANTIATED.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW  
CONCERNING THE POST-CONSTRUCTION VERIFICATION PROGRAM  
ADDRESSED UNDER QA/QC CATEGORY 8, AS BUILT. THEREFORE,  
THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE  
PREDICATED ON THE SATISFACTORY RESULTS OF THE OVERALL  
PROGRAMMATIC REVIEW ON THIS SUBJECT.

(REFER TO ITEM 11 83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TBT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 07 07 02C-2 A/E-06  
SSER: 07 ELECTRICAL INSPECTORS WERE  
ALLEG: A/E-06 DIRECTED BY A QC SUPERVISOR NOT  
ITEM: 07 02C-2 TO FOLLOW INSPECTION PROCEDURES.  
REF. PG. J-63.

TRT  
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BASED ON THE REVIEW OF PROCEDURES FOR IN-PROCESS INSPECTIONS, POST-CONSTRUCTION, AND TURNOVER INSPECTIONS, TRT CONCLUDED THAT NO SIGNIFICANT CONCERNS EXISTED WITH ELECTRICAL PROCEDURES, HOWEVER, EQUIPMENT INSTALLATION PROBLEMS, AS RELATED TO NON-COMFORMANCE WITH PROCEDURES, ARE BEING ADDRESSED IN THE HARDWARE-RELATED ELECTRICAL AND INSTRUMENTATION CATEGORIES. TRT, THEREFORE, CONCLUDED THAT THESE ELECTRICAL PROCEDURE-RELATED ALLEGATIONS COULD NOT BE SUBSTANTIATED.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING THE POST-CONSTRUCTION VERIFICATION PROGRAM ADDRESSED UNDER QA/QC, CATEGORY 8, AS BUILT. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE OVERALL PROGRAMMATIC REVIEW ON THIS SUBJECT.

ACTIONS REQUIRED

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TU ELECTRIC SHALL EVALUATE THE ADEQUACY OF THE QA/QC PROGRAM AS RELATED TO THE DEFICIENCIES IDENTIFIED ABOVE TO ESTABLISH ROOT CAUSES AND APPROPRIATE CORRECTIVE ACTIONS. THESE ACTIONS SHALL BE INTEGRATED WITH OTHER ACTIONS ADDRESSED UNDER ELECTRICAL AND INSTRUMENTATION CATEGORY 8, ELECTRICAL QC INSPECTOR TRAINING AND QUALIFICATIONS, QA/QC CATEGORY 8, AS BUILT, AND QA/QC CATEGORY 1, DESIGN PROCESS.

(REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



CUMARCHE PEAK STEAM ELECTRIC STATION (CFSES)

TRT ISSUES -- SSERs 07, 06, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 07 02F SSER: 07 ALLEG: AE-51 ITEM: 07-02F	AE-51 A CONDUIT WAS ABOUT 3 FEET BELOW A CABLE TRAY IN THE CONTROL ROOM BUILDING, PERHAPS VIOLATING SEPARATION CRITERIA. REF. PG. J-37	TRT --- REQUIREMENTS IN CFSES SPECIFICATION 2323-ES-100 WERE ALLEGED TO BE INCONSISTENT WITH THE CRITERIA IN IEEE STANDARD 384-1974 AS ACCENTED BY RG 1.75 PARTICULARLY REGARDING THE SEPARATION OF CABLE TRAY AND CONDUIT. TRT FOUND A REQUIREMENT IN THE SPECIFICATION THAT PERMITTED NONSAFETY-RELATED RIGID CONDUITS TO HAVE A MINIMUM SEPARATION OF ONE INCH FROM THE TOP OF OPEN SAFETY-RELATED TRAYS. THIS REQUIREMENT APPEARED TO BE INCONSISTENT WITH IEEE STANDARD 384-1974 AND RG 1.75.  TRT DETERMINED THAT NO INFORMATION WAS INCLUDED IN THE FSMR THAT SUPPORTED THE ONE INCH SEPARATION BETWEEN CABLE TRAYS AND CONDUITS. TRT DID, HOWEVER, REVIEW AS E-STEERING GIBBS & HILL (G&H) ANALYSIS, INCLUDING TEST RESULTS, THAT WAS USED TO ESTABLISH THE REQUIREMENT IN SPECIFICATION 2323-ES-100 FOR THE ONE INCH SEPARATION. THE ANALYSIS CONCLUDED THAT RIGID CONDUITS CONSTITUTED AN ACCEPTABLE BARRIER BETWEEN CABLES INSIDE CONDUIT AND CABLES INSIDE LAUNDER OR OPEN-TYPE TRAYS.  TRT FOUND NO EVIDENCE THAT THE EXISTING G&H ANALYSIS HAD BEEN EVALUATED BY THE NSC STAFF FOR CUMARCHE PEAK. THE ANALYSIS SHOULD HAVE BEEN REFERENCED IN THE FSAR	ISAF(a) I.B.3 FOR: ELECTRICAL STIR CPRT-006 CAR(a) 064, 103, 87-605, 102 SOAR(a) CP-83-092, 87-102

COMPANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSGs 07, 64, 10 and 11  
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TRT ISSUE SUMMARY

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07.02B AGE-54  
SSER: 07 LADDER TYPE CABLE TRAYS SHOULD  
ALLEG: AGE-54 NOT QUALIFY AS BARRIERS.  
ITEM: 07.02B THEREFORE, THE 1-INCH SEPARATION  
CRITERIA BETWEEN LADDER-TYPE  
TRAYS AND CONDUITS ROUTED UNDER  
THE TRAYS SHOULD NOT APPLY.  
REF. PG. J-37.

TRT

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REQUIREMENTS IN CPSES SPECIFICATION 2323-ES-100 WERE  
ALLEGED TO BE INCONSISTENT WITH THE CRITERIA IN IEEE  
STANDARD 384-1974 AS AMENDED BY RG 1.75 PARTICULARLY  
REGARDING THE SEPARATION OF CABLE TRAY AND CONDUIT.  
TRT FOUND A REQUIREMENT IN THE SPECIFICATION THAT  
PERMITTED NONSAFETY-RELATED RIGID CONDUITS TO HAVE A  
MINIMUM SEPARATION OF ONE INCH FROM THE TOP OF OPEN  
SAFETY-RELATED TRAYS. THIS REQUIREMENT APPEARED TO BE  
INCONSISTENT WITH IEEE STANDARD 384-1974 AND RG 1.75.

TRT DETERMINED THAT NO INFORMATION WAS INCLUDED IN THE  
FSAR THAT SUPPORTED THE ONE INCH SEPARATION BETWEEN  
CABLE TRAYS AND CONDUITS. TRT DID, HOWEVER, REVIEW AN  
EXISTING GIBBS & HILL (G&H) ANALYSIS, INCLUDING TEST  
RESULTS, THAT WAS USED TO ESTABLISH THE REQUIREMENT IN  
SPECIFICATION 2323-ES-100 FOR THE ONE INCH SEPARATION.  
THE ANALYSIS CONCLUDED THAT RIGID CONDUITS  
CONSTITUTED AN ACCEPTABLE BARRIER BETWEEN CABLES  
INSIDE CONDUIT AND CABLES INSIDE LADDER OR OPEN-TYPE  
TRAYS.

TRT FOUND NO EVIDENCE THAT THE EXISTING G&H ANALYSIS  
HAD BEEN EVALUATED BY THE NRC STAFF FOR COMPANCHE PEAK.  
THE ANALYSIS SHOULD HAVE BEEN REFERENCED IN THE FSAR.

ISAF(s) I.B.3  
FSR: ELECTRICAL  
STIR CPRT-E-006  
CAR(s) 064, 103, 102, 87-005  
SDAR CP-86-83, 87-082, 87-102  
FSAR AMENDMENT 64

TRT/CPRT RESOLUTION DOCUMENTS

CUMMINS PEAK STEAM ELECTRIC STATION (CFSES)

TRT ISSUES -- SSER# 07. 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT/CPRT RESOLUTION DOCUMENTS
** 07 07.03A SSER: 07 ALLEG: AQE-36 ITEM: 07.03A	AQE-36 VENDOR INSTALLED TERMINAL LUGS IN GE MOTOR CONTROL CENTERS WERE EXCESSIVELY BENT, AND THE RESULTING NCR'S HAD NOT BEEN PROPERLY DISPOSITIONED. REF. PG. 3-27.	TRT --- TRT DISCOVERED 16 NCR'S THAT ADDRESSED THE ALLEGATION REGARDING EXCESSIVELY BENT VENDOR-INSTALLED APC TERMINAL LUGS IN ITE GOULD-BROWN BOVERI 6.9KV SWITCNGEAR. MANY OF THE DISPOSITIONS OF THE NONCONFORMANCE REPORTS (NCR'S) DID NOT INDICATE THAT AN ENGINEERING EVALUATION HAD TAKEN PLACE, AND NEITHER MECHANICAL STRENGTH NOR ELECTRICAL CHARACTERISTICS WERE ADDRESSED FOR TWISTED LUGS. TRT CONCLUDED THAT CONCERNS EXISTED ABOUT THE ACCEPTABILITY OF VENDOR-INSTALLED TERMINAL LUGS IN ITE GOULD-BROWN BOVERI SWITCNGEAR.  ACTIONS REQUIRED ----- TU ELECTRIC SHALL REEVALUATE AND REDISPOSITION ALL NCR'S RELATED TO VENDOR-INSTALLED TERMINAL LUGS IN ITE GOULD-BROWN BOVERI SWITCNGEAR, TAKING INTO CONSIDERATION THE EFFECTS OF TWISTED AS WELL AS BENT LUGS, AND PERFORM AND DOCUMENT THE RESULTS OF ENGINEERING ANALYSES TO JUSTIFY ANY RESULTING USE-AS-IS-DISPOSITIONS.	ISAP(8), I.A.5; VII.C. APPENDIX 3 FSR: ELECTRICAL (REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

CUMMINGS PEAK STEAM ELECTRIC STATION (CPSES)

TWT ISSUES - SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TWT ISSUE SUMMARY

TWT/CPST RESOLUTION DOCUMENTS

\*\* 07 07.04A-2 AE-13  
SSER: 07 IMPROPER CABLE SPLICES EXISTED  
ALLEG: AE-13 WITHIN VARIOUS PANELS. REF. PG  
ITDM: 07.04A-2 J-27

TKT  
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THE ALLEGATION INVOLVED THE USE OF IM-COPPER SIZE AND TYPE OF TERMINAL LUGS FOR CABLES IN VARIOUS PANELS AND THE USE OF BUTT SPLICES IN PANELS THAT COULD BE IN VIOLATION OF REGULATORY REQUIREMENTS AND SITE PROCEDURES. THE CONCERN ABOUT TERMINAL LUGS IS DISCUSSED UNDER ITEM 07.04A-1. THE CONCERN ABOUT BUTT SPLICES IS DISCUSSED BELOW.

NRC STAFF REVIEWED TU ELECTRIC'S JUSTIFICATION FOR PERMITTING BUTT SPLICES IN PANELS AND CONCLUDED THAT THE PRACTICE IS ACCEPTABLE ON A LIMITED BASIS PROVIDED OPERABILITY OF CIRCUITS IS VERIFIED, WIRE SPLICES ARE QUALIFIED, AND SPLICES ARE STAGGERED. NRC INSPECTED BUTT SPLICES IN SAFETY RELATED PANELS AND FOUND THE SPLICES TO BE IN CONFORMANCE WITH TU ELECTRIC'S PROCEDURAL REQUIREMENTS, EXCEPT THAT HEAT-SHRINKABLE CABLE INSULATION SLEEVES WERE NOT INSTALLED AS REQUIRED ON 600 VOLT CONTROL AND INSTRUMENTATION CONNECTIONS. THE CONCERN ABOUT HEAT-SHRINKABLE SLEEVES IS DISCUSSED UNDER ITEM 07.04C-3. PROCEDURES DID NOT REQUIRE CHECKS FOR OPERABILITY, QUALIFICATION OF SPLICES, AND STAGGERING OF SPLICES. A REVIEW OF QC INSPECTION REPORTS SHOWED THAT THE WITNESSING OF SPLICES HAD NOT BEEN DOCUMENTED IN ALL CASES AS REQUIRED. THIS CONCERN IS DISCUSSED UNDER ITEM 07A.

ISAP(s) I.A.2; I.A.3, VII.C, APPENDIX 3  
FSR: ELECTRICAL  
CAR(s) 050, 083, 092  
SDAR CP-86-03



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRI ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRI ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 07 07.04C-1 AE-22 SSER: 07 ALLEG: AE-22 ITEM: 07.04C-1	CABLE BUTT SPLICES EXISTED IN PANELS WITHOUT AUTHORIZATION OR DOCUMENTATION ON DRAWINGS. REF. PG. J-27.	TRI --- THE ALLEGATION INVOLVED BUTT SPLICES IN PANELS THAT COULD HAVE BEEN INSTALLED WITHOUT AUTHORIZATION OR DOCUMENTATION ON DRAWINGS. AMENDMENT 44 TO THE FSAR ALLOWED BUTT SPLICES IN PANELS ON A LIMITED BASIS. THE NRC STAFF REVIEWED TU ELECTRIC'S JUSTIFICATION FOR PERMITTING BUTT SPLICES IN PANELS AND CONCLUDED THAT THE PRACTICE IS ACCEPTABLE ON A LIMITED BASIS PROVIDED THE OPERABILITY OF CIRCUITS IS VERIFIED, SPLICES ARE QUALIFIED, AND SPLICES ARE STAGGERED WITHIN PANELS.	ISAP(a) I.A.2; VII.C, APPENDIX 3 PSR: ELECTRICAL CAR(a) 050, 063, STIR CPE-E-004

CUMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 07 04C-3 AE-13 SSER: 07 ALLEG: AE-13 ITEM: 07 04C-3	ALL SPLICES INSPECTED WERE MISSING NUCLEAR HEAT-SHRINKABLE CABLE INS SLEEVES AS REQ. BY PROCEDURE FOR 600-V CTRL & INSTR CONNECTIONS. REF PG J-29	TNT --- IN THE PROCESS OF INVESTIGATING AE-13, AE-18, AND AE-22, TNT FOUND THAT SPLICES WERE MISSING HEAT-SHRINKABLE CABLE INSULATION SLEEVES WHICH WERE REQUIRED FOR 600 VOLT CONTROL AND INSTRUMENTATION CONNECTIONS.	ISAP(s) I.A.1: I.A.4; VII.C, APPENDIX 3 FSR: ELECTRICAL CAR(s) 063, 050, 092, SDAR(s) CF-86-38 STIR CPRT-E-003

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPNT RESOLUTION DOCUMENTS
** 07 07.05A SSER: 07 ALLEG: AGE-10 ITEM: 07.05A	AGE-10 CRAFTSMEN INSTALLING CONDUIT SUPPORTS WERE NOT PROPERLY TRAINED, THIS NECESSITATING EXTENSIVE REMOK. REF. PG. J-33.	TRT --- TRT CONCLUDED THAT THIS CONCERN MAY BE INDICATIVE OF POOR TRAINING IN THE AREA OF PROCEDURAL REQUIREMENTS.  ACTIONS REQUIRED ----- TO ELECTRIC SHALL EVALUATE THE ADEQUACY OF CRAFT PERSONNEL TRAINING IN THE USE OF INSTALLATION MANUALS TO ESTABLISH ROOT CAUSES AND APPROPRIATE CORRECTIVE ACTIONS. THIS ACTION SHALL BE INTEGRATED WITH OTHER ACTIONS CONCERNING CRAFT PERSONNEL TRAINING ADDRESSED UNDER QA/QC CATEGORY 9, AS BUILT.	(REFER TO ITEM 11.84D AND 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES) COLLECTIVE EVALUATION REPORT PART III



COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE TRT ISSUE SUMMARY TUE/CPRT RESOLUTION DOCUMENTS

\*\* 07 07.06 AE-17  
SSER: 0/ FIELD RUN CONDUIT, DRYMALL, AND  
ALLEG: AE-17 LIGHTING INSTALLED ABOVE CONTROL  
ITEM: 07.06 ROOM PANELS WERE CLASSIFIED  
NONSEISMIC AND INADEQUATELY  
SUPPORTED. REF. PG. J-45

TRT  
TRT INSPECTED THE CONDUIT INSTALLATION ABOVE THE CONTROL ROOM CEILING AND DETERMINED THAT SAFETY-RELATED CONDUIT WAS FASTENED BY SEISMIC CATEGORY I SUPPORTS TYPICAL OF THOSE IN OTHER AREAS OF THE PLANT. NONSAFETY-RELATED CONDUIT THAT WAS NOT GREATER THAN TWO INCHES IN DIAMETER, WAS NOT SUPPORTED BY SEISMIC CATEGORY I SUPPORTS AND DID NOT HAVE SEISMIC CATEGORY II CABLE RESTRAINTS. THIS INSTALLATION WAS CONSISTENT WITH OTHER SUCH NONSAFETY-RELATED CONDUIT IN THE PLANT. THE APPLICABLE DRAWING DID NOT REQUIRE SEISMIC CATEGORY II CABLE RESTRAINTS FOR THIS TYPE OF CONDUIT INSTALLATION.

ISAP I.C; II.D, APPENDIX 4  
FSR: CIVIL  
STIR: CPRT-S-006, 007, 009, 009, 011, 012, 013, 016, 018  
SEAR(s) CP 84-31, 86-54  
(REFER TO ITEM 11.84A FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

TRT FOUND THAT THE SUSPENDED CEILING ABOVE THE CENTRAL PART OF THE CONTROL ROOM WAS SUPPORTED BY A METAL FRAMEWORK ATTACHED TO PRIMARY BUILDING CONCRETE. THE FRAMEWORK WAS ALSO ATTACHED TO THE CONCRETE WITH A SYSTEM OF STEEL CABLES. THE CABLES WOULD HOLD THE WEIGHT OF THE FRAMING AND DRYMALL IF THE FRAMEWORK FAILED DURING A SEISMIC EVENT.

TRT FOUND THAT LIGHTING FIXTURES WERE SUPPORTED FROM AN INTERMEDIATE SUBSTRUCTURE BY LIGHT-WEIGHT CONDUIT. THE SUBSTRUCTURE WAS ALSO SUPPORTED FROM THE FRUIGRY BUILDING CEILING BY LIGHT-WEIGHT CONDUIT. PARALLEL WITH EACH SUPPORT CONDUIT WERE TWO STEEL CABLES WHICH WOULD ASSUME THE LOAD IF THE SUPPORT CONDUIT OR ITS ATTACHMENT WERE TO FAIL.

TRT CONCLUDED THAT THE INSTALLATION OF NONSAFETY-RELATED CONDUIT IN THE CONTROL ROOM APPEARED TO BE INCONSISTENT WITH RG 1.29. THE ACCEPTABILITY OF THE SUSPENDED CEILING AND LIGHTING SUPPORTS WAS DEPENDENT ON THE ANALYSIS OF SEISMIC CATEGORY II RESTRAINTS TO BE PROVIDED BY TU ELECTRIC.

ACTION REQUIRED

TU ELECTRIC SHALL

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSER# 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

1. PROVIDE THE TRT WITH ANALYSES THAT SUBSTANTIATE (1) THE ADEQUACY OF THE OVERALL SEISMIC SUPPORT SYSTEM INSTALLATION FOR ALL THE ITEMS LOCATED ABOVE THE CEILING IN THE CONTROL ROOM, INCLUDING NONSAFETY-RELATED CONDUIT, SUSPENDED CEILING, AND LIGHTING FIXTURES AND (2) THE ADEQUACY OF THE SEISMIC SUPPORT SYSTEM INSTALLATION FOR NONSAFETY-RELATED CONDUIT IN SEISMIC CATEGORY I AREAS OF THE PLANT OTHER THAN THE CONTROL ROOM. THIS ACTION SHALL BE INTEGRATED AS APPROPRIATE WITH OTHER ACTIONS ADDRESSED UNDER CIVIL AND STRUCTURAL CATEGORY 14, SEISMIC DESIGN OF CONTROL ROOM CEILING ELEMENTS.

2. EVALUATE THE ADEQUACY OF THE QA/QC PROGRAM RELATED TO THE DEFICIENCIES IDENTIFIED ABOVE TO ESTABLISH ROOT CAUSES AND APPROPRIATE ACTIONS. THESE ACTIONS SHOULD BE INTEGRATED WITH OTHER ACTIONS ADDRESSED UNDER THE QA/QC CATEGORY 1, DESIGN PROCESS.

3. PROVIDE THE RESULTS OF SEISMIC DESIGN THAT DEMONSTRATE THAT THE NONSEISMIC ITEMS IN THE CONTROL ROOM (OTHER THAN THE SLOPING SUSPENDED DRYWALL CEILING) SATISFY THE PROVISIONS OF REGULATORY GUIDE 1.29 AND FSAR SECTION 3.7B.2.8.

4. PROVIDE AN EVALUATION OF SEISMIC DESIGN ADEQUACY OF SUPPORT SYSTEMS FOR THE LIGHTING FIXTURES (SEISMIC CATEGORY II) AND THE SUSPENDED DRYWALL CEILING (NONSEISMIC ITEM WITH MODIFICATION WHICH ACCOUNTS FOR PERTINENT FLOOR RESPONSE CHARACTERISTICS OF THE SYSTEMS).

5. VERIFY THAT THOSE ITEMS IN THE CONTROL ROOM CEILING NOT INSTALLED IN ACCORDANCE WITH THE REQUIREMENTS OF REGULATORY GUIDE 1.29 SATISFY APPLICABLE DESIGN REQUIREMENTS.

6. PROVIDE THE RESULTS OF AN ANALYSIS THAT JUSTIFY THE ADEQUACY OF THE NONSAFETY-RELATED CONDUIT SUPPORT SYSTEM IN THE CONTROL ROOM FOR CONDUIT WHOSE DIAMETER IS TWO INCHES OR LESS.

7. PROVIDE THE RESULTS OF AN ANALYSIS THAT

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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SEENs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

DEMONSTRATE THAT THE FOREGOING PROBLEMS ARE NOT APPLICABLE TO OTHER CATEGORY II AND NONSEISMIC STRUCTURES, SYSTEMS, AND COMPONENTS ELSEWHERE IN THE PLANT.

CUMMANCE PEAK STEAM ELECTRIC STATION (CPSES)

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TNT ISSUES -- SSERs 07, 08, 10 and 11

TUE/CPRT RESOLUTION DOCUMENTS

TNT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07.07A AGE-08  
SSER: 07 SOME ELECTRICAL INSPECTORS WERE  
ALLEG: AGE-08 NOT ADEQUATELY QUALIFIED, WERE  
ITEM: 07.07A GIVEN HELP TO PASS THEIR  
CERTIFICATION TESTS, AND HAD  
INCORRECT DESCRIPTIONS OF PRIOR  
ELECTRICAL OR INSPECTION  
EXPERIENCE OR THEIR EMPLOYMENT  
APPLICATIONS. REF. PG. J-55.

TNT

ISAP I.D.2; I.D.1  
(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TNT PROGRAMMATIC CATEGORIES)

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BASED ON A REVIEW OF PERTINENT DOCUMENTATION AND  
INTERVIEWS, TNT CONCLUDED THAT EVIDENCE INDICATED THAT  
THE ELECTRICAL QC INSPECTOR QUALIFICATION PROGRAM  
LACKED PROGRAMMATIC CONTROLS WHICH MAY BE INDICATIVE  
THAT THE REQUIRED LEVEL OF QUALIFICATION WAS NOT  
OBTAINED FOR SOME ELECTRICAL QA INSPECTORS. BECAUSE  
THE TRAINING AND CERTIFICATION PROGRAM WAS THE SAME  
FOR ALL DISCIPLINES, EXCEPT ASME, TNT CONCLUDED THAT  
THE DEFICIENCIES IN PROCEDURAL REQUIREMENTS AND  
GUIDELINES IN THE TESTING PROGRAM AND THE LACK OF  
DOCUMENTATION IN ISOLATED CASES HAVE GENERIC  
IMPLICATIONS TO OTHER CONSTRUCTION DISCIPLINES. THE  
IMPLICATIONS OF TNT FINDINGS WILL BE FURTHER ASSESSED  
AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF QC  
INSPECTOR TRAINING AND QUALIFICATION UNDER QA/QC  
CATEGORY 4, TRAINING AND QUALIFICATION

ACTIONS REQUIRED

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TJ ELECTRIC SHALL:

1. JUSTIFY THE ALLOWANCES IN THE PROCEDURE FOR  
ADMINISTERING SEPARATE (WAIVER) VISION TESTS IN LIEU  
OF EXAMINATIONS ADMINISTERED BY AN INDEPENDENT  
PROFESSIONAL EYE SPECIALIST.
2. EVALUATE THE QC TESTING PROGRAM FOR QC  
ELECTRICAL INSPECTOR QUALIFICATIONS AND DEVELOP A  
TESTING PROGRAM WHICH OPTIMIZES ADMINISTRATIVE  
GUIDELINES, PROCEDURAL REQUIREMENTS, AND TEST  
FLEXIBILITY (\* E.G., COMPUTER-GENERATED TESTS) TO ASSURE  
THAT SUITABLE PROFICIENCY IS ACHIEVED AND MAINTAINED.  
THESE GUIDELINES AND/OR PROCEDURES SHALL INCLUDE SUCH  
ITEMS AS SCORING, RETESTS, AND QUESTION  
DISQUALIFICATION.
3. REVIEW ALL ELECTRICAL QC INSPECTOR TRAINING,  
QUALIFICATION, CERTIFICATION AND RE-CERTIFICATION FILES  
AGAINST THE PROJECT REQUIREMENTS AS DOCUMENTED IN THE  
FSAR, AND PROVIDE THE INFORMATION IN SUCH A FORM THAT  
EACH REQUIREMENT IS CLEARLY SHOWN TO HAVE BEEN MET BY

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

EACH INSPECTOR. IF AN INSPECTOR IS FOUND TO NOT MEET THE TRAINING, QUALIFICATION, CERTIFICATION, OR RECERTIFICATION REQUIREMENTS, TU ELECTRIC SHALL THEN REVIEW THE RECORDS TO DETERMINE THE ADEQUACY OF INSPECTIONS MADE BY UNQUALIFIED INDIVIDUALS AND PROVIDE A STATEMENT ON THE IMPACT OF THE DEFICIENCIES NOTED ON THE SAFETY OF THE PROJECT.

4. INTEGRATE ACTIONS UNDER PARAGRAPH 1, 2, AND 3 ABOVE, AS APPROPRIATE, WITH OTHER ACTIONS ADDRESSED UNDER QA/QC CATEGORY 4, TRAINING AND QUALIFICATIONS.

COMPANCHO PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 07 07.07B-2 AGE-04  
SSEP: 07 UNQUALIFIED INSPECTORS WERE TOLD  
ALLEG: AGE-04 TO CLOSE-OUT NCR'S. REF. PG.  
ITEM: 07.07B-2 J-15.

TRT  
----

BASED ON A REVIEW OF PERTINENT DOCUMENTATION AND INTERVIEWING, TRT CONCLUDED THAT EVIDENCE INDICATED THAT THE ELECTRICAL QC INSPECTOR QUALIFICATION PROGRAM LACKED PROGRAMMATIC CONTROLS WHICH MAY BE INDICATIVE THAT THE REQUIRED LEVEL OF QUALIFICATION WAS NOT OBTAINED FOR SOME ELECTRICAL QA INSPECTORS. BECAUSE THE TRAINING AND CERTIFICATION PROGRAM WAS THE SAME FOR ALL DISCIPLINES, EXCEPT ASME, TRT CONCLUDED THAT THE DEFICIENCIES IN PROCEDURAL REQUIREMENTS AND GUIDELINES IN THE TESTING PROGRAM AND THE LACK OF DOCUMENTATION IN ISOLATED CASES HAVE GENERIC IMPLICATIONS TO OTHER CONSTRUCTION DISCIPLINES. THE IMPLICATIONS OF YRT FINDINGS WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF QC INSPECTOR TRAINING AND QUALIFICATION UNDER QA/QC CATEGORY 4, TRAINING AND QUALIFICATION.

ISAP(0) I.D.1, I.D.2  
(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE                                                  ISSUE                                                  TBT ISSUE SUMMARY                                                  THE/CPBT RESOLUTION DOCUMENTS

\*\* 07 07.08A            AGE-01  
SSER: 07                                                  AN ELECTRICAL INSPECTOR WAS  
ALLEG: AGE-01                                                  PRESSURED NOT TO WRITE  
ITDM: 07.08A                                                  PERFORMANCE REPORTS (NCRs) IN  
SEVERAL INSTANCES. IN ONE CASE,  
A QC SUPERVISOR INSTRUCTED HIM  
NOT TO WRITE AN NCR FOR CONTROL  
ROOM CABLES THAT WERE REMOVED  
WITHOUT PROPER DOCUMENTATION  
REF. PG. 3-50.

TBT  
----  
THE ALLEGATION OF IMPROPER DOCUMENTATION OF CABLE  
REMOVAL COULD NOT BE SUBSTANTIATED, BECAUSE IN ITS  
REVIEW OF A RANDOM SAMPLE OF 75 NCRs ON THESE ISSUES,  
TBT COULD NOT IDENTIFY ANY INCONSISTENCIES OR  
DEFICIENCIES THAT WOULD RAISE A SAFETY QUESTION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5,  
NONPERFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON THE SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

(REFER TO ITDM 11.04E AND 11.04F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TBT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 06, 10 and 11

TUE/CPRI RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07.06B  
SSER: 07  
ALLES: AGE-02  
ITEM: 07.06B  
AGE-02  
A CABLE WAS REMOVED FROM THE SAFEGUARDS BUILDING WITHOUT PROPER DOCUMENTATION. AN NCR WAS PREPARED, BUT IT WAS UNCERTAIN WHETHER THAT NCR WAS FULLY GENERATED, PROCESSED, AND DISPOSITIONED. REF. PG. J-50.

TRT  
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THE ALLEGATION OF IMPROPER DOCUMENTATION OF CABLE REMOVAL COULD NOT BE SUBSTANTIATED, BECAUSE IN THE REVIEW OF A RANDOM SAMPLE OF 75 NCRs ON THESE ISSUES, TRT COULD NOT IDENTIFY ANY INCONSISTENCIES OR DEFICIENCIES THAT WOULD RAISE A SAFETY QUESTION TRT CONCLUDES THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCONFORMANCE AS RELATED TO THE CONCERNS RAISED BY THE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5, NONCONFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBJECTS.

(REFER TO ITEM 11.84E AND 11.94F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



CUMMINS PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TRT/CPST RESOLUTION DOCUMENTS

\*\* 07 07 08C AQE-03  
SSE# 07 AN INSPECTOR WAS TOLD TO  
ALLEG: AQE-03 CLOSE-OUT AN MCR THAT DESCRIBED  
ITEM: 07 08C REPAIR OF A FLEXIBLE CONDUIT IN  
THE FUEL HANDLING BUILDING WHEN  
THE CONDUIT HAD BEEN REPLACED  
RATHER THAN REPAIRED. REF. PG.  
J-49.

TRT  
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TRT INTERVIEWED A TU ELECTRIC ELECTRICAL ENGINEER ABOUT DISPOSITIONS OF NONCOMFORMANCE REPORTS (NCRs) WITH RESPECT TO REPLACE VERSUS REPAIR AND "COMPROMISED WORKMANSHIP" (AQE-48). TRT DETERMINED THAT REPLACING A REPORTED ITEM INSTEAD OF REPAIRING IT AS ORIGINALLY DISPOSITIONED WOULD REQUIRE A REVISION TO THE ORIGINAL MCR. THE DISPOSITION OF THE MCR FOR REPLACEMENT WOULD BE BASED ON AN ENGINEERING EVALUATION. TRT DETERMINED THAT ON A CASE-BY-CASE BASIS WHERE WORKMANSHIP MIGHT HAVE BEEN COMPROMISED, THE INSPECTING ENGINEER WOULD APPLY ENGINEERING JUDGMENT TO DETERMINE THAT THE QUALITY OF WORKMANSHIP DID NOT DEGRADE THE INSTALLATION BELOW AN ACCEPTABLE LEVEL. FROM THE 75 NCRs EXAMINED, TRT COULD NOT FIND ANY EVIDENCE OF UNACCEPTABLE INSTALLATION. TRT CONCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCOMFORMANCE AS RELATED TO THE CONCERNS RAISED BY THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5, NONCOMFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBJECTS.

(REFER TO ITEM 11 84E AND 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

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TRI ISSUES -- SSERs 07, 08, 20 and 11

ISSUE SOURCE

ISSUE

TRI ISSUE SUMMARY

THE/TRI RESOLUTION DOCUMENTS

\*\* 07 07 08E ACE-25

SSER: 07 ELECTRICAL QC INSPECTORS WERE REQUIRED TO SUBMIT DRAFT NCRs TO THEIR SUPERVISORS FOR APPROVAL IN CONTRADICTION OF SITE PROCEDURES. REF PG. J-49.

TRI

-----  
THE ALLEGATION OF FAILURE TO FOLLOW PROCEDURES AND SPECIFICATIONS (ACE-25 AND ACE-40) COULD NOT BE SUBSTANTIATED, BECAUSE IN THE REVIEW OF A RANDOM SAMPLE OF 75 NONCONFORMANCE REPORTS (NCRs) ON THESE ISSUES, TRI COULD NOT IDENTIFY ANY INCONSISTENCIES OR DEFICIENCIES THAT WOULD RAISE A SAFETY QUESTION. TRI EXCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCONFORMANCE REPORTS, AS RELATED TO THE CONCERNS RAISED BY THIS ALLEGATION.

(REFER TO ITEM 11.04C AND 11.04F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRI PROGRAMMATIC CATEGORIES)

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs. ADDRESS'G UNDER QA/QC CATEGORY 5, NONCONFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBJECTS.

CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSGs 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TRT/CPRT RESOLUTION DOCUMENTS

\*\* 07 07 08F A/E-33  
SSR: 07 THERE WERE PREVALENT USE-AS-IS  
ALLEG: A/E-33 DISPOSITIONS WRITTEN FOR NCRs  
ITEM: 07 08F GENERATED WITH RESPECT TO THE  
ELECTRICAL ERECTION  
SPECIFICATION, REF. PG. J-49.

TRT  
---

OF THE 75 NONCOMFORMANCE REPORTS (NCRs) EXAMINED, TRT  
COULD IDENTIFY NO USE-AS-IS DISPOSITIONS THAT DEVIATED  
FROM APPLICABLE DESIGN REQUIREMENTS, EXCEPT FOR THOSE  
IDENTIFIED IN ELECTRICAL AND INSTRUMENTATION CATEGORY  
1, ELECTRICAL CABLE TERMINATIONS, AND ELECTRICAL AND  
INSTRUMENTATION CATEGORY 2, ELECTRICAL CABLE TRAY AND  
CONDUIT INSTALLATION. THE EXCEPTIONS CONCERNED NCRs ON  
BERT TERMINAL LUGS IN MOTOR CONTROL CENTERS (PART OF  
A/E-36) AND TWO LOOSE CONDUIT ELBOW FITTINGS (PART OF  
A/E-27). TRT CONCLUDED THAT ADEQUATE PROCEDURES,  
CONTROLS, AND PROCESS CHECKS EXISTED FOR THE  
GENERATION AND DISPOSITION OF REPORTED ITEMS OF  
NONCOMFORMANCE AS RELATED TO THE CONCERNS RAISED BY  
THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5,  
NONCOMFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON THE SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

(REFER TO ITEM 11, 84E AND 11, 84F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 06, 10 and 11  
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ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

TUE/CPST RESOLUTION DOCUMENTS

\*\* 07 07 086 AGE-34  
SSER 07 A CABLE JACKET WAS DAMAGED WHEN  
ALLEG. AGE-34 A BISCO SEAL WAS REMOVED USING A  
ITEM: 07 086 THREADED ROD. THE RESULTING NCR  
WAS DISPOSITIONED USE-AS-IS.  
REF. PG. J-49.

TNT  
---

OF THE 75 NONPERFORMANCE REPORTS (NCRs) EXAMINED, TNT  
COULD IDENTIFY NO USE-AS-IS DISPOSITIONS WHICH  
DEVIATED FROM APPLICABLE DESIGN REQUIREMENTS, EXCEPT  
FOR THOSE IDENTIFIED IN ELECTRICAL AND INSTRUMENTATION  
CATEGORY 1, ELECTRICAL CABLE TERMINATIONS, AND  
ELECTRICAL AND INSTRUMENTATION CATEGORY 2, ELECTRICAL  
CABLE TRAY AND CONDUIT INSTALLATION. THE EXCEPTIONS  
CONCERNED NCRs ON BENT TERMINAL LUGS IN MOTOR CONTROL  
CENTERS (PART OF AGE-36) AND TWO LOOSE CONDUIT ELBOW  
FITTINGS (PART OF AE-27). TNT CONCLUDED THAT ADEQUATE  
PROCEDURES, CONTROLS, AND PROBLEMS CHECKS EXISTED FOR  
THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF  
NONPERFORMANCE AS RELATED TO THE CONCERNS RAISED BY  
THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5,  
NONPERFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON THE SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

THE RESULTS OF THE TNT REVIEW OF NEW INFORMATION  
CONCERNING ALLEGATION AGE-34, WILL ALSO BE REPORTED IN  
A SUPPLEMENT TO THIS SSER (CLOSED BY NRC IN ITS  
JANUARY 21, 1986 LETTER)

(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TNT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSCR# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TRT/CPRT RESOLUTION DOCUMENTS

\*\* 07 07.088 ACR-35  
SSR: 07 NON-Q FUSE BLOCKS WERE INSTALLED  
ALLEG: ACR-35 WHERE Q BLOCKS WERE REQUIRED  
ITEM: 07.088 THE MCR WAS DISPOSITIONED  
BLOCKS WERE ORDERED UNDER THE  
SAME MATERIAL SPECIFICATION.  
REF. PG. J-49.

TRT  
---

OF THE 75 NONCOMFORMANCE REPORTS (NCRs) EXAMINED, TRT  
COULD IDENTIFY NO USE-AS-IS DISPOSITIONS THAT DEVIATED  
FROM APPLICABLE DESIGN REQUIREMENTS, EXCEPT FOR THOSE  
IDENTIFIED IN ELECTRICAL AND INSTRUMENTATION CATEGORY  
1, ELECTRICAL CABLE TERMINATIONS, AND ELECTRICAL AND  
INSTRUMENTATION CATEGORY 2, ELECTRICAL CABLE TRAY AND  
CONDUIT INSTALLATION. THE EXCEPTIONS CONCERNED NCRs ON  
REPT TERMINAL LOGS IN MOTOR CONTROL CENTERS (PART OF  
ACR-36) AND TWO LOOSE CONDUIT ELBOW FITTINGS (PART OF  
AE-27). TRT CONCLUDED THAT ADEQUATE PROCEDURES,  
CONTROLS, AND PROCESS CHECKS EXISTED FOR THE  
GENERATION AND DISPOSITION OF REPORTED ITEMS C/  
NONCOMFORMANCE AS RELATED TO THE CONCERNS RAISED BY  
THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5,  
NONCOMFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON TYP. SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

THE RESULTS OF THE TRT REVIEW OF NCR INFORMATION  
CONCERNING ALLEGATION ACR-35 WILL ALSO BE REPORTED IN  
A SUPPLEMENT TO THIS SSCR. (CLOSED BY NRC IN ITS  
JANUARY 21, 1986 LETTER.)

(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TMT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TMT ISSUE SUMMARY

TMT/CPMT RESOLUTION DOCUMENTS

\*\* 07 07 061 AGE-37  
SSER: 07 THE DISPOSITIONS OF NCRs  
ALLEG: AGE-37 INVOLVING REMOVAL OF TERMINAL  
ITEM: 07 061 BLOCKS WERE QUESTIONABLE. REF  
PG. 2-50.

TMT  
---

THE ALLEGATION OF REMOVAL OF TERMINAL BLOCKS (AGE-37) COULD NOT BE SUBSTANTIATED, BECAUSE IN THE REVIEW OF A RANDOM SAMPLE OF 75 NONCOMFORMANCE REPORTS (NCRs) ON THESE ISSUES, TMT COULD NOT IDENTIFY ANY INCONSISTENCIES OR DEFICIENCIES THAT WOULD RAISE A SAFETY QUESTION. THESE FINDINGS WERE DISCUSSED WITH SOME OF THE INDIVIDUALS RESPONSIBLE FOR RAISING THESE CONCERNS, ONE OF WHOM DISAGREED WITH THE TMT DETERMINATION CONCERNING AGE-37 AND PROVIDED ADDITIONAL INFORMATION. TMT IS CURRENTLY EVALUATING THIS NEW INFORMATION AND WILL REPORT THE RESULTS IN A SUPPLEMENT TO THIS SSER. TMT CONCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCOMFORMANCE AS RELATED TO THE CONCERNS RAISED BY THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs, ASSESSED UNDER QA/QC CATEGORY 5, NONCOMFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBS.

(REFER TO ITEM 11, 04E AND 11.04F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TMT PROGRAMMATIC CATEGORIES)

COMPANUC PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSEE# 07, 08, 10 and 11

TRT RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07.08K AQE-40  
SSEE: 07  
ALLEG: AQE-40  
ITEM: 07.08K  
SOME NCRs WERE CLOSED OUT BY STATING THAT THE NONCONFORMING CONDITION WAS NOT ADDRESSED IN THE ELECTRICAL ERECTION SPECIFICATION. REF. PG. J-49.

TRT  
-----  
THE ALLEGATIONS OF FAILURE TO FOLLOW PROCEDURES AND SPECIFICATIONS (AQE-25 AND AQE-40) COULD NOT BE SUBSTANTIATED, BECAUSE IN THE REVIEW OF A RANDOM SAMPLE OF 75 NONCONFORMANCE REPORTS (NCRs) ON THESE ISSUES, TRT COULD NOT IDENTIFY ANY INCONSISTENCIES OR DEFICIENCIES THAT WOULD RAISE A SAFETY QUESTION. TRT CONCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITDPs OF NONCONFORMANCE AS RELATED TO THE CONCERNS RAISED BY THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs, ADDRESSED UNDER QA/QC CATEGORY 5, NONCONFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBJECTS.

(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

CIMMACHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- DDER# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

THE/C/PWT RESOLUTION DOCUMENTS

\*\* 07 07 00N AGE-45  
SSE# 07 THERE WERE QUESTIONABLE  
ALLEG. AGE-45 DISPOSITIONS FOR NCRA INVOLVING  
ITEM: 07.00N INADEQUATE THREAD ENGAGEMENT  
BETWEEN A CONDUIT FITTING AND  
DAMAGED CABLE. REF. PG. J-48.

TBT  
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THE ALLEGATIONS OF DAMAGED CABLE DUE TO INADEQUATE  
THREAD ENGAGEMENT ON A CONDUIT (AGE-45) AND REMARK OF  
TERMINAL BLOCKS (AGE-37) COULD NOT BE SUBSTANTIATED,  
BECAUSE IN THE REVIEW OF A RANDOM SAMPLE OF 75  
NONCOMFORMANCE REPORTS (NCRA) ON THESE ISSUES, TBT  
COULD NOT IDENTIFY ANY INCONSISTENCIES OR DEFICIENCIES  
THAT WOULD RAISE A SAFETY QUESTION. TBT CONCLUDED THAT  
ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS  
EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED  
ITEMS OF NONCOMFORMANCE AS RELATED TO THE CONCERNS  
RAISED BY THE ABOVE ALLEGATION.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRA, ADDRESSED UNDER QA/QC CATEGORY 5,  
NONCOMFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON THE SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

THE RESULTS OF THE TBT REVIEW OF NEW INFORMATION  
CONCERNING ALLEGATIONS AGE-37 WILL ALSO BE REPORTED IN  
A SUPPLEMENT TO THIS ISSUE. (CLOSED BY SSC IN ITS  
JANUARY 21, 1988 LETTER).

(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TBT PROGRAMMATIC CATEGORIES)





COMPACHE PEAK STEAM ELECTRIC STATION (CPSES)

TEXT ISSUES --- SCSRs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TEXT ISSUE SUMMARY

TEXT/CPST RESOLUTION DOCUMENTS

\*\* 07 07.08P AGE-48  
SCSR: 07 SOME NCR EVALUATIONS  
ALLEG: AGE-48 INACCURATELY DESCRIBED  
ITEM: 07.08P MEMORANDUM AS "NOT COMPLETED"  
WHEN IT HAD BEEN POOR. REF. PG.  
3-49.

TEXT  
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TEXT INTERVIEWED TO ELECTRIC ELECTRICAL ENGINEER ABOUT DISPOSITIONS OF NONCOMPLIANCE REPORTS (NCRs) WITH RESPECT TO COMPLETED MEMORANDUMS. TEXT DETERMINED THAT REPLACING A REPORTED ITEM INSTEAD OF A REVISION TO THE ORIGINAL NCR. THE DISPOSITION OF THE NCR FOR REPLACEMENT WOULD BE BASED ON AN ENGINEERING EVALUATION. TEXT DETERMINED THAT ON A CASE-BY-CASE BASIS WHERE MEMORANDUMS HAD BEEN COMPLETED, THE INSPECTING ENGINEER WOULD APPLY ENGINEERING JUDGMENT TO DETERMINE THAT THE QUALITY OF MEMORANDUMS DID NOT DEGRADE THE INSTALLATION BELOW AN ACCEPTABLE LEVEL. FROM THE 75 NCRs EXAMINED, TEXT COULD NOT FIND ANY EVIDENCE OF UNACCEPTABLE INSTALLATION. TEXT CONCLUDED THAT ADEQUATE PROCEDURES, CONTROLS, AND PROCESS CHECKS EXISTED FOR THE GENERATION AND DISPOSITION OF REPORTED ITEMS OF NONCOMPLIANCE AS RELATED TO THE CONCERNS RAISED BY THE ABOVE ALLEGATIONS.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF ALL NCRs, ACCESSED UNDER QA/QC CATEGORY 5, NONCOMPLIANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE SUBJECTS.

(REFER TO ITEM 11.84E AND 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TEXT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TEXT ISSUES -- SEE#s 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TEXT ISSUE SUMMARY

THE CPST RESOLUTION DOCUMENTS

\*\* 07 07 09Q AE-24

ISSR: 07 A CABLE TRAY SUPPORTED BY A  
ALLEG: AE-24 TEMPORARY HANGER FELL, DAMAGING  
ITEM: 07 09Q INSTRUMENTATION CABLES ENTERING  
THE CONTROL ROOM. REF. PG.  
2-40.

TEXT

THE ALLEGATIONS OF DAMAGED CABLE AS A RESULT OF A  
FALLEN CABLE TRAY (80-24); FAILURE TO FOLLOW  
PROCEDURES AND SPECIFICATIONS (AGE-25 AND AGE-48);  
INADEQUATE THREAD ENGAGEMENT ON A CONDUIT (AGE-45);  
AND REMOVAL OF TERMINAL BLOCKS (AGE-37) COULD NOT BE  
SUBSTANTIATED, BECAUSE IN THE REVIEW OF A RANDOM  
SAMPLE OF 75 NONPERFORMANCE REPORTS (NCRs) ON THESE  
ISSUES, THE COULD NOT IDENTIFY ANY INCONSISTENCIES OR  
DIFFICULTIES THAT WOULD RAISE A SAFETY QUESTION. THE  
CONCLUSION THAT ADEQUATE PROCEDURES, CONTROLS, AND  
PROCESS CHECKS EXISTED FOR THE GENERATION AND  
DISPOSITION OF REPORTED ITEMS OF NONPERFORMANCE AS  
RELATED TO THE CONCERNS RAISED BY THE ABOVE  
ALLEGATIONS.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF  
ALL NCRs, ASSESSED UNDER QA/QC CATEGORY 5,  
NONPERFORMANCE REPORTS, AND UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS  
EVALUATION WILL BE PREDICATED ON THE SATISFACTORY  
RESULT OF THE OVERALL PROGRAMMATIC REVIEW ON THESE  
SUBJECTS.

(REFER TO ITEM 11 04E AND 11 04F FOR LISTING OF RESOLUTION  
DOCUMENTS RELATED TO THE TEXT PROGRAMMATIC CATEGORIES)

CUMMINS PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SEE#s 07, 08, 10 and 11  
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ISSUE SOURCE                              ISSUE                              TRT ISSUE SUMMARY                              TUE/CPST RESOLUTION DOCUMENTS

\*\* 07 07 08T-2 AE-50  
SEE# 07 CABLES IN THE CABLE SPREADING  
ALLEG: AE-50 WORK WERE SPLICED IN VIOLATION  
ITEM: 07 08T-2 OF REGULATORY REQUIREMENTS.  
REF. PG. 3-58.

TRT

ALLEGATION AE-50 INVOLVED THE ALLEGED SPLICING OF  
SPEECH-RELATED CABLES IN RACKWAYS IN VIOLATION OF  
REGULATORY REQUIREMENTS. NRC TECHNICAL REVIEW TEAM  
(TRT) REVIEWED NRC REGION IV (RIV) INSPECTION REPORT  
83-03 (NOVEMBER 6, 1982) AND FOUND THAT THE RIV  
INVESTIGATION OF THE TWO CABLES SPECIFICALLY  
IDENTIFIED BY THE ALLEGOR ADEQUATELY ADDRESSED THIS  
ALLEGATION. THE RIV INVESTIGATION DETERMINED THAT ONE  
CABLE NO LONGER PERFORMS A SAFETY-RELATED FUNCTION,  
AND THE OTHER CABLE HAD BECOME A SPARE AND WAS REMOVED  
FROM THE RACKWAY. TRT DETERMINED THAT  
SIMILAR-APPEARING ITEMS IN THE SAME AREA WERE NOT  
SPLICES, BUT WERE, IN FACT, ACCEPTABLE METHODS OF  
REPAIRING MINOR CABLE JACKET DAMAGE. TRT CONCURRED  
WITH THE RIV DETERMINATION, BUT NOTES THAT REGULATORY  
REQUIREMENTS DISCOURAGE THE USE OF SPLICES IN  
RACKWAYS, AS STATED IN POSITION 9 OF REGULATORY GUIDE  
(RG) 1.75, PHYSICAL INTERFERENCE OF ELECTRICAL  
SYSTEMS. IF SPLICES ARE MADE, THE RESULTING DESIGN  
SHOULD BE JUSTIFIED BY ANALYSIS. THIS AREA IS FURTHER  
ADDRESSED UNDER QA/QC CATEGORY 6, AS BUILT.

(REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

CORVASCHE PEAK STEAM ELECTRIC STATION (CPSES)

TEXT ISSUES --- 0000a 07. 06, 10 mod 11  
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THE/CPMT RESOLUTION DOCUMENTS

TEXT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07 090 AE-28  
0000: 07 CABLES WERE NOT TRAINED BY USE  
ALLEG: AE-28 OF GOOD MEMBERSHIP IN UNIT 1  
ITEM: 07 090 CABLE SPEAKING ROOM AND  
JUNCTION BOXES 1056A-1059. AN NCR  
DISPOSITIONED THIS CONDITION AS  
ACCEPTABLE BECAUSE OF PROPER  
CABLE BEND RADIUS, BUT MEMBERSHIP  
PROBLEM WASN'T ADDRESSED. REF  
PG 3-79

(FUTURE)

TEXT

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ALLEGATION AE-28 INVOLVED INSTANCES OF IMPROPER CABLE TRAINING (OR BENDING) AND POOR MEMBERSHIP IN CABLE INSTALLATION, JUNCTION BOXES 1058 AND 1059 WERE INSPECTED BY TET TO CHECK FOR IMPROPER TRAINING OF CABLES AND POOR MEMBERSHIP. JUNCT-28 BOXES 1058 AND 1059 WERE INSPECTED BY TET TO CHECK FOR IMPROPER TRAINING OF CABLES AND POOR MEMBERSHIP. TET FINDINGS AGREED WITH THE PREVIOUS NRC REGION IV DETERMINATION THAT THESE CABLES, WHICH ARE WORKSAFETY-RELATED, WERE PROPERLY TRAINED AND THAT THEY EXHIBITED AN ACCEPTABLE DEGREE OF MEMBERSHIP. THESE FINDINGS WERE DISCUSSED WITH THE ALLEGOR WHO INDICATED THAT THE JUNCTION BOX NUMBERS MAY NOT HAVE BEEN CORRECT AND PROVIDED ADDITIONAL INFORMATION CONCERNING THE LOCATION OF THE BOXES IN THE PLANT. TET IS CURRENTLY EVALUATING THIS NEW INFORMATION AND WILL REPORT THE RESULTS IN A SUPPLEMENT TO THIS ISSUE.

COMPACORE PEAK STEAM ELECTRIC STATION (CPSES)

THE ISSUES -- SOERs 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

THE ISSUE SUMMARY

THE/CPRET RESOLUTION DOCUMENTS

\*\* 07 07 108 47-02  
SOER: 07 SIGNIFICANT MODIFICATIONS HAVE  
ALLES: 47-02 BEEN MADE OR PLANNED WHICH  
ITEM: 07 108 INVALIDATE THE HOT FUNCTIONAL  
TEST. REF. PG. 2-66.

INT  
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ITP FOUND THAT WHILE SOME COMPONENTS AND EQUIPMENT WERE NOT INSTALLED DURING THE INITIAL HOT FUNCTIONAL TEST, THEY WERE DOCUMENTED AND TRACKED TO BE INCLUDED IN THE DEFERRED PREOPERATIONAL TESTING. ALSO SOME 74 MODIFICATIONS, MOSTLY TO WARGERS, SUPPORTS, AND OTHER PIPE SUPPORTS, REQUIRED HOT PLANT CONDITIONS FOR VALID RETESTING.

ITP FOUND THAT TO ELECTRIC'S PLAN TO COMPLETE HOT FUNCTIONAL TESTING APPEARED TECHNICALLY SOUND AND WITHOUT SAFETY IMPLICATIONS.

ACTION REQUIRED

TO ELECTRIC HAS INFORMED TPT THAT THE STATION OPERATIONAL REVIEW COMMITTEE (SORC) WILL REVIEW DEFERRED PREOPERATIONAL TEST DATA. BECAUSE THE REVIEW OF DATA OBTAINED FROM THE DEFERRED PREOPERATIONAL TESTS IS A FUNCTION OF THE SORC, TO ELECTRIC SHALL AMEND THE FSAR TO REFLECT THEIR COMMITMENT TO TEST THAT THE SORC AND NOT THE JOINT TEST GROUP (JTG) WILL PERFORM THESE REVIEWS. THIS REQUIREMENT, NOT INCLUDED IN THE SC-77-18 1984 LETTER TO TO ELECTRIC, IS NECESSARY BECAUSE THE CURRENT VERSION OF THE FSAR STATES THAT THE JTG IS RESPONSIBLE FOR REVIEWING PREOPERATIONAL TEST DATA. (PG. 77 SOER-7).

ISAF(s) III.A.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- S588 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 07.100 S588: 07 ALLEG: AT-04 ITEM: 07.100	AT-04 EITHER TUEC NOR NRC REGION IV STAFF NOTICED THAT MAJOR COMPONENTS AND EQUIPMENT WERE NOT INSTALLED PRIOR TO THE HOT FUNCTIONAL TEST. REF. PG. J-69.	TNT ---- TNT FOUND THAT THERE WAS NO EVIDENCE THAT EITHER TU ELECTRIC OR THE NRC REGION IV STAFF WAS WILLING TO ACCEPT DEFICIENT TEST RESULTS OR THAT EITHER HAD EXHIBITED A LACK OF CANDOR IN IDENTIFYING PROBLEMS DURING THE HOT FUNCTIONAL TEST.  TNT DETERMINED THAT ABOUT 50 PERCENT OF THE MONITORING LOCATIONS STILL REQUIRED MEASUREMENTS AFTER THE THERMAL EXPANSION TEST WAS COMPLETED. THIS WAS DUE TO TEST POINTS FAILING ACCEPTANCE CRITERIA, EQUIPMENT REMOVED OR MISSING DURING THE TEST, AND EQUIPMENT MUTILATED AFTER THE TEST. ALSO, THE SPECIFIC MEASURING DEVICE USED AT EACH MONITORING LOCATION WAS NOT IDENTIFIED IN THE TEST DATA PACKAGE BUT WAS CONTAINED IN A LOG HELD BY TU ELECTRIC. TTI ADVISED TU ELECTRIC THAT THE INFORMATION RELATING MEASURING DEVICES TO MONITORING LOCATIONS MUST BE IN THE DATA PACKAGE.	ISAP(a) III.A.4

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

\*\* 07 07.10F  
SSER: 07  
ALL SG: AT-06  
ITEM: 07.10F

AT-06  
THE WILLINGNESS OF BOTH THE  
APPLICANT AND THE NRC REGION IV  
STAFF TO ACCEPT NOT FUNCTIONAL  
TEST RESULTS WHICH ARE DEFICIENT  
MAKES IT IMPOSSIBLE TO RELY ON  
THE TEST RESULTS TO PROVE CPSES  
IS SAFE. REF. PG. J-69.

ISSUE

TRT ISSUE SUMMARY

TRT  
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TRT FOUND NO EVIDENCE THAT EITHER TU ELECTRIC OR THE  
NRC REGION IV STAFF WAS WILLING TO ACCEPT DEFICIENT  
TEST RESULTS OR THAT EITHER HAD EXHIBITED A LACK OF  
CARE OR IN IDENTIFYING PROCEDURES DURING THE NOT  
FUNCTIONAL TEST (HFT).

TRT IDENTIFIED THREE PREOPERATIONAL TESTS CONDUCTED  
DURING HFT THAT WERE NOT COMPLETED TO THE OBJECTIVES  
STATED IN TEST PROCEDURES.

ACTIONS REQUIRED

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SECTION 4(6), PGJ-73 THROUGH J-76 SSER-7, REFERS TO  
THREE PREOPERATIONAL TESTS CONDUCTED DURING HFT THAT  
TRT DETERMINED WERE NOT COMPLETED TO THE EXTENT  
REQUIRED BY THE OBJECTIVES STATED IN THE TEST  
PROCEDURES. ACCORDINGLY, TU ELECTRIC SHALL REVIEW ALL  
COMPLETED PREOPERATIONAL TEST DATA PACKAGES TO ENSURE  
THERE ARE NO OTHER INSTANCES WHERE TEST OBJECTIVES  
WERE NOT MET, OR PREREQUISITE CONDITIONS WERE NOT  
SATISFIED. THE FOUR ITEMS IDENTIFIED BY THE TRT STAFF  
SHALL BE ADDRESSED, WITH APPROPRIATE RESOLUTION, IN  
THE DEFERRED PREOPERATIONAL TESTS.

TUE/CPRT RESOLUTION DOCUMENTS

ISAP(s) III.A.1



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 06, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 07 07.10L-1 AT-17  
SSER: 07 TRACEABILITY OF MEASURING  
ALLEG: AT-17 DEVICES FOR THERMAL EXPANSION  
ITEM: 07.10L-1 TEST WAS LOST. REF. PG J-72.

TRT

ISAP(s) III.A.4

ALTHOUGH TEMPERATURES WERE TAKEN AND LOGGED DURING ICP-PT-55-11, THERMAL EXPANSION, THE SPECIFIC MEASURING DEVICE USED AT EACH MONITORING LOCATION WAS NOT AVAILABLE IN THE TEST DATA PACKAGE. HOWEVER, INFORMATION THAT TIED THE DEVICES TO SPECIFIC MONITORING LOCATIONS WAS AVAILABLE IN A LOG THAT WAS NOT PART OF THE TEST DATA PACKAGE.

TRT SPECIFIED THAT TU ELECTRIC INCORPORATE THE INFORMATION FROM THE LOG IN THE OFFICIAL ICP-PT-55-11 DATA PACKAGE AND ESTABLISH ADMINISTRATIVE CONTROLS TO ASSURE APPROPRIATE TEST AND MEASURING EQUIPMENT TRACEABILITY DURING FUTURE TESTING AND PLANT OPERATIONS.

ACTIONS REQUIRED

TRT DETERMINED THAT ICP-PT-55-11, THERMAL EXPANSION, DID NOT INCLUDE INFORMATION NEEDED TO TRACE THE MEASURING DEVICES TO THE MONITORED LOCATIONS. ALTHOUGH THE INFORMATION WAS AVAILABLE IN A LOG MAINTAINED BY TU ELECTRIC SHALL INCORPORATE THE INFORMATION CONTAINED IN THE LOG INTO THE OFFICIAL ICP-PT-55-11 DATA PACKAGE SO THAT THE TRACEABILITY IS MAINTAINED. AND SHALL ALSO ESTABLISH ADMINISTRATIVE CONTROLS TO ASSURE APPROPRIATE TEST AND MEASURING EQUIPMENT TRACEABILITY DURING FUTURE TESTING AND PLANT OPERATION.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11

TUE/CPRI RESOLUTION DOCUMENTS

TNT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 07 07.11 AT-07  
SSER: 07 PROBLEMS REVEALED BY THE BOT  
ALLEG: AT-07 FUNCTIONAL TEST, AF: RELATED  
ITEM: 0..11 CONTAINMENT AND LEAK-RATE TESTS,  
ARE SO EXTENSIVE AND OF SUCH  
MAGNITUDE THAT THEY MUST BE  
CORRECTED BEFORE FUEL LOAD.  
REF. PG. J-81.

ISAP(s) III.B

TNT  
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TNT REVIEWED THE PROCEDURE FOR THE CONTAINMENT INTEGRATED LEAK RATE TEST (CILRT) AND THE RESULTANT TEST DATA TO DETERMINE IF THE TEST WAS IN COMPLIANCE WITH 10CFR50, APPENDIX J, AND PROPOSED TECHNICAL SPECIFICATIONS. TNT DETERMINED THAT, AS ALLEGED, NUMEROUS LEAKS WERE DETECTED DURING THE FIRST TWO ATTEMPTS TO MEASURE THE CONTAINMENT BUILDING LEAKAGE RATE. THESE LEAKS WERE CORRECTED, EXCEPT FOR THREE ELECTRICAL PENETRATIONS WHICH WERE ISOLATED. THE THIRD ATTEMPT WAS CONSIDERED SATISFACTORY. THE MEASURED LEAKAGE RATES FROM THE THREE REPAIRED ELECTRICAL PENETRATIONS AND THE FOUR PENETRATIONS USED TO CONDUCT THE TEST WERE ADDED TO THE MEASURED LEAKAGE RATE FROM THE CILRT. THE TOTAL RESULTANT LEAKAGE RATE WAS LESS THAN THAT ALLOWED BY 10CFR50, APPENDIX J, AND PROPOSED TECHNICAL SPECIFICATIONS.

TNT, HOWEVER, WAS CONCERNED THAT THE METHOD OF CALCULATING THE LEAKAGE RATE WAS IN ACCORDANCE WITH ANSI/ANS 5.8-1961 INSTEAD OF ANSI N45.4-1972 AS PRESCRIBED BY THE FSAR, AND THAT THE THREE ELECTRICAL PENETRATIONS WERE ISOLATED WITHOUT NRC APPROVAL. THESE ITEMS, WHICH WERE TECHNICALLY INSIGNIFICANT WITH RESPECT TO THE TEST RESULTS, WERE REFERRED TO THE OFFICE OF NUCLEAR REACTOR REGULATION (NRR). NRR REQUESTED ADDITIONAL INFORMATION FROM TU ELECTRIC BY FSAR QUESTION Q022.22. TU ELECTRIC PROVIDED THAT INFORMATION AND APPROPRIATE CHANGES TO THE FSAR IN AMENDMENT 34 BY LETTER OF DECEMBER 21, 1984. NRR CONCLUDED THAT THESE MATTERS WERE RESOLVED AS REFLECTED IN ITEM (36), SECTION 1.7, OF COMANCHE PEAK SSER-6.

TNT STATED THAT THE FAILURE TO REPORT THE DEVIATION FROM AN FSAR COMMITMENT TO NRC COULD BE INDICATIVE OF A GENERIC WEAKNESS.

ACTION REQUIRED

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PRIOR TO FUEL LOADING, TU ELECTRIC SHALL IDENTIFY ALL

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES);

TRT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

OTHER DEVIATIONS FROM FSAR COMMITMENTS WHICH HAVE NOT BEEN IDENTIFIED PREVIOUSLY TO THE MRC.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSER# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

\*\* 07 07.12 AT-14  
SSER: 07 UNQUALIFIED CRAFT PERSONNEL  
ALLEG: AT-14 PERFORMED PREREQUISITE TESTING,  
ITEM: 07.12 STE# SIGNED FOR TESTS NOT  
OBSERVED, AND DOCUMENTATION MADE  
TO APPEAR THAT STE# INSTEAD OF  
CRAFT PERSONNEL PERFORMED TESTS.  
REF. PG J-85

TRT

ISAP(s) III.C

PREREQUISITE TESTING IS PERFORMED TO VERIFY THE COMPLETE INSTALLATION, CLEANLINESS, AND INITIAL OPERABILITY OF INDIVIDUAL PLANT COMPONENTS. THIS TESTING INVOLVES CHECKS OF ELECTRICAL RESISTANCE, TRANSFORMER POLARITY, RELAY AND CIRCUIT BREAKER OPERATION, MOTOR ROTATION, INITIAL PUMP OPERATION, SYSTEM CLEANLINESS, AND PIPE SUPPORT ADJUSTMENTS.

CRAFT PERSONNEL WHO WERE NOT QUALIFIED TO ANSI N45.2.6 STANDARDS WERE USED TO ASSIST WITH PREREQUISITE TESTING ACTIVITIES. THIS IS PERMITTED BY ANSI N45.2.6 AS AUTHORIZED BY REGULATORY GUIDE (RG) 1.58. THESE PEOPLE CAN TAKE DATA AND OPERATE EQUIPMENT PROVIDED THEY ARE SUPERVISED BY QUALIFIED INDIVIDUALS AND HAVE SUFFICIENT KNOWLEDGE TO ENSURE AN ACCEPTABLE LEVEL OF PERFORMANCE. TRT FOUND THAT THE CRAFT PERSONNEL USED TO ASSIST WITH PREREQUISITE TEST ACTIVITIES WERE APPROPRIATELY INDOCTRINATED IN THE ADMINISTRATIVE AND PREREQUISITE TEST PROCEDURES APPLICABLE TO THEIR WORK, PERFORMED WORK UNDER SYSTEM TEST ENGINEER (STE) SUPERVISION, AND PERFORMED WORK THAT WAS WITHIN JOURNEYMAN LEVEL OF EXPERTISE.

CRAFT PERSONNEL MAY NOT HAVE BEEN UNDER THE CONSTANT SUPERVISION OF AN STE DURING PREREQUISITE TESTING, BUT THIS IS NOT REQUIRED BY ANSI N45.2.6 OR RG 1.58. TRT CONSIDERED THAT ADEQUATE TECHNICAL SUPERVISION AND OVERSIGHT WERE BEING EXERCISED.

TRT DID NOT FIND THAT TEST DOCUMENTATION WAS MADE TO LOOK AS IF AN STE PERFORMED THE TEST WHEN THE TEST WAS ACTUALLY PERFORMED BY CRAFT PERSONNEL. TRT FOUND THAT WHEN CRAFT PERSONNEL TOOK AND RECORDED TEST DATA, THEY SIGNED THE ENTRIES. THE SIGNATURES OF STE'S ON DATA SHEETS INDICATED THAT THE DATA HAD BEEN EVALUATED AGAINST ACCEPTANCE CRITERIA BY THE STE AND WAS FOUND TO BE SATISFACTORY.

TRT CONSIDERED THE PRACTICE OF USING CRAFT PERSONNEL TO ASSIST WITH PREREQUISITE TESTING TO BE CONSISTENT

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

WITH APPLICABLE INDUSTRY GUIDES AND STANDARDS AND IN CONFORMANCE WITH FSAR COMMITMENTS.

TRT WILL FURTHER ASSESS THE CONCERN ABOUT THE INADEQUATE QUALIFICATIONS OF PREOPERATIONAL TEST PERSONNEL AS PART OF THE OVERALL PROGRAMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 4, CONSTRUCTION AND TESTING.

TRT FOUND SOME DATA SHEETS THAT CRAFT PERSONNEL HAD SIGNED VERIFYING INITIAL CONDITIONS FOR SOME PREREQUISITE TESTS INSTEAD OF STE's AS WAS REQUIRED BY PROCEDURE. FURTHER INVESTIGATION REVEALED A MEMORANDUM ISSUED BY THE LEAD STARTUP ENGINEER THAT ALLOWED CRAFT PERSONNEL TO VERIFY INITIAL CONDITIONS ACTIONS REQUIRED

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TU ELECTRIC SHALL RESCIND MEMORANDUM STM-83084 OF MARCH 31, 1983, WHICH WAS ISSUED IN CONFLICT WITH CP-SAP-21, AND TAKE ACTION TO ENSURE THAT THESE ARE NO OTHER MEMORANDA ISSUED THAT CONFLICT WITH APPROVED PROCEDURES. TU ELECTRIC SHALL ALSO CONDUCT A REVIEW OF ALL OTHER PREREQUISITE TEST RECORDS TO DETERMINE THOSE THAT HAD PREREQUISITES SIGNED BY CRAFT PERSONNEL, AND ASSESS THE IMPACT OF THOSE IMPROPER VERIFICATIONS ON SUBSEQUENT TESTING.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

\*\* 07 07.13G AT-15  
SSER: 07 PREOPERATIONAL TEST PROGRAM IS  
ALLES: AT-15 FLAMED BECAUSE: (?) STE'S WERE  
ITEM: 07.13G NOT PROVIDED WITH CURRENT DESIGN  
INFORMATION AND, THEREFORE, MUST  
SPEND TOO MUCH TIME RESEARCHING  
AND VALIDATING DRAWINGS. REF.  
PG. J-91.

ISSUE

TBT  
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THE ALLEGATION INVOLVED THE USE OF OUTDATED DRAWINGS BY SYSTEM TEST ENGINEERS (STE's). SUPPOSEDLY, OUTDATED DRAWINGS WERE BEING PROVIDED BY THE DOCUMENT CONTROL CENTER (DCC). ALSO, PROCEDURAL GUIDANCE DID NOT EXIST TO ENSURE THAT STE'S HAD CURRENT DRAWINGS AND OTHER DESIGN INFORMATION TO CONDUCT TESTS.

TBT INTERVIEWED SEVERAL STE'S. THE INTERVIEWS INDICATED THAT THE PROBLEM OF RECEIVING OUTDATED DRAWINGS EXISTED IN THE PAST BUT IMPROVEMENTS HAVE BEEN MADE. PREVIOUSLY, STE'S WERE REQUIRED TO GO TO THE DCC TO UPDATE DOCUMENTS. THIS WAS VERY TIME-CONSUMING. TO IMPROVE THIS SITUATION, A SATELLITE DOCUMENT CONTROL CENTER HAS BEEN ESTABLISHED CLOSE TO THE STE WORK AREA, AND CONTROLS HAVE BEEN IMPROVED TO ENSURE THAT DRAWINGS ARE UP-TO-DATE. ALSO, STE'S STATED THAT THEY HAVE ALWAYS BEEN RESPONSIBLE BY PROCEDURE FOR ENSURING THAT THE LATEST DESIGN INFORMATION WAS USED IN TESTING. TBT CONFIRMED THAT A PROCEDURE DOES ASSIGN THAT RESPONSIBILITY TO STE'S.

DURING THE REVIEW OF THE TEST PROGRAM, TBT COULD FIND NO INDICATION OF DEFICIENT TESTING ACTIVITIES THAT COULD BE ATTRIBUTED TO THE USE OF OUTDATED DRAWINGS, EITHER PAST OR PRESENT.

ACTIONS REQUIRED

TO ELECTRIC SHALL ESTABLISH MEASURES TO PROVIDE GREATER ASSURANCE THAT STE'S AND OTHER RESPONSIBLE TEST PERSONNEL ARE PROVIDED WITH CURRENT DESIGN DOCUMENTS AND CHANGE NOTICES. ADDITIONALLY, TO ELECTRIC SHALL PROVIDE NRC WITH REASONABLE ASSURANCE THAT PAST DOCUMENT CONTROL SYSTEM PROBLEMS DID NOT ADVERSELY AFFECT THE TESTING PROGRAM.

TBT ISSUE SUMMARY

ISAF(s) III D

TUE/CPRT RESOLUTION DOCUMENTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 07.14A SSER: 07 ALLEG: AGE-07 ITEM: 07.14A	AGE-07 A QC SUPERVISOR INSTRUCTED ELECTRICAL INSPECTORS NOT TO PERFORM REQUIRED IN-PROCESS INSPECTIONS, BUT ONLY TO INSPECT COMPLETED WORK. REF. PG. J-67.	TRT --- TRT EXAMINED CURRENT AND PAST INSPECTION PROCEDURES IN THE ELECTRICAL AREA TO DETERMINE THE NUMBER OF IN-PROCESS INSPECTIONS REQUIRED. TRT FOUND ONLY ONE ELECTRICAL INSPECTION PROCEDURE THAT DEFINED A SPECIFIC NUMBER OF REQUIRED IN-PROCESS INSPECTIONS. THAT PROCEDURE COVERED CABLE TERMINATIONS AND REQUIRED A MINIMUM OF TEN IN-PROCESS INSPECTIONS PER SHIFT. THE FREQUENCY OF INSPECTION WAS CHANGED IN AUGUST 1980 WEEKLY IN-PROCESS INSPECTION.	ISAF(s) I.A.2; I.A.4; VII.C. APPENDIX 3 FSR: ELECTRICAL CARS 87-039, 87-049, 87-073 (REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

TRT COULD NOT DETERMINE THE REASON FOR THE DECREASE IN INSPECTIONS. THE NUMBER OF NON-COMFORMANCE REPORTS (NCRs) ISSUED BEFORE AND AFTER THE CHANGE REMAINED THE SAME. THE SAME NUMBER OF NCRs FROM FEWER INSPECTIONS MIGHT INDICATE MORE THOROUGH INSPECTIONS. QC PERSONNEL COULD ONLY SPECULATE THAT THE CAUSE OF THE DECREASE IN INSPECTIONS WAS AN INCREASE IN THE LEVEL OF CONFIDENCE THAT THE QUALITY OF WORK WAS ADEQUATE. TRT, HOWEVER, COULD NOT SUBSTANTIATE AN IMPROVEMENT IN THE QUALITY OF WORK BASED ON CONCERNS THEY HAD WITH ELECTRICAL TERMINATIONS. THESE CONCERNS INVOLVED IMPROPERLY DISPOSITIONED NCRs FOR VENDOR-INSTALLED TERMINAL LUGS, TERMINATIONS NOT IN CONFORMANCE WITH CURRENT DRAWINGS, AND THE ADEQUACY OF QC INSPECTIONS AND SUPPORTING DOCUMENTATION PARTICULARLY WITH RESPECT TO TERMINATION ACTIVITIES REQUIRING WITNESSING BY QC PERSONNEL.

TRT CONCLUDED THAT THE ALLEGATION ABOUT COMPROMISING THE QUALITY OF INSTALLATION BY CHANGING THE FREQUENCY OF IN-PROCESS INSPECTIONS FOR CABLE TERMINATIONS WAS UNSUBSTANTIATED. HOWEVER, THIS EVALUATION WILL BE ASSESSED FURTHER AS PART OF THE OVERALL PROGRAMMATIC REVIEW OF TU ELECTRIC'S DEFICIENCY IDENTIFICATION PROGRAM FOR IN-PROCESS INSPECTIONS ADDRESSED UNDER QA/QC CATEGORY 3, NON-COMFORMANCE REPORTS.

ACTION REQUIRED

FOR ACTIONS REQUIRED IN ELECTRICAL AND INSTRUMENTATION CATEGORY I, ELECTRICAL CABLE TERMINATIONS, TU ELECTRIC

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE

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ISSUE

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TRT ISSUE SUMMARY

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TUE/CPRT RESOLUTION DOCUMENTS

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SMALL ADDRESS CONCERNS WITH REGARD TO REDUCTION IN  
CABLE TERMINATION INSPECTIONS.



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

AGE-23

MANY REQUIREMENTS WERE DELETED  
BY REVISIONS TO  
POST-CONSTRUCTION ELECTRICAL  
INSPECTION PROCEDURES. REF. PG.  
J-63.

\*\* 07 07.17A

SSES: 07  
ALLEG: AGE-23  
ITEM: 07.17A

TRT  
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TRT FOUND NO OMISSIONS IN REQUIREMENTS FOR THE  
INSPECTION OF ELECTRICAL EQUIPMENT AND RACEWAYS.

BASED ON THE REVIEW OF PROCEDURES FOR IN-PROCESS,  
POST-CONSTRUCTION, AND TURNOVER INSPECTIONS, TRT  
CONCLUDED THAT NO SIGNIFICANT CONCERNS EXISTED WITH  
ELECTRICAL PROCEDURES. HOWEVER, EQUIPMENT INSTALLATION  
PROBLEMS, AS RELATED TO NONCONFORMANCES WITH  
PROCEDURES, ARE BEING ADDRESSED IN THE  
HARDWARE-RELATED ELECTRICAL AND INSTRUMENTATION  
CATEGORIES. TRT, THEREFORE, CONCLUDED THAT THESE  
ELECTRICAL PROCEDURE-RELATED ALLEGATIONS COULD NOT BE  
SUBSTANTIATED.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW  
CONCERNING THE POST-CONSTRUCTION VERIFICATION PROGRAM  
ADDRESSED UNDER QA/QC, CATEGORY 8, AS BUILT.

THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION  
WILL BE INDICATED ON THE SATISFACTORY RESULTS OF THE  
OVERALL PROGRAMMATIC REVIEW ON THIS SUBJECT.

(REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

TUE/CPMT RESOLUTION DOCUMENTS

CORVACHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 07 07.17B AGE-32  
SSER: 07  
ALLEG: AGE-32  
ITEM: 07.17B

BECAUSE OF COMPLAINTS FROM CRAFT  
PERSONNEL, FOUR REVISIONS WERE  
MADE TO QI-QP 11.14-12 THAT  
DELETED INSPECTION REQUIREMENTS.  
REF. PG. J-63.

TNT  
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TNT FOUND NO OMISSIONS IN REQUIREMENTS OF ELECTRICAL  
EQUIPMENT.

BASED ON THE REVIEW OF PROCEDURES FOR IN-PROCESS,  
POST-CONSTRUCTION, AND TURNOVER INSPECTIONS, TRT  
CONCLUDED THAT NO SIGNIFICANT CONCERNS EXISTED WITH  
ELECTRICAL PROCEDURES. HOWEVER, EQUIPMENT INSTALLATION  
PROBLEMS, AS RELATED TO NONCONFORMANCES WITH  
PROCEDURES, ARE BEING ADDRESSED IN THE  
BARUMARE-RELATED ELECTRICAL AND INSTRUMENTATION  
CATEGORIES. TRT, THEREFORE, CONCLUDED THAT TB'S  
ELECTRICAL PROCEDURE-RELATED ALLEGATION COULD NOT BE  
SUBSTANTIATED.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW  
CONCERNING THE POST-CONSTRUCTION VERIFICATION PROGRAM  
ADDRESSED UNDER QA/QC, CATEGORY 8, AS BUILT.

(REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

YUE/CPR1 RESOLUTION DOCUMENTS

\*\* 07 07.1/C AGE-52  
SSER: 07 REVISION 15 TO A  
ALLEG: AGE-52 POST-CONSTRUCTION INSPECTION  
ITEM: 07.1/C PROCEDURE ELIMINATED THE  
REQUIREMENT TO INSPECT LARGE  
PIECES OF EQUIPMENT SUCH AS 6.9  
KV MOTORS. REF. PG. J-63.

TNT  
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TNT FOUND NO OMISSIONS IN REQUIREMENTS FOR INSPECTION  
OF ELECTRICAL EQUIPMENT AND RACENAYS.  
BASED ON THE REVIEW OF PROCEDURES FOR IN-PROCESS,  
POST-CONSTRUCTION, AND TURBOWER INSPECTIONS, TNT  
CONCLUDED THAT NO SIGNIFICANT CONCERNS EXISTED WITH  
ELECTRICAL PROCEDURES. HOWEVER, EQUIPMENT INSTALLATION  
PROBLEMS, AS RELATED TO NONCONFORMANCES WITH  
PROCEDURES, ARE BEING ADDRESSED IN THE  
BASEWARE-RELATED ELECTRICAL AND INSTRUMENTATION  
CATEGORIES. TNT, THEREFORE, CONCLUDED THAT THESE  
ELECTRICAL PROCEDUR E-RELATED ALLEGATIONS COULD NOT BE  
SUBSTANTIATED.

THE RESULTS OF THIS EVALUATION WILL BE FURTHER  
ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW  
CONCERNING THE POST-CONSTRUCTION VERIFICATION PROGRAM  
ADDRESSED UNDER QA/QC, CATEGORY 8, AS BUILT.

(REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TNT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CFSES)  
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TRT ISSUES -- SSESs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 A-02 SSEs: 07 ALLEG: J-118 ITEM: A-02	J-118 TRT DID NOT FIND ANY DOCUMENT PROVIDING ASSURANCE THAT TU ELECTRIC WOULD HAVE JTG, OR SIMILARLY QUALIFIED GROUP, APPROVE DATA FOR PROPOSED POST-REFUELING, DEFERRED PROOPERATIONAL NPT PRIOR TO PROCEEDING TO CRITICALITY. REF. PG. J-118	TRT ---- TRT STATED THAT TU ELECTRIC SHALL COMMIT TO HAVING A JTG, OR SIMILARLY QUALIFIED GROUP, REVIEW AND APPROVE ALL POST-FUELING PROOPERATIONAL TEST RESULTS PRIOR TO DECLARING THE SYSTEM OPERABLE IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS.	ISAP(s) III.A.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 07 A-03 SSEs: 07 ALLEG: J-118 ITEM: A-03	J-118 TO CONDUCT PREOPERATIONAL TESTS AT NECESSARY TEMPERATURES AND PRESSURES AFTER FUEL LOAD CERTAIN LIMITING CONDITIONS OF THE PROPOSED TECH. SPECIF. CANNOT BE MET. * & ALL SMURBERS WILL NOT BE OPERATIONAL SINCE SOME WILL NOT HAVE BEEN TESTED REF. PG. J-118	TRT ---- TRT STATED THAT TU ELECTRIC SHALL EVALUATE REQUIRED PLANT CONDITIONS FOR DEFERRED PREOPERATIONAL TESTS AGAINST LIMITING CONDITIONS IN THE PROPOSED TECHNICAL SPECIFICATIONS AND OBTAIN NRC APPROVAL WHERE DEVIATIONS FROM THE TECHNICAL SPECIFICATIONS ARE NECESSARY. THIS REQUIREMENT BECAME INAPPLICABLE WHEN TU ELECTRIC INFORMED TRT THAT THE DEFERRED TESTS WOULD BE CONDUCTED PRIOR TO FUEL LOAD. (PG J-18)	ISAP(s) III.A.3

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERS 07, 08, 10 and 11

TUE/CPRT RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 11 11.27A AQ-055  
SSER: 11 FUEL TRANSFER CANAL LINER  
ALLEG: AQ-055 DOCUMENTATION WAS FALSIFIED.  
ISSN: 11.27A REQUIRED WELD RADIOGRAPHY WAS  
NOT COMPLETED. REF. PG. 0-199.

TRT  
---

THE ALLEGATION THAT REQUIRED RADIOGRAPHY WAS NOT COMPLETED IS NOT SUBSTANTIATED, SINCE THE TRT FOUND RECORDS SHOWING THE RESULTS OF RADIOGRAPHY OF THOSE WELDS FOR WHICH RADIOGRAPHY WAS REQUIRED. THE PRIMARY SUBJECT OF THIS ALLEGATION WAS THE FALSIFICATION OR IMPROPER SIGN-OFF OF RECORDS I.E., INSPECTION TRAVELERS. THE TRT COULD NOT CONCLUDE THAT THE IRREGULARITIES NOTED CONSTITUTED FALSIFICATION, PER SE. APPARENTLY, THESE IRREGULARITIES OCCURRED BECAUSE OF POOR PRACTICES AND INADEQUATE INSPECTION FORMS. SOME TRAVELERS ALSO APPEARED TO HAVE BEEN SIGNED OFF IMPROPERLY.

TRT CONCLUDED THAT THERE ARE RECORD ANOMALIES APPARENT IN THE LINER PLATE TRAVELERS WHICH ARE NOT ADEQUATELY EXPLAINED ON THE FACE OF THE TRAVELERS (E.G., DATES CHANGED), WHICH VIOLATE PROCEDURES (E.G., FAILURE TO TRANSFER SIGN-OFF FROM CHITS TO TRAVELERS DAILY), AND WHICH EMPLOY INADEQUATE PROCEDURES (I.E., CONFUSION OVER THE USE OF THE FIVE-LINE TRAVELER).

IT APPEARS TO THE TRT THAT THE QC DOCUMENTATION RELATING TO THE LINER PLATE WELDS DID NOT MEET THE STANDARDS EXPECTED OF AN EFFECTIVE QA/QC PROGRAM, OR THE STANDARDS REQUIRED BY GIBBS & HILL SPECIFICATION 2323-SS-10, AND 10 CFR 50 APPENDIX B.

ISAP(s) VII A. 8  
CAR 76X, 77X

COMMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11.278 AQ-078  
SSER: 11 HOLD POINTS FOR INSPECTION ON  
ALLEG: AQ-078 TRAVELERS FOR THE FUEL BUILDING  
ITEM: 11.278 WERE SIGNED OFF IMPROPERLY.  
REF. PG 0-199

TBT  
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TU ELECTRIC REPRESENTATIVES INDICATED THAT IT WAS  
COMMON PRACTICE FOR THE MILLWRIGHT DEPARTMENT TO WRITE  
"SAT" AND, IN SOME INSTANCES, THE SCHEDULED DATE FOR  
INSPECTION OF THE COMPLETED WELD ON THE TRAVELER, WITH  
THE INTENTION OF OBTAINING THE INSPECTOR'S SIGNATURE  
WHEN THE WELD WAS COMPLETED AND INSPECTED. WELDING  
PRIORITIES APPARENTLY WERE THEN RESCHEDULED AND THE  
PRE-ENTERED DATES WERE CORRECTED WHEN THE TRAVELER WAS  
SIGNED.

THE TBT CONCLUDES THAT THERE ARE RECORD ANOMALIES  
APPARENT IN THE LINER PLATE TRAVELERS WHICH ARE NOT  
ADEQUATELY EXPLAINED ON THE FACE OF THE TRAVELERS  
(E.G., DATES CHANGED), WHICH VIOLATE PROCEDURES (E.G.,  
FAILURE TO TRANSFER SIGN-OFF FROM CHITS TO TRAVELERS  
DAILY), AND WHICH EMPLOY INADEQUATE PROCEDURES (I.E.,  
CONFUSION OVER THE USE OF THE FIVE-LINE TRAVELER).  
IT APPEARS TO THE TBT THAT THE QC DOCUMENTATION  
RELATING TO THE LINER PLATE WELDS DID NOT MEET THE  
STANDARDS EXPECTED OF AN EFFECTIVE QA/QC PROGRAM, OR  
THE STANDARDS REQUIRED BY GIBBS & HILL SPECIFICATION  
2323-SS-18, AND 10 CFR 50 APPENDIX B.

ISAP(s) VII.A.8  
CAR 76X, 77X

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11  
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TUE/CPRT RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 11 11.288 AQ-126  
SSES: 11 BETWEEN DECEMBER 1983 AND  
ALLEG: AQ-126 FEBRUARY 1984, FORMER CRAFTSMEN  
ITEM: 11.288 AND INSPECTORS WERE PERFORMING A  
RECORD VERIFICATION OF DOCUMENT  
PACKAGES THAT CONTAINED RECORDS  
OF THEIR OWN WORK OR  
INSPECTIONS. REF. PG. C-209.

SAPETEAM CONCERNS 110130, 110140  
TU/MEMO CQA-0816

TRT  
---  
BROWN & ROOT ACKNOWLEDGED THAT THERE WERE INSTANCES IN  
THE PAC WHERE THIS SITUATION HAD OCCURRED, BUT THEY  
COULD IDENTIFY NO SPECIFIC INSTANCE OF THIS PRACTICE.  
TRT INTERVIEWED THE AUTHORIZED NUCLEAR INSPECTORS  
(ANI's) WHO STATED THAT WHEN THEY FOUND INSPECTORS  
VERIFYING THEIR OWN WORK AT UNIT 1, THEY RETURNED THE  
PACKAGES TO SSES FOR REVERIFICATION BY ANOTHER PERSON.  
TRT ATTEMPTED TO IDENTIFY INSTANCES OF THIS TYPE OF  
POTENTIAL CONFLICT OF INTEREST, BUT WAS UNABLE TO DO  
SO. TRT REVIEWED ALL 66 FIELD WELD DATA CARD PACKAGES  
TRANSMITTED BY THE N-5 GROUP TO THE PERMANENT PLANT  
RECORDS VAULT FROM NOVEMBER 1, 1983, TO MARCH 31,  
1984. TRT COULD IDENTIFY NO SPECIFIC INSTANCE WHERE  
THE DOCUMENT REVIEWER WAS THE SAME PERSON AS THE QC  
INSPECTOR, WELDER, OR WELD FILLER METAL ISSUER.

TRT ALSO SELECTED 92 PIPE HANGER RECORD PACKAGES, ONE  
FROM EACH N-5 GROUP, TRANSMITTED TO THE PERMANENT  
PLANT RECORDS VAULT FROM DECEMBER 1, 1983, TO FEBRUARY  
29, 1984. EACH PACKAGE CONTAINED ONE TO SIX WELD DATA  
CARDS (THE AVERAGE WAS THREE). TRT COULD FIND NO  
INSTANCE WHERE THE DOCUMENT REVIEWER WAS THE SAME  
INDIVIDUAL AS THE CRAFT PERSON OR THE QC INSPECTOR.

BASED ON INTERVIEWS WITH ANI'S AND WITH BAR  
MANAGEMENT, WHO WERE DIRECTLY RESPONSIBLE FOR CREATING  
THE RECORD REVIEW GROUP, THE TRT SUBSTANTIATED THE  
ALLEGATION OF THE POTENTIAL FOR INSPECTORS REVIEWING  
RECORDS OF THEIR OWN WORK, ALTHOUGH SPECIFIC EXAMPLES  
WERE NOT FOUND. THE SITUATION WAS CREATED BY BAR QA  
MANAGEMENT'S INTERPRETATION THAT 10 CFR PART 50,  
APPENDIX B, CRITERION X WAS NOT VIOLATED. THE TRT  
QUESTIONS THE EFFECTIVENESS OF A QA PROGRAM WHEN  
INSPECTORS ARE PLACED IN COMPROMISING POSITIONS IN  
WHICH FALSIFICATION OF RECORDS COULD OCCUR.



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPMT RESOLUTION DOCUMENTS

\*\* 11 11 30A  
SSER: 11  
ALLEG: AQ-069  
ITEM: 11 30A

AQ-069  
THERE WAS A LACK OF JOB  
COORDINATION AS EVIDENCED BY  
SLOppy WORKMANSHIP, POOR  
SUPERVISION, WASTE OF MATERIALS,  
AND HUNDREDS OF DEFECTS THAT  
WERE NOT REPORTED. REF. PG.  
0-219.

TRT  
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(REFER TO ITEM 11.03L FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

IN THE EVIDENCE PRESENTED, THE CONCERN THAT THERE WAS  
A LACK OF JOB COORDINATION WAS SUBSTANTIATED ONLY IN  
THE AREA OF CARELESS WORKMANSHIP. THE DETAILS FOUND BY  
TRT INDICATING CARELESS WORKMANSHIP ARE OUTLINED IN  
THE RESULTS REPORTED IN QA/QC CATEGORY 8. TRT  
CONCLUDED THAT TU ELECTRIC HAD ADEQUATE MEASURES TO  
ASSURE GOOD SITE COORDINATION.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 11 11.31 SSER: 11 ALLEG: AQ-113 ITEM: 11.31	AQ-113 TEKAS UTILITIES ELEC. CO. (TUEC) MANAGEMENT LACKED COMMITMENT TO AN ADEQUATE QUALITY ASSURANCE AND CONTROL PROGRAM IN THE UNTIMELY REPORTING OF TRANSFORMER FAILURES TO THE NRC. REF. PG. O-223.	TRT --- BASED ON THE ASSESSMENT OF TUEC'S UNTIMELY REPORTING OF THE FERRORESONANT TRANSFORMER FAILURES, THE TRT CONCLUDES THAT THE ALLEGATION IS SUBSTANTIATED, AND THAT THIS VIOLATION COULD INDICATE A LACK OF MANAGEMENT COMMITMENT TO AN EFFECTIVE QA/QC PROGRAM. IT APPEARS THAT THIS PARTICULAR VIOLATION WAS CAUSED BY INEFFECTIVE PROCEDURAL IMPLEMENTATION. THIS EXAMPLE OF INEFFECTIVE 10 CFR 50.55(E) REPORTING, WHICH IS NOT AN ISOLATED OCCURRENCE, HAS POTENTIAL GENERIC IMPLICATIONS, AS NOTED IN QA/QC CATEGORY 2, ALLEGATION AQ-102. TU ELECTRIC PROCEDURES FOR REPORTING SIGNIFICANT CONSTRUCTION DEFICIENCIES LACK SPECIFICITY. THE NRC PREPARED NOTICE OF VIOLATION 445/84-22-V-02 FOR THIS FAILURE TO REPORT AS REQUIRED AND CLOSED IT ON MARCH 6, 1986; 445/85-14 AND 446/85-11.	ISAP(a) VII.A.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
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TNT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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<p>** 11 14.33 SSER: 11 ALLES: AQ-132 ITEM: 11.33</p>	<p>AQ-132 TEXAS UTILITIES ELECTRIC COMPANY'S (TU)C'S) QUALITY ASSURANCE AUDITS AND AUDITORS WERE NOT INDEPENDENT OF THE AREA BEING AUDITED, AND AUDIT REPORTS WERE CHANGED TO REFLECT WHAT MANAGEMENT WANTED THEM TO STATE. REF. PG. 0-233.</p>	<p>TEXT --- TNT SUBSTANTIATED THE ALLEGATION TO THE EXTENT THAT A QA SUPERVISOR HAD REMITTEN TU ELECTRIC AUDIT REPORT TCP-66. HOWEVER, AFTER AN IN-DEPTH REVIEW OF THE REPORT, TNT CONCLUDES THAT THE BASIS FOR THE REMRITE WAS APPROPRIATE.</p>	<p>ISAF(*) VII.A.4</p>
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TNT FINDS A WEAKNESS IN THE QUALIFICATIONS OF THE TU  
ELECTRIC AUDIT PERSONNEL IN THAT THEY HAD ONLY MINIMAL  
TECHNICAL EDUCATION AND EXPERIENCE.

BASED ON INTERVIEWS WITH TU ELECTRIC QA MANAGEMENT AND  
REVIEWS OF QA AUDIT REPORTS, TNT CONCLUDES THAT NO  
INGERCENT MANAGEMENT AUDITS OF TU ELECTRIC QA  
PROGRAM AT CPSES WERE CONDUCTED.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11 34  
SSER: 11  
ALLEG: AQ-133  
ITEM: 11.34

AQ-133  
MANAGEMENT OF TUEC'S PERSONNEL  
EXIT INTERVIEW PROGRAM WAS  
INADEQUATE AND THE PROGRAM WAS  
NOT EFFECTIVE. REF. PG. 9-237.

TRT  
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TU ELECTRIC INITIATED AN EXIT INTERVIEW PROGRAM IN  
OCTOBER 1983. IN APRIL 1984, TU ELECTRIC ALSO  
INITIATED A QUALITY AWARENESS PROGRAM THAT INCLUDED A  
BOUTLINE FOR EMPLOYEES TO CALL IN QUALITY MATTERS. TRT  
SUBSTANTIATED THE CONCERN REGARDING THE ADEQUACY AND  
EFFECTIVENESS OF THE EXIT INTERVIEW PROGRAM. THE EXIT  
INTERVIEW QUESTIONNAIRE AND FOLLOWUP DID NOT APPEAR TO  
MEET PROGRAM OBJECTIVES.

ISAF(s) VII.A.6

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
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<p>** 11 11.36A-4 AQ-050 SSER: 11 DEFICIENCIES SUCH AS LOOSE BOLTS ALLEG: AQ-050 OR BAD WELDS WERE NOT REPORTED. ITEM: 11.36A-4 REF. PG. 8-2*3.</p>	<p>IDENTIFYING THESE TYPES OF DEFICIENCIES WAS NOT THE PRINCIPAL PURPOSE OF THE IEB 78-14 PROGRAM. HOWEVER, THESE TYPES OF DEFICIENCIES, WHEN DETECTED, SHOULD HAVE BEEN REPORTED TO THE INSTALLATION QC INSPECTOR. WHEN THE QC INSPECTOR WAS NOTIFIED OF ANY DEFICIENCIES, NONCONFORMANCE REPORTS SHOULD HAVE BEEN PROCESSED BY THE QC INSPECTOR AS APPROPRIATE. NO SPECIFIC DETAILS WERE PROVIDED BY THE ALLEGER. HOWEVER, AN INDEPENDENT INSPECTION BY TRT, USING QC INSTALLATION INSPECTION CRITERIA, IS DISCUSSED IN SECTION 4.8 OF THE TRT ASSESSMENT OF AQ-50.</p>	<p>IDENTIFYING THESE TYPES OF DEFICIENCIES WAS NOT THE PRINCIPAL PURPOSE OF THE IEB 78-14 PROGRAM. HOWEVER, THESE TYPES OF DEFICIENCIES, WHEN DETECTED, SHOULD HAVE BEEN REPORTED TO THE INSTALLATION QC INSPECTOR. WHEN THE QC INSPECTOR WAS NOTIFIED OF ANY DEFICIENCIES, NONCONFORMANCE REPORTS SHOULD HAVE BEEN PROCESSED BY THE QC INSPECTOR AS APPROPRIATE. NO SPECIFIC DETAILS WERE PROVIDED BY THE ALLEGER. HOWEVER, AN INDEPENDENT INSPECTION BY TRT, USING QC INSTALLATION INSPECTION CRITERIA, IS DISCUSSED IN SECTION 4.8 OF THE TRT ASSESSMENT OF AQ-50.</p>	<p>ISAP(s) VII B.3; VII C. APPENDIX 25, 26, 27 (REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES) FSR. LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS</p>
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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.368-1 AQ-050 SSER: 11 IN THE COURSE OF INSPECTING #2 ALLEG: AQ-050 PIPE SUPPORTS, TRI FOUND ITEM: 11.368-1 POTENTIALLY GENERIC DEFICIENCIES. REF. PG 8-233.		TNT ---- STRUT AND SCRUBBER LOAD PIN SPHERICAL BEARING CLEARANCE WITH WASHERS WAS EXCESSIVE. BAR PROCEDURE QI-GAP-11.1-28, SEC. 3.7.3.1, REV. 25 DEFINED BEARING GAP AS THE SPACE BETWEEN THE OUTSIDE SURFACE OF THE BEARING RACE AND THE INSIDE SURFACE OF THE CLEVIS BRACKET AND MAY NOT BE MORE THAN ONE THICKNESS OF THE VENDOR-SUPPLIED SPACER WASHER TO PREVENT BEARINGS FROM DISLODGING FROM THEIR SEATS. BEARING DISLODGE- MENT COULD CAUSE SCRUBBER OR STRUT MISALIGNMENT AND CHANGE ITS MOMENT RANGE, OR ANGLE OF LOADING, THUS DEGRADING THE SCRUBBER'S OR STRUT'S LOADING CAPACITY.	ISAP(a) VII.C, APPENDIX 25, VII.C, APPENDIX 26, APPENDIX 27, VII.B.3 PSR: LARG BORE PIPING PIPE SUPPORTS SMALL BORE PIPING PIPE SUPPORTS CAR 68X

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES --- SSEs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.348-3 AQ-050 SSE: 11 ALLEG: AQ-050 ITDM: 11.348-3	11 THE COURSE OF INSPECTING 42 PIPE SUPPORTS, THE TRT FOUND POTENTIALLY GENERIC DEFICIENCIES. REF. PG 0-233.	TRT --- PIPE CLAMP HALVES ON THE LOAD SIDE WERE NOT PARALLEL. (REF. QI-QAP-11.1-28, SEC. 3.7.3.1, REV. 25.)	ISAP(s) VII.C, APPENDIX 25, VII.C, APPENDIX 26, VII.C, APPENDIX 27; VII.B.3 FSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS CAR 069X

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.348-6 AQ-050 SSER: 11 ALLEG: AQ-050 ITDM: 11.348-4	IN THE COURSE OF INSPECTING #2 PIPE SUPPORTS, TRT FOUND POTENTIALLY GENERIC DEFICIENCIES. REF. PG 0-253.	TRT --- TOO EARLY ENGAGEMENT OF BOLTS INTO TAPPED HOLES OF SWIBER ADAPTER PLATE WAS LESS THAN FULL. (REF. ASME SEC. III, NF 4711.)	ISAP(s) VII.B.3 FOR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS CAR 66X PROCEDURE: AQP 11.3



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.368-5 AQ-050			
SSER: 11	IN THE COURSE OF INSPECTING 42	TBT	ISAF(s) VII B.4; VII C, APPENDIX 32
ALLEG: AQ-050	PIPE SUPPORTS, TBT FOUND	----	STIR CPRT-S-001
ITEM: 11.368-5	POTENTIALLY GENERIC	"BUILT IN" BOLTS (CONCRETE EXPANSION ANCHORS) AS	CAR 87-031, 87-052
	DEFICIENCIES. REF. PG 0-233.	INSTALLED DID NOT MEET MINIMUM EFFECTIVE EMBEDMENT	SDAR 87-59, 87-68, 86-04
		CRITERIA. (REF. QI-QP-11.2-1, SEC. 3.5.1, REV. 16)	

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPST RESOLUTION DOCUMENTS
** 11 11 368-6 AQ-050 SSER: 11 ALLEG: AQ-050 ITEM: 11 368-6	IN THE COURSE OF INSPECTING 42 PIPE SUPPORTS, TBT FOUND POTENTIALLY GENERIC DEFICIENCIES. REF. PG 9-253.	TBT --- LOCKING DEVICES FOR TREADED FASTENERS WERE MISSING OR OF A NON-APPROVED TYPE. (REF. ASME SEC. IY 4725.)	ISAP(s) VII.B, APPENDIX 3; VII.C, APPENDIX 25, V.I.C, APPENDIX 26; VII.C, APPENDIX 27 PSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS CAR 66X, 67X

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES --- SSES# 07, 08, 10 and 11

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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 11 11 368-7 AQ-050  
SSE# 11 1GE AS-BUILT VERIFICATION EFFORT  
ALLEG: AQ-050 CONDUCTED BY THE TRT (OF THE  
ITEM: 11 368-7 ELECTRICAL BACKWAY SUPPORTS)  
PROVIDES EVIDENCE OF FAULTY  
CONST. B' CHAFT, INSTALLED  
HARDWARE THAT DOES NOT MATCH  
AS-BUILT DRAWINGS, AND  
INACTIVE QA AND QC  
INSPECTIONS. REF. PG 0-264

TRT  
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BASED ON INSPECTION FINDINGS IN CLASS IE ELECTRICAL  
SUPPORTS AND THE HIGH RATE OF REJECTABLE  
CHARACTERISTICS PERHAPS UNIQUE TO ELECTRICAL SUPPORTS,  
THE TRT CONCLUDED THAT PAR INSPECTION OF THESE  
ELECTRICAL CABLE TRAY AND CONDUIT SUPPORTS WAS  
UNSATISFACTORY AND THAT OBJECTIVE EVIDENCE OF  
COMPLIANCE WITH SPECIFIED ENGINEERING AND CONSTRUCTION  
CRITERIA WAS NOT PROVIDED.

ISAP(s) VII.C, APPENDIX 32; VII.B.4; VII.C, APPENDIX 35  
FSR: CABLE TRAY AND CABLE TRAY HANGERS  
CONDUIT SUPPORTS TRAIN A & B AND TRAIN C LARGER THAN 2 INCH  
DIAMETER

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES --- SSEE#s 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPPT RESOLUTION DOCUMENTS
** 11 11.368-8 AQ-050 SSEE: 11 ALLEG: AQ-C50 ITDM: 11.368-8 REF. PG. 0-263	TU ELECTRIC FAILED TO REPORT VIOLATION OF ASME CODE TO NRC.	TRT --- TRT'S FINDINGS WITH REGARD TO TU ELECTRIC'S OMISSION OF LOCKING DEVICES FOR NF SUPPORT THREADED FASTENERS WERE THAT QA/QC FAILED TO REPORT THE VIOLATION OF THE REQUIREMENTS OF ASME III, NF, SUBARTICLE A725, BY A FORMAL NONCONFORMANCE REPORT (NCR). FURTHER, TU ELECTRIC FAILED TO REPORT THE ASME CODE VIOLATION TO THE NRC AND WAS, THEREFORE, IN NONCOMPLIANCE WITH THE REQUIREMENTS OF 10CFR50.55(*).	(REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE  
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TRT ISSUE SUMMARY  
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TUE/CPST RESOLUTION DOCUMENTS  
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\*\* 11 11.346C-1 AQ-050  
SSER: 11 POTENTIAL EXISTED FOR EXCESSIVE  
ALLEG: AQ-050 RADIAL WELD SHRINKAGE.  
ITEM: 11.346C-1 ESPECIALLY FOR THIN-WALLED  
STAINLESS STEEL PIPE. REF. PG.  
0-563.

TRT  
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TRT MEASURED SHRINKAGE IN A WELD JOINT OF A 12 INCH  
DIAMETER SAFETY INJECTION LINE THAT EXCEEDED THE 3/16  
INCH CRITERIA THAT WAS INCORPORATED BY DCA IN THE  
GIBBS & HILL PIPING ERECTION SPECIFICATION IN 1982.  
TRT ALLEGED THAT THE QC INSPECTION CRITERIA FOR  
THE WELD JOINT INVOLVING RADIAL WELD SHRINKAGE WAS NOT  
VIOLATED AT THE TIME OF THE VISUAL TEST INSPECTION AND  
THAT THE ASME CODE PRIOR TO 1987 DID NOT SPECIFICALLY  
ADDRESS ACCEPTANCE CRITERIA FOR WELD SHRINKAGE. TRT  
REQUESTED THAT TU ELECTRIC ASSES THE SAFETY  
SIGNIFICANCE OF WELD SHRINKAGE ESPECIALLY FOR THIN  
WALLED STAINLESS STEEL PIPE.

ISAP VII C, APPENDIX 12  
FSR: MECHANICAL  
CAR 87-029

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 11 11.37A SSER: 11 ALLEG: AQ-135 ITEM: 11.37A	AQ-135 PCVP FAILED TO ADEQUATELY PROCESS THE RESULTS OF QC INSPECTIONS AS REQUIRED BY 10CFR50, APPENDIX B, REF. PG 0-274	TRT --- THE TRT CONCLUDES THAT THE PCVP MEETS THE REQUIREMENTS OF IEEE-336. MOST ASPECTS OF THE ALLEGATION WERE NOT SUBSTANTIATED AND HAD NO GENERIC IMPLICATION. HOWEVER, THE ALLEGATION OF INADEQUATE REVIEW OF IDENTIFIED DEFICIENCIES LED THE TRT TO DETERMINE A PROGRAMMATIC WEAKNESS INVOLVING THE LACK OF GUIDANCE ON THE LEVEL OF DEFICIENCY NEEDED TO INITIATE AN NCR. THIS FINDING HAS GENERIC IMPLICATIONS FOR TU ELECTRIC AND OTHER INSPECTION AND CORRECTIVE ACTION PROGRAMS, FOR THE DESIGN AND CONSTRUCTION OF CPSES. REVIEW OF THIS ALLEGATION ALSO LED THE TRT TO CONCLUDE THAT TU ELECTRIC'S PROGRAM FOR TRENDING NONCONFORMANCES WAS WEAK.	ISAP(a) VII.A.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11.378 AQ-135  
SSER: 11 THE PCVP HAD INADEQUATE SCOPE & TRT  
ALLEG: AQ-135 DEPTH. ---  
ITEM: 11.378 INADEQUATE REVIEW OF IDENTIFIED PROGRAM (PCVP) MET THE REQUIREMENTS OF IEEE-336. MOST ASPECTS OF THE ALLEGATION WERE NOT SUBSTANTIATED AND HAD NO GENERIC IMPLICATIONS. HOWEVER, THE ALLEGATION OF INADEQUATE REVIEW OF IDENTIFIED DEFICIENCIES LED TRT TO DETERMINE A PROGRAMMATIC WEAKNESS INVOLVING THE LACK OF GUIDANCE ON THE LEVEL OF DEFICIENCY NEEDED TO INITIATE A NONCOMFORMANCE REPORT. THIS FINDING HAS GENERIC IMPLICATIONS FOR TU ELECTRIC'S OTHER INSPECTION AND CORRECTIVE ACTION PROGRAMS FOR THE DESIGN AND CONSTRUCTION OF CPSES. REVIEW OF THIS ALLEGATION ALSO LED TRT TO CONCLUDE THAT TU ELECTRIC'S PROGRAM FOR TRENDING NONCOMPLIANCES WAS WEAK.

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPST RESOLUTION DOCUMENTS
** 11 11.41 SSER: 11 ALLEG: AQ-008 ITEM: 11.41	AQ-008 THERE WAS AN INTENTIONAL COVERUP OF KNOWN DEFICIENCIES IN THE DOCUMENT CONTROL SYSTEM. REF. PG. 9-21.	TBT --- TBT REFERRED THIS ALLEGATION TO MRC OFFICE OF INVESTIGATIONS.	ISAP(s) VII.A.3



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TWT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TWT ISSUES SUMMARY	TUE/CPWT RESOLUTION DOCUMENTS
** 11 11.63A SSER: 11 ALLEG: TWT-P1 ITEM: 11.63A	TWT-P1 DESIGN PROCESS. REF PG P-27	COMMENTS FIELD ----- TWT DESCRIPTION AND CPWT RESOLUTION OF THIS ISSUE IS CONTAINED IN ITEM 11.84A, TWT-P1, DESIGN PROCESS ISSUES.	TUE PROCEDURE (*) ECE: 5.01-03, 5.09-01 CAR 87-073 TASK DESCRIPTION: CPE-TD-SARC-061 SDAR CP-87-10

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

THE ISSUE SUMMARY

THE/CPMT RESOLUTION IN DOCUMENTS

\*\* 11 11.838 TRT-02  
SSER: 11  
ALLEG: TRT-02  
ITEM: 11.838

TRT

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OF THE 30 ALLEGATIONS AND CONCERNS PERTAINING TO DOCUMENT CONTROL, 11 COULD NOT BE SUBSTANTIATED, 13 WERE SUBSTANTIATED, AND 6 WERE PARTIALLY SUBSTANTIATED. THOSE THAT WERE SUBSTANTIATED IN WHOLE OR PART RELATED TO PROCEDURAL DEVIATIONS OR ADMINISTRATIVE FLAWS IN THE DOCUMENT CONTROL FUNCTION, AS IT EXISTED AT THE TIME WHEN THE ALLEGATIONS ORIGINATED.

THE QA/QC GROUP FOUND THAT PRIOR TO 1984, THERE WERE NUMEROUS RECURRING ADMINISTRATIVE AND PROCEDURAL DEVIATIONS IN THE DOCUMENT CONTROL FUNCTION. MANY OF THESE RECURRING DEFICIENCIES WERE IDENTIFIED BY INTERNAL AND EXTERNAL AUDITS. BUT THERE WAS LITTLE FOLLOW-UP OR VERIFICATION BY TU ELECTRIC MANAGEMENT THAT EFFECTIVE CORRECTIVE ACTIONS WERE TAKEN. UNTIL EARLY IN 1984 WHEN THE DOCUMENT CONTROL CENTER (DCC) MONITORING TEAM BEGAN REPORTING TO SENIOR MANAGEMENT. THE CURRENT DOCUMENT CONTROL PROGRAM, WITH AN ESTIMATED ERROR RATE OF ONE PERCENT OR LESS, WAS FOUND TO BE ADEQUATELY STAFFED AND EFFECTIVE. THE PROBLEM OF INCOMPLETE AND ISOCOMPLETE DRAWING PACKAGES APPEARS TO HAVE BEEN CORRECTED.

THE QA/QC GROUP FOUND THAT TU ELECTRIC DID NOT REPORT THE IDENTIFIED DEFICIENCIES WITHIN THE DCC TO THE MRC AS REQUIRED BY 10 CFR 50.55(\*). ONLY DEFICIENCIES IDENTIFIED BY THE ENGINEERING, CRAFT, AND TESTING DISCIPLINES WERE SUBMITTED TO THE MRC AS 10 CFR 50.55(\*) ITEMS. (SEE ATTACHMENT 2, QA/QC CATEGORY 2.)

ALTHOUGH IT WAS ASSUMED BY QC THAT PAST FINAL INSPECTIONS AND ACCEPTANCE OF COMPLETED WORK WERE PERFORMED USING THE LATEST ISSUE OF DESIGN DRAWINGS, THE POTENTIAL EXISTED FOR ISSUING INCOMPLETE DOCUMENT PACKAGES TO CRAFT PERSONNEL. THUS THE LATEST REVISION OF DOCUMENTS MAY NOT ALWAYS HAVE BEEN USED. ACCORDINGLY, THE QA/QC GROUP PHYSICALLY COMPARED A SAMPLE OF INSTALLED HARDWARE TO THE AS-BUILT DOCUMENTATION IN THE PLANT PERMANENT RECORDS VAULT.

(REFER TO ITEM 11.848 FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

CUMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TXT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TXT ISSUE SUMMARY

THE/CPRIT RESOLUTION DOCUMENTS

THE RESULTS OF THIS COMPARISON AS PRESENTED IN CATEGORY 8 OF ATTACHMENT 2 (AQ-3a) GIVES EXAMPLES OF WHERE THE HARDWARE CONSTRUCTION DOES NOT MATCH THE DRAWINGS.

IN SUMMARY, THE QA/QC GROUP FOUND THE CURRENT DOCUMENTATION CONTROL PROGRAM TO BE ACCEPTABLE. HOWEVER, PRIOR TO 1984, AS IDENTIFIED BY CAT AND TU ELECTRIC, THERE WAS A DOCUMENT CONTROL BREAKDOWN. ALTHOUGH MANY OF THE DOCUMENT CONTROL DEFICIENCIES HAVE BEEN CORRECTED, THE IMPLICATION OF PAST INADEQUACIES ON CONSTRUCTION AND INSPECTION HAVE POTENTIAL GENERIC SIGNIFICANCE WHICH HAS NOT YET BEEN FULLY ANALYZED BY TU ELECTRIC.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TRT/CPWT RESOLUTION DOCUMENTS

\*\* 11 11.83C TRT-03  
SSES: 11  
ALLEG: TRT-03  
ITEM: 11.83C

ELEVEN ALLEGATIONS PERTAINED TO RECORDS, THREE WERE SUBSTANTIATED. THE THREE SUBSTANTIATED ALLEGATIONS (AQ 49, 74, 125) PERTAIN TO THE LOSS OF CONSTRUCTION, FABRICATION, INSTALLATION AND INSPECTION RECORDS, WHICH WERE SUBSEQUENTLY FOUND, RECONSTRUCTED, OR REPLACED IN ACCORDANCE WITH APPROVED PROCEDURES. THE QA/QC GROUP CONCLUDES THAT THE RECORDS SYSTEM IS ADEQUATE AND ACCEPTABLE.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TXT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TXT ISSUE SUMMARY	TXT/CPST RESOLUTION DOCUMENTS
** 11 11-830 SSER: 11 ALLEG: TMT-64 ITEM: 11-830	TMT-64 TRAINING AND QUALIFICATION ISSUES (REF PG 0-10)	TMT ----- OF EIGHT ALLEGATIONS IN THIS CATEGORY, THREE COULD NOT BE SUBSTANTIATED. FIVE ALLEGATIONS WERE SUBSTANTIATED, OR WERE OF SUFFICIENT SUBSTANCE TO CAUSE CONCERN. THE QA/QC GROUP FOUND NUMEROUS DEFICIENCIES IN THE SITE INSPECTOR QUALIFICATION AND CERTIFICATION PROGRAM, INCLUDING THE FOLLOWING: AN IDENTICAL CERTIFICATION TEST COULD BE TAKEN AFTER FAILING THE FIRST ONE, AND THERE WAS NO LIMIT ON HOW MANY TIMES AN EXAMINATION COULD BE RETAKEN. TWENTY PERCENT OF THE 102 TRAINING RECORDS REVIEWED CONTAINED NO VERIFICATION OF EDUCATION OR WORK EXPERIENCE. THERE WERE NO GUIDELINES PROVIDED FOR THE USE OF WAIVERS FOR ON-THE-JOB TRAINING, ALTHOUGH WAIVERS WERE FREQUENTLY USED; SEVEN INSPECTORS WERE IDENTIFIED AS HAVING QUESTIONABLE QUALIFICATIONS; AND WRITE-OUT WAS USED ON CERTIFICATION TESTS.	(REFER TO ITEM 11-830 FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TMT PROGRAMMATIC CATEGORIES)
		THERE ALSO WERE NUMEROUS PROBLEMS IN THE NON-ASME (TU ELECTRIC) INSPECTOR CERTIFICATION TESTING, SUCH AS: NO REQUIREMENTS FOR ADDITIONAL TRAINING BETWEEN A FAILED TEST AND THE RETEST; NO TIME LIMITATION BETWEEN A FAILED TEST AND A RETEST; DIFFERENT SCORING METHODS TO GRADE THE ORIGINAL TEST AND THE RETEST; NO GUIDELINES ON HOW A TEST QUESTION SHOULD BE DISQUALIFIED; NO PROGRAM FOR PERIODICALLY ESTABLISHING NEW TESTS, EXCEPT WHEN PROCEDURES CHANGED, AND NO DETAILS ON HOW THE ADMINISTRATION OF TESTS SHOULD BE MONITORED. THE TMT ALSO FOUND THAT THERE WERE FIVE CHAFT PERSONNEL WHO TRANSFERRED INTO QC INSPECTION THAT HAD NO PRIOR BACKGROUND OR EXPERIENCE IN INSPECTION, AND ALSO WERE FOUND TO HAVE QUESTIONABLE QUALIFICATIONS. THESE PROBLEMS AMOUNT TO A FAILURE OF ACTIVITIES INDICATING INADEQUATE CONTROLS TO ENSURE CORRECT APPLICATION OF QC TRAINING AND QUALIFICATION PROGRAM, I.E., TO ASSURE THAT THE PROGRAM ACHIEVES, IMPLEMENTS, AND MAINTAINS REQUIREMENTS AS SET FORTH BY 10 CFR PART 50, APPENDIX B.	
		ALTHOUGH ON PAPER THE ASME (SAR) PERSONNEL TRAINING AND CERTIFICATION PROGRAM, AS ESTABLISHED BY TU	

COMARCHE PEAK STEAM ELECTRIC STATION (CFSES)

TRT ISSUES -- SSER# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CFRT RESOLUTION DOCUMENTS

ELECTRIC AND BAR PROCEDURES, MET THE REQUIREMENTS OF ANSI N45.2.6, AND REGULATORY GUIDE 1.58. IN PRACTICE THESE GUIDELINES WERE NOT FOLLOWED. INSTEAD, THE PROGRAM, IN PRACTICE, FOLLOWED THE "EXCEPTION TO THE RULE" AND USED "OTHER FACTORS" AS THE NORMAL METHOD OF QUALIFICATION. OF THE 102 INSPECTOR RECORDS SAMPLED, MORE THAN 80 PERCENT OF THE INSPECTORS WERE QUALIFIED UNDER THE "EXCEPTION TO THE RULE" FACTOR.

THE QA/QC GROUP NOTES THAT NOT ALL QC INSPECTORS HAD DOUBTFUL QUALIFICATIONS. FOR EXAMPLE, IN SOME SMALL GROUPS, SUCH AS THE DESIGN CHANGE VERIFICATION GROUP (DCVG), THE TRT QA/QC GROUP FOUND ONLY ONE OF 19 INSPECTORS THAT HAD QUESTIONABLE QUALIFICATIONS. BUT, THE QA/QC GROUP ALSO NOTES THAT OVER 80 PERCENT OF ALL /SITE LINE QC INSPECTORS WERE QUALIFIED TO THE SECONDARY "EXCEPTION TO THE RULE" CLAUSE; AND THEN TO MAKE MATTERS MORE SERIOUS, THIS SECONDARY PROGRAM HAD MANY DEFICIENCIES AND EXCESSES (PREVIOUSLY NOTED) THAT FURTHER DIMINISHED THE CREDIBILITY OF THE QUALIFICATIONS.

THE TRT QA/QC GROUP CONCLUDES THAT THE WEAK QC QUALIFICATION PROGRAM MAY HAVE RESULTED IN THE NON-DETECTION OF OR FAILURE TO REPORT THE BACKGROUND DEFICIENCIES IDENTIFIED IN QA/QC CATEGORY 8, AQ-50, AND IN TRT SSER# 7 THROUGH 10. THE QA/QC GROUP CONCLUDES THAT THE WIDESPREAD DEFICIENCIES AND MINIMAL REQUIREMENTS IN THE QC INSPECTOR QUALIFICATION PROGRAM HAVE POTENTIAL QUALITY AND GENERIC IMPLICATIONS.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

TVE/CPWT RESOLUTION DOCUMENTS

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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES --- SCEs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE/CPRT RESOLUTION DOCUMENTS

REASSEMBLY PROCESS FOR INSTALLATION, MAINTENANCE QND TESTING HAS RESULTED IN COMPONENTS BEING LOST, DAMAGED, OR INTERCHANGED. THE RECURRENCES DOCUMENTED IN NONPERFORMANCE REPORTS (NCR) AND PERMANENT EQUIPMENT TRANSFERS (PET) WERE INDICATIVE OF A PROBLEM WITH QUALITY IMPLICATIONS; HOWEVER, THE QA/QC GROUP COULD FIND NO EVIDENCE THAT CORRECTIVE ACTION WAS INITIATED TO DETERMINE THE ROOT CAUSE AND PREVENT RECURRENCE OF THE PROBLEM. THE QA/QC GROUP CONCLUDES THAT THE FAILURE OF THE CORRECTIVE ACTION SYSTEM TO ADEQUATELY ADDRESS THIS RECURRING PROBLEM HAS QUALITY AND GENERIC IMPLICATIONS BECAUSE GALLING OR EVEN VALVE FAILURE MAY OCCUR IF VALVE BONNETS AND BODIES OF DIFFERENT PRESSURE AND TEMPERATURE RATINGS WERE MIXED.

IR SUMMARY. ALTHOUGH 10 ALLEGATIONS WERE CONFIRMED, THE ITEMS WERE IDENTIFIED AND CORRECTED BY TU ELECTRIC. THE MAJOR EXCEPTION WAS THE RECURRING PROBLEM WITH VALVE PARTS BEING LOST, DAMAGED, OR INTERCHANGED AND THE FAILURE TO DETERMINE ROOT CAUSE AND PREVENT RECURRENCE. AS STATED, THIS ITEM HAS QUALITY AND GENERIC IMPLICATIONS.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSBs 07, 08, 10 and 11

TRT ISSUE SUMMARY

TRT ISSUE SUMMARY

\*\* 11 11.83F TRT-05B  
SSB: 11 ON-SITE FABRICATION ISSUES (REF  
ALLEG: TRT-05B PG 0-13)  
ITEM: 11.83F

ISSUE

ISSUE SOURCE

TRT

APPENDIX 0 -

(SEC. 3.2.6, PG 0-13)

THREE ALLEGATIONS WERE ASSESSED, ONE ALLEGATION CONSISTING OF 12 ITEMS OF CONCERN, WAS PARTICULARLY SUBSTANTIATED. THE QA/QC GROUP'S ASSESSMENT SUBSTANTIATED THE EXISTENCES OF PROCEDURAL NONCOMPLIANCES WHICH CREATE CONDITIONS POTENTIALLY ADVERSE TO QUALITY, AND WHICH HAVE GENERIC IMPLICATIONS. THE SUBSTANTIATED CONCERNS ARE IDENTIFIED AS FOLLOWS:

THE QA/QC GROUP FOUND THAT THE IRON FABRICATION SHOP FABRICATED ITEMS BASED ON MATERIAL REQUISITIONS USING A PHOTO OR A SKETCH INSTEAD OF THE HANGER PACKAGE, CONTROLLED DRAWING, OR TRAVELER, AS REQUIRED BY PROCEDURES, AND THAT THE FABRICATION SHOP FORMEN WERE NOT FAMILIAR WITH THE FABRICATION PROCEDURES THAT CONTROLLED THE WORK PERFORMED UNDER THEIR SUPERVISION. ADDITIONALLY, FABRICATION PROCEDURES DID NOT IDENTIFY THE DESIGN SPECIFICATION REQUIREMENT OR A STANDARD FOR TIEHEADS FABRICATED ON SITE. SITE QC SURVEILLANCES OF MISCELLANEOUS STEEL STORAGE AREAS WERE NOT PERFORMED. THERE WAS INADEQUATE CONTROL OF THE SCRAP/SALVAGE MATERIAL IN THE IRON FABRICATION SHOP LAYDOWN YARD IN THAT THE MATERIAL WAS NOT IDENTIFIED AS SCRAP NOR WAS THE AREA RESTRICTED TO ACCESS, AND UNIDENTIFIED MATERIAL, RETURNED FROM THE FIELD, WAS MINGLED WITH SAFETY AND NONSAFETY-RELATED MATERIAL. ALTHOUGH THE QA/QC GROUP DID NOT FIND ANY EXAMPLES OF THE LOSS OF MATERIAL TRACEABILITY, THE MATERIAL REQUISITIONS PREPARED IN THE IRON FABRICATION SHOP DID NOT COMPLY WITH THE APPLICABLE PROCEDURE BECAUSE THE INTENDED USE DESCRIPTIONS WERE VAGUE, AND IN MANY CASES THE CODE CLASS WAS NOT IDENTIFIED.

THE QA/QC GROUP FOUND THAT THE SUBSTANTIATED CONCERN CONSTITUTED NONCOMPLIANCES WITH SITE PROCEDURES; HOWEVER, THE QA/QC GROUP, IN ITS REVIEW, OBSERVATIONS AND WALKDOWNS DID NOT FIND ANY EVIDENCE OF POOR WORKMANSHIP OR UNACCEPTABLE QUALITY OF THE FABRICATED

(REFER TO ITEM 11.84D FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

TRT/C/PRT RESOLUTION DOCUMENTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TRT/CPRT RESOLUTION DOCUMENTS -----

ITDPS RELEASED TO CONSTRUCTION.

THE QA/QC GROUP FINDS THAT THE NONCOMPLIANCES INDICATE A LACK OF PROCEDURAL AND MANAGEMENT CONTROL OF WORK FUNCTIONS IN THE IRON FABRICATION SHOP AND THE POTENTIAL FOR HARDWARE FABRICATION ERRORS PRESENTS A QUALITY CONCERN OF POSSIBLE GENERIC IMPLICATIONS.

CUMMACHE PEAK STEAM ELECTRIC STATION (CPRES)

TRT ISSUES --- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT/CPRT RESOLUTION DOCUMENTS
** 11 11.834 SSE# 11 ALLEG: TRT-05C ITEM: 11.834	TRT-05C HOUSEKEEPING ISSUES (REF PG 0-13)	TRT --- APPENDIX 0 (SEC 3.2.7, PGs 0 - 13 & 0 - 14):  TWO ALLEGATIONS WERE INVESTIGATED BY THE TRT. THE ALLEGATION RELATING TO INADEQUATE CLEARLINES COMBOLS DURING THE EARLY STAGES OF CONSTRUCTION (AQ-54) WAS SUBSTANTIATED. TU ELECTRIC'S QA SURVEILLANCE INSPECTIONS REPORTED A SUBSTANTIAL NUMBER OF CLEARLINES PROCEDURE VIOLATIONS, WHICH WERE SUBSEQUENTLY CORRECTED. THE OTHER ALLEGATION, CONCERNING A SUPERVISOR'S INSTRUCTIONS TO DISREGARD SOME REACTOR VESSEL CLEARLINES CONTROL REQUIREMENTS (AQ-65), COULD NOT BE SUBSTANTIATED.  THE TRT ASSESSED THE CURRENT HOUSEKEEPING SYSTEM OF CLEARLINES AND EQUIPMENT PROTECTION, PERFORMED A WALKDOWN SURVEILLANCE OF UNITS 1 AND 2, AND REVISED CLEARLINES CONTROL PROCEDURES, AND FOUND THAT THE OVERALL PROGRAM FOR DETECTION AND CORRECTION OF HOUSEKEEPING DEFICIENCIES APPEARED TO BE SATISFACTORY.  DURING THE TRT'S ASSESSMENT, TWO ITEMS WERE IDENTIFIED THAT REQUIRE TU ELECTRIC'S ACTION. THE FIRST PERTAINS TO THE NUMBER OF SWIPE TESTS REQUIRED BY DRAFT PROCEDURE FP-55-08 TO ASSURE THAT THE REACTOR VESSEL HAD BEEN ADEQUATELY CLEARED. THE SECOND PERTAINED TO AN OBSERVATION THAT NOT ALL FIVE SUPPORT SMURRES WERE PROTECTED FROM ONGOING CONSTRUCTION ACTIVITY.	(REFER TO ITEM 11.840 FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TET ISSUES -- SSEERs 07, 06, 10 and 11

ISSUE SOURCE	ISSUE	TET ISSUE SUMMARY	TET/CPET RESOLUTION DOCUMENTS
** 11 11.838 SSEER 11 ALLEG. TET-05D ITEM 11.838	TET-05D NONPERFORMANCE REPORT ISSUES (SEE PG 0-14)	THE TET DESCRIPTION AND CPET RESOLUTION OF THIS ISSUE IS CONTAINED IN ITEM 11.84E. TET-P-5, NONCONFORMANCES AND CORRECTIVE ACTIONS.	(REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TET PROGRAMMATIC CATEGORIES)

COMARCHE PEAK STEAM ELECTRIC STATION (CPRES)

TRT ISSUES -- ISSNs 07, 08, 10 and 11  
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THE/CPRT RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 11 11.833 TRT-06

ISSN: 11 QC INSPECTION ISSUES (REF PG 0-15)

ALLEG: TRT-06  
ITEM: 11.833

TRT  
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SIX ALLEGATIONS WERE REVISED BY THE QA/QC GROUP. ONE ALLEGATION WAS PARTIALLY SUBSTANTIATED (AQ-76). THE ALLEGATION THAT AN INSPECTOR WAS TOLD TO IGNORE PROBLEMS WITH PIPE WELD RESTRAINTS WAS SUBSTANTIATED (AQ-38).

NUMEROUS WELD IRREGULARITIES WERE IDENTIFIED BY SITE QA INSPECTORS ON CHICAGO BRIDGE AND IRON (CB&I) PIPE WELD RESTRAINTS. GIBBS & HILL (G&H) STRUCTURAL ENGINEERING EVALUATED THE SERIOUSNESS OF DEFECTS IN EACH RESTRAINT. BASED ON THIS REVIEW, G&H DISPOSITIONED 67 RESTRAINTS AS HAVING INCONSPICUOUS DEFECTS. OF THE 46 REMAINING RESTRAINTS, 21 WERE SELECTED AS WELD CASE AND THE WELDS ON THESE 21 RESTRAINTS WERE REINSPECTED THROUGH PAINT IN SOME CASES. A STRESS ANALYSIS WAS ALSO RUN FOR THESE 21 RESTRAINTS, AND BASED ON THIS INSPECTION AND ANALYSIS, ALL RESTRAINTS WERE FOUND ACCEPTABLE. THE QA/QC GROUP FOUND THAT THE SELECTION OF WELD CASE WELDS AND THEIR REANALYSIS WAS NOT ADEQUATELY DOCUMENTED TO PERMIT REVIEW. ACCORDINGLY, THE QA/QC GROUP CONCLUDES THAT THE TECHNICAL CONCERN RELEVANT TO THIS ISSUE HAD BEEN SUBSTANTIATED AND HAS POTENTIAL QUALITY AND GENERIC IMPLICATIONS.

THE ALLEGATION THAT FUEL POOL WELD RADIOGRAPHY WAS NOT COMPLETED WAS NOT SUBSTANTIATED (PART OF AQ-55).

THE QA/QC GROUP FOUND AN EXCESSIVE NUMBER OF IRREGULARITIES IN THE INSPECTION TRAVELERS FOR THE FUEL POOL LINERS. THESE DOCUMENTATION ANOMALIES DID NOT APPEAR TO BE FALSIFICATIONS, BUT OCCURRED BECAUSE OF POOR QA PRACTICES. THE QA/QC GROUP CONCLUDES THAT DOCUMENTATION ANOMALIES RESULTED FROM A POOR SYSTEM FOR CONTROL OF THESE PARTICULAR TRAVELERS, AND FROM THAT OF A POORLY IMPLEMENTED QC INSPECTION PROGRAM.

(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMPANDE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- ISSUES 07, 08, 10 and 11

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ISSUE SOURCE

TBT ISSUE SUMMARY

ISSUE

\*\* 11 11.83K TBT-07  
ISSUE 11 QA SCOPE ISSUES (REF, PG 0-18)  
ALLEG: TBT-07  
ITEM: 11.83K

ISSUE SOURCE

TBT ISSUE SUMMARY

ISSUE

TBT  
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APPENDIX F -  
(SEC. 9.2.11, PG 0-16 AND 0-17)  
THE TBT REVIEWED 13 ALLEGATIONS IN THIS CATEGORY. FOUR  
ALLEGATIONS WERE SUBSTANTIATED (AQ-20, -126, -113,  
-133), THREE WERE PARTIALLY SUBSTANTIATED (AQ-69,  
-127, -132), AND SIX WERE NOT (AQ-6, -9, -25, -112,  
-122, -127). BASED ON REVIEWS AND INTERVIEWS CONDUCTED  
BY THE TBT, THE ALLEGATION AND CONCERNS THAT QC WAS  
RELUCTANT TO REPORT DEFICIENCIES IN THE PAST COULD NOT  
BE SUBSTANTIATED OR REFUTED. IN REGARDS TO THE  
ALLEGATION OF CARELESS MEMBERSHIP, DURING ITS  
AS-BUILT INSPECTIONS THE TBT FOUND OBVIOUS CARELESS  
MEMBERSHIP THAT QC FAILED TO IDENTIFY

WITH RESPECT TO THE RECEIPT OF NONCONFORMING MATERIAL  
AT CPSES, THE QA/QC GROUP FOUND THAT THE RECEIVING  
INSPECTION SYSTEM USED AT CPSES WAS ADEQUATE TO  
PRECLUDE INSUFFICIENTLY EXAMINED OR NONCONFORMING  
MATERIAL FROM BEING RELEASED FOR INSTALLATION.

THE TBT COULD NOT SUBSTANTIATE THE ALLEGATION AND  
CONCERN IN REGARDS TO THE QUALIFICATIONS OF BROWN &  
ROOT QA CONSTRUCTION MANAGERS, BROWN & ROOT'S QA  
MANAGEMENT AND ENGINEERS JOB CLASSIFICATIONS/POSITIONS  
PREREQUISITES, VS INCLUDED SPECIFIC EDUCATION AND  
EXPERIENCE REQUIREMENTS. BASED ON THE REVIEW OF  
SELECTED MANAGERS QUALIFICATIONS (EDUCATION/TRAINING),  
IT WAS NOTED THAT THE EDUCATION REQUIREMENTS FOR A  
SUPER MANAGEMENT POSITIONS WERE WAIVED USING AN  
EXCLUSION CLAUSE. THIS PERMITTED WORK EXPERIENCE TO BE  
WHOLLY SUBSTITUTED FOR EDUCATION REQUIREMENTS. THE  
ALTERATION OF MANAGEMENT POSITION PREREQUISITES IS NOT  
A VIOLATION OF NBC REQUIREMENTS. NEVERTHELESS, SUCH  
PRACTICE IS ANOTHER EXAMPLE OF BROWN & ROOT OVERUSE OF  
THE "EXCEPTION TO THE RULE CLAUSE."

THE TBT SUBSTANTIATED THE ALLEGATION AND CONCERN OF  
THE POTENTIAL FOR CRAFT PERSONNEL AND QC INSPECTORS  
REVIEWING RECORDS OF THEIR OWN WORK. BOTH BROWN & ROOT  
AND THE ASI, ACKNOWLEDGED THAT PAST INSTANCES OCCURRED

TBT/CPNT RESOLUTION DOCUMENTS

TBT ISSUE SUMMARY

ISSUE

ISSUE

CHUMACHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SEE#s 07, 06, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

IN WHICH RECORD REVIEWERS VERIFIED/ACCEPTED INSPECTION RECORDS THAT CONTAINED THE RESULTS OF THEIR OWN QC INSPECTIONS. THE ANI REQUIRED SUCH RECORDS TO BE IMMEDIATELY REVERIFIED. SINCE RECORD REVIEWERS WERE PLACED IN POSITION TO REVIEW THEIR OWN WORK, THE INDEPENDENCE OF RECORD REVIEWERS IN THE PAST IS SUSPECT.

THE ALLEGATION AND CONCERN THAT QC LACKED ORGANIZATIONAL INDEPENDENCE FROM CONSTRUCTION COULD NOT BE SUBSTANTIATED OR REFUTED.

THE TRT ALSO CONCLUDES THAT IMPROVEMENTS NEED TO BE MADE IN THE MANAGEMENT OF TU ELECTRIC'S EXIT INTERVIEW PROGRAM, WHICH APPEARED TO LACK OBJECTIVITY AND EFFECTIVENESS.

WITH RESPECT TO TU ELECTRIC'S AUDITS AND AUDITORS, THE TRT FOUND THAT DURING THE PEAK CONSTRUCTION PERIOD (1981-1982), THE AUDIT GROUP CONSISTED OF ONLY FOUR AUDITORS. WITH RESPECT TO THE ALLEGATION AND CONCERN THAT THE AUDIT REPORTS WERE CHANGED, THE QA/QC GROUP FOUND THAT THE IDENTIFIED AUDIT REPORT WAS BASED ON INCORRECT REGULATORY REQUIREMENTS. THE CHANGES MADE BY THE QA SUPERVISOR WERE APPROPRIATE. THE TRT NOTES THAT WHAT IS IMPORTANT IS THAT THE AUDITORS WERE INADEQUATELY TRAINED AND DID NOT HAVE ADEQUATE PROCEDURES TO PERFORM THEIR AUDIT TASK CORRECTLY.

THE ALLEGATION AND CONCERN THAT TU ELECTRIC MANAGEMENT LACKED COMMITMENT TO AN ADEQUATE QA/QC PROGRAM WAS SUBSTANTIATED; \* . . FAILURE TO PERFORM MANAGEMENT ASSESSMENT AND OVERVIEW OF THE EFFECTIVENESS OF THE QA PROGRAM AND UNTIMELY REWRITING OF SIGNIFICANT DEFICIENCIES AS REQUIRED BY 10 CFR 50.55(\*). ALTHOUGH TU ELECTRIC'S DOCUMENTED QUALITY PROGRAM MANUAL MET THE NRC'S REQUIREMENTS, THE TRT FOUND THAT THE IMPLEMENTATION OF THE QA PROGRAM IN A NUMBER OF AREAS WAS INEFFECTIVE, BECAUSE THERE WAS A LACK OF SENIOR TU ELECTRIC MANAGEMENT COMMITMENT TO, AND VERIFICATION OF, AN EFFECTIVELY IMPLEMENTED QA PROGRAM.

IN SUMMARY, THE TRT CONCLUDES THAT THE SIGNIFICANCE AND GENERIC IMPLICATIONS OF AN INEFFECTIVE QA PROGRAM



COMANCHE PEAK STRAP ELECTRIC STATION (CPSES)

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TWT ISSUES --- ISSUES 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TWT ISSUE SUMMARY

TWT/CPRT RESOLUTION DOCUMENTS

IMPLEMENTATION ARE REFLECTED IN THE RESULTS OF THE  
TWT'S EVALUATION OF THE QA/QC PROGRAMS AS CPSES,  
INCLUDING AS-BUILT INSPECTIONS OF COMPLETED SYSTEMS OR  
COMPONENTS, WHICH HAD BEEN INSPECTED AND ACCEPTED BY  
TU ELECTRIC.

COMARCHE PEAK STEAM ELECTRIC STATION (CPSEP)

TRT ISSUES -- SEEKS 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	THE/CPRT RESOLUTION DOCUMENTS
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\*\* 11 11-03L TRT-08  
 ORDER: 11 AS-BUILT ISSUES (REF PG 0-17)  
 ALLEG: TRT-08  
 ITEM: 11-03L

TRT  
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 THE QA/QC GROUP REVIEWED FOUR ALLEGATIONS IN THIS CATEGORY. TWO ALLEGATIONS WERE PARTIALLY SUBSTANTIATED AND TWO WERE PARTIALLY SUBSTANTIATED.

WITH RESPECT TO THE ALLEGATION AND CONCERN THAT CRAFT PERSONNEL WOULD MAKE THINGS FIT, AND NCRs WERE VOIDED BY ENGINEERS WRITING AS-BUILT OR USE-AS-IS OR TRM, THE QA/QC GROUP FOUND THAT MODIFICATIONS TO VENDOR-CERTIFIED DRAWINGS, WHICH REFLECTED THE AS-BUILT CONDITION, WERE PROPERLY RECEIPTED BY THE VENDOR'S ON-SITE REPRESENTATIVE IN ACCORDANCE WITH SITE PROCEDURES. THE QA/QC GROUP REVIEWED 72 NCRs THAT WERE DISPOSITIONED USE-AS-IS AND FOUND NONE THAT WERE IMPROPERLY DISPOSITIONED.

THE POST-CONSTRUCTION VERIFICATION PROGRAM (PCVP) MAJORWORKS WERE MADE AFTER FINAL INSPECTIONS AND PRIOR TO A PLANT AREA BEING TURNED OVER TO THE TO ELECTRIC STARTUP TESTING ORGANIZATION. MAJORWORKS BY PLANT OPERATIONS PERSONNEL WERE NOT CONSIDERED TO BE INSPECTIONS, BUT SERVED TO IDENTIFY AND CORRECT ANY REMAINING DEFICIENCIES. THE QA/QC GROUP COULD NOT SUBSTANTIATE MOST OF THE ALLEGATIONS AND CONCERNS RELEVANT TO THE PCVP. DURING THE COURSE OF ITS REVIEW, THE QA/QC GROUP FOUND CERTAIN PROGRAMMATIC WEARABLES DUE TO A LACK OF GUIDANCE WITH RESPECT TO THE LEVEL OF DEFICIENCY REQUIRED TO INITIATE AN NCR, AND WITH RESPECT TO TRENCHING NONPERFORMANCE. THE MAIN WEARABLES APPEARED TO BE IN BHM TO DETERMINE WHETHER AN IDENTIFIED NONPERFORMANCE WARRANTED MORE EXTENSIVE CORRECTIVE ACTION OR WARRANTED A BROADER ASSESSMENT FOR GENERIC CONCERNS.

THE QA/QC GROUP FORGED SEVEN PRINCIPAL CONCERNS WITHIN ONE ALLEGATION (AQ-30) ABOUT THE AS-BUILT INSPECTION PROGRAM USED BY TO ELECTRIC TO ADDRESS THE NCR'S INSPECTION AND ENFORCEMENT BULLETIN (IEB) 79-14, WHICH INVOLVED VERIFICATION OF INPUT USED IN SEISMIC ANALYSES FOR AS-BUILT SAFETY-RELATED PIPING SYSTEMS. THE QA/QC GROUP CONDUCTED FIELD INSPECTIONS

FOR: CONDUIT SUPPORTS TRAIN A & B AND TRAIN C LARGER THAN 2 INCH DIAMETER  
 FOR: CONDUIT SUPPORTS TRAIN C 2 INCH DIAMETER AND LESS  
 FOR: CABLE TRAY AND CABLE TRAY BARRIERS  
 FOR: LARGE BORE PIPING AND PIPE SUPPORTS  
 FOR: SMALL BORE PIPING AND PIPE SUPPORTS  
 FOR: EQUIPMENT QUALIFICATION  
 FOR: ELECTRICAL  
 FOR: INSTRUMENT AND CONTROL  
 FOR: HVAC  
 FOR: CIVIL STRUCTURAL  
 FOR: MECHANICAL

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES --- SSGRs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

THE/CPST RESOLUTION DOCUMENTS

IN UNIT 1 IN AN EFFORT TO DETERMINE WHETHER TO ELECTRIC'S AS-BUILT INSPECTION PROGRAM FUNCTIONED IN PROPER RESPONSE TO APPLICABLE CRITERIA OF 10 CFR PART 50, APPENDIX B, AND THE REQUIREMENTS OF IEB 79-14, PERTINENT TO THE CONCERNS OF THE PRINCIPAL ALLEGATIONS, AND TO VERIFY WHETHER THE PLANT'S AS-BUILT CONDITION FOR PIPE SUPPORTS WAS CONFIRMED IN THE FINAL DESIGN. THE QA/QC GROUP CONCLUDED THAT THE ALLEGATIONS AND CONCERNS INVOLVING THE IEB 79-14 ISSUES WERE NOT SUBSTANTIATED.

AS A FOLLOW-UP TO THE IEB 79-14 ISSUE, THE QA/QC GROUP MADE AN INSPECTION OF 42 PIPE SUPPORTS AND 5 ELECTRICAL RACKWAY BARGERS AND CONDUIT SUPPORTS AND SELECTED ATTRIBUTES ON 82 ADDITIONAL PIPE SUPPORTS IN UNIT 1 AND FOUND NUMEROUS DEFICIENCIES. THESE INSPECTIONS WERE OF COMPLETED SYSTEMS OR COMPONENTS THAT HAD BEEN PREVIOUSLY INSPECTED AND ACCEPTED BY QC AS MEETING THE RESPECTIVE CONSTRUCTION AND INSTALLATION REQUIREMENTS. THE AREAS INSPECTED HAD BEEN CLEARED AND SECURED READY FOR FUEL LOAD.

ALTHOUGH THE AS-BUILT ASSESSMENT DID NOT SPECIFICALLY ASSOCIATE THE IDENTIFIED MAINTENANCE PROBLEMS WITH DESIGN OR DOCUMENT CONTROL DEFICIENCIES, SOME OF THE PROBLEMS IDENTIFIED COULD HAVE RESULTED FROM NOT USING THE LATEST DOCUMENT PACKAGES FOR CONSTRUCTION AND INSPECTION. THE QA/QC GROUP AS-BUILT VERIFICATION INSPECTION OF PIPE SUPPORTS AND ELECTRICAL RACKWAY BARGERS AND CONDUIT SUPPORTS FOUND SOME EXAMPLES OF FAULTY CONSTRUCTION BY CRAFT PERSONNEL, INSTALLED HARDWARE THAT DID NOT MATCH THE AS-BUILT DRAWINGS, AND INSPECTIVE QC INSPECTIONS IN THE FIELD. ALSO, TWO OF THE QC INSPECTION PROCEDURES HAD SEVERAL PROBLEMS:

- (1) A LACK OF DEFINITION OF TOLERANCE RANGE FOR TWO INSPECTION CRITERIA; (2) THE TABLE FOR MINIMUM THREAD ENGAGEMENT OF BOLTS IN CROSSER ADAPTER PLATES WAS IN POTENTIAL CONFLICT WITH ASME CODE REQUIREMENTS, AND
- (3) INSPECTION REQUIREMENTS FOR CERTAIN ALTERNATE LOCKING DEVICES FOR THREADED FASTENERS AND FOR LOAD PINS ON RF SUPPORTS FOUND IN THE PLANT WERE NOT ADMISSIBLE.

THE OMISSION OF LOCKING DEVICES ON RF SUPPORT THREADED

COMPANIE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- S02Rs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	THE CPST RESOLUTION DOCUMENTS
		<p>FASTENERS IN UNIT 1 WAS NOT REPORTED ON AN RCR BY QC FOR DISPOSITIONING BY ENGINEERING AND WAS NOT REPORTED TO MRC UNDER 10 CFR PART 50.55(a). INSTEAD, TUCO ENGINEERING STATED BY MEMORANDUM THAT EXISTING PAINT ON THE THREADS WAS ACCEPTABLE AS A LOCKING DEVICE. THE QUALITY ASSURANCE SPECIFICATION FOR PAINTING MF SUPPORTS WAS INADEQUATE IN THE AREA OF INSPECTION OF PAINTED THREADS, WHICH ACCORDING TO TU ELECTRIC SERVED AS LOCKING DEVICES ON MF SUPPORTS.</p> <p>IN THE LIMITED INSPECTION BY THE QA/QC GROUP, THE FREQUENCY AND REPEATABILITY OF DEFICIENCIES RELATED TO PIPE SUPPORTS WERE MOST NOTABLE WITH RESPECT TO EXCESSIVE FREE GAP AT THE SPHERICAL BEARINGS OF DRUMS AND SHAY STRUTS, STRUT AND RUBBER FASTENERS NOT PROPERLY SECURED, AND INADEQUATE THREAD ENGAGEMENT OF BOLTS IN SHOCK ARRESTER PLATES. THE QA/QC GROUP ALSO FOUND A HIGH RATE OF REJECTABLE CHARACTERISTICS ON CLASS 1E ELECTRICAL RACEWAY BANGERS AND CONDUIT SUPPORTS.</p> <p>THE QA/QC GROUP CONCLUDES THAT FOR PIPE SUPPORTS IN THESE SYSTEMS AND COMPONENTS INSPECTED, ASME CODE REQUIREMENTS, QC QUALITY ACCEPTANCE STANDARDS, DESIGN DRAWINGS, AND SITE QC PROCEEDURE WERE NOT FOLLOWED CONSISTENTLY. THE QA/QC GROUP ALSO CONCLUDES THAT THE QC INSPECTION OF CERTAIN ELECTRICAL RACEWAY BANGERS AND CONDUIT SUPPORTS WAS UNSATISFACTORY IN THAT VARIOUS UNACCEPTABLE FABRICATION AND INSTALLATION CHARACTERISTICS WERE NOT REPORTED. BASED ON THE QA/QC GROUP INSPECTION OF 42 PIPE SUPPORTS, 5 ELECTRICAL SUPPORTS AND SELECTED ATTRIBUTES ON 92 ADDITIONAL PIPE SUPPORTS, AND CONSIDERING THE RATE OF OCCURRENCE OF NONCONFORMANCE, THE QA/QC GROUP CONCLUDES THAT SOME TYPES OF DEFICIENCIES MAY BE GENERIC IN NATURE THROUGHOUT UNIT 1. DEFICIENCIES IN LOAD PIN LOCKING DEVICES FOR SHAY STRUTS AND DRUMS, TRIP-ENGAGEMENT OF BOLTS IN RUBBER ADAPTER PLATES, BILTI BOLT INSTALLATION, AND INADEQUATE LOCKING DEVICES ON MF SUPPORT THREADED FASTENERS EACH HAS POTENTIAL QUALITY AND SAFETY IMPLICATIONS. (SEE ATTACHMENT 2, CATEGORY 6, AQ-50.)</p>	
		<p>IN SUMMARY, THE QA/QC GROUP MADE A LIMITED INSPECTION</p>	

COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SEE#s 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPST RESOLUTION DOCUMENTS

OF INSTALLED QC-ACCEPTED PIPE SUPPORTS, ELECTRICAL HANGERS, AND CONDUIT SUPPORTS AND CONCLUDED, IN GENERAL, THAT THE FINAL QC INSPECTIONS WERE INADEQUATE BECAUSE THE FREQUENCY OF RECURRING DEFICIENCIES IDENTIFIED DURING THE INSPECTION WERE EXCESSIVE.

THE QA/QC GROUP CONCLUDES THAT THE MOST IMPORTANT QA CONCERN RESULTING FROM THE AS-BUILT INSPECTION EFFORT IS THAT QC DID NOT DETECT AND REPORT THESE OBVIOUS NONCONFORMING CONDITIONS.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- USER# 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11-844 TRT-01  
USER: 11 DESIGN PROCESS ISSUES, REF PG  
ALLEG: TRT-01 0-9  
ITEM: 11 8-4

TRT

APPENDIX D

(SEC. 3.2.1, PG 0-9)

TRT REVIEWED SIX ALLEGATIONS PERTAINING PRINCIPALLY TO DESIGN CHANGE ISSUES, TRT'S WERE SUBSTANTIATED (CERTIFIED DRAWINGS HAD ERRORS IN WELD SIZE AND LOCATION, CERTIFIED DRAWINGS WERE REVISED TO REFLECT AS-BUILT CONDITIONS, AND VENDOR DOCUMENTS WERE NOT CONTROLLED).

ELEVEN SUPPORTS WERE INSPECTED BY THE QA/QC GROUP TO ESTABLISH WHETHER THE AS-BUILT CONDITIONS OF THESE PIPE SUPPORTS WERE FOUND TO HAVE WELD PROBLEMS (CORROSION AND OVERSIZING OF WELDS). BOTH CONDITIONS REQUIRED ENGINEERING DISPOSITION TO ACCEPT AS-IS, OR TO REPAIR, BUT NEITHER CONDITION WOULD HAVE REQUIRED A DRAWING CHANGE. THEREFORE, IN THIS SAMPLE NO DISAGREEMENT WAS IDENTIFIED BETWEEN THE CERTIFIED DRAWINGS AND THE AS-BUILT SUPPORTS.

TRT FOUND THAT CHANGES TO DESIGN DRAWINGS AND VENDOR-CERTIFIED DRAWINGS WERE MADE AFTER THE PIPE SUPPORTS HAD BEEN INSTALLED, AND THE SUPPORTS WERE MODIFIED AFTER THE DRAWINGS WERE VENDOR CERTIFIED. THESE ACTIONS ALTHOUGH THEY MAY HAVE APPEARED TO BE UNCONTROLLED DID NOT VIOLATE PROCEDURES OR WRC REQUIREMENTS AND THE ANALYSIS OF THESE CHANGES WAS IN ACCORDANCE WITH PROCEDURES.

TRT'S ASSESSMENT OF THE ITERATIVE DESIGN PROCESS RELATIVE TO PROCESSING DESIGN FIELD CHANGES DID NOT IDENTIFY ANY QA PROGRAMMATIC DEFICIENCIES THAT COULD CAUSE A BREAKDOWN IN THE DESIGN PROCESS. HOWEVER, AN IN-DEPTH ASSESSMENT OF THE OVERALL DESIGN PROCESS WILL BE INCLUDED IN A FUTURE STUDY PERTAINING TO THE CYRMA INDEPENDENT ASSESSMENT PROGRAM (IAP). APPENDIX F OF USER-11 PROVIDES A CUMULATIVE ASSESSMENT OF THE DESIGN PROCESS BASED ON THE FINDINGS OF THE ENTIRE TRT.

APPENDIX F  
(SEC. 4.1, PG F-27)

THE PROCEDURE(S) ECE: 5-01-83, 5-09-01  
CAR 87-073  
TASK DESCRIPTION: CPE-TD-SMEC-061  
SUAR CP-87-10

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

THE ASSESSMENT OF DESIGN PROCESS GENERALLY FOCUSED ON A REVIEW OF CONTROL OF CHANGES TO DESIGN DOCUMENTS, PRINCIPALLY VENDOR DESIGNS, INCORPORATION OF FIELD CHANGES IN THE DESIGN, AND DESIGN INTERACTION WITH PLANT ORGANIZATIONS. FROM THE QA/QC POINT OF VIEW, TRT FINDS THAT THE DESIGN PROCESS FOR COMANCHE PEAK IS BASED ON PROCEDURES CONSISTENT WITH K&C REQUIREMENTS AND THAT THESE PROCEDURES WERE IMPLEMENTED. ACTUAL DESIGN PROCESS PERFORMANCE, HOWEVER, DISPLAYED SOME DEFICIENCIES. DESIGN CHANGES (DCAs AND CMCs) WERE PERMITTED TO ACCUMULATE AGAINST BASIC DESIGN DOCUMENTS WITH NO PROGRAM REQUIREMENT FOR THEIR TIMELY INCORPORATION INTO THE DRAWINGS. MEASURES HAVE NOW BEEN ESTABLISHED TO QUICKEN THE INCORPORATION OF CHANGES AND TO LESSEN THE CONTROL PROBLEMS AND DELAYS PREVIOUSLY EXPERIENCED.

TRT FOUND EXAMPLES OF INEFFECTIVE INTERACTION AMONG THE ENGINEERING, CONSTRUCTION, AND QUALITY CONTROL GROUPS THAT WAS EVIDENT BECAUSE OF INCOMPLETE OR INADEQUATE WORK INSTRUCTIONS FOR CRAFT PERSONNEL, DESIGN ACCEPTANCE OF QUESTIONABLE CONSTRUCTION PRACTICES, INADEQUATE DESIGN ANALYSES OF FIELD CHANGES, AND INCOMPLETE SEISMIC ANALYSES. NCR DISPOSITIONS BY ENGINEERS WERE SOMETIMES POOR IN JUDGMENT AND LACKING IN ANALYSIS AND IN TECHNICAL DEPTH.

BECAUSE A BASIC PREMISE IN DESIGNING A PIPING SYSTEM INCLUDES THE FACT THAT SUPPORT DESIGNS WILL REFLECT THE ASSUMPTIONS MADE IN THE ANALYSIS OF THAT PIPING, THE FAILURE OF THE DESIGN PROCESS TO REQUIRE GIBBS & JILL TO REVIEW DESIGNS AND MODIFICATIONS OF PIPE SUPPORTS PRIOR TO FABRICATION AND INSTALLATION, IS OF CONCERN.

THERE WERE INSTANCES OF FAILURE TO CONTROL QUALITY STANDARDS IN DESIGN DOCUMENTATION (SEE SSERs 8 AND 10). THERE WAS ALSO FAILURE TO NOTIFY THE K&C OF CHANGES TO THE FSAR (SEE SSER 10).

WITHIN THE SCOPE OF TRT QA/QC GROUP'S ASSESSMENT OF THE DESIGN PROCESS, THE INTERACTIONS AMONG THE ENGINEERING, CONSTRUCTION AND QC GROUPS, AND PROGRAM

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TVE/CPRT RESOLUTION DOCUMENTS

DEFICIENCIES PRESENTED, APPEAR TO BE THE ONLY DEFICIENT AREAS ADDRESSED BY TU ELECTRIC. A MORE COMPREHENSIVE ASSESSMENT OF THIS DESIGN PROCESS WILL BE INCLUDED IN FUTURE SER SUPPLEMENTS DEALING WITH THE NRC'S REVIEW OF FINDINGS FROM THE CYGNA INDEPENDENT ASSESSMENT PROGRAM.



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSIRs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11.048 TRT-P2  
SSER: 11 DOCUMENT CONTROL (REF PG P-27)  
ALLEG: TRT-P2  
ITEM: 11.048

TRT

ISAP VII A.3  
CER PART IV SEC. 3.6.3  
TUE AUDIT ATP 87-513

THE TRT ASSESSMENT OF THE DOCUMENT CONTROL FUNCTION FOR THE PERIOD FOLLOWING JULY 1984 INDICATES THAT THE PREPARATION, ISSUANCE AND CHANGES TO DOCUMENTS THAT SPECIFY QUALITY REQUIREMENTS OR PRESCRIBE ACTIVITIES AFFECTING QUALITY ARE ADEQUATELY CONTROLLED. DOCUMENTATION PACKAGES REVIEWED AT THE POINT OF ISSUE, AND IN THE FIELD WHERE PRESCRIBED ACTIVITIES WERE BEING PERFORMED, WERE FOUND TO BE COMPLETE AND CURRENT. FURTHER, A SAMPLE OF SAFETY-RELATED QUALITY RECORDS STORED IN THE PERMANENT PLANT RECORDS VAULT (PERV) WAS REVIEWED AND FOUND TO BE ACCEPTABLE. INCLUDED IN THE DOCUMENTATION PACKAGES WERE COMPLETED RECORDS OF PIPING, PIPING SUPPORTS (HANGERS), ASSEMBLED AND/OR INSTALLED COMPONENTS, FABRICATION AND INSPECTION/TESTING DATA, INCLUDING WALKDOWN INSPECTION CHECK LISTS AND THE APPLICABLE N-5 DATA REPORTS. IN-PROCESS AND FINAL INSPECTION AND ACCEPTANCES FOR COMPLETED RECORD PACKAGES APPEARED TO HAVE BEEN PERFORMED TO THE LATEST REVISION OF DRAWINGS AND SPECIFICATIONS.

HOWEVER, THE HISTORY OF RECURRING DOCUMENT CONTROL DEFICIENCIES PRIOR TO JULY 1984 RAISES CONCERNS ABOUT CERTAIN ASPECTS OF THE QUALITY OF CONSTRUCTION. FOR EXAMPLE, THE TRT OBSERVED DEFICIENCIES IN COATING INSPECTION REPORTS WHICH INCLUDED: INADEQUATE DESCRIPTION OR LOCATION OF AREAS OR ITEMS COATED; IMPROPER CHANGES AND CORRECTIONS; LACK OF SIGNATURES OR ACCEPTANCE FOR IN-PROCESS AND FINAL INSPECTIONS; AND MISSING DATES AND TIMES. THESE DEFICIENCIES WERE SIGNIFICANT ENOUGH TO RENDER THE INSPECTION REPORTS UNACCEPTABLE AS QUALITY RECORDS AND INADEQUATE TO PROVIDE DOCUMENTATION OF MATERIAL TRACEABILITY. ONE SPECIFIC TRACEABILITY AND RECORDS PROBLEM WAS THAT PAINT MIXING SLIPS WERE NOT RETAINED AS PERMANENT RECORDS, BUT WERE DISCARDED AFTER THE INSPECTOR IN THE COATING APPLICATIONS AREA TRANSCRIBED THE INFORMATION ONTO HIS OWN REPORT. THUS, THE ORIGINAL RECORD OF THE MIXING INSPECTION, INCLUDING INSPECTION ACCEPTANCE, WAS LOST. IN PROCEDURAL CONTROL, THE TRT MECHANICAL

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 06, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/T/PRT RESOLUTION DOCUMENTS

AND PIPING GROUP OBSERVED THAT UNCONTROLLED AND UNAUTHORIZED PROCEDURES WERE USED TO PERFORM COLD-SPRINGING (REALIGN PIPING) DURING ITS INSTALLATION.

WITH RESPECT TO DRAWING CONTROL PRIOR TO 1984, THE TRT FOUND DEFICIENCIES THAT INCLUDED: DISTRIBUTION OF INCOMPLETE OR OBSOLETE DRAWING PACKAGES TO THE CRAFT AND QC PERSONNEL; INADEQUATE DRAWING CONTROL; HIGH DOC SATELLITE ERROR RATES; AND PROCEDURAL NON-COMPLIANCE. THE TRT QA/QC GROUP CONCLUDES THAT ALTHOUGH MANY OF THE DOCUMENT CONTROL INADEQUACIES HAVE BEEN CORRECTED, THE IMPLICATIONS OF FAST INADEQUACIES ON CONSTRUCTION AND INSPECTION HAVE POTENTIAL GENERIC SIGNIFICANCE WHICH HAS NOT YET BEEN FULLY ANALYZED BY TU ELECTRIC.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.84C SSER: 11 ALL: TRT-P3 ITEM: 11.84c	TRT-P3 TRAINING AND QUALIFICATIONS (REF PG P-28)	TRT ---- THE TRT QA/QC GROUP FOUND A PATTERN OF INADEQUACIES WITH THE TRAINING, CERTIFICATION AND QUALIFICATION PROGRAM AT CPSES, BECAUSE OF THE MANY DEFICIENCIES IDENTIFIED. THESE PROBLEMS CAN BE DIRECTLY TRACEABLE TO THE ELECTRIC'S AND B&R'S MINIMAL REQUIREMENT TRAINING, CERTIFICATION, AND QUALIFICATION PROGRAM; THE LACK OF OR FAILURE TO FOLLOW PROCEDURES AND GUIDELINES; AND A LACK OF PROGRAMMATIC CONTROLS TO ASSURE THAT THE PROGRAM ACHIEVED AND MAINTAINED REQUIREMENTS AS SET FORTH BY 10 CFR PART 50, APPENDIX B.  THE TRT ELECTRICAL AND INSTRUMENTATION, PROTECTIVE COATINGS, AND CIVIL AND STRUCTURAL GROUPS ALSO ASSESSED ALLEGATIONS AND CONCERNS ABOUT ELECTRICAL INSPECTORS, COATINGS INSPECTORS, AND CONCRETE INSPECTORS. THESE INSPECTORS WERE ALL TRAINED, CERTIFIED, AND QUALIFIED UNDER THE SAME PROGRAM (NON-ASME) AS THE INSPECTION PERSONNEL REVIEWED BY THE QA/QC GROUP. EACH TRT GROUP FOUND EXAMPLES OF THE SAME KINDS OF DEFICIENCIES: NO VERIFICATION OF EDUCATION OR WORK EXPERIENCE, AN IDENTICAL CERTIFICATION TEST TAKEN AFTER THE EXAMINEE FAILED THE FIRST ONE; NO GUIDELINES PROVIDED FOR THE USE OF WAIVER FOR OJT; NO TIME LIMIT ON HOW MANY TIMES AN EXAMINATION COULD BE RETAKEN; AND INSPECTORS WITH QUESTIONABLE QUALIFICATIONS.  THERE WERE ALSO MANY PROBLEMS WITH THE CERTIFICATION TESTING PROGRAM FOR THE NON-ASME INSPECTORS. THERE WAS NO TIME LIMIT BETWEEN A FAILED TEST AND A RETEST, THERE WERE DIFFERENT SCORING METHODS TO GRADE THE ORIGINAL TEST AND THE RETEST, THERE WERE NO GUIDELINES ON HOW A TEST QUESTION SHOULD BE DISQUALIFIED, AND THERE WERE NO DETAILS ON HOW THE ADMINISTRATION OF TESTS SHOULD BE MONITORED.  THE TRT ALSO FOUND THAT MANY CRAFTSMEN THAT TRANSFERRED INTO QC INSPECTION HAD NO PRIOR BACKGROUND OR EXPERIENCE IN INSPECTION. THIS WAS ESPECIALLY TRUE	ISAP I.D.1; I.D.2; I.D.3 CAR(s) 90X, 111, 87-013, 87-042, 87-045, 87-067 SDAR(s) CP-85-54, CP-87-32, CP-86-63, CP-86-48

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES --- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

TUE/CPMT RESOLUTION DOCUMENTS

IN THE COATINGS AREA WHEN PAINTERS WERE MADE "INSTANT"  
QC PAINT INSPECTORS.

BAR HAD PROCEDURES FOR ASME PERSONNEL TRAINING AND  
CERTIFICATION THAT MINIMALLY MET THE REQUIREMENTS OF  
ANSI N45.2.6 AND REGULATORY GUIDE 1.58, BUT IN  
PRACTICE THESE GUIDELINES WERE NOT ALWAYS FOLLOWED.  
ALTHOUGH TU ELECTRIC AND BAR HAD COMMITTED TO FOLLOW  
THE REQUIREMENTS SET FORTH IN ANSI N45.2.6 AND  
REGULATORY GUIDE 1.58, BOTH CHOSE TO FOLLOW IT'S  
"EXCEPTION TO THE RULE" AND USED "OTHER FACTORS" AS  
THE NORMAL METHOD OF QUALIFICATION. MORE THAN 80  
PERCENT OF THE INSPECTION PERSONNEL (BOTH ASME AND  
NON-ASME) WERE QUALIFIED UNDER THE "EXCEPTION TO THE  
RULE" FACTOR.

THE TBT QA/QC GROUP ALSO FOUND THAT SOME QA AUDITORS  
LACKED EXPERIENCE, WERE INADEQUATELY TRAINED, OR HAD  
QUESTIONABLE QUALIFICATIONS.

THE TBT QA/QC GROUP CONCLUDES THAT DEFICIENCIES IN  
PROCEDURAL REQUIREMENTS AND GUIDELINES IN TU  
ELECTRIC'S TRAINING, CERTIFICATION, AND QUALIFICATION  
PROGRAMS HAVE POTENTIAL QUALITY SIGNIFICANCE. FURTHER  
EVALUATION BY TU ELECTRIC IS REQUIRED IN ORDER TO  
DETERMINE THE IMPACT OF THE DEFICIENCIES ON THE SAFETY  
OF THE PROJECT.

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TBT ISSUES --- SSERA 07, 08, 10 and 11

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ISSUE SOURCE ----- ISSUE ----- TBT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 11 11.840 TBT-P4  
SSER: 11 CONSTRUCTION AND TESTING (REF PG  
ALLEG: TBT-P4 P-29)  
ITDR: 11.840

TBT

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FOLLOWING IS A LIST OF THESE RECURRING PRACTICES FOR WHICH CONSTRUCTION CRAFT PERSONNEL WAS EITHER A PRIMARY OR CONTRIBUTING FACTOR AND HAD A PLANT-WIDE IMPACT.

CER PART IV SECTION 3.2, 3.5, 3.7, 3.9, 3.11

(1) CRAFT PERSONNEL FAILED TO FOLLOW DESIGN DOCUMENTS OR INSTALLATION PROCEDURES.

(2) UNAUTHORIZED WORK WAS PERFORMED IN ABSENCE OF PROCEDURES.

(3) HOUSEKEEPING PROCEDURES WERE NOT FOLLOWED.

(4) USE AND RETURN OF EQUIPMENT, TOOLS, AND MATERIALS WERE NOT PER REQUIREMENTS.

(5) THERE WAS LOSS, DAMAGE, AND INTERCHANGE OF VALVE PARTS.

(6) THERE WAS IMPROPER TRANSFER OF HEAT NUMBERS ONTO SCRAP METAL WHICH WAS USED IN A PIPE SUPPORT.

(7) EQUIPMENT REPAIRS AND REMARK WERE PERFORMED WITHOUT PROPER DOCUMENTATION.

IN CONCLUSION, THESE TYPES OF IMPROPER WORKMANSHIP BY CRAFT PERSONNEL, COUPLED WITH LACK OF PROPER SUPERVISION OF CRAFT PERSONNEL DURING CONSTRUCTION, HAVE POTENTIAL FOR SIGNIFICANT QUALITY AND SAFETY IMPACT ON CRITICAL PLANT SYSTEMS AND STRUCTURES.

THERE WERE ALLEGATIONS OR CONCERNS INVOLVING CONSTRUCTION PRACTICE THAT WERE NEITHER SUBSTANTIATED NOR REFUTED. THESE WERE NOT INCLUDED IN THE ABOVE CONCLUSION, BUT ARE UNRESOLVED QA/QC ISSUES.

THERE WERE ONLY TWO ISSUES CONSIDERED WHICH INVOLVED THE AREA OF TESTING. BOTH OF THESE ENTRIES INDICATED THAT THE DEFICIENT PRACTICE WAS NOT FREQUENT ENOUGH AS TO IMPLY A GENERIC PROBLEM. ONE CONCERN INVOLVED

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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

SEVERAL HOT FUNCTIONAL TEST OBJECTIVES THAT WERE NOT MET. THE OTHER DEFICIENT PRACTICE WAS THAT TU ELECTRIC'S METHOD FOR CALCULATING LEAK RATE WAS NOT CONSISTENT WITH TU ELECTRIC'S FSAR COMMITMENT.

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.84E SSER: 11 ALLEG: TRT-P5 ITEM: 11.84E	TRT-P5 NONCONFORMANCES AND CORRECTIVE ACTIONS (REF PG P-30)	TRT --- APPENDIX Q (SEC. 3.2.8, PG 0-14) OF THE 20 ALLEGATIONS AND CONCERNS RELATING TO NONCONFORMANCE REPORT (NCR) ISSUES; FOUR ALLEGATIONS AND CONCERNS WERE SUBSTANTIATED, AS FOLLOWS: ALLEGATIONS AQ-24; HOWEVER, THE ACTIVITY HAS BEEN CORRECTED; ALLEGATION AQ-97; HOWEVER, THE ACTIVITY WAS DONE IN ACCORDANCE WITH PROCEDURES. ALLEGATION AQ-114, AND ALLEGATION AQ-124, AND THESE MAY HAVE GENERIC IMPLICATIONS PERTAINING TO A PARTIAL QA/QC BREAKDOWN. TRT FOUND THAT DURING THE EARLY YEARS OF THE CPSES PROJECT, QC INSPECTORS KEPT LOGS OF ALL JOBS THAT THEY INSPECTED. ADDITIONALLY, A PERSONAL LOG WAS DISCOVERED THAT NOTED SOME ITEMS, IN THE EARLY YEARS, WHICH SHOULD HAVE BEEN DOCUMENTED IN INSPECTION REPORTS (IRs) OR NCRs; BUT BECAUSE OF THE LIMITED INFORMATION IN THE LOG, SUCH DOCUMENTATION COULD NOT BE VERIFIED. ALTHOUGH ONLY ONE LOG OF THIS TYPE WAS FOUND, THIS ITEM MAY HAVE GENERIC IMPLICATIONS AS EVALUATED BY THE TRT. THE TRT ALSO FOUND THAT IN THE PAST, VOIDED NCRs HAD BEEN DESTROYED. ALTHOUGH SOME PROCEDURAL CLARIFICATION IS NEEDED, THE PRACTICE HAS BEEN CORRECTED. WITH RESPECT TO REVIEWS AND CHANGES TO N-5 (ASME) DOCUMENTS IN THE PERMANENT RECORDS VAULT, THE TRT FOUND THAT SUCH REVIEWS AND CHANGES TO OCCUR, BUT ARE CONDUCTED ACCORDING TO PROCEDURE. THE TRT ALSO FOUND A LACK OF GUIDANCE IN REGARD TO THE LEVEL OF DEFICIENCY REQUIRED TO WRITE AN NCR. THE TRT ALSO FOUND INSTANCES OF IMPROPER DISPOSITIONING OF NCRs.  THE TRT ALSO FOUND THAT ALTHOUGH SPECIFIC NONCONFORMANCE SYSTEM IN RELATION TO CORRECTLY DOCUMENTING PROBLEMS, QA REVIEW OF DOCUMENTATION AND ENTRIES INTO THE CORRECTIVE ACTION SYSTEM IN ORDER TO PREVENT RECURRENCE.  APPENDIX P (SEC. 4.5, PG 30 AND 31): THE TRT IDENTIFIED DEFICIENCIES DURING ITS OVERALL REVIEW OF THE NONCONFORMANCE SYSTEM. MOST OF THE	ISAP(s) VII.A.2 CAR(s) 62, 108, 110, 87-003, 87-067, 87-073 TASK DESCRIPTION: CPE-TD-SWEC-034 SDAR CP 86-48, CP 86-63, CP 85-27

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TU2/CPRT RESOLUTION DOCUMENTS

DEFICIENCIES RELATED TO IMPLEMENTATION OF THE NCR SYSTEM IN SPECIFIC AREAS; FOR EXAMPLE, COATINGS NCRs THAT WERE DISPOSITIONED "USE-AS-IS" LACKED SUFFICIENT ENGINEERING JUSTIFICATION, AND SOME INSTANCES WERE NOTED IN THE MECHANICAL AND PIPING AREA IN WHICH NCR CORRECTIVE ACTION WAS NOT CONSIDERED TO BE SATISFACTORY. THERE WAS ALSO AN INSTANCE OF THE USE OF PIECES OF NONCONFORMING PIPING WHILE ON NCR HOLD. IMPROPER DISPOSITION OF THE NCR ALLOWED THE INSTALLATION OF THE PIPE.

THE TRT ALSO NOTED A GENERIC DEFICIENCY IN THE CORRECTIVE ACTION SYSTEM. SOME OF THE SPECIFIC DEFICIENCIES NOTED ARE:

a. THE B&R CORRECTIVE ACTION SYSTEM WAS GENERALLY BYPASSED, AS SHOWN IN THE FOLLOWING EXAMPLES:

(1) THERE WERE NO DEFINITIVE INSTRUCTIONS TO DESCRIBE THE TYPES OF PROBLEMS THAT REQUIRED CORRECTIVE ACTION. MINIMAL PROCEDURAL INSTRUCTIONS RESULTED IN CORRECTIVE ACTION DECISIONS FREQUENTLY BEING LEFT TO THE JUDGEMENT OF THE QA MANAGER.

(2) SINCE JUNE 1983, B&R HAD ISSUED NO CORRECTIVE ACTION REQUESTS (CARs), AND WAS SUBSTITUTING MEMOS AND LETTERS OF CONCERN FOR THIS FUNCTION. THIS SHORTCUT HAD BECOME A REGULAR METHOD OF OPERATION AND APPEARED TO BYPASS THE CAR SYSTEM.

b. THE TU ELECTRIC CORRECTIVE ACTION SYSTEM WAS POORLY STRUCTURED AND INEFFECTIVE IN THAT:

(1) CONTROLLING PROCEDURES WERE BRIEF AND GENERAL.

(2) THERE WAS NO TRANSLATION OF FSAR REQUIREMENTS ON TRENDS AND NO DETAILS ON HOW TREND ANALYSES WERE TO BE ACCOMPLISHED.

(3) QUARTERLY REPORTS WERE NOT ISSUED IN A TIMELY MANNER.

(4) THE METHOD OF CATEGORIZING LIFE AND NCRs BY BUILDING DID NOT ASSURE MEANINGFUL TREND ANALYSIS.

(5) A 1984 CAR REPORT IDENTIFIED THREE ITEMS THAT APPEARED TO REQUIRE ACTION; HOWEVER, NONE HAD BEEN TAKEN.



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TUE/CPRT RESOLUTION DOCUMENTS

(6) CAR 029 WAS USED AS A VEHICLE FOR A SPECIFIC DISPOSITION RATHER THAN FOR GENERIC ACTION, AS INTENDED BY THE CAR SYSTEM.

THE TIT ALSO NOTED THAT APPROXIMATELY 40 DIFFERENT FORMS AND REPORTS (OTHER THAN MCRs) WERE USED FOR RECORDING DEFICIENCIES. MANY OF THESE FORMS AND REPORTS DID NOT APPEAR TO PROVIDE INFORMATION ENTRY INTO THE CORRECTIVE ACTION SYSTEM TO PREVENT PROBLEM RECURRENCE.

IN CONCLUSION, THE TIT FOUND DEFICIENCIES IN MCR IMPLEMENTATION, AND IN SOME CASES MCR CORRECTIVE ACTIONS WAS UNSATISFACTORY. THE TIT FOUND BAR AND TU ELECTRIC CORRECTIVE SYSTEMS POORLY STRUCTURED, INEFFECTIVE, AND POORLY APPLIED.

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T. A. ISSUES -- SSESs 07, 08, 10 and 11

ISSUE SOURCE TAT ISSUE SUMMARY TUE/CPWT RESOLUTION DOCUMENTS

\*\* 11 11 84F TRT-P6  
SSER: 11 QC INSPECTION (REF PG F-31)  
ALLEG: TRT-P6  
ITEM: 11 84F

TRT  
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OF PARTICULAR CONCERN WERE THOSE ITEMS FOR WHICH QC INSPECTION WAS INDICATED AS BEING PRIMARILY RESPONSIBLE AND HAVING A GENERIC IMPACT LEVEL OF 4 (FREQUENT OCCURRENCES THAT HAVE PLANT-WIDE IMPACT). THERE ARE EIGHT ITEMS, OF LESSER CONCERN WERE THE 27 ADDITIONAL ITEMS THAT INDICATED QC INSPECTION AS A CONTRIBUTING FACTOR FOR LEVEL 4 ITEMS, OR AS EITHER A PRIMARY OR CONTRIBUTING FACTOR FOR LEVEL 3 ITEMS (FREQUENT OCCURRENCES, BUT APPARENTLY CONFINED TO A PARTICULAR AREA OR ITEM). THE ABOVE 35 ITEMS INDICATED TO THE TRT THAT QC INSPECTION WAS PARTICULARLY DEFICIENT IN THE AREAS OF COATINGS AND MECHANICAL HARDWARE, AND THAT QC INSPECTORS MADE SIGNIFICANT ERRORS IN A NUMBER OF ADDITIONAL SPECIFIC ITEMS. FURTHER, QC INSPECTION PROBLEMS ARE GENERALLY ACCOMPANIED BY AND ASSOCIATED WITH CONSTRUCTION/TESTING PROBLEMS (SEE ITEM 11.84D).

QC INSPECTORS IN MANY INSTANCES FAILED TO FOLLOW DESIGN DOCUMENTS AND THE QUALITY PROCEDURES FOR INSPECTION. OF CONCERN IS THE POTENTIAL FOR CRITICAL INSTALLATIONS TO BE INADEQUATELY CONSTRUCTED AND IMPROPERLY REPRESENTED ON DOCUMENTS IN THE PLANT PERMANENT RECORDS VAULT AS WELL AS INACCURATE ACCOUNTING OF SAFETY-RELATED SYSTEMS AND STRUCTURES FOR INPUT USED IN THE STRESS ANALYSES BY THE ENGINEERING GROUP. IN CONCLUSION, THE QAQC GROUP CONSIDERS THE SITE QC INSPECTION PROGRAM TO BE LESS THAN FULLY EFFECTIVE IN MONITORING, DETECTING, AND REPORTING DEFICIENCIES THAT HAVE OR COULD HAVE A SIGNIFICANT SAFETY IMPACT ON THE PLANT.

CAR(s) 46, 50, 63, 65X, 66X, 67X, 68X, 69X, 70X, 71X, 72X, 77X, 80X, 86, 95X, 96X, 111, 87-002, 87-005, 87-006, 87-007, 87-009, 87-011, 87-012, 87-013, 87-014, 87-015, 87-016, 87-017, 87-018, 87-022, 87-029, 87-030, 87-031, 87-033, 87-034, 87-035, 87-039, 87-041, 87-042, 87-043, 87-045, 87-051, 87-056, 87-067, 87-068

SDAR(s) CP-85-27, CP-87-71, CP-85-54, CP-87-67, CP-86-36, CP-87-113, CP-88-12, CP-85-39, CP-87-81, CP-87-70, CP-87-63, CP-87-78, CP-86-63, CP-86-50, CP-87-56, CP-87-23, CP-86-04, CP-86-59, CP-87-75

DR C-87-4331  
STIR CPWT-S-001; CPWT-S-010; CPWT-E-006

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TRT ISSUES -- SSERs 07, 06, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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\*\* 11 11.04G TWT-P7  
SSER: 11 AUDITS AND REPORTING (REF PG  
ALLEG: TWT-P7 P-31)  
ITEM: 11.04G

TRT  
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APPENDIX P -  
(SEC 4.7, PG P-31 THRU P-34):

IN THE TRT'S OVERALL ASSESSMENT OF TU ELECTRIC'S AUDIT PROGRAM, EMPHASIS WAS PLACED ON EVALUATING THE ADMINISTRATION OF THE AUDIT PROGRAM, MANAGEMENT'S ACTION TO REVIEW THE STATUS AND ADEQUACY OF THE QA PROGRAM, AND FOLLOWUP ON FINDINGS IDENTIFIED BY INTERNAL (TU/EC) AND EXTERNAL AUDIT TEAMS (NRC AND CONSULTANTS).

TU ELECTRIC'S AUDIT PROGRAM CONSISTED OF INTERNAL AND EXTERNAL AUDITS OF DESIGN, CONSTRUCTION, ENGINEERING, AND PROCUREMENT ACTIVITIES. TU ELECTRIC ASSUMED THE RESPONSIBILITY FOR EXTERNAL AUDITS OF VENDORS.

REGION IV FOUND THAT TU ELECTRIC'S AUDIT PROCEDURES DID NOT COMPLY WITH NRC REQUIREMENTS, AND THAT THE PROGRAM WAS NOT IMPLEMENTED IN ACCORDANCE WITH PROCEDURES. THE LACK OF AN ESTABLISHED AUDIT PROGRAM WAS ALSO SUBSTANTIATED BY REGION IV. FOR EXAMPLE, REGION IV REPORT NO. 50-445/84-32 CITED TU ELECTRIC FOR FAILURE TO ESTABLISH AND IMPLEMENT A COMPREHENSIVE SYSTEM OF PLANNED AND PERIODIC AUDITS. NON-COMPLIANCES IDENTIFIED WERE: ANNUAL AUDITS WERE NOT ADEQUATELY ADDRESSED BY AUDIT IMPLEMENTATION PROCEDURES; FLAMING AND STAFFING TO PERFORM 1983 AUDITS WERE INADEQUATE; THE WESTINGHOUSE SITE ORGANIZATION PERFORMING NUCLEAR STEAM SUPPLY SYSTEM (NSSS) ENGINEERING SERVICES WAS NOT AUDITED BY TU ELECTRIC FROM 1977 THROUGH 1981; AND AUDITS OF VENDORS THAT MANUFACTURE OR FABRICATE PARTS, COMPONENTS, AND EQUIPMENT FOR SAFETY-RELATED SYSTEMS WERE NOT CONDUCTED IN COMPLIANCE WITH ANNUAL OR OTHER APPLICABLE REQUIREMENTS DATING BACK TO AUGUST 1978. ASSESSMENTS BY THE MISCELLANEOUS AND MECHANICAL AND PIPING GROUPS CONCURRED WITH THE QA/C GROUP THAT THE AUDIT FREQUENCY OF VENDORS DID NOT COMPLY WITH ANSI N45.2.12 REQUIREMENTS.

REVIEW OF THE PAST ADMINISTRATION OF THE AUDIT PROGRAM DISCLOSED THAT DURING 1981 AND 1982, THE HEIGHT OF

ISAP(s) VII.A.4; VII.A.5; VII.A.6  
CAR(s) 86-005D, 86-006D, 86-007D  
CER PART IV SEC 3.18

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

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TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

CONSTRUCTION, TRT AUDIT STAFF CONSISTED OF FOUR AUDITORS. FROM 1982 TO 1984, THE AUDIT STAFF HAS INCREASED FROM 4 TO 12. ALSO, ON OCCASIONS, INDIVIDUALS PARTICIPATING ON THE AUDIT TEAMS WERE NOT QA AUDITORS. AS SUCH, A POTENTIAL EXISTED TO COMPROMISE THEIR INDEPENDENCE. THE TRT REVIEWED THE TECHNICAL BACKGROUND, EXPERIENCE, AND TRAINING OF AUDITORS, AS WELL AS THE QUALITY OF AUDIT REPORTS. THE TRT DETERMINED AUDITOR STAFFING AND QUALIFICATIONS TO BE QUESTIONABLE, WHICH RENDERED THE AUDIT RESULTS FOR 1981 THROUGH 1983 POTENTIALLY EFFECTIVE.

THE TRT AND REGION IV REVIEWED THE SCOPE OF THE QA PROGRAM AUDITED DURING 1983. OF APPROXIMATELY 650 SAFETY-RELATED PROCEDURES, 165 (25% OVERALL) WERE AUDITED. IN LOOKING AT QUALITY PROCEDURES, TU ELECTRIC AUDITED 241 FO TUGCO'S IMPLEMENTING PROCEDURES AND 394 FO BROWN & ROOT'S PROCEDURES FOR A COMPOSITE 321 AUDIT DATE. ALTHOUGH AUDITS ON A SAMPLING BASIS ARE ACCEPTABLE, THERE WAS NO EVIDENCE THAT ALL SAFETY-RELATED AREAS WERE AUDITED. THE AUDITS DID NOT ENCOMPASS ALL ASPECTS OF THE QA PROGRAM IN ORDER TO DETERMINE EFFECTIVENESS.

WITH RESPECT TO AUDIT CORRECTIVE ACTION FOLLOWUP, IT WAS LEARNED THAT TU ELECTRIC QA HAD NOT BEEN VERIFYING THAT CORRECTIVE ACTION ON PREVIOUS AUDIT FINDINGS WAS ACCOMPLISHED. FOR EXAMPLE, AUDIT TCP-111, INITIATED TO VERIFY CORRECTIVE ACTIONS ON PREVIOUS AUDIT FINDINGS, WAS STARTED PRIOR TO THE TRT'S REVIEW. TU ELECTRIC EMPHASIZED THAT TCP-111 BE CONSIDERED A "PUNCH LIST OF COMPLETION TASKS" TO VERIFY THAT CORRECTIVE ACTION HAD BEEN IMPLEMENTED AND NOT AN ATTEMPT TO REWRITE OR CHANGE PREVIOUS AUDIT FINDINGS. ANOTHER SPECIFIC EXAMPLE OF INEFFECTIVE FOLLOWUP ACTION WAS FOUND THAT PERTAINED TO A DEFICIENCY IDENTIFIED IN AUDIT TCP-23, PERFORMED IN SEPTEMBER 1981. AUDIT TCP-68, CONDUCTED IN MARCH 1983, ATTEMPTED TO VERIFY CORRECTIVE ACTION OF TCP-23'S AUDIT FINDING, BUT LOGS THAT WOULD DOCUMENT THE CORRECTIVE ACTION HAD BEEN DESTROYED. A NEW DEFICIENCY WAS WRITTEN AT THAT TIME AND THE RESPONSE WAS ACCEPTED, BUT THE CORRECTIVE ACTION IMPLEMENTATION IS STILL UNVERIFIED.

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TRT ISSUES -- SSESs 07, 08, 10 and 11

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TUE/CPRT RESOLUTION DOCUMENTS

IN CORRELATING NONCONFORMANCE REPORTING TO THE AUDIT FINDING/CORRECTIVE ACTION REPORTING TRACKING SYSTEM. THE TRT NOTED THAT DURING 1983, 16 NCRs IDENTIFIED THE NEED TO RETRAIN CONSTRUCTION PERSONNEL IN THE CONTENT AND REQUIREMENTS OF QA PROCEDURES. THE TRT FOUND THAT TU ELECTRIC CORRECTIVE ACTION REQUEST CAR-024, WHICH DEALT WITH INADEQUATE CONSTRUCTION TRAINING AND RECORDS, WAS OPEN FOR 12 MONTHS. AGET CAR-024 WAS CLOSED. FIVE OTHER CARs IDENTIFIED INADEQUATE TRAINING OF CONSTRUCTION PERSONNEL. THE TU ELECTRIC CONSTRUCTION STARTUP/TURNOVER SURVEILLANCE GROUP IDENTIFIED THE ABOVE CONDITIONS IN CAR-009, DATED APRIL 9, 1984, WHICH HAD NOT BEEN CLOSED AT THE TIME OF THE TRT INSPECTION. THIS FURTHER SUPPORTS THE TRT FINDING OF INADEQUATE FOLLOWUP AND CORRECTIVE ACTION OF

THE TRT FOUND THAT TU ELECTRIC MANAGEMENT HAD FAILED TO PERIODICALLY REVIEW THE STATUS AND ADEQUACY OF THEIR QA PROGRAM. THIS WAS CONFIRMED BY REGION IV (IR 50-445/84-32). TU ELECTRIC REPRESENTATIVES STATED THAT THERE HAVE BEEN NO REGULAR ASSESSMENTS OR REVIEWS OF THE ADEQUACY OF THE TOTAL QA PROGRAM BY UPPER MANAGEMENT, AS REQUIRED IN CRITERION 11 OF 10 CFR 50, APPENDIX B, AND AS COMMITTED IN THE FSAR.

WITH RESPECT TO FOLLOW-UP CORRECTIVE ACTION FOR PREVIOUS FINDINGS CITED AGAINST THE AUDIT PROGRAM BY NRC AND TU ELECTRIC CONSULTANT AUDIT/INSPECTION TEAMS. THE TRT FOUND TU ELECTRIC'S CORRECTIVE ACTION FOLLOWUP TO BE NOT FULLY EFFECTIVE. THE FRED LOBBIN REPORT ( A TU ELECTRIC CONSULTANT), DATED FEBRUARY 1982, IDENTIFIED FOUR MAJOR FINDINGS: (1) LEVEL OF EXPERIENCE WITHIN THE TUGCO QA ORGANIZATION IS LOW;

1. \*. COMMERCIAL NUCLEAR PLANT DESIGN AND CONSTRUCTION QA EXPERIENCE; (2) STAFFING FOR THE AUDIT AND SURVEILLANCE FUNCTIONS IS INADEQUATE. (3) THE NUMBER AND SCOPE OF DESIGN AND CONSTRUCTION AUDITS CONDUCTED BY TUGCO QA TO DATE HAD BEEN LIMITED, AND (4), QA MANAGEMENT HAS NOT DEFINED CLEARLY THE OBJECTIVES FOR THE SURVEILLANCE PROGRAM RESULTING IN A PROGRAM WHICH, IN THE AUTHOR'S OPINION "IS PRESENTLY INEFFECTIVE." TO DATE, FINDINGS (2), (3) AND (4) HAVE NOT BEEN ADEQUATELY ADDRESSED BY TU ELECTRIC. (REGION IV REPORT

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TUE/CPRT RESOLUTION DOCUMENTS

NO. 50-445/84-32.).

FOLLOWING THE LORBIN REPORT, THE NRC PERFORMED A CAT INSPECTION (IR 445/83-18; 446/83-12, DATED APRIL 11, 1983) AND INCLUDED A REVIEW OF 18 AUDITS (CONDUCTED BETWEEN 1978 AND EARLY 1983), AUDITOR QUALIFICATIONS, AUDIT PLANNING AND SCHEDULING, AUDIT REPORTING AND FOLLOWUP, AND AUDIT PROGRAM EFFECTIVENESS. THE REPORT CONCLUDED THAT WEAKNESSES EXISTED IN THE ESTABLISHED QA AUDIT PROGRAM WHICH INCLUDED THE SCHEDULING AND FREQUENCY OF AUDITS, THE LACK OF EFFECTIVE MONITORING OF THE CONSTRUCTION PROGRAM, AND THE LACK OF EFFECTIVE RESOLUTION OF CERTAIN FINDINGS. THE INSPECTION ALSO INDICATED THAT THE QA PROGRAM SHOULD HAVE BEEN MORE EFFECTIVE.

DURING THE TRT'S EVALUATION OF ALLEGATIONS AND CONCERNS, IT WAS OBSERVED THAT THE AUDIT FUNCTION DID NOT ALWAYS IDENTIFY QA PROGRAM BREAKDOWNS, OR IF REPORTED, EFFECTIVE CORRECTIVE ACTION WAS NOT INSTITUTED TO PREVENT RECURRENCE. TYPICAL EXAMPLES WERE: (1) UNTIMELY REPORTING OF SIGNIFICANT CONSTRUCTION DEFICIENCIES FOR 10 CFR 50.55(6) ITEMS, (2) QA BREAKDOWNS IN DOCUMENT CONTROL FOR SATELLITE 306 WHICH WAS NOT REPORTED TO THE NRC, AND (3) RECORD REVIEWERS WERE REVIEWING AND ACCEPTING DOCUMENTATION FOR WORK THEY PREVIOUSLY PERFORMED AS INSPECTORS.

BASED ON ITS FINDINGS AND OBSERVATIONS, THE TRT CONCLUDES THAT THE QA AUDIT AND REPORTING PROGRAM HAS SAO AND CONTINUES TO EXHIBIT DEFICIENCIES. OVER A SIGNIFICANT PERIOD OF TIME, RECURRING DEFICIENCIES INCLUDE: INADEQUATE STAFFING DURING PEAK PERIODS; FAILURE BY MANAGEMENT TO REVIEW THE QA PROGRAM FOR EFFECTIVENESS; PROCEDURAL AND IMPLEMENTATION INADEQUACIES; QUESTIONABLE QUALIFICATIONS AND CAPABILITIES; INCOMPLETE ASSESSMENT OF THE QA PROGRAM ON AN ANNUAL BASIS; INADEQUATE CORRECTIVE ACTION TO PREVENT RECURRENCE OF IDENTIFIED DEFICIENCIES AND INSUFFICIENT MANAGEMENT DIRECTION AND UNDERSTANDING. IN SUMMARY, THE TRT FINDS THE PAST AUDIT AND REPORTING SYSTEM LESS THAN ADEQUATE, AND THE AUDIT AND REPORTING PROGRAM AT THE TIME OF THE TRT REVIEW WAS QUESTIONABLE.

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ISSUE SOURCE

ISSUE

TWT ISSUE SUMMARY

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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SCRs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11.848 TRT-P8  
ISSUE: 11 INADEQUATE PROCEDURES (REF PG  
ALLEG: TRT-P8 P-34)  
ITEM: 11.848

TRT

CRITERION V TO 10 CFR 50, APPENDIX B REQUIRES THAT QA/QC PROCEDURES BE WRITTEN TO PRESCRIBE ACTIVITIES AFFECTING QUALITY. THE TRT FOUND THAT PROCEDURES IN SOME AREAS DID NOT COMPLY WITH THIS GUIDELINE. FOR EXAMPLE, MATERIAL CONTROL PROCEDURES DID NOT ADEQUATELY ADDRESS REQUIREMENTS FOR PHYSICAL INVENTORY CONTROL, MATERIAL TRACEABILITY, MATERIAL HANDLING, AND SEGREGATION OF PAINTS TO ELECTRIC REQUIREMENTS FOR AUTHORIZED NUCLEAR INSPECTOR INVOLVEMENT IN THE TO ELECTRIC INSPECTION PROCESS WERE UNCLEAR. QUALITY CONTROL PERSONNEL INSPECTED ~~THE~~ ~~BY~~ ~~THE~~ ~~BY~~ WRITTEN PROCEDURES OR FORMAL ACCEPT/REJECT CRITERIA. SOME INSPECTION PROCEDURES LACKED COMPREHENSIVE INSPECTION AND REINSPECTION CRITERIA FOR INSPECTORS. REQUIREMENTS FOR REINSPECTION OF REPAIR WORK WERE NOT CLEAR.

THE TRT FOUND THAT CONSTRUCTION PROCEDURES PROVIDED INADEQUATE INSTRUCTIONS TO CRAFT AND QA PERSONNEL FOR INSTALLATION OF TEMPORARY SUPPORTS, STEAM GENERATOR BOLTING, JAM NUTS, THREAD ENGAGEMENT, EICHROD ANCHOR BOLT INSERTS, REPAIR OF MISDRILLED HOLES/PLUG WELDING, MIXING OF PAINTS, AND PROTECTION OF UNPAINTED THREADS AND SURFACES. PROCEDURES DO NOT SPECIFY DESIGN STANDARDS FOR FABRICATED THREADS, INTERCHANGEABILITY OF VALVE PARTS, AND REACTOR VESSEL CLEANLINESS REQUIREMENTS. THERE WERE INADEQUATE WELDING PROCEDURES FOR WELDING OF THIN-WALL STAINLESS STEEL PIPE FOR PREVENTING HOOP SHRINKAGE. PROCEDURES DID NOT PROVIDE CLEAR PRECAUTIONARY DIRECTIONS REGARDING PROHIBITED CONSTRUCTION METHODS, SUCH AS UNAUTHORIZED WELDING TO REBAR, AND RESTRICTED USE OF VARIOUS TOOLS. REQUIREMENTS TO PAINT THE THREADS OF COMPONENT SUPPORT BOLTING CONTRADICT REQUIREMENTS OF ANOTHER PROCEDURE TO MAINTAIN THREADS FREE OF EXTRANEOUS MATERIALS.

IN SUMMARY, THE TRT QA/QC GROUP CONCLUDES THAT CONSTRUCTION AND INSPECTION PROCEDURES IN SOME AREAS WERE INADEQUATE, CONTRADICTORY, UNCONTROLLED, OR NONEXISTENT.

CAR(s) 90X, 66X, 68X, 65X, 67X, 87-1, 69X, 87-009, 87-015, 53, 46, 87-035, 87-039, 87-002, 70X, 95X, 87-016, 87-018, 71X, 87-017, 87-041, 101, 72X, 87-005  
SDAR CF 87-32, 85-27, 88-12, 85-39, 87-081, 87-023, 87-070, 85-003, 86-050, 87-056, 86-063, 86-38, 87-113



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSESs 07, 06, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

\*\* 11 11.841 TRT-79  
SSER: 11 OVERALL ASSESSMENT AND  
ALLEG: TR-79 CONCLUSIONS (REF PG P-34)  
ITEM: 11.841

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

TRT  
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CER PART IV

APPENDIX P CONSOLIDATES ALL QUALITY ISSUES IDENTIFIED BY ALL TRT GROUPS IN RELATION TO EIGHT QUALITY ATTRIBUTES. AS NOTED IN THE INTRODUCTION, THE SCOPE OF THE TRT REVIEW AND INSPECTION WAS LIMITED TO THE QA/QC CONCERNS RAISED BY THE ALLEGATIONS. APPENDIX P FOCUSES ON PROBLEM AREAS THAT NEED FURTHER IDENTIFICATION. THIS IDENTIFICATION OF PROBLEM AREAS WILL FACILITATE THE PREPARATION OF A CORRECTIVE ACTION PLAN, WHICH SHOULD PROVIDE REASONABLE ASSURANCE THAT THE FACILITY HAS BEEN PROPERLY CONSTRUCTED.

BASED ON ITS ASSESSMENT OF THE TOTAL TRT EFFORT, THE QA/QC GROUP FINDS THAT QA/QC PROBLEMS AT COMANCHE PEAK APPEAR TO BE THE RESULT OF THE FOLLOWING CONDITIONS THAT EXISTED PRIOR TO 1984:

- a. TU ELECTRIC SENIOR MANAGEMENT WAS NOT ACTIVELY INVOLVED IN SITE QA/QC ACTIVITIES.
- b. THE TRAINING AND QUALIFICATION OF QA/QC, CRAFT, AND OTHER PERSONNEL WERE NOT ADMINISTERED AND MONITORED EFFECTIVELY.
- c. DESIGN ENGINEERING ACTIVITIES WERE NOT EFFECTIVE IN PROVIDING CRAFT AND QA PERSONNEL WITH ADEQUATE PROCEDURES, INSTRUCTIONS, AND OTHER DESIGN DOCUMENTS.
- d. THE CONTROL OF DOCUMENTS, AND SUBSEQUENTLY OF RECORDS, WAS REplete WITH RECURRENT DEFICIENCIES.
- e. SOME CRAFT PERSONNEL APPEARED TO BE INSENSITIVE TO QA/QC CONCERNS AT TIMES, POSSIBLY BECAUSE OF LACK OF TRAINING, TIGHT SCHEDULES, AND EXCESSIVE SCHEDULE EMPHASIS BY CONSTRUCTION MANAGEMENT.
- f. QUALITY MANAGEMENT WAS LAX IN ITS RESPONSIBILITIES TO DIRECT AND OVERSEE AN EFFECTIVE SITE QUALITY PROGRAM.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

8. SOME QC PERSONNEL EXHIBITED REPEATED LAPSES IN EFFECTIVELY EXECUTING THEIR RESPONSIBILITIES FOR INSPECTION ACTIVITIES.

THE PATTERN OF FAILURES BY QA AND QC PERSONNEL TO DETECT AND DOCUMENT DEFICIENCIES SUGGESTS AND INEFFECTIVE NRC AND TUCO INSPECTION SYSTEM. THIS PATTERN, COUPLED WITH (a) THE PAST PROBLEMS IN THE DOCUMENT CONTROL SYSTEM, (b) DEFICIENCIES IN THE QC QUALIFICATION PROGRAM, (c) INEFFECTIVENESS OF THE QUALITY AUDIT AND SURVEILLANCE SYSTEMS, (d) A REDUNDANT AND INEFFECTIVE TRENDS AND CORRECTIVE ACTION SYSTEM, (e) QC PROBLEMS AS SHOWN IN QA/QC CATEGORY 8, AQ-20; AND (f) INSTANCES OF IMPROPER MEMBERSHIP OF BAROMARE AS FOUND BY ALL OF THE TRT GROUPS, CHALLENGES THE ADEQUACY OF THE QC INSPECTION PROGRAM AT CPSES ON A SYSTEM-WIDE BASIS

CORRECTIVE ACTION WILL REQUIRE HIGH-LEVEL MANAGEMENT ATTENTION AND A NEW MANAGEMENT EMPHASIS ON THE IMPORTANCE OF QUALITY AS A VITAL ELEMENT OF AN ADEQUATE CONSTRUCTION PROGRAM.

TU ELECTRIC ACTIONS

AS THE TRT QA/QC GROUP HAS NOTED PREVIOUSLY, ITS RESULTS ARE BASED ON A BIASED SAMPLE IN THE SENSE THAT THE SAMPLE WAS INITIALLY DEVELOPED FROM ALLEGATIONS. ADDITIONAL ITEMS BROUGHT TO THE TRT'S ATTENTION, AND ITEMS FOUND BY THE TRT. NEVERTHELESS THE TRT BELIEVES THE RESULTS ARE MEANINGFUL. TU ELECTRIC SHALL EVALUATE THE TRT QA/QC FINDINGS AND CONSIDER THE IMPLICATIONS OF THESE FINDINGS ON THE QUALITY OF CONSTRUCTION AT COMANCHE PEAK. TU ELECTRIC SHALL THEN SUBMIT TO THE NRC A PROGRAM PLAN AND SCHEDULE FOR COMPLETING A DETAILED AND THOROUGH ASSESSMENT OF THE QA ISSUES PRESENTED IN THE ENCLOSURE TO THIS SUPPLEMENT. THE PROGRAMMATIC PLAN AND THE PLANS FOR ITS IMPLEMENTATION WILL BE REVIEWED AND EVALUATED BY THE NRC STAFF.

THE TRT CONSIDERS THE FINDINGS TO BE GENERIC TO BOTH UNITS 1 AND 2, AND THE PROGRAM PLAN AND SCHEDULE SHOULD ADDRESS BOTH UNITS. THIS PROGRAM PLAN SHOULD:  
(1) ADDRESS THE ROOT CAUSE OF EACH FINDING AND ITS GENERIC IMPLICATIONS ON SAFETY-RELATED SYSTEMS.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

PROGRAMS, OR AREAS. (2) ADDRESS THE COLLECTIVE SIGNIFICANCE OF THESE DEFICIENCIES. (3) ADDRESS THE TOTAL IMPACT OF ONE DISCIPLINE-RELATED FINDING IN OTHER DISCIPLINES. AND (4) PROPOSE AN ACTION PLAN THAT WILL CORRECT ALL PROBLEMS IDENTIFIED AND ENSURE SUCH PROBLEMS DO NOT OCCUR IN THE FUTURE.

THE PLAN SHOULD ALSO ASSURE THAT THE FOREGOING MATTERS ARE ADDRESSED SO AS TO PROVIDE REASONABLE ASSURANCE THAT NO SAFETY-SIGNIFICANT DEFICIENCIES REMAIN UNDETECTED AND UNRESOLVED. TU ELECTRIC EXAMINATION OF THE POTENTIAL QUALITY IMPLICATIONS OF THE TRT FINDINGS SHALL INCLUDE, BUT NOT BE LIMITED TO THE AREAS OR ACTIVITIES SELECTED BY THE TRT. THE PROGRAM PLAN MUST DESCRIBE THE DEPTH AND BREADTH OF TU ELECTRIC'S APPROACH IN SUFFICIENT DETAIL TO PERMIT AN INDEPENDENT EVALUATION OF THE PLAN. THIS EVALUATION MUST CONCLUDE THAT THE PLAN IS COMPREHENSIVE AND SELF-SUFFICIENT AND WILL PROVIDE REASONABLE ASSURANCE THAT THE QUALITY OF THE CONSTRUCTION CAN BE DEMONSTRATED.

THE ACTIONS SHALL ALSO CONSIDER THE USE OF MANAGEMENT PERSONNEL WITH A FRESH PERSPECTIVE TO EVALUATE THE TRT'S FINDINGS AND IMPLEMENT CORRECTIVE ACTIONS. TU ELECTRIC SHALL CONSIDER THE USE OF AN INDEPENDENT CONSULTANT TO PROVIDE OVERSIGHT TO THE PROGRAM. TU ELECTRIC SHALL ALSO INVESTIGATE THE ROLE OF THE PRINCIPAL CONTRACTOR PERSONNEL (BROWN & ROOT AND EMASCO) IN REGARD TO QUALITY ASSURANCE/QUALITY CONTROL CONCERNS. ALTHOUGH THE TRT QA/QC GROUP REALIZES THAT TU ELECTRIC IS ULTIMATELY RESPONSIBLE FOR THE PLANT, THE CONTRACTOR (CONSTRUCTION) IS DIRECTLY RESPONSIBLE FOR CONSTRUCTION AND QUALITY CONTROL. TU ELECTRIC SHALL ALSO CONSIDER THE PRUDENCE OF CONTINUING TO RELY ON CONTRACTOR MANAGEMENT PERSONNEL INVOLVED IN ONGOING WORK AND RECOVERY EFFORTS WHEN THEY ARE THE SAME PEOPLE DIRECTLY RESPONSIBLE FOR THE PROBLEMS IDENTIFIED HEREIN.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TBT ISS'VE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

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COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
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TNT ISSUES - SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPPT RESOLUTION DOCUMENTS
** 08 08 05A SSER: 08 ALLEG: AC-25 ITEM: 08 05A	AC-25 VOIDS EXISTED IN THE CONCRETE WALL BEHIND THE UNIT-1 REACTOR CAVITY STAINLESS STEEL LINER. REF. PG. K-38.	TNT --- THE ALLEGOR STIPULATED THAT HOLLOW PLACES WERE LOCATED BEHIND THE STAINLESS STEEL LINER OF UNIT 1 REACTOR C-VITY, BUT WHEN INTERVIEWED BY TNT, HE STATED THAT HE MEANT UNIT 2. THE ALLEGATION WAS INVESTIGATED BY NRC REGION IV AND DOCUMENTED IN RIV-IN 50-445/80-11 AND 50-446/80-11, WHICH WERE REVIEWED BY TNT AS A STEP IN ITS OWN ASSESSMENT OF THE SITUATION.	ISAP(s) VII.C, APPENDIX 10 SOAR CP-79-13 STIR CPRT-5-002
		ACTION REQUIRED ----- THE REPAIRS AND THE REPAIR DOCUMENTATION TO THE REINFORCING EXISTING IN CONCRETE BEHIND THE STAINLESS STEEL LINER OF THE UNIT 2 REACTOR CAVITY MUST BE INSPECTED/REVIEWED AND APPROVED BY THE NRC RESIDENT INSPECTOR BEFORE TNT CAN DETERMINE WHETHER THIS ISSUE HAD BEEN ADEQUATELY RESOLVED. THE SUCCESSFUL COMPLETION OF THE REPAIRS SHALL BE REPORTED TO TNT AND WILL BE VERIFIED BY THE NRC RESIDENT INSPECTOR PRIOR TO LOW-POWER OPERATIONS.	

COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 08 08.098 SSER: 08 ALLEG: AC-38 ITEM: 08.098	AC-38 HORIZONTAL TIE REBAR WAS MISSING FROM THE UNIT-1 CONTAINMENT BLDG. WALL. REF. PG. K-49.	TRT --- TRT CONCLUDED THAT HORIZONTAL SHEAR BAR REINFORCEMENT WAS PLACED IN THE UNIT-1 CONTAINMENT BUILDING WALL AS REQUIRED. TRT AGREED WITH THE CONCLUSION DRAWN BY THE NRC REGION IV INSPECTION REPORT NO. 79-25 THAT THE ALLEGATION REFERS TO THE UNIT-2 CONTAINMENT STRUCTURE. FOR THE UNIT-2 CONTAINMENT, A GIBBS & HILL ANALYSIS SHOWED THAT THE STRUCTURE WAS CAPABLE OF CARRYING THE DESIGN LOADING IN THE AS-BUILT CONDITION. THIS ISSUE HAS NO STRUCTURAL SAFETY SIGNIFICANCE.  HOWEVER, THE RESULTS OF THESE EVALUATIONS THAT PERTAIN TO QC REBAR PLACEMENT WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.	(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRE ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRE ISSUE SUMMARY

TRE/CPRT RESOLUTION DOCUMENTS

\*\* 08 08 060 AC-49  
SSER: 08  
ALLEG: AC-49  
ITEM: 08 060

REBAR WAS INSTALLED UPSIDE DOWN  
IN A BUILDING NEAR THE UNIT-2  
CONTAINMENT STRUCTURE. REF. PG.  
K-49.

TRE  
---

TRE CONCLUDED THAT THIS INSTANCE OF REBAR BEING  
IMPROPERLY INSTALLED WAS CORRECTED PRIOR TO CONCRETE  
PLACEMENT. THEREFORE, THIS ALLEGATION HAS NO  
STRUCTURAL SAFETY SIGNIFICANCE.

HOWEVER, THE RESULTS OF THESE EVALUATIONS THAT PERTAIN  
TO QC REBAR PLACEMENT WILL BE FURTHER ASSESSED AS A  
PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING  
PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, QC  
INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF  
THESE EVALUATIONS WILL BE PREDICATED ON THE  
SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF  
THIS SUBJECT.

(REFER TO ITEM 11.04F FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRE PROGRAMMATIC CATEGORIES)



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TEXT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TEXT ISSUE SUMMARY

THE/CPRT RESOLUTION DOCUMENTS

\*\* 08 08 10 PARA E (1)  
SSER: 08 REBAR WAS OMITTED IN A REACTOR  
ALLEG: PARA E (1) CAVITY CONCRETE PLACEMENT  
ITEM: 08 10 BETWEEN THE 812-FT. AND 819-FT.  
1/2-IN. ELEVATIONS IN UNIT-3  
REACTOR BLDG. REF PG. 8-52.

TEXT

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TEXT COULD NOT DETERMINE THE SAFETY SIGNIFICANCE OF THIS ISSUE UNTIL AN ANALYSIS WAS PERFORMED VERIFYING THAT THE REINFORCING STEEL IN THE AS-BUILT CONDITION WAS ADEQUATE.

ACTION REQUIRED

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TO ELECTRIC SHALL PROVIDE AN ANALYSIS OF THE AS-BUILT CONDITION OF THE UNIT 1 REACTOR CAVITY THAT VERIFIES THE ADEQUACY OF THE REINFORCING STEEL BETWEEN THE 812-FOOT AND 819-FOOT, 1/2-INCH ELEVATIONS. THE ANALYSIS SHALL CONSIDER ALL REQUIRED LOAD COMBINATIONS.

HOWEVER, THE RESULTS OF THESE EVALUATIONS THAT PERTAIN TO QC REBAR PLACEMENT WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, QC INSPECTING. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.

IN APPENDIX P, SSER-11, TEXT CHARACTERIZED THIS ITEM AS AN ISOLATED OCCURRENCE, OR VERY FEW OCCURRENCES, WITH NO GENERIC IMPACT.

ISAF(\*) 11 A  
STIR CPRT-5-003  
PGR: CIVIL

CHANDRER PEAK STATION ELECTRIC STATION (CPSES)  
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TNT ISSUES -- SSBs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPWT RESOLUTION DOCUMENTS
** 08 08 10A-1 PARA E (2) USER: 08 B & R REQUESTED A CHANGE IN ALLEG: PARA E (2) CONFIGURATION OF TWO ROWS BY ITEM: 08 10A-1 NINE LAYERS OF NO. 9 REBAR AS SHOWN ON DWG. 2323-51-07/2, REV. 4 TO A CONTIGUOUS CIRCULAR ARRANGEMENT. REF. PG. E-52.		TNT --- TNT CONCLUDED THAT THE CHANGE MADE TO THE NO. 9 REINFORCING BARS DID NOT AFFECT THE LOAD-CARRYING CAPACITY OF THE STRUCTURE.  HOWEVER, THE RESULTS OF THESE EVALUATIONS WHICH PERTAIN TO QC REBAR PLACEMENT AND RECEIPT INSPECTION PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, QC INSPECTION THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.	
			ISAP(a) II.A (REFER TO ITEM 11.64F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TNT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TXT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TXT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 08 08.15A SSEER: 08 ALLEG: PARA E (8) AUTHORIZATION TO SUBSTITUTE NO. ITEM: 08.15A	PARA E (8) B & B CONSTRUCTION REQUESTED 5 VERTICAL WALL REBAR IN LIEU OF THE NO. 8 WALL REBAR REQUIRED IN TWO CORNERS OF A WALL IN THE AUXILIARY BLDG. REF. PG. K-50.	TXT ---- BASED ON THE FACT THAT THE NO. 4 VERTICAL WALL BARS WERE INSTALLED IN CORNERS AS REQUIRED, TWT CONCLUDED THAT THIS ISSUE HAS NO STRUCTURAL SAFETY SIGNIFICANCE.  HOWEVER, THE RESULTS OF THESE EVALUATIONS THAT PERTAIN TO QC REBAR PLACEMENT WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, 1 INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.	ISAP II A (REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TWT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESa 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT/CPST RESOLUTION DOCUMENTS
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** 06 06 17A	AQC-01		ISAF(a) 11.B
SSER: 06	CONCRETE AIR ENTRAINMENT RECORDS		
ALLEG AQC-01	WERE FALSIFIED. REF. PG. K-59.		
ITEM: 06 17A			

TRT  
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TRT CONCLUDED THAT THE ALLEGATION ABOUT FALSIFYING A CONCRETE AIR ENTRAINMENT RECORD IS TRUE. EVEN SO, THE COMPRESSIVE STRENGTHS OF THE CONCRETE IN QUESTION WAS WITHIN SPECIFICATION. ACCORDINGLY, THE ABOVE ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE ALLEGATIONS RESOLVED ON THE BASIS OF ACCEPTABLE CONCRETE STRENGTH TEST RESULTS MAY NEED TO BE FURTHER ASSESSED PENDING THE RESOLUTION OF ALLEGATION AQC-7.

ALSO, THE RESULTS OF THESE EVALUATIONS PERTAINING TO QC INSPECTION PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 3, RECORDS. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW AND THE SATISFACTORY RESOLUTION OF ALLEGATION AQC-7.

IN APPENDIX P. SSES-11, TRT CHARACTERIZED THIS ITEM AS AN ISOLATED OCCURRENCE, OR VERY FEW OCCURRENCES, WITH NO GENERIC IMEACT.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 08 08.178-1 AQC-02  
SSES: 08 SLUMP RECORDS WERE FALSIFIED.  
ALLEG: AQC-02 REF. PG K-59  
ITDM: 08.178-1

15AP 11.B

THE ALLEGATION THAT SLUMP TESTS ON APRIL 11 AND 13, 1978 WERE PERFORMED INCORRECTLY AND THAT THE RESULTS WERE FALSIFIED COULD WELL BE TRUE AND CANNOT BE REFUTED. TRT EXAMINED THE COMPRESSIVE STRENGTH TEST RESULTS OF THE CONCRETE IN QUESTION AND FOUND THAT THEY WERE WITHIN SPECIFICATIONS. ACCORDINGLY, THE ABOVE ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE ALLEGATIONS RESOLVED ON THE BASIS OF ACCEPTABLE CONCRETE STRENGTH TEST RESULTS MAY NEED TO BE FURTHER ASSESSED PENDING THE RESOLUTION OF ALLEGATION AQC-7. ALSO, THE RESULTS OF THESE EVALUATIONS PERTAINING TO QC INSPECTION PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 3, RECORDS. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED /ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW AND THE SATISFACTORY RESOLUTION OF ALLEGATION AQC-7.

THE TRT PROGRAMMATIC REVIEW OF QA/QC CATEGORY 3, RECORDS, CONCLUDED THAT THE RECORDS SYSTEM WAS ADEQUATE AND ACCEPTABLE.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 08 08.17B-2 AQC-02  
SSER: 08 LABORATORY TESTS (AIR, SLUMP AND  
ALLEG: AQC-02 TDRP.) FOR CONCRETE PLACEMENTS  
ITEM: 08.17B-2 FOR 10 CU YDS OR LESS, PRIOR TO  
1976, WERE NOT PERFORMED. REF.  
PG. K-59

TRT

THE ALLEGATION THAT LABORATORY TESTS FOR SMALL  
PLACEMENTS WERE FALSIFIED WAS FOUND TO HAVE NO  
STRUCTURAL SAFETY SIGNIFICANCE BECAUSE CYLINDER  
STRENGTH TESTS WERE ALSO PERFORMED TO DEMONSTRATE  
ADEQUATE STRENGTH. IN INTERVIEWS WITH TRT, FORMER  
EMPLOYEES OF THE R. W. HUNT CO., WHO WORKED DURING THE  
TIME PERIOD CITED IN THE ALLEGATION, DENIED THE  
VALIDITY OF THE ALLEGATION. FURTHERMORE, THE LIMITED  
NUMBER OF CONCRETE PLACEMENTS OF LESS THAN 10 CU YDS,  
EVEN IF IMPROPERLY TESTED, WOULD HAVE LITTLE  
STRUCTURAL SAFETY SIGNIFICANCE.

ACCORDINGLY, THE ABOVE ALLEGATION HAS NO STRUCTURAL  
SAFETY SIGNIFICANCE. HOWEVER, THE ALLEGATIONS RESOLVED  
ON THE BASIS OF ACCEPTABLE CONCRETE STRENGTH TEST  
RESULTS MAY NEED TO BE FURTHER ASSESSED PENDING THE  
RESOLUTION OF ALLEGATION AQC-7. ALSO, THE RESULTS OF  
THESE EVALUATIONS PERTAINING TO QC INSPECTION  
PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE  
SMALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES  
ADDRESSED UNDER QA/QC CATEGORY 3, RECORDS. THEREFORE,  
THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE  
PREDICATED ON THE SATISFACTORY RESULTS OF THE  
PROGRAMMATIC REVIEW AND THE SATISFACTORY RESOLUTION OF  
ALLEGATION AQC-7.

THE TRT PROGRAMMATIC REVIEW OF QA/QC CATEGORY 3,  
RECORDS, CONCLUDED THAT THE RECORDS SYSTEM WAS  
ADEQUATE AND ACCEPTABLE. ALSO, IN APPENDIX F, SSER-11,  
TRT CHARACTERIZED THIS ITEM AS OCCURRING NOT AS  
FREQUENTLY AS TO IMPLY A GENERIC PROBLEM.

15AP(8) VII.C, APPENDIX 14, II.B

COPANACHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPPT RESOLUTION DOCUMENTS

\*\* 08 08.178-3 AQC-02  
SSER: 08 LABORATORY TESTS WERE SIGNED BY  
ALLEG: AQC-02 A LEVEL II INSPECTOR NOT PRESENT  
ITEM: 08.178-3 AT TIME THE TESTS WERE  
PERFORMED. REF. PG K-61

TRT  
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THE ALLEGATION THAT AN INSPECTOR SIGNED TEST RESULTS FOR WHICH HE COULD NOT HAVE HAD KNOWLEDGE, COULD NOT BE SUBSTANTIATED BECAUSE NO REPORTS COULD BE FOUND WHICH HAD BEEN SIGNED BY THE INSPECTOR ON THE DAYS ALLEGED. EVEN IF THE ALLEGATION WERE TRUE, TEST RESULTS SHOWED THE STRENGTH OF THE CONCRETE PLACED DURING THE PERIOD OF THE ALLEGATION TO BE ABOVE THE MINIMUM REQUIRED STRENGTH. ACCORDINGLY, THE ABOVE ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE ALLEGATIONS RESOLVED ON THE BASIS OF ACCEPTABLE CONCRETE STRENGTH TEST RESULTS MAY NEED TO BE FURTHER ASSESSED PENDING THE RESOLUTION OF ALLEGATION AQC-7.

ALSO, THE RESULTS OF THESE EVALUATIONS PERTAINING TO QC INSPECTION PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 3. RECORDS THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW AND THE SATISFACTORY RESOLUTION OF ALLEGATION AQC-7.

TRT CONCLUDED UNDER QA/QC CATEGORY 3 THAT THE RECORDS SYSTEM WAS ADEQUATE AND ACCEPTABLE.

ISAF(s) 11.B

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

\*\* 08 08.178-4 A/C-02  
SSER: 08 THE ALLEGER SIGNED A PRESSURE  
ALLEG: A/C-02 GAUGE QUALIFICATION TEST THAT HE  
ITEM: 08.178-4 WAS NOT QUALIFIED TO CERTIFY.  
REF. PG. K-60 AND 61.

ISSUE

TRT

THE ALLEGATION THAT THE ALLEGER SIGNED A PRESSURE GAUGE TEST THAT HE WAS NOT QUALIFIED TO CERTIFY WAS FOUND TO HAVE NO STRUCTURAL SAFETY SIGNIFICANCE BECAUSE THE ALLEGER DID NOT ACTUALLY PERFORM THE CALIBRATION. ACCORDINGLY, THE ABOVE ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE ALLEGATIONS RESOLVED ON THE BASIS OF ACCEPTABLE CONCRETE STRENGTH TEST RESULTS MAY NEED TO BE FURTHER ASSESSED PENDING THE RESOLUTION OF ALLEGATION A/C-7.

ALSO, THE RESULTS OF THESE EVALUATIONS PERTAINING TO QC INSPECTION PROCEDURES WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 3, RECORDS. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW AND THE SATISFACTORY RESOLUTION OF ALLEGATION A/C-7.

TRT CONCLUDED UNDER QA/QC CATEGORY 3 THAT THE RECORDS SYSTEM WAS ADEQUATE AND ACCEPTABLE. ALSO, IN APPENDIX F, SSER-11, TRT CHARACTERIZED THIS ITEM AS OCCURRING NOT SO FREQUENTLY AS TO IMPLY A GENERIC PROBLEM.

TRT ISSUE SUMMARY

ISS/P(s) 11.B

THE/CPRT RESOLUTION DOCUMENTS





COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TBT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 08 08 17D AQC-07  
SSER: 08 CONCRETE COMPRESSIVE STRENGTH  
ALLEG: AQC-07 TEST RESULTS WERE FALSIFIED.  
ITEM: 08 17D REF. PG. K-62 AND 64.

TBT  
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TBT AGREED WITH THE NRC REGION IV STAFF THAT THE UNIFORMITY OF THE FRESH CONCRETE PLACED DURING THIS PERIOD SUGGESTED THAT THERE WAS NO SERIOUS PROBLEM WITH THE HARDENED CONCRETE AND, THEREFORE, NO SERIOUS SAFETY PROBLEM. HOWEVER, THIS CONCLUSION WAS BASED ON AIR CONTENT, SLUMP AND STRENGTH TESTS, ALL OF WHICH HAD BEEN ALLEGED TO BE FALSIFIED. THE ISSUES REGARDING AIR CONTENT AND SLUMP WERE RESOLVED ON THE BASIS OF THE CONCRETE STRENGTH TEST RESULTS. DUE TO THE IMPORTANCE OF THESE RESULTS, TBT CONCLUDED THAT ADDITIONAL ACTION BY TU ELECTRIC WAS NECESSARY TO PROVIDE CONFIRMATORY EVIDENCE THAT THE REPORTED COMPLETE STRENGTH TEST RESULTS WERE REPRESENTATIVE OF THE STRENGTH OF THE CONCRETE PLACED IN CATEGORY 1 STRUCTURES.

ACTIONS REQUIRED

TU ELECTRIC SHALL DETERMINE AREAS WHERE SA, Y-RELATED CONCRETE WAS PLACED BETWEEN JANUARY 1976 AND JANUARY 1977, AND PROVIDE A PROGRAM TO ASSURE ACCEPTABLE CONCRETE STRENGTH. THE PROGRAM SHALL INCLUDE TESTS SUCH AS THE USE OF RANDOM SCHMIDT HAMMER TESTS ON THE CONCRETE IN AREAS WHERE SAFETY IS CRITICAL. THE PROGRAM SHALL INCLUDE A COMPARISON OF THE RESULTS WITH THE RESULTS OF TESTS PERFORMED ON CONCRETE OF THE SAME DESIGN STRENGTH IN AREAS WHERE THE STRENGTH OF THE CONCRETE IS NOT QUESTIONED, TO DETERMINE IF ANY SIGNIFICANT VARIANCE IN STRENGTH OCCURS. TU ELECTRIC SHALL SUBMIT THE PROGRAM FOR PERFORMING THESE TESTS TO THE NRC FOR REVIEW AND APPROVAL PRIOR TO PERFORMING THE TESTS.

ISAP(s) 11.B  
FSR- CIVIL



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SERS 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPMT RESOLUTION DOCUMENTS -----

\*\* 09 08 18  
SERS: 08  
ALLEG: AGC-09  
ITEM: 08 18

AGC-09  
RECERTIFICATION EXAMINATIONS FOR  
R. W. BUNT INSPECTORS WERE GIVEN  
"OPEN BOOK" AND EXAMINATIONS  
WERE GIVEN WITH THE ANSWERS  
SUPPLIED. REF. PG. K-67.

TRT  
----

THE ALLEGATION THAT RECERTIFICATION TESTS WERE GIVEN  
OPEN BOOK COULD NOT BE REFUTED. WORK PERFORMED BY THE  
INDIVIDUAL IN QUESTION WAS AUDITED AND FOUND TO BE  
SATISFACTORY WHICH WOULD INDICATE HE WAS CAPABLE OF  
PERFORMING THE REQUIRED TESTING PROPERLY.  
ADDITIONALLY, TEST RESULTS FOR CONCRETE PLACED,  
INCLUDING COMPRESSION TESTS, SHOWED CONCRETE TO BE OF  
UNIFORM QUALITY. THIS SUPPORTED THE QUALIFICATIONS OF  
INSPECTORS INVOLVED. TRT CONCLUDED THAT THIS ISSUE HAS  
NO STRUCTURAL SAFETY SIGNIFICANCE.

THE RESULTS OF THESE EVALUATIONS WILL BE FURTHER  
ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW  
CONCERNING INSPECTOR QUALIFICATIONS ADDRESSED UNDER  
QA/QC CATEGORY 4, TRAINING AND QUALIFICATION OF  
PERSONNEL. THEREFORE, THE FINAL ACCEPTABILITY OF THESE  
EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY  
RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.

(REFER TO ITEM 11 8-c FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)



COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- S5ERS 07, 08, 10 and 11  
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TUE/CPRT RESOLUTION DOCUMENTS  
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TNT ISSUE SUMMARY  
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ISSUE  
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ISSUE SOURCE  
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\*\* 08 08 10B AQC-05  
S5ER: 08 IMPROPER METHODS WERE USED TO  
ALLEG: AQC-05 DRY COMARCHE AGGREGATE FOR SIEVE  
ITEM: 08 10B ANALYSIS. REF. PG. K-72.

TNT  
---

TNT CONCLUDED THAT THE ALLEGED SHORTCUT IN CARRYING  
OUT AGGREGATE GRADING TESTS WAS PERMITTED BY THE  
PROVISIONS OF THE SPECIFIED TEST METHOD IN ASTM C-136.  
ACCORDINGLY, THIS ALLEGATION HAS NO STRUCTURAL SAFETY  
SIGNIFICANCE.

HOWEVER, THE EFFECTIVENESS OF QUALITY CONTROL IN THE  
LABORATORY WILL BE FURTHER ASSESSED AS PART OF THE  
OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES  
ADDRESSED UNDER QA/QC CATEGORY 6. QC INSPECTION.  
THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION  
WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE  
PROGRAMMATIC REVIEW OF THIS SUBJECT.

(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TNT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 08 08.19C AQC-06  
SSER: 08 SOME OF THE UNIT-1 CONTAINMENT  
ALLEG: AQC-06 BLDG. BASEMAT CONCRETE WAS  
ITEM: 08.19C PLACED WITHOUT REQUIRED TESTING.  
REF. PG. K-72.

TRT  
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TRT CONCLUDED THAT ALL REQUIRED TESTING WAS CARRIED  
OUT IN CONNECTION WITH THE 6600-CUBIC-YD. BASEMAT  
PLACEMENT. ACCORDINGLY, THIS ALLEGATION HAS NO  
STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE  
EFFECTIVENESS OF QUALITY CONTROL IN THE LABORATORY  
WILL BE FURTHER ASSESSED AS PART OF THE OVERALL  
PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED  
UNDER QA/QC CATEGORY 6. QC INSPECTION, THEREFORE, THE  
FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE  
PREDICATED ON THE SATISFACTORY RESULTS OF THE  
PROGRAMMATIC REVIEW OF THIS SUBJECT.

(REFER TO ITEM 11.94F FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSES# 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPST RESOLUTION DOCUMENTS

\*\* 08 08.180 AGC-08  
SSES: 08 CONCRETE COMPRESSIVE STRENGTH  
ALLEG: AGC-08 TR: 5.7" CILINDERS WERE LOADED AT AN  
ITEM: 08.180 EXCL: " RATE. REF. PG. K-71.

TRT  
---

TRT CONCLUDED THAT ALTHOUGH THE ALLEGATION MAY HAVE BEEN TRUE, THE FASTEST POSSIBLE LOADING OF TEST CYLINDERS WOULD HAVE INCREASED THE INDICATED STRENGTHS BY NO MORE THAN 6.5 PERCENT AND WOULD HAVE NO EFFECT ON ACCEPTABILITY OF THE CONCRETE. ACCORDINGLY, THIS ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE EFFECTIVENESS OF QUALITY CONTROL IN THE LABORATORY WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6. QC INSPECTION THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.

(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 08 08.19F SSER: 08 ALLEG: AQC-48 ITEM: 08.19F	AQC-48 CONCRETE TEST CYLINDERS IN THE R. W. HUNT LABORATORY MOIST ROOM WERE ALLOWED TO DRY. REF. PG. K-73.	TRT --- TRT CONCLUDED THAT ALTHOUGH THE LABORATORY FAILED TO MAINTAIN WATER SUPPLY FOR BRIEF PERIODS, THESE PERIODIC BREAKDOWNS WOULD RESULT IN CONSERVATIVE STRENGTH RESULTS. ACCORDINGLY, THIS ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE.  HOWEVER, THE EFFECTIVENESS OF QUALITY CONTROL IN THE LABORATORY WILL BE FURTHER ASSESSED AS PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, QC INSPECTION. THEREFORE, THE FINAL ACCEPTABILITY OF THIS EVALUATION WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.	(REFER TO ITEM 11 84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



COMPACTE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 06, 10 and 11  
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ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

TUE/CPST RESOLUTION DOCUMENTS

\*\* 06 06 210 AC-14  
SSER: 06 THERE WAS UNAUTHORIZED CUTTING  
ALLEG: AC-14 OF REBAR IN NONSPECIFIC  
ITEM: 06 210 LOCATIONS. (AC-16 AND AC-40 ARE  
ALSO COVERED) REF. PG. K-87.

TNT  
---

TNT CONCLUDED THAT THIS ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. ALLEGATIONS WERE NOT SPECIFIC, AS TO WHO MADE THE UNAUTHORIZED CUTS OF REBAR OR WHERE THEY TOOK PLACE. THE NUMBER OF UNAUTHORIZED CUTS, IF TRUE, WOULD HAVE AN INCONSEQUENTIAL EFFECT ON THE SAFETY OF THE STRUCTURE. HOWEVER, THE RESULTS OF THESE EVALUATIONS WILL BE FURTHER ASSESSED AS A PART OF THE PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER QA/QC CATEGORY 6, Q. INSPECTIONS. THEREFORE, THE FINAL ACCEPTABILITY OF THESE EVALUATIONS WILL BE PREDICATED ON THE SATISFACTORY RESULTS OF THE PROGRAMMATIC REVIEW OF THIS SUBJECT.

USAF(4) 11.E  
(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TNT PROGRAMMATIC CATEGORIES)

CUMMINS PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSBs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TRT/CPRT RESOLUTION DOCUMENTS -----

\*\* 06 08 21C AC-18  
SSER: 06 T-REX WAS UNAUTHORIZED CUTTING SEE AC-14, ITEM 08 21B  
ALLEG: AC-18 OF REBAR IN NONSPECIFIC  
ITEM: 06 21C LOCATIONS. REF. PG. K-87.

COMPANIE PEAK STEEL ELECTRIC STATION (CPSES)

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TWT ISSUES --- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TWT ISSUE SUMMARY	TWT/CPWT RESOLUTION DOCUMENTS
** 08 08 210 AC-40 SSER. 08 ALLEG. AC-40 ITEM. 08 210	THESE WAS UNAUTHORIZED CUTTING OF REBAR IN NONSPECIFIC LOCATIONS. REF. PG. K-87.	SEE AC-14, ITEM 08 218.	

COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 16 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE/CPWT RESOLUTION DOCUMENTS

\*\* 08 08 21E AC-15  
SSER: 08  
ALLEG: AC-15  
I/DM: 08 21E  
THERE WAS UNAUTHORIZED CUTTING OF REBAR DURING INSTALLATION OF TROLLEY PROCESS AISLE RAILS IN THE FUEL HANDLING BLDG. REF. PG. 8-87.

TRT  
----

REVIEW OF THE REINFORCEMENT DRAWINGS REVEALED THAT THE LAYOUT OF THE EAST-WEST REINFORCEMENT AND THE TROLLEY PROCESS AISLE RAILS WAS SUCH THAT ONLY ONE BAR OF THE EAST-WEST REINFORCEMENT COULD BE CUT BY DRILLING HOLES FOR RAIL ANCHORS. HOWEVER, IF NINE INCH HOLES WERE DRILLED, BOTH LAYERS OF THE NO. 16 REINFORCING BAR WOULD BE CUT. IF THE TEN HOLES WERE ACTUALLY DRILLED NINE INCHES DEEP, THEN THE ALLEGATION THAT REINFORCEMENT WAS CUT WITHOUT PROPER AUTHORIZATION MAY BE VALID.

ISAP(s) II, K  
PSR. CIVIL

ACTION REQUIRED

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THIS ALLEGATION WILL REMAIN OPEN UNTIL TO ELECTRIC PROVIDES THE FOLLOWING:

1. INFORMATION TO DEMONSTRATE THAT ONLY THE NO. 16 REINFORCING STEEL IN THE FIRST LAYER WAS CUT, OR
2. DESIGN CALCULATIONS TO DEMONSTRATE THAT STRUCTURAL INTEGRITY IS MAINTAINED IF THE NO. 16 REINFORCING STEEL ON BOTH THE FIRST AND THIRD LAYERS WAS CUT.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSTRES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE/CPST RESOLUTION DOCUMENTS

\*\* 06 08 23

AQC-45

SOMEBODY PRODUCED INCORRECT SCALE READINGS AT THE CONCRETE BATCH PLANT BY LEAVING ON THE WIRES CONNECTING THE WEIGHT HOPPERS TO THE SCALES. REF. PG. K-95.

TRT  
---

TRT CONCLUDED THAT THIS ALLEGATION CAN NEITHER BE VERIFIED NOR REFUTED. IF TAMPERING DID OCCUR, IT WAS CONFINED TO SCALES WHERE EITHER NO EFFECT OR A BENEFICIAL EFFECT ON THE CONCRETE OCCURRED. ACCORDINGLY, THIS ALLEGATION HAS NO STRUCTURAL SAFETY SIGNIFICANCE. HOWEVER, THE RESULTS OF THIS EVALUATION PERTAINING TO QC CONTROLS AT THE BATCH PLANT WILL BE FURTHER ASSESSED AS A PART OF THE OVERALL PROGRAMMATIC REVIEW CONCERNING PROCEDURES ADDRESSED UNDER "QC INSPECTION".

ISAP(s) VII C. APPENDIX 18  
(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SEE#s 07, 08, 10 and 11

TRT ISSUE SUMMARY

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 04 08 31 AM-03  
DURING HOT FUNCTIONAL TESTING,  
EXPANSION CAUSED THE REACTOR  
PRESSURE VESSEL REFLECTIVE  
INSULATION (RIPORI) TO TOUCH THE  
BIOLOGICAL SHIELD WALL. REF.  
PG. E-90

TRT  
---

BASED ON A REVIEW OF DOCUMENTATION AND DISCUSSIONS,  
TRT CONCLUDED THAT THE RIPORI DID MAKE CONTACT WITH  
CONSTRUCTION DERRIS, BUT DID NOT CONTACT THE  
STEEL-LINED CONCRETE BIOLOGICAL SHIELD WALL AS  
SPECIFICALLY ALLEGED. DURING FINDER OPTIC INSPECTION,  
TU ELECTRIC PERSONNEL OBSERVED NO VISIBLE DAMAGE TO  
THE REFLECTIVE INSULATION, AND ALL CORRECTIVE  
MODIFICATIONS WERE ACCOMPLISHED AND ACCEPTED IN  
ACCORDANCE WITH WESTINGHOUSE PROCEDURE MP 2.7.1-TDR-3  
AND FMS TRM-10609, 10611 AND 10612.

TRT CONCLUDED THAT THE REACTOR PRESSURE VESSEL WAS SET  
WITHIN THE DESIGN LOCATION TOLERANCE. TRT COULD NOT  
SUBSTANTIATE THE ALLEGATION AS STATED, ALTHOUGH IT  
DOES HAVE SOME VALIDITY BECAUSE AN UNSATISFACTORY  
CONDITION DID EXIST IN THAT THE REFLECTIVE INSULATION  
MADE CONTACT WITH DERRIS. HOWEVER, THIS ALLEGATION  
HAS BOTH SAFETY SIGNIFICANCE AND GENERIC IMPLICATIONS  
BECAUSE OF PERIPHERAL ISSUES, I.E., FAILURE TO ASSURE  
THAT PROPER DESIGN CHANGES WERE COMMUNICATED BETWEEN  
ORGANIZATIONS, FAILURE TO DETERMINE AND REPORT THE  
UNDERLYING CAUSE OF A SIGNIFICANT DEFICIENCY, AND  
FAILURE TO ENSURE A PROPER GAP BETWEEN THE SUPPORT  
CHANNEL AND SHIELD WALL WHEN THE VESSEL WAS SET.

IN APPENDIX F, SEE#-11, TRT CHARACTERIZED THIS ITEM AS  
AN ISOLATED OCCURRENCE, OR VERY FEW OCCURRENCES, WITH  
NO GENERIC IMPACT.

ACTION\* REQUIRED

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TO ELECTRIC SHALL.

1. REVIEW THEIR PROCEDURES FOR APPROVAL OF DESIGN  
CHANGES TO NONNUCLEAR SAFETY-RELATED EQUIPMENT, SUCH  
AS THE RA-021, AND MAKE REVISIONS AS NECESSARY TO  
ENSURE THAT SUCH DESIGN CHANGES DO NOT ADVERSELY  
AFFECT SAFETY-RELATED SYSTEMS.

ISAF(a) VI.A, SEC. 5.5, 5.8  
STIR CPRT-C-010

TRT/CPST RESOLUTION DOCUMENTS



COMBICHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT 125-825 -- SURE# 07, 08, 10 #0 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE CPSEC RESOLUTION DOCUMENTS

2. REVIEW PROCEDURES FOR REPORTING SIGNIFICANT DESIGN/CONSTRUCTION DEFICIENCIES, PURSUANT TO 10CFR PART 50.55 (\*), AND MAKE CHANGES AS NECESSARY TO ENSURE THAT COMPLETE EVALUATIONS ARE SPECIFIED.
3. PROVIDE ANALYSIS THAT VERIFIES THAT THE COOLING FLOW IN THE ANNULUS BETWEEN THE NPVRI AND THE SHIELD WALL OF UNIT 2 IS ADEQUATE FOR THE AS-BUILT CONDITION.
4. VERIFY DURING UNIT 3 HOT FUNCTIONAL TESTING THAT COMPLETED MODIFICATIONS TO THE NPVRI SUPPORT RING NOW ALLOW ADEQUATE COOLING AIR FLOW.

TRT NOTES THAT CONTROL OF DEBRIS IN CRITICAL SPACINGS BETWEEN COMPONENTS AND/OR STRUCTURES WAS IDENTIFIED AS AN ISSUE NOTE IN THE INVESTIGATION OF THIS ALLEGATION AND IN THE CIVIL AND STRUCTURAL AREA CONTAINED IN DARRELL G. EIDERBOUT'S LETTER OF SEPTEMBER 19, 1984, TO TU ELECTRIC. ACCORDINGLY, TO ELECTRIC SHALL ALSO:

1. IDENTIFY AREAS IN THE PLANT WITH SPACING BETWEEN COMPONENTS AND/OR STRUCTURES THAT ARE NECESSARY FOR PROPER FUNCTIONING OF SAFETY-RELATED COMPONENTS, SYSTEMS, OR STRUCTURES IN WHICH UNWANTED DEBRIS MAY COLLECT AND BE UNDETECTED OR BE DIFFICULT TO REMOVE.
2. INSPECT THE AREAS AND SPACES IDENTIFIED AND REMOVE DEBRIS.
3. INSTITUTE A PROGRAM TO MINIMIZE THE COLLECTION OF DEBRIS IN CRITICAL SPACES AND PERIODICALLY REINSPECT THESE SPACES AND REMOVE ANY DEBRIS WHICH MAY BE PRESENT.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 08 08.42 SSER: 08 ALLEG: AM-13 ITEM: 08.42	AM-13 PUMPS MANUFACTURED BY THE RAYNARD TYLER PUMP COMPANY WERE INSTALLED IN COMANCHE PEAK SAFETY SYSTEMS. THESE PUMPS MAY HAVE UNIDENTIFIED DEFICIENCIES BECAUSE OF THE POOR QA PROGRAM AT RAYNARD TYLER. REF. PG. K-117.	TRT --- TRT CONCLUDED THAT TU ELECTRIC HAD IDENTIFIED RAYNARD TYLER PUMPS ONSITE, TESTED THE PUMPS, AND REPORTED RESULTS AS REQUIRED BY IER-83-05. TRT ALSO CONCLUDED THAT THE ALLEGATION HAD POTENTIAL SAFETY SIGNIFICANCE AND GENERIC IMPLICATIONS. HOWEVER, TU ELECTRIC'S COMPLIANCE WITH IER 83-05 HAS ELIMINATED THOSE CONCERNS WITH RESPECT TO UNIT 1 STATION SERVICE WATER PUMPS (SSWPs). THE UNIT 2 PUMPS WILL BE INSPECTED DURING UNIT 2 PREOPERATIONAL TESTING.  ACTION REQUIRED ----- TU ELECTRIC SHALL VERIFY COMPLIANCE WITH IER 83-05 REQUIREMENTS FOR CPSES UNIT 2 SSWPs DURING PREOPERATIONAL TESTING FOR UNIT 2.	DIR E-0492

CPWABHE PEAK STEAM ELECTRIC STATION (CPRES)

TRT ISSUES -- SEE#s 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

\*\* 08 08 44A AM 15  
08 08 SHIMS FOR THE RAIL SUPPORT  
ALLEG. AM 15 SYSTEM FOR THE POLAR CRANE WERE  
ITEM: 08 44A ALTERED DURING INSTALLATION  
REF. PG. 8-121

ISAP(s) V: B  
STIR CPWT-5-005  
SOAR CP 86-60  
SOAR CP 86-61

TRT  
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TRT OBSERVED LARGE GAPS BETWEEN SHIMS AND THE 28 CRANE GIRDER TO GIRDER SUPPORT BRACETS. IN ADDITION, TRT OBSERVED THAT WIRE GIRDERS HAD GAPS IN EXCESS OF 1/16 INCH EXTENDING UNDER THE BOTTOM FLANGE. THAT THE COMPLETE RAIL HAD MOVED CIRCUMFERENTIALLY. THAT THE 3/8 INCH DESIGNED GAP BETWEEN THE ENDS OF THE RAIL SECTION VARIED FROM 0.6 INCHES TO 0.875 INCHES; AND THAT RAIL-TO-RAIL GROUND WIRES AND TWO CARMELIS WERE BROKEN. BASED ON THE ABOVE INSPECTIONS, TRT CONCLUDED THAT THE ALLEGATION IS SUBSTANTIATED AND IS POTENTIALLY SAFETY SIGNIFICANT.

IN APPENDIX F, SEE# 11, TRT CHARACTERIZED THIS ITEM AS AN ISOLATED OCCURRENCE OR VERY FEW OCCURRENCES WITH NO GENERIC IMPACT.

THE ALLEGATION FOR POLAR CRANE RAIL MOVEMENT WAS CLASSIFIED AS A DESIGN DEVIATION, REQUIRING A SAFETY-SIGNIFICANCE EVALUATION. CPWT DECIDED NOT TO INVESTIGATE THE POTENTIAL SAFETY SIGNIFICANCE OF THIS DEVIATION AND TO PROCEED DIRECTLY TO CORRECTIVE ACTION.

INVESTIGATION BY THE CPRES PROJECT, AS WELL AS BY CPWT, CONFIRMED THAT THE EARLIER ATTEMPTS TO CONTROL THE CIRCUMFERENTIAL MOVEMENT OF THE CRANE RAILS WERE INADEQUATE. CPWT CONCLUDED THAT THE RAIL SPLICE DESIGN PROPOSED BY G&P AND FINALIZED BY SMC WILL CORRECT ANY PROBLEMS OF MISALIGNED RAIL ENDS AT THE JOINTS. THE ANALYTICAL WORK BY SMC SUPPORTS A CONCLUSION THAT THE SPLICE BARS WILL BE STRUCTURALLY ADEQUATE TO LIMIT THE GAPS BETWEEN RAIL ENDS TO THE PRESCRIBED MAXIMUM WITHOUT UNDULY RESTRICTING THE CAPABILITY OF THE RAIL SUPPORT SYSTEM TO ALLOW FOR EXPANSIONS AND CONTRACTIONS RESULTING FROM TEMPERATURE VARIATIONS AND FUGULATED ACCIDENT CONDITIONS. (ISAP VI.8 RESULTS REPORT PG 29 AND 32).

ACTIONS REQUIRED

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CORWASKE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- 0028a 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TRT/CPST RESOLUTION DOCUMENTS

TO ELECTRIC SHALL.

1. INSPECT THE POLAR CRANE RAIL GIRDER SEAT CONNECTIONS FOR THE PRESENCE OF GAPS THAT REDUCE THE BEARING SURFACE TO LESS THAN THE WIDTH OF THE BOTTOM FLANGE.

2. PERFORM AN ANALYSIS THAT WILL DETERMINE WHETHER EXISTING GAPS ARE ACCEPTABLE OR IF CORRECTIVE ACTIONS ARE REQUIRED. TO ELECTRIC SHALL DETERMINE IF ADDITIONAL RAIL MOVEMENT IS OCCURRING AND, IF SO, PROVIDE AN EVALUATION OF SAFETY SIGNIFICANCE AND THE NEED FOR CORRECTIVE ACTION.

3. PERFORM A GENERAL INSPECTION OF THE POLAR CRANE RAIL AND THE RAIL SUPPORT SYSTEM, CORRECT IDENTIFIED DEFICIENCIES OF SAFETY SIGNIFICANCE, AND PROVIDE AN ASSESSMENT OF THE ADEQUACY OF EXISTING MAINTENANCE AND/OR SURVEILLANCE PROGRAMS.

THE GAPS IN THE SEISMIC RESTRAINTS WERE THE SUBJECT OF NRC INSPECTION REPORTS 50-445/R2-11, 50-446/R2-10, AND 50-445/R4-08 VIOLATIONS WERE ISSUED IN EACH REPORT. ALTHOUGH THESE MATTERS MAY HAVE BEEN EVALUATED AND A RESPONSE MADE TO THE REFERENCED VIOLATIONS, TO ELECTRIC SHALL CONSIDER THIS MATTER AS A PART OF THE INSPECTION OF THE POLAR CRANE SYSTEM.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRE ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRE ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 08 08.448 SSER: 08 ALLEG: AM-16 ITEM: 08.448	AM-16 THE POLAR CRANE RAIL MOVES DURING CRANE OPERATION SUCH THAT LARGE GAPS DEVELOP. REF. PG. K-121.	<p>THE ALLEGATION FOR POLAR CRANE RAIL MOVEMENT WAS CLASSIFIED AS A DESIGN DEVIATION, REQUIRING A SAFETY-SIGNIFICANCE EVALUATION. CPRT DECIDED NOT TO INVESTIGATE THE POTENTIAL SAFETY SIGNIFICANCE OF THIS DEVIATION AND TO PROCEED DIRECTLY TO CORRECTIVE ACTION.</p> <p>INVESTIGATIONS BY THE CPSES PROJECT, AS WELL AS BY CPRT, CONFIRMED THAT THE EARLIER ATTEMPTS TO CONTROL THE CIRCUMFERENTIAL MOVEMENT OF THE CRANE RAILS WERE INADEQUATE. CPRT CONCLUDED THAT THE RAIL SPLICE DESIGN PROPOSED BY G&amp;H AND FINALIZED BY DMEC WILL CORRECT ANY PROBLEMS OF MISALIGNED RAIL ENDS AT THE JOINTS. THE ANALYTICAL WORK BY DMEC SUPPORTS A CONCLUSION THAT THE SPLICE BARS WILL BE STRUCTURALLY ADEQUATE TO LIMIT THE GAPS BETWEEN RAIL ENDS TO THE PRESCRIBED MAXIMUMS WITHOUT UNDESIRABLY RESTRICTING THE CAPABILITY OF THE RAIL SUPPORT SYSTEM TO ALLOW FOR EXPANSIONS AND CONTRACTIONS RESULTING FROM TEMPERATURE VARIATIONS AND POSTULATED ACCIDENT CONDITIONS. (ISAP VI.8 RESULTS REPORT PG 29 AND 32).</p> <p>TTY CHARACTERIZATION AND CPRT RESOLUTION OF THIS ALLEGATION IS DISCUSSED UNDER ITEM 9.44 (AM-15).</p>	ISAP(*) VI.8 STIR CPRT-S-005



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

\*\* 08 08 49  
SSER: 08  
ALLEG: AM-21  
ITEM: 08 49  
THERE WAS WIDESPREAD DRUG ABUSE  
AT COMANCHE PEAK, AND MANAGEMENT  
DID NOT GIVE PROPER ATTENTION TO  
THIS PROBLEM. REF. PG. K-133.

ISSUE

TRT

TRT CONCLUDED THAT TU ELECTRIC HAD PERFORMED AN INVESTIGATION, IDENTIFIED BROWN & ROOT (B&R) PERSONNEL IMPLICATED BY THEIR REFUSAL TO TAKE POLYGRAPH TESTS AND TERMINATED EMPLOYMENT OF THOSE PERSONNEL. ALTHOUGH THIS ALLEGATION HAD SIGNIFICANT SAFETY SIGNIFICANCE AND GENERIC IMPLICATIONS, TU ELECTRIC WROTE A NONCONFORMANCE REPORT THAT IDENTIFIED ALL WORK PERFORMED BY THE IMPLICATED B & R INSPECTORS AND REINSPECTED THAT WORK WITH DIFFERENT INSPECTORS. THE REINSPECTION IDENTIFIED ONLY MINOR DEFICIENCIES THAT WERE REFERRED TO ENGINEERING FOR FINAL EVALUATION AND CORRECTION. THIS ALLEGATION APPEARED TO HAVE SOME SUBSTANCE. WITH RESPECT TO MANAGEMENT, TRT CONCLUDED THAT TU ELECTRIC AND SITE CONTRACTOR MANAGEMENT AND SUPERVISION HAD IMPLEMENTED STRONG MEASURES TO PREVENT DRUG USE AND ABUSE BY CPSES PERSONNEL. IN FACT, THOSE COMMITMENTS TO SUCH A PROGRAM EXCEEDED EXISTING NRC REQUIREMENTS AND STANDARDS. THEREFORE, THERE WAS NO EVIDENCE THAT MANAGEMENT DID NOT GIVE PROPER ATTENTION TO THE ALLEGED PROBLEM TO PREVENT DRUG ABUSE OR DEAL WITH THE INCIDENT THAT OCCURRED.

ACTION REQUIRED

TU ELECTRIC SHALL PROVIDE A REPORT OF FINDINGS INCLUDING THE FINAL ENGINEERING ANALYSIS OF THE MINOR DEFICIENCIES RESULTING FROM THE REINSPECTION OF WORK PERFORMED BY INSPECTORS IMPLICATED IN DRUG ABUSE.

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

NCR M-84-01840 R1  
TUE CORP FILE II-5





COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSER# 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10.005A SSER: 10 ALLEG: AM-49 ITEM: 10.005A	AM-49 THIS ALLEGATION DUPLICATES AM-14. REF. PG. N-57	SEE ITEM 10.005.	ISAP(s) V D (REFER TO ITEM 10.005 FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 06, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10.0028 AM-51 SSEER: 10 ALLEG: AM-51 ITEM: 10.0058	THIS ALLEGATION DUPLICATES AM-14. REF. PG. 4-57	SEE ITEM 10.005.	ISAP(s) V.D (REFER TO IYDM 11.005 FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 06, 10 and 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 10 10.005C AM-55  
SSER: 10 THIS ALLEGATION DUPLICATES  
ALLEG: AM-55 AM-14  
ITEM: 10.005C REF. PG. 8-57

SEE ITEM 10.005.

ISAF(s) V.D  
(REFER TO ITEM 10.005 FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)



COMPARISE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSEEa 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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\*\* 10 10.011 AP-13  
SSEE: 10 USING THE POLAR CRANE AND 3-TON  
ALLEG: AP-13 "COME ALONGS." A 32-INCH MAIN  
ITEM: 10.011 STEAM LINE WAS FORCED 6-INCHES  
VERTICALLY AND 4-INCHES  
HORIZONTALLY. REF. PG. W-99

ISAP(a) V.E  
FSR: MECHANICAL  
LARGE BORE PIPING AND PIPE SUPPORTS

ACTION REQUIRED

TRT WILL REQUIRE THE FOLLOWING TU ELECTRIC ACTIONS:

1. MODIFY GIBBS & HILL SPECIFICATION 2J23-MS-100, AND INSTITUTE PROCEDURES TO SUPPORT THE MAIN STEAM LINE DURING FLUSHING AND PROVIDE TEMPORARY SUPPORTS FOR PIPING AND EQUIPMENT IN GENERAL TO ASSURE THAT THE QUALITY OF AFFECTED PIPING AND EQUIPMENT IS NOT AFFECTED.
2. ASSESS STRESSES IN THE PORTIONS OF THE UNIT 1, LOOP 1 MAIN STEAM AND FEEDWATER LINES THAT WERE AFFECTED IN THE SEQUENCE OF EVENTS INVOLVED DURING THEIR INITIAL INSTALLATION, FLUSHING AND FINAL INSTALLATION. CONDITIONS OF CONCERN ARE:
  - a. THE CONDITION WHEN THE LINES WERE FULL OF WATER AND TEMPORARY SUPPORTS HAD SAGGED OR SETTLED.
  - b. THE CONDITION WHEN VIBRATIONS OF THE TEMPORARY LINE COULD HAVE OCCURRED.
  - c. THE CONDITION WHEN FORCES WERE APPLIED BY THE POLAR CRANE AND COME-ALONGS.THESE ASSESSMENTS SHALL BE BASED ON APPROPRIATE PIPING CONFIGURATIONS INVOLVED.
3. PERFORM A NONDESTRUCTIVE EXAMINATION OF LOCATIONS IN THE UNIT 1, LOOP 1, MAIN STEAM AND FEEDWATER PIPING INVOLVED WHERE STRESSES GREATER THAN RELEVANT STRESS ALLOWABLES WERE EXCEEDED DURING THE CONDITIONS OF CONCERN IN a. THROUGH c. ABOVE.
4. REVIEW THE EXISTING BASELINE ULTRASONIC EXAMINATIONS FOR THOSE PORTIONS OF THE UNIT 1, LOOP 1, MAIN STEAM AND FEEDWATER PIPING INVOLVED IN ALL THE CONDITIONS OF CONCERN IN a. THROUGH c. ABOVE FOR

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

UNACCEPTABLE INDICATIONS.

5. REVIEW RECORDS OF HYDROSTATIC TESTING OF THE UNIT 1, LOOP 1, MAIN STEAM AND FEEDWATER PIPING TO VERIFY THE QUALITY OF PIPING INVOLVED IN THE INCIDENT.
6. PROVIDE SIMILAR ASSESSMENTS FOR CIRCUMSTANCES INVOLVED IN THE LIFTING INCIDENT IDENTIFIED DURING TRT INSPECTIONS OF THE UNIT 1, LOOP 4, MAIN STEAM LINE.
7. PROVIDE ASSESSMENTS OF EFFECTS ON QUALITY OF SAFETY-RELATED PIPING AND EQUIPMENT WHICH WERE INVOLVED IN SIMILAR INCIDENTS OF SAGGING, SETTLEMENTS AND FAILURES, IF ANY, OF TEMPORARY SUPPORTS.
8. DOCUMENT THE RESULTS OF ANALYSIS, EXAMINATIONS AND REVIEWS AND SUBMIT THEM IN A REPORT FOR TRT REVIEW.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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TRT ISSUE SUMMARY

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 10 10 014  
SSER: 10  
ALLEG: AP-15  
ITEM: 10.014  
AP-15  
IN SEPTEMBER 1982, A PIPE THAT  
WAS 1/2 INCH OUT-OF-ROUND WAS  
INSTALLED IN THE CONTAINMENT  
SPRAY SYSTEM. DURING ITS  
INSTALLATION, THE PIPE WAS  
BUTTERED EXTENSIVELY TO ACHIEVE  
THE REQUIRED MINIMUM WALL  
THICKNESS. REF. PG. B-119

TRT  
---  
THE TRT INVESTIGATION SUBSTANTIATED THE ALLEGATION  
THAT THE 1/2-INCH NONCONFORMING PIPE WAS BUTTERED  
EXTENSIVELY (ALLEGATION AP-15). THE TRT FOUND THAT  
EXTENSIVE WELD METAL SURFACING WAS PERFORMED IN THE  
VICINITY OF WELD FW 13-AA TO REPAIR AN EXTENSIVE AREA  
OF MINIMUM WALL THICKNESS VIOLATION. THE TRT COULD NOT  
SUBSTANTIATE THE ALLEGATION THAT UNEVEN BUTTERING WAS  
PERFORMED TO ACHIEVE FITUP. THE WELD DATA PACKAGE  
INDICATED THAT PROPER FITUP AND ACCEPTABLE VISUAL AND  
RADIOGRAPHIC INSPECTION RESULTS WERE OBTAINED.

TRT EVALUATIONS OF THE INSTALLATION OF THE  
NONCONFORMING PIPE BY JACKS AND CLAMPS, AS SUGGESTED  
BY NCR 4015S, REV. 5, INDICATE THAT SIGNIFICANT  
STRESSES COULD HAVE OCCURRED DURING INSTALLATION WHICH  
WERE NOT INCLUDED IN THE PIPE STRESS ANALYSIS.  
CONSERVATIVE CALCULATIONS PERFORMED BY THE TRT  
INDICATED THAT SIGNIFICANT ELASTICALLY CALCULATED  
STRESSES COULD HAVE OCCURRED DURING INSTALLATION OF  
THE 1/2-INCH OUT-OF-ROUND PIPE BY MECHANICAL MEANS  
WHICH WERE NOT INCLUDED IN THE G&H PIPING STRESS  
ANALYSIS. BASED ON THE MAGNITUDE OF THE STRESSES  
OBTAINED IN THE TRT CALCULATIONS, THE TRT FINDS THAT  
TUBC SHOULD PERFORM MORE DETAILED ANALYSES TO  
DEMONSTRATE THE STRUCTURAL INTEGRITY OF THE INSTALLED  
NONCONFORMING PIPE, ESPECIALLY IN THE VICINITY OF WELD  
FW 13-AA. THE TRT NOTES HOWEVER THAT STRESSES IN THE  
INSTALLED NONCONFORMING PIPE ARE SECONDARY STRESSES  
WHICH WILL BE APPLIED ONLY ONCE DURING THE LIFE OF THE  
PLANT AND THAT PLASTIC DEFORMATIONS ASSOCIATED WITH  
THESE STRESSES ARE LESS THAN THOSE PERMITTED IN OTHER  
PROCESSES ACCEPTABLE TO THE ASME CODE, § 8. DURING  
PIPE BENDING (PARAGRAPHS NB/NC/ND-4223 OF THE ASME  
CODE). FURTHERMORE, SINCE HYDROSTATIC AND  
PREOPERATIONAL TESTING OF THE CTS SYSTEM WERE  
COMPLETED SUCCESSFULLY, THE TRT FOUND THAT THE  
INSTALLED ALLEGED NONCONFORMING PIPE MAY BE  
ACCEPTABLE.

DURING ITS ASSESSMENT OF ALLEGATIONS AP-15 AND AP-16

ISAP(s) VII.A.2; VII.C, APPENDIX 12  
CAR 87-72, 87-067, 87-029  
PSR: MECHANICAL

TUE/CPRT RESOLUTION DOCUMENTS

CUMMINS PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

THE TRT IDENTIFIED NONCOMPLIANCES WITH THE REQUIREMENT OF BAR PROCEDURE CP-QP-6.0, "CONTROL OF NONCONFORMING ITEMS" THAT THE DISPOSITION OF NCRs BE EVALUATED FOR ADEQUACY. THESE NONCONFORMANCES WERE ASSOCIATED WITH ERRORS IN LOGIC AND INVALID REFERENCES IN THE DISPOSITION OF NCRs 4015 REV. 5 AND 49425. A NONCOMPLIANCE WITH THE INTENT OF BAR PROCEDURE CP-QP-6.0 WAS ALSO IDENTIFIED IN THE USE OF INSPECTION RESULTS TO VERIFY THAT THE NONCONFORMING PIPE WAS NOT NONCONFORMING. A WEAKNESS IN BAR PROCEDURE CP-CRM-6.9E IN NOT PERMITTING THE USE OF MECHANICAL MEANS TO ACHIEVE FITUP IN THE FABRICATION OF FIELD WELDS WAS ALSO IDENTIFIED BY THE TRT.





COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

TRT ISSUE SUMMARY

ISSUE

TRT/CPRT RESOLUTION DOCUMENTS

\*\* 10 10 017  
SSER: 10  
ALLEG: AB-12  
ITEM: 10 017

AB-12  
SOME BOLTS HOLDING THE UPPER  
STEAM GENERATOR (SG) LATERAL  
SUPPORTS TO THE WALL PLATES WERE  
CUT THEREFORE, THEY WERE  
INCAPABLE OF SECURING THE SG  
LATERAL SUPPORTS TO THE  
EMBEDMENT PLATES IN ACCORDANCE  
WITH DESIGN REQUIREMENTS. REF.  
PG N-149

TRT  
---

TU ELECTRIC PURCHASED 144 BOLTS WHICH WERE 1 1/2  
INCHES LONGER THAN THE 7 1/2 INCHES NEEDED TO MEET THE  
INSTALLATION REQUIREMENTS FOR STEAM GENERATOR  
SUPPORTS. THE BOLTS WERE THEN CUT TO 7 1/2 INCHES AS  
AUTHORIZED BY WORK PACKAGE. TRT VERIFIED THROUGH FIELD  
INSPECTIONS THAT PERMANENT MARKINGS WERE ON THE BOLT  
HEADS PROVIDING MATERIAL TRACEABILITY. THE ALLEGATION  
THAT THE BOLTS HAD BEEN CUT WAS SUBSTANTIATED, BUT THE  
CUTTING HAD BEEN AUTHORIZED AND MATERIAL TRACEABILITY  
HAD BEEN MAINTAINED.

ISAP VI.B  
PSR: CIVIL  
STIR CPRT-5-014

TU ELECTRIC WAS UNABLE TO PROVIDE TRT WITH AN  
INSPECTION RECORD OR TRAVELER PACKAGE DOCUMENTING THE  
INSTALLATION OF THE BOLTS. ABSENCE OF THE INSPECTION  
RECORD RAISED A POTENTIAL SAFETY AND QA/QC CONCERN  
BECAUSE THE BOLTS RESTRAINED THE STEAM GENERATOR  
DURING A SEISMIC OR PIPE RUPTURE EVENT.

ACTIONS REQUIRED

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TU ELECTRIC SHALL, IF POSSIBLE, FIND THE ORIGINAL  
QA/QC INSPECTION AND INSTALLATION RECORDS FOR THE  
RESTRAINT IN QUESTION. IF THE RECORDS ARE NOT  
RETRIEVED, TU ELECTRIC SHALL PROVIDE EVIDENCE, SUCH AS  
ULTRASONIC MEASUREMENT RESULTS, TO VERIFY ACCEPTABLE  
BOLT LENGTH. SHOULD UNAUTHORIZED BOLT CUTTING BE  
VERIFIED, TU ELECTRIC SHALL:

1. REPLACE SHORTENED BOLTS WITH BOLTS OF PROPER  
LENGTH, OR PROVIDE ANALYSIS TO JUSTIFY THE ADEQUACY OF  
SHORTENED BOLTS AS INSTALLED, AND

2. PROVIDE JUSTIFICATION OR PROPOSE MEASURES TO  
ENSURE THAT NO SIMILAR CONCERN EXISTS FOR BOLTING.

COMANCHE PEAK STEAM ELECTRIC STATION (CFSES)

TRT ISSUES -- SSESs 07, 06, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 10 10.017A AGB-03  
SSER: 10  
ALLEG: AGB-03  
ITEM: 10.017A

SOME BOLTS WERE CUT BECAUSE  
THERE WAS CONCRETE IN THE BOLT  
HOLE THAT PREVENTED INSTALLING  
THE BOLT TO ITS FULL LENGTH.  
THIS CUTTING REMOVED THE HEAT  
NUMBERS FROM THE ENDS OF THE  
BOLTS. REF. PG W-149

SEE ITEM 10.017

ISAP(\*) VII.C, APPENDIX 19; VII.C, APPENDIX 25; VII.C, APPENDIX  
26; VII.C, APPENDIX 27; VII.C, APPENDIX 29; VII.C, APPENDIX 33,  
VII.B; V.B  
STIR CPRT S-001. CPRT S-014  
CAR(\*) 101  
SDAR CP B7-59, CP #6-04, CP #5-03  
PSR: CIVIL

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSES# 07, 08, 10 and 11

TRT ISSUE SUMMARY

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 10 10 019 SRT-08  
SSER: 10 NUTS ON THE SUPPORT BOLTS FOR  
ALLEG: SRT-08 THE VERTICAL RESIDUAL HEAT  
ITEM: 10 019 EXCHANGERS WERE LOOSE. REF. PG  
N-132.

TRT  
---

THE NRC SPECIAL REVIEW TEAM (SRT) REPORT ON COMANCHE PEAK STATED THAT A FEW NUTS WERE VERY LOOSE AND OTHER BOLTS HAD EXPOSED THREADS BETWEEN NUTS AND BEARING SURFACES ON THE VERTICAL RESIDUAL HEAT EXCHANGERS. ALSO, SUPPORT BOLTING AND WELDING RECORDS WERE NOT READILY RETRIEVABLE.

TRT REVIEWED RECORDS FOR THE SUPPORTS OF THE VERTICAL RESIDUAL HEAT EXCHANGERS AND FOUND THAT THOSE RECORDS LACKED PROPER DOCUMENTATION TO TRACE BOLT MATERIAL. THIS LACK OF PROPER DOCUMENTATION WAS DISCOVERED BY TU ELECTRIC DURING PREPARATIONS FOR THE ASME N-5 CLOSEOUT AND WAS REPORTED BY NONCOMFORMANCE REPORTS (NCRs).

TRT ALSO REVIEWED THE DOCUMENTATION AND INSTALLATION OF THE CONTAINMENT SPRAY HEAT EXCHANGER, WHICH WAS SIMILAR TO THE INSTALLATION OF THE VERTICAL RESIDUAL HEAT EXCHANGERS AND IN THE SAME AREA. TRT FOUND THE BOLT MATERIAL RECORDS FOR THE CONTAINMENT SPRAY HEAT EXCHANGER AND DETERMINED THAT SUPPORT BOLTS WERE NOT LOOSE.

TRT CONCLUDED THAT TU ELECTRIC HAD CORRECTLY ADDRESSED THE LACK OF MATERIAL TRACEABILITY DOCUMENTATION FOR SUPPORT BOLTS FOR THE VERTICAL RESIDUAL HEAT EXCHANGERS. WHEN THE NCR ON THE INADEQUATE DOCUMENTATION IS CLOSED, THERE WILL BE NO SAFETY SIGNIFICANCE RELATED TO THE ALLEGATION.

NCR M 14-243 R/1, M 14-244 R/1

TUE/CPRT RESOLUTION DOCUMENTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 10 10.021 AQP-01  
SSER: 10 A PIPE PIECE NUMBER WAS CHANGED  
ALLEG: AQP-01 TO COVER UP UNAUTHORIZED MARK  
ITEM: 10.021 AND TO AVOID GENERATION OF NCRs.  
REF. PG N-155.

TRT

TRT  
-----  
BASED ON A REVIEW AND ASSESSMENT OF NONCONFORMANCE  
REPORTS (NCR'S), TRT SUBSTANTIATED THIS ALLEGATION.  
FIT-UP INSPECTION OF PIECE 38 WAS RECORDED AS  
ACCEPTABLE AND THE WELD ACCEPTANCE AND MATERIAL  
TRACEABILITY WERE DOCUMENTED IN QA RECORDS.

TRT ALSO CONCLUDED THAT THERE IS A GENERIC IMPLICATION  
BECAUSE A NONCONFORMING ITEM (PIECE NO. 38/48) WAS  
INSTALLED AND NO INFORMATION IS AVAILABLE COVERING THE  
DISPOSITIONING OF THREE OTHER NONCONFORMING SPOOL  
PIECES CT-1-SB-017 IIT2; PIECE NUMBER 23, CT-1-SB-013  
IIT1, PIECE NUMBER 33, AND CT-1-SB-004 IIT1, PIECE  
NUMBER 41, WHICH WERE IDENTIFIED ON NCR M-40155.  
THESE NONCONFORMING PIECES ALSO MAY HAVE BEEN  
INSTALLED WHILE IN A HOLD STATUS.

(FUTURE)

CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 10 10.026A-2AQM-01  
SSER: 10 QC INSPECTORS LACKED SUFFICIENT TRT  
ALLEG: AQW-01 WELDING BACKGROUND TO CORRECT ----  
ITEM: 10.026A-2 ADEQUATE INSPECTIONS. REF. PG THIS ALLEGATION WILL BE DISCUSSED IN QA/QC CATEGORY 4.  
N-169

(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

<u>ISSUE SOURCE</u>	<u>ISSUE</u>	<u>TRT ISSUE SUMMARY</u>	<u>TUE/CPRT RESOLUTION DOCUMENTS</u>
** 10 10.026E SSER: 10 ALLEG: AQW-05 ITEM: 10.026E	AQW-05 VISUAL WELD INSPECTORS WERE INADEQUATELY TRAINED AND CERTIFIED. REF. PG. N-187.	TRT --- THE SUBJECT OF INSPECTOR QUALIFICATIONS WILL BE ADDRESSED IN QA/QC CATAGORY 4, TRAINING AND QUALIFICATIONS.	(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT/CPRI RESOLUTION DOCUMENTS
** 10 10 029 SSER: 10 ALLEG: AB-06 ITEM: 10.029	AB-06 THERE WERE FITUP GAP VIOLATIONS ON THREE RANGERS. REF. PG 8-199.	TRT --- THE TRT RESPONSE COVERS AB-06, AM-50 AND AM-56. THE TRT REVIEWED RIV IR 30-445/83-07 AND DETERMINED THAT TUEC SUBMITTED A RESPONSE TO THE VIOLATION REPORTED IN IR 83-07 (AB-6). THE TRT VERIFIED TUEC'S REMORK AND ENGINEERING DESIGN RESPONSE TO THIS VIOLATION AND CONCLUDES THAT THE CONDITIONS WERE CORRECTED. IN ADDITION, THE TRT CONCLUDES THAT THE REDUCTION IN EFFECTIVE WELD LENGTH DUE TO THE FIT-UP GAP HAS NO SAFETY SIGNIFICANCE FROM A DESIGN AND ENGINEERING STANDPOINT. THE TRT ALSO REVIEWED THE DOCUMENTS SUBMITTED BY PSE TO ADDRESS THIS CONCERN AND CONCLUDES THAT THE RESULTS OF THE ENGINEERING RESPONSE ARE ACCEPTABLE. ACCORDINGLY, THE ALLEGATIONS AB-6, AM-50 (AND AB-13), AND AM-56 DO NOT HAVE SAFETY SIGNIFICANCE. THE TRT CONCLUDES, HOWEVER, THAT THE RESPONSE BY BAR MANAGEMENT TO AVOID FURTURE VIOLATIONS WAS NOT ACCEPTABLE. THE TRT CONCLUDES THAT IM-25, 408 PROVIDED THE NECESSARY RESPONSE FROM BAR MANAGEMENT CONCERNING THE REPORTING OF NON-COMFORMING ITEMS. HOWEVER, NO ATTEMPT WAS MADE TO (1) CHECK SIMILAR WORK PERFORMED BY THE WELDER, OR (2) DETERMINE WHETHER THE FIT-UP GAP ON HIGHLY STRESSED WELDS SHOULD BE RANDOMLY CHECKED.	ISAP V.A PSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS

THE TRT, IN APPENDIX F, SSER 11, CHARACTERIZED THIS ISSUE AS MAY INDICATE FREQUENT OCCURRENCES, BUT APPARENTLY CONFINED TO A SPECIFIC ITEM OR AREA.



CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TXT ISSUES -- SSERS 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TXT ISSUE SUMMARY	TUE/CPMT RESOLUTION DOCUMENTS
** 10 10.029A SSER: 10 ALLEG: AM-50 ITDM: 10.029A	AM-50 AN EXCESSIVE GAP WAS PRESENT BETWEEN SOME PIPE RANGERS AND WRIP RESTRAINTS WERE WELDED IN PLACE. REF. PG N-199.	SEE ITDM 10.029	ISAP(s) V.A FOR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SSERs 07, 06, 10 and 11

ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10 0200 AM-58 SYER: 10 ALLEG: AM-58 ITEM: 10 0200	MULTIPLI-CATE OF AM-50. REF. PG. N-199	SEE ITEM 10 020	ISAF(s) V A PSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11

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ISSUE SOURCE

TRT ISSUE SUMMARY

ISSUE

ISAP(\*) V.A

\*\* 10 10 030 AQM-73  
SSES: 10 INSPECTION PROCEDURES DID NOT  
ALLEG: AQM-73 INCLUDE INSTRUCTIONS FOR  
ITEM: 10 030 EXAMINING SKEMED FILLET WELDS.  
REF. PG 8-199.

TRT

IN THE REVIEW OF THIS ALLEGATION, TRT FOUND EVIDENCE THAT PROCEDURES WERE REVISED TO INCLUDE APPROPRIATE CRITERIA FOR SKEMED WELD INSPECTION, AND THAT A 100 PERCENT REINSPECTION PROGRAM FOR NON-ASME SKEMED FILLET WELDS WAS COMPLETED. A SAMPLING OF THOSE SUPPORTS IDENTIFIED BY TRT SHOWED THAT ALL INSPECTIONS WERE SATISFACTORY. ACCORDINGLY, THIS ALLEGATION HAS NO SAFETY SIGNIFICANCE FOR NON-ASME SUPPORTS.

ADDITIONALLY, TRT CONCLUDED THAT THE INSPECTION OF SKEMED FILLET WELDS BETWEEN TYPICAL STRUCTURAL MEMBERS FOR ASME SUPPORTS WAS ALSO SATISFACTORY. HOWEVER, FOR THOSE PIPE STANCHION PIPE CONNECTIONS THAT ARE TYPICALLY INSPECTED TO A PIPING PROCEDURE, BUT BY DEFINITION ARE A SUBSECTION OF WELD, TRT SUBSTANTIATED THE ALLEGATION. TRT FOUND NO EVIDENCE THAT WOULD PERMIT THE USE OF A PIPING INSPECTION PROCEDURE AS STATED BY BROWN & ROOT (BAR) IN THE INSPECTION OF COMPONENT SUPPORT SKEMED WELDS. BECAUSE THESE PIPE STANCHION TYPE FILLET WELDS WERE NOT INSPECTED AS SKEMED FILLET WELDS, AS DEFINED ON THE QC CHECKLIST (LINE ITEM 5B) OF PROCEDURE CP-QAP-12.1, THE COMMITMENT TO RECTIFY THE SKEMED WELD INSPECTION PROBLEM BY REINSPECTION WAS NOT COMPLETED. A REVIEW OF THE WELD DATA CARDS OF A RANDOM SAMPLING OF SUPPORTS INDICATED THAT THE WELDS HAD BEEN INSPECTED. HOWEVER, BAR COULD NOT PROVIDE ANY DOCUMENTATION TO INDICATE THE REVISED PROCEDURE FOR CORRECTLY INSPECTING SKEMED WELDS WAS USED. THIS ALLEGATION MAY HAVE SAFETY SIGNIFICANCE BECAUSE UNDERSIZED WELDS MAY EXIST. THIS IS AN OPEN ISSUE FOR WHICH TU ELECTRIC ACTION IS REQUIRED.

ACTIONS REQUIRED

TU ELECTRIC SHALL RESPOND TO ALLEGATION AQM 73 (PERTAINING TO ASME SUPPORTS FOR INSPECTION CRITERIA FOR SKEMED WELDS) BY CORRECTING PROCEDURE CP-QAP-12.1 AND QI-QAP-11.1-28 TO INCLUDE ALL SUBSECTION WF WELDS, INCLUDING STANCHION-TO-STANCHION WELDS AND

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11

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ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

STATION - TO-PAD WELDS.

TO ELECTRIC SMALL PROVIDE EVIDENCE TO VERIFY THAT  
PREVIOUS WCD/DWD INSPECTIONS OF THESE TYPES OF SKEMED  
WELDS WERE PERFORMED CORRECTLY AND INSPECTED TO THE  
APPROPRIATE CRITERIA.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TBT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TBT ISSUE SUMMARY	TUE/CPBT RESOLUTION DOCUMENTS
** 10 10 032 SSER 10 ALLEG: AF-10 ITEM: 10 032	AF-10 BOLT HOLES IN HANGERS WERE ENLARGED WITH A TORCH. REF PG B-209	TBT --- TBT COULD FIND NO SPECIFIC DETAILS FOR THE ALLEGATION. TBT REVIEWED NRC REGION IV INSPECTION REPORT (IR) A3-27 AND AGREED WITH THE INSPECTOR'S ASSESSMENT THAT CUTTING HOLES WITH A TORCH WAS NOT PROHIBITED. HOWEVER, NO PROCEDURES WERE FOUND TO ADDRESS TORCH CUTTING OF HOLES. NO EVIDENCE WAS FOUND OF TORCH CUTTING.  HOWEVER, TBT DID IDENTIFY TWO SUPPORTS THAT HAD OVERSIZED HOLES BY DRILLING, ACCORDING TO CP-CFM-9.10 AND FOUR SUPPORTS THAT APPEARED QUESTIONABLE. THE ALLEGED CONCERN OF OVERSIZED BOLT BOLLS BY DRILLING WAS SUBSTANTIATED.	FOR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	THE/CPRT RESOLUTION DOCUMENTS
** 10 10 035 SSEER: 10 ALLEG: AP-27 ITID: 10 035	AP-27 THE SEISMIC RESPONSE SPECTRA GENERATED WAS NOT REPRESENTATIVE OF THE COMANCHE PEAK PLANT AND AGREED POORLY WITH THE UNIFORM BUILDING CODE REF. PG 8-131	TRT --- TRT AGREED WITH THE NRC REGION IV INSPECTOR'S CONCLUSIONS CONCERNING THE REVIEW OF EQUIVALENT PIPING ANALYSIS TECHNIQUES. HOWEVER, TRT CONCLUDED THAT TU ELECTRIC SHOULD HAVE ADVISED NRC IN THE PSAR OF THE EXCLUSION OF THE 1.5 FACTOR AS RECOMMENDED BY THE NRC STANDARD REVIEW PLAN. ADDITIONALLY, TU ELECTRIC SHOULD HAVE PROVIDED TECHNICAL EVIDENCE AS THE BASIS FOR THIS EXCLUSION. BECAUSE REDUCTION OF THE 1.5 FACTOR IS ALSO BEING EVALUATED BY TRT IN A RELATED CONCERN (CIVIL AND STRUCTURAL CATEGORY 70), A STATEMENT OF SAFETY SIGNIFICANCE WILL NOT BE MADE PENDING THE RESULTS OF THAT ASSESSMENT.	(FUTURE)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSEEa 07, 06, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10 036 SSEE: 10 ALLEG: SMT-03 ITEM: 10 036	SMT-03 THERE WERE CONCERNS ABOUT DESIGN CONSIDERATIONS FOR PIPING SYSTEMS FROM A SAFETY-RELATED TO A NONSAFETY-RELATED BUILDING. REF. PG. B-237.	TRT ---- BECAUSE GIBBS AND HILL (G&H) HAD NOT ADDRESSED THE ORIGINAL SRT CONCERN REGARDING PIPING SYSTEM DESIGN, THE STATUS OF THIS ITEM REMAINED UNDETERMINED. TRT CONCLUDED THAT THIS CONCERN COULD HAVE SAFETY IMPLICATIONS, HOWEVER, UNTIL G&H COMPLETED THEIR REVIEW, A FINAL DETERMINATION OF THE SAFETY IMPLICATIONS COULD NOT BE MADE.	ISAP(n) V.C FSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS
		ACTION REQUIRED ----- TU ELECTRIC SHALL PROVIDE ANALYSIS AND DOCUMENTATION THAT THE PIPING SYSTEMS ROUTED BETWEEN SEISMIC CATEGORY I AND NON SEISMIC CATEGORY I BUILDINGS MEET THE STATED FSR CRITERIA.	

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TNT ISSUES -- SSES# 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

TUE/CPRT RESOLUTION DOCUMENTS

\*\* 10 10 037 SRT-05  
SSE# 10 TRAINING FOR INSPECTORS ON THE  
ALLEG: SRT-05 MEASUREMENT OF STRUT AND SWURSER  
ITEM: 10 037 ORIENTATION ANGLES WAS WEAK.  
REF. PG. B-241.

TNT  
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WITH REFERENCE TO THE CONFUSION AMONG QC INSPECTORS CONCERNING THE INSTALLATION TOLERANCE ON STRUT AND SWURSER ORIENTATION, TNT REVIEWED TU ELECTRIC RESPONSE TO THE NRC SPECIAL REVIEW TEAM REPORT AND FOUND THAT THE COMMITTED RESPONSES HAD BEEN CARRIED OUT AND THAT THE ALLEGATION DID NOT HAVE SAFETY SIGNIFICANCE. HOWEVER, TNT WAS CONCERNED ABOUT POTENTIAL GENERIC IMPLICATIONS ON PREVIOUSLY INSPECTED STRUTS AND SWURSER. TNT REVIEWED DOCUMENTATION THAT SWURSER HAD BEEN INSPECTED FOR POTENTIAL BINDING DURING HOT FUNCTIONAL TESTING; HOWEVER, NO DOCUMENTATION COULD BE PRODUCED BY PIPE SUPPORT ENGINEERING (PSE) THAT STRUTS HAD BEEN SIMILARLY REINSPECTED. BOTH BROWN & ROOT (BAR) QA AND PSE ATTEMPTED TO PROVIDE INDIRECT ASSURANCE THAT, IN THEIR OPINION, BASED UPON OTHER INSPECTIONS AND DOCUMENTED PIPE POSITIONS, NO STRUTS WERE BINDING TO CAUSE A PROBLEM. HOWEVER, TNT DISAGREED WITH THEIR CONCLUSIONS.

ISAP(s) VII.B.3; VII.C. APPENDIX 25; VII.C. APPENDIX 26



COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10.038 SSER: 10 ALLEG: AQP-23 ITEM: 10.038	AQP-23 THE TUEC QA PROGRAM DID NOT APPLY TO CLASS 5 (NON-SEISMIC) HANGERS AND SUPPORTS. REF. PG N-251.	TRT --- NRC REGION IV INSPECTION REPORT (IR) 80-15, THAT COVERED REGION IV INSPECTIONS PERFORMED IN JUNE 1980, REPORTED THAT THERE WAS NO QUALITY ASSURANCE EFFORT BEING MADE BY TU ELECTRIC REGARDING CLASS 5 PIPE HANGERS AND SUPPORTS. TRT FOUND THAT TU ELECTRIC IN RESPONSE TO IR80-15, HAD IMPLEMENTED A QA PROGRAM FOR CLASS 5 PIPE HANGERS AND SUPPORTS.  NRC REGION IV IR84-32/84-11, DATED FEBRUARY 12, 1985, ISSUED A NOTICE OF VIOLATION TO TU ELECTRIC THAT CITED TU ELECTRIC'S FAILURE TO ESTABLISH AND IMPLEMENT A COMPREHENSIVE SYSTEM OF PLANNED AND PERIODIC AUDITS. TRT'S FINDING OF VIOLATIONS IN THE TU ELECTRIC QA AUDIT SYSTEM ARE CONSISTENT WITH IR84-32/84-11.	ISAP VII.A.4



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERS 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
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CUMARACHE PEAK STEAM ELECTRIC STATION (CPSES)

TWT ISSUES -- SSER# 07. 06. 30 mod 11  
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ISSUE SOURCE	ISSUE	TWT ISSUE SUMMARY	TUE/CPWT RESOLUTION DOCUMENTS
** 10 10 033 SSER: 10 ALLEG: AB-13 ITEM: 10.053	AB-13 DURING INSTALLATION OF APPROXIMATELY 1000 HANGERS, SOME BOLT HOLES WERE DRILLED TOO LARGE, CAUSING AN EXCESSIVE BOLT-TO-BOLT HOLE GAP IN THE BASEPLATES.	TWT --- THIS ALLEGATION WILL BE ADDRESSED IN THE STAFF'S SUMMARY DISPOSITIONS ON THE WALSH/DOTLE ALLEGATIONS CONCERNING THE DESIGN OF PIPE SUPPORTS.	DSAP IX PSR: LARGE BORE PIPING AND PIPE SUPPORTS SMALL BORE PIPING AND PIPE SUPPORTS

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TXT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TXT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10 093 SSER: 10 ALLES: ACM-18 ITEMS: 10 093	ACM-18 EBASCO INSPECTORS DID NOT PROPERLY INSPECT WELDS. REF. PG N-187.	TXT --- TWT FOUND THAT EBASCO INSPECTION PERSONNEL WERE TRAINED AND CERTIFIED IN THE SAME MANNER AS TU ELECTRIC EMPLOYEES. THE SUBJECT OF TU ELECTRIC INSPECTOR TRAINING AND QUALIFICATION IS ADDRESSED IN QA/QC CATEGORY 4.	(REFER TO ITEM 11.64C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TKT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 16 093A SSER: 10 ALLEG: AQM-19 ITDM: 10 093A	AQM-19 THE BACKFIT INSPECTION PROGRAM WAS NOT COMPLETELY IMPLEMENTED. REF. PG. N-187.	TRT --- THE SUBJECT OF INSPECTOR QUALIFICATIONS WILL BE ADDRESSED IN QA/QC CATEGORY 4.	(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

CUMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10 096 SSER: 10 ALLEG: AQM-22 ITEM: 10 096	AQM-22 AN NCR ON DEFECTIVE WELDS IN CB&I PIPE WHIF RESTRAINTS WAS NEVER ASSIGNED AN NCR NUMBER AND WAS NOT PROPERLY PROCESSED OR DISPOSITIONED. REF. PG N-282.	TRT EVALUATION IS O-GOING AND WILL BE INCLUDED IN A FUTURE SSER.	(FUTURE)



COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TRT/C/PRT RESOLUTION DOCUMENTS -----

\*\* 10 10.096-A AM-39  
SSER: 10 VENDOR WELDS WERE DEFECTIVE ON A TRT EVALUATION IS ON-GOING AND WILL BE INCLUDED IN A (FUTURE)  
ALLEG: AM-39 CBI-SUPPLIED FIVE WRP RESTRAINT FUTURE SSER.  
ITEM: 10.096-A IN THE UNIT 3 PRESSURE RELIEF  
TANK ROOM. REF. PG B-269

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SERs 07, 08, 10 and 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TRT/CPRT RESOLUTION DOCUMENTS -----

\*\* 10 10 096-B AM-53  
SER: 10 THERE WERE WELD DEFICIENCIES IN TRT EVALUATION IS ON-GOING AND WILL BE INCLUDED IN A (FUTURE)  
ALLEG: AM-53 FIVE HANGERS. REF. PG N-289 FUTURE SSER  
ITEM: 10.096-B

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TUE/CPRT RESOLUTION DOCUMENTS -----

\*\* 16 10.096-C AM-57  
SSER: 10 THERE WERE DEFECTIVE WELDS IN  
ALLEG: AM-57 PIPE WELD RESTRAINTS SUPPLIED BY (FUTURE)  
ITEM: 10.096-C NPS INDUSTRIES. REF. PG N-289 FUTURE SSER.

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TNT ISSUES -- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TNT ISSUE SUMMARY	TUE/CPST RESOLUTION DOCUMENTS
** 10 10.086-D AM-64 SSER: 10 ALLEG: AM-64 ITEN: 10.086-D	(THIS ALLEGATION DUPLICATES AM-57.) REF. PG N-209	TNT EVALUATION IS ON-GOING AND WILL BE INCLUDED IN A FUTURE SSER.	

COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSESs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 10 10 116 SSE: 10 ALLEG: ACM-69 ITEM: 10 116	ACM-69 THERE WAS WIDESPREAD USE OF INADEQUATELY QUALIFIED MECHANICAL AND WELDING INSPECTORS. REF. PG N-187.	TST --- THE ALLEGATION THAT EIGHT BROWN & ROOT (BAR) QC PERSONNEL MAY NOT HAVE HAD EITHER HIGH SCHOOL DIPLOMAS OR GED CERTIFICATES AND THEREFORE WERE NOT QUALIFIED TO BE INSPECTORS WILL BE ADDRESSED IN QA/QC CATEGORY 4.	(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

TUE/TRT RESOLUTION DOCUMENTS

\*\* 10 10 131

SRT-04  
THE ALLOWED TOLERANCES FOR STRUT  
AND SWIBBER ORIENTATION ANGLES  
WEREN'T CLEARLY STATED IN  
APPLICABLE INSPECTION  
PROCEDURES. REF. PG 8-241

TRT

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WITH REFERENCE TO THE CONFUSION AMONG QC INSPECTORS  
CONCERNING THE INSTALLATION TOLERANCE ON STRUT AND  
SWIBBER ORIENTATION, TRT REVIEWED TO ELECTRIC'S  
RESPONSE TO THE NRC SPECIAL REVIEW TEAM REPORT AND  
FOUND THAT THE COMMITTED RESPONSES HAD BEEN CARRIED  
OUT AND THAT THE ALLEGATION DID NOT HAVE SAFETY  
SIGNIFICANCE. HOWEVER, TRT WAS CONCERNED ABOUT  
POTENTIAL GENERIC IMPLICATIONS ON PREVIOUSLY INSPECTED  
STRUTS AND SWIBBLES. TRT REVIEWED DOCUMENTATION THAT  
SWIBBLES HAD BEEN INSPECTED FOR POTENTIAL BINDING  
DURING HOT FUNCTIONAL TESTING; HOWEVER, NO  
DOCUMENTATION COULD BE PRODUCED BY PIPE SUPPORT  
ENGINEERING (PSE) THAT STRUTS HAD BEEN SIMILARLY  
REINSPECTED. BOTH BROWN & ROOT (BAR) QA AND PSE  
ATTEMPTED TO PROVIDE INDIRECT ASSURANCE THAT, IN THEIR  
OPINION, BASED UPON OTHER INSPECTIONS AND DOCUMENTED  
PIPE POSITIONS, NO STRUTS WERE BINDING TO CAUSE A  
PROBLEM. HOWEVER, TRT DISAGREED WITH THEIR  
CONCLUSIONS.

ISAP(s) VII C, APPENDIX 26, APPENDIX 27; VII B.3  
PSR: LARGE BORE PIPING AND PIPE SUPPORTS  
SMALL BORE PIPING AND PIPE SUPPORTS  
(REFER TO ITEM 11.84F FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES --- SSERs 07, 08, 10 and 11

ISSUE SOURCE  
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ISSUE  
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TRT ISSUE SUMMARY  
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TUE/CPRT RESOLUTION DOCUMENTS  
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\*\* 11 11.02 AQ-003  
SSER 11 DOCUMENTATION SYSTEM WAS TOTALLY  
ALLEG: AQ-003 OUT OF CONTROL. REF. PG. 0-45.  
ITEM: 11.02

TRT  
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THE TRT FOUND THAT THE PORTION OF THE ALLEGATION CONCERNING CONTROL OF PROCEDURES AND INSTRUCTION WAS NOT SUBSTANTIATED. SINCE JULY 1984, THE PROGRAM FOR CONTROLLING DESIGN DOCUMENTS, THOUGH COMPREHENSIVE, IS EFFECTIVE. PROBLEMS WHICH MAY HAVE EXISTED PRIOR TO JULY 1984 ARE COVERED IN AQ-50. DEFICIENCIES PRIOR TO JULY 1984 HAD THE POTENTIAL FOR CONTRIBUTING TO PROBLEMS IN CONSTRUCTION, INSTALLATION AND INSPECTION.

ISAP(s) VII A 3, PG 9, 11; III D; VII C, RESULTS REPORT  
COLLECTIVE EVALUATION REPORT: PART IV SEC. 3.6

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.06 SSER: 11 ALLEG: AQ-102 ITEM: 11.06	AQ-102 A DOCUMENT CONTROL CENTER SATELLITE SUPERVISOR'S ACTION RESULTED IN PROCEDURAL VIOLATIONS THAT WERE NOT REPORTED TO TUEC QUALITY ASSURANCE REPRESENTATIVES FOR REVIEW AND CONSIDERATION OF A REPORTABLE DEFICIENCY PURSUANT TO 10 CFR 50.55(E). REF. PG. 0-65.	TRT --- THE CONCERN THAT THE DCC SATELLITE SUPERVISOR TOOK ACTIONS WHICH RESULTED IN PROCEDURAL VIOLATIONS WAS SUBSTANTIATED. THE CONCERN THAT TU ELECTRIC DCC PROCEDURAL VIOLATIONS WERE NOT REPORTED TO TU ELECTRIC FOR POTENTIAL REPORTABILITY UNDER 10 CFR 50.55(E) WAS NOT SUBSTANTIATED. IN THE COURSE OF ASSESSING THIS ALLEGATION, TRT DETERMINED THAT TU ELECTRIC'S DEFINITION OF REPORTABLE DEFICIENCIES IS TOO VAGUE. TU ELECTRIC'S WCR PROCEDURE LACKED REFERENCES AND DID NOT ADDRESS CORRELATION OF WCRS TO REPORTABILITY UNDER 10 CFR 50.55(E). THE SIGNIFICANT DEFICIENCY PROCEDURE LACKED SPECIFICITY AS TO WHAT IS A SIGNIFICANT BREAKDOWN IN ANY PORTION OF THE QA PROGRAM OR THE MECHANISM FOR REVIEW OF WCRS FOR POTENTIAL REPORTABILITY. THIS CONCERN HAS GENERIC IMPLICATIONS IN THAT SIGNIFICANT QUALITY PROGRAM DEFICIENCIES COULD GO UNREPORTED TO THE NRC.	ISAP(*) VII.A.2



CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES --- SSERs 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.13A SSER: 17 ALLEG: AQ-023 ITEM: 11.13A	AQ-023 QUALITY CONTROL INSPECTION TRAINING WAS DEFICIENT. REF PG. 0-107.	TRT --- BASED ON A TRT REVIEW OF ALLEGATIONS CONCERNING INSPECTOR QUALIFICATIONS, CERTIFICATION, AND TRAINING IN GENERAL, TRT CONCLUDED THAT THE TRAINING AND CERTIFICATION PROGRAM AS WRITTEN FOR THE ASME INSPECTION PERSONNEL WAS ADEQUATE WITH THE EXCEPTIONS ALREADY NOTED. HOWEVER, IN ACTUAL PRACTICE, THIS PROGRAM WAS NOT FOLLOWED SCRUPULOUSLY.  IN THE NON-ASME TRAINING AND CERTIFICATION PROGRAM, TRT FOUND A LACK OF PROGRAMMATIC CONTROLS TO ENSURE THAT THE PROGRAM ACHIEVED AND MAINTAINED REQUIREMENTS AS SET FORTH IN 10 CFR PART 50, APPENDIX B. PROBLEM AREAS WERE: (1) IN THE DOCUMENTATION FOR QUALIFICATION, INCLUDING VERIFICATION OF EDUCATION AND EXPERIENCE, (2) IN THE TRAINING AND CERTIFICATION PROGRAM, (3) IN RECERTIFICATION PROGRAM, AND (4) IN THE CERTIFICATION TESTING PROGRAM. TRT CONCLUDED THAT THESE DEFICIENCIES IN PROCEDURAL REQUIREMENTS AND GUIDELINES IN THE TRAINING AND CERTIFICATION PROGRAMS WERE OF MAJOR CONCERN.  TRT DOES NOT INFER FROM THE ABOVE THAT ALL TU ELECTRIC AND NUCLEAR & ROOT INSPECTORS ARE UNQUALIFIED. HOWEVER, IDENTIFIED INSPECTION DEFICIENCIES (AS ENUMERATED IN THE TRT * ELECTRICAL AND CIVIL AND STRUCTURAL SSERs) OR LACK OF INSPECTION THEREOF, INDICATE A ROOT PROBLEM WITH INSPECTION QUALIFICATION THAT IS DIRECTLY TRACEABLE TO TU ELECTRIC'S AND BROWN & ROOT'S LACK OF PROGRAMMATIC CONTROLS AND USE OF MINIMUM REQUIREMENTS FOR THE INSPECTION CERTIFICATION PROGRAM.	ISAF(*) I.D.1; I.D.2. (REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSER# 07, 08, 10 and 11  
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TUE/CPRT RESOLUTION DOCUMENTS

TRT ISSUE SUMMARY

ISSUE

ISSUE SOURCE

\*\* 11 11.13C AQ-026  
SSER: 11 DUE TO INADEQUATE TRAINING,  
ALLEG: AQ-026 QUALITY CONTROL INSPECTORS WERE  
ITEM: 11.13C NOT QUALIFIED. REF. PG. 9-107.

ISAP(\*) I.D.1: I.D.2  
(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

TRT  
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BASED ON A TRT REVIEW OF ALLEGATIONS CONCERNING  
INSPECTOR QUALIFICATION, CERTIFICATION, AND TRAINING IN  
GENERAL, TRT CONCLUDED THAT THE TRAINING AND  
CERTIFICATION PROGRAM AS WRITTEN FOR ASME INSPECTION  
PERSONNEL WAS ADEQUATE WITH EXCEPTIONS. THESE  
EXCEPTIONS PRIMARILY INVOLVED (1) WEARABLES IN BROWN  
& ROOT PROCEDURES IN THE AREAS OF THE TYPE OF  
MONITORING TO BE USED FOR CERTIFICATION TESTING AND OF  
PERIODICALLY ESTABLISHING N-2M TESTS AND (2) BROWN &  
ROOT AND TU ELECTRIC'S INTERPRETATION OF GUIDELINES  
FOR EDUCATION AND EXPERIENCE REQUIREMENTS FOR EACH  
INSPECTOR LEVEL. HOWEVER, IN ACTUAL PRACTICE, THIS  
PROGRAM WAS NOT FOLLOWED SCRUPULOUSLY.

IN THE NON-ASME TRAINING AND CERTIFICATION PROGRAM,  
TRT FOUND A LACK OF PROGRAMMATIC CONTROLS TO ENSURE  
THAT THE PROGRAM ACHIEVED AND MAINTAINED REQUIREMENTS  
AS SET FORTH IN 10 CFR PART 50, APPENDIX B. PROBLEM  
AREAS WERE IN: (1) THE DOCUMENTATION FOR  
QUALIFICATION, INCLUDING VERIFICATION OF EDUCATION AND  
EXPERIENCE, (2) IN THE TRAINING AND CERTIFICATION  
PROGRAM, (3) THE CERTIFICATION PROGRAM, AND (4) THE  
CERTIFICATION TESTING PROGRAM. TRT CONCLUDED THAT  
THESE DEFICIENCIES IN PROCEDURAL REQUIREMENTS AND  
GUIDELINES IN THE TRAINING AND CERTIFICATION PROGRAMS  
ARE OF MAJOR CONCERN.

COMPACRE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- SSES# 07, 08, 10 and 11  
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ISSUE SOURCE

ISSUE

TRT ISSUE SUMMARY

THE/CPRT RESOLUTION DOCUMENTS

\*\* 11 11 13E AQ-028  
SSE# 11 TRAINING RECORDS INCORRECTLY  
ALLEG: AQ-028 STATED THE TRAINING RECEIVED BY  
ITEM: 11 13E INDIVIDUAL QC INSPECTORS. REF.  
PG. 0-107.

TRT

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BASED ON A TRT REVIEW OF ALLEGATIONS CONCERNING  
INSPECTOR QUALIFICATIONS, CERTIFICATION, AND TRAINING  
PROGRAM AS WELL AS THE ASME INSPECTION PERSONNEL  
WAS ADEQUATE WITH SOME EXCEPTIONS. HOWEVER, IN ACTUAL  
PRACTICE, THIS PROGRAM WAS NOT FOLLOWED SCRUPULOUSLY.  
IN THE NON-ASME TRAINING AND CERTIFICATION PROGRAM,  
TRT FOUND A LACK OF PROGRAMMATIC CONTROLS TO ENSURE  
THAT THE PROGRAM ACHIEVED AND MAINTAINED REQUIREMENTS  
AS SET FORTH IN 10 CFR PART 50, APPENDIX E. PROBLEMS  
AREAS WERE IN: (1) THE DOCUMENTATION FOR  
QUALIFICATION, INCLUDING VERIFICATION OF EDUCATION AND  
EXPERIENCE, (2) THE TRAINING AND CERTIFICATION  
PROGRAM, (3) THE RECERTIFICATION PROGRAM, AND (4) THE  
CERTIFICATION TESTING PROGRAM. TRT CONCLUDED THAT  
THESE DEFICIENCIES IN PROCEDURAL REQUIREMENTS AND  
GUIDELINES IN THE TRAINING AND CERTIFICATION PROGRAMS  
WERE OF MAJOR CONCERN.

TRT DOES NOT INFER FROM THE ABOVE THAT ALL TU ELECTRIC  
AND BROWN & ROOT INSPECTORS ARE UNQUALIFIED. HOWEVER,  
IDENTIFIED INSPECTION DEFICIENCIES (AS ENUMERATED IN  
THE TRT'S ELECTRICAL AND CIVIL AND STRUCTURAL SSES#) OR  
LACK OF INSPECTION THEREOF INDICATE A ROOT PROBLEM  
WITH INSPECTION QUALIFICATION THAT IS DIRECTLY  
TRACEABLE TO TU ELECTRIC'S AND BROWN & ROOT'S LACK OF  
PROGRAMMATIC CONTROLS AND USE OF MINIMUM REQUIREMENTS  
FOR THE INSPECTION CERTIFICATION PROGRAM.

ISAF(s) I.D.1; I.D.2  
(REFER TO ITEM 11.5-C FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TRT PROGRAMMATIC CATEGORIES)

COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TBT ISSUES -- SCERS 07, 08, 10 and 11

ISSUE SOURCE ----- TBT ISSUE SUMMARY ----- TUE/CPST RESOLUTION DOCUMENTS -----

\*\* 11 11 13F AQ-108  
SQR: 11 THE QUALITY CONTROL INSPECTORS  
ALLEG: AQ-1-8 INITIALLY ASSIGNED TO INSPECTING  
ITEM: 11 13F SOME 2500 CLASS 5 SUPPORTS WERE  
INADEQUATELY TRAINED AND  
SUPERVISED. REF. PG. 8-107.

TBT  
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TBT REVIEWED THE ALLEGATION THAT SPECIFICALLY  
QUESTIONED THE QUALIFICATIONS OF PERSONNEL INSPECTING  
SOME 2500 CLASS 5 SUPPORTS. TBT REVIEWED THE  
QUALIFICATIONS FOR 19 INSPECTORS INVOLVED WITH THIS  
ACTIVITY AND CONCLUDED THAT ONLY 1 INSPECTOR HAD  
QUESTIONABLE QUALIFICATIONS. THE STAFF POSITION IS  
THAT, ALTHOUGH A SMALL PERCENTAGE OF THE INSPECTORS  
WERE NOT QUALIFIED, THE QUALITY (7 SOME OF THE  
HARDWARE MAY BE SUSPECT. THEREFORE, THE ALLEGATION HAS  
SUBSTANCE.

(REFER TO ITEM 11.84C FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TBT PROGRAMMATIC CATEGORIES)

COMARCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SEE'S 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT RESOLUTION DOCUMENTS
** 11 11 14 SIZE: 11 ALLEG: AQ-073 ITEM: 11 14	AQ-073 DOCUMENT CONTROL CLERKS RECEIVED LITTLE TRAINING AND LEARNED HOW TO PROCESS TRAVELERS AND OTHER TYPES OF DOCUMENT PACKAGES ON THE JOB. REF. PG. 0-113.	TRT ---- THE TRT CONCLUDES THAT THIS ALLEGATION IS SUBSTANTIATED. THE TRT FOUND NO EVIDENCE OF ANY TYPE OF FORMAL TRAINING PROGRAM FOR DOCUMENT CONTROL CLERKS PRIOR TO THE ISSUANCE OF DCF-3, REV. 16 (AUGUST 1983).	ISAF(s) VII A.3

COMARCHE PEAS STEAM ELECTRIC STATION (CPSES)

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TNT ISSUES -- SSERS 07, 08, 10 and 11

ISSUE SOURCE

ISSUE

TNT ISSUE SUMMARY

TUE/CPBT RESOLUTION DOCUMENTS

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CUMMINS PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSCRs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPST RESOLUTION DOCUMENTS
** 11 11.16A USER: 11 ALLEG: AQ-032 ITEM: 11.16A	AQ-052 SITE PERSONNEL INTERCHANGED PARTS OF UNIDENTIFIED DIAGNOSIS VALVES DURING SITE DISASSEMBLY AND REASSEMBLY OPERATIONS. PART TRACEABILITY TO THE VALVES WAS LOST & THE OPERABILITY OF THE VALVES MAY BE AFFECTED. REF. PG. 0-117	TRT --- TRT CONCLUDED THAT THE ALLEGATION CONCERNING INTERCHANGED VALVE PARTS WAS SUBSTANTIATED. TRT ALSO CONCLUDED THAT THIS CONDITION HAD POTENTIAL QUALITY SIGNIFICANCE DUE TO THE GENERIC IMPLICATIONS. THE GENERIC IMPLICATIONS WERE BASED ON DOCUMENTED EVIDENCE THAT THE INTERCHANGE OF VALVE PARTS HAD OCCURRED AND EFFECTIVE PROGRAMMATIC CORRECTIVE ACTION HAD NOT BEEN IMPLEMENTED TO IDENTIFY THE PROBLEM AND PREVENT THE LOSS, DAMAGE AND INTERCHANGE OF VALVE PARTS.	**SAP(s) VII.B.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

TXT ISSUES --- SEEKS 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TXT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11 100 SEER: 11 ALLEG: AQ-061 ITEM: 11.100	AQ-061 SUPERVISORS TOLD WELDERS TO WELD UP A "GORGED" BULF RATHER THAN WAIT FOR THE AUTHORIZATION THAT FOLLOWS THE ENGINEERING DISPOSITION OF A DISCREPANT CONDITION. REF. PG 9-131.	TXT --- THE ALLEGATION CONCERNING A "GORGED" HOLE IS ADDRESSED IN MECHANICAL AND PIPING CATEGORY 1, ALLEGATIONS AM-38 AND AM-24. IN THIS ASSESSMENT, THE NRC TECHNICAL REVIEW TEAM (TRT) EXAMINED THE PROGRAMMATIC CONTROLS USE TO ADDRESS WELD REPAIRS OF TPV TYPE.  BASED ON A REVIEW OF THE APPLICABLE REQUIREMENTS GOVERNING WELD REPAIR AND ON INTERVIEWS WITH WELDERS, THE TRT CONCLUDES THAT THIS ALLEGATION IS NOT SUBSTANTIATED.  THE ALLEGATION THAT SUPERVISORS TOLD WELDERS TO PERFORM UNAUTHORIZED REPAIR IS NOT ADDRESSED IN THIS ASSESSMENT AND WILL BE AN OPEN ITEM TO BE FOLLOWED UP BY THE NRC STAFF.	(FUTURE)



CORNBACHE PEAK STEAM ELECTRIC STATION (CPSES)

TXT ISSUES -- SSESs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TTX ISSUE SUMMARY ----- THE/CRAFT RESOLUTION DOCUMENTS -----

\*\* 11 11.22A-1 AQ-136  
SSEs. 11 CRAFT PERSONNEL WERE ASKED TO  
ALLEG. AQ-136 PERFORM WORK W/O PROPER  
ITEM. 11.22A-1 PAPERWORK. TWELVE CONCERNS WERE  
INCLUDED IN THIS ALLEGATION.  
REF. PG. 0-143 T880 PG. 0-152.

TXT  
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IN ASSESSING THE TWELVE CONCERNS ENCOMPASSED BY ALLEGATION AQ-136, THE TTX REVIEWED PROCEDURES AND DOCUMENTATION, AUDITED FABRICATION WORK IN PROCESS, WITNESSED THE FABRICATION AND PT EXAMINATION OF A COMPARISON SAMPLE, WITNESSED THE FABRICATION OF THREADED RODS, AND CONDUCTED A WALKDOWN VERIFICATION OF THE MATERIAL LAYDOWN STORAGE AREAS. THE ASSESSMENT ALSO INCLUDED INTERVIEWS WITH NAR SNOF FOREMEN AND CRAFT PERSONNEL, QC INSPECTORS, QUALITY ENGINEERS, MATERIAL CONTROL PERSONNEL, AND A TU ELECTRIC INSTRUMENTATION ENGINEER. THE TTX'S ASSESSMENT DETERMINED THAT SIX OF THE TWELVE CONCERNS WERE NOT SUBSTANTIATED AND ANOTHER FIVE CONCERNS COULD BE NEITHER SUBSTANTIATED NOR REFUTED. THE TTX FOUND PROCEDURAL NONCOMPLIANCE, HOWEVER THE DOCUMENTATION EXAMINED BY THE TTX IN THE IRON FABRICATION SNOF INDICATED THAT THE REQUIRED QC INSPECTIONS WERE PERFORMED AND MATERIAL TRACEABILITY WAS MAINTAINED AND DOCUMENTED. THE TTX CONCLUDES THAT THE PROCEDURAL VIOLATIONS HAVE QUALITY SIGNIFICANCE AND GENERIC IMPLICATIONS.

ISAF(s) VII B 1  
THE AUDIT REPORT ATP-87-516  
(REFER TO ITEM 11 BAR FOR LISTING OF RESOLUTION DOCUMENTS RELATED  
TO THE TTX PROGRAMMATIC CATEGORIES)



COMARCO PEAK STEAM ELECTRIC STATION (CPSES)

TET ISSUES -- SEEs 07, 08, 10 and 11  
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ISSUE SOURCE ----- ISSUE ----- TET ISSUE SUMMARY ----- TUE/CPWT RESOLUTION DOCUMENTS -----

SURVEILLANCES WERE PERFORMED, A CONDITION IN NONCOMPLIANCE WITH THE PROCEDURE QUOTED.

THE DOCUMENTATION EXAMINED BY TET IN THE IRON FABRICATION SHOP INDICATED THAT THE REQUIRED QC INSPECTIONS WERE PERFORMED AND MATERIAL TRACEABILITY WAS MAINTAINED AND DOCUMENTED. TET THEREFORE CONCLUDED THAT THE PROCEDURAL VIOLATIONS HAVE QUALITY SIGNIFICANCE AND GENERIC IMPLICATIONS.

CUNNINGHAM PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SERIALS 07, 08, 10 AND 11

ISSUE SOURCE ----- ISSUE ----- TRT ISSUE SUMMARY ----- TRT/CPRES RESOLUTION DOCUMENTS -----

\*\* 11 11.23A AQ-054  
SER: 11 CLEARING PROCEDURES FOR AND  
ALLEG: AQ-054 CLEARLINESS OF COMPONENTS AND  
ITEM: 11.23A AREAS WERE NOT MAINTAINED DURING  
CONSTRUCTION OF THE PLANT. REF.  
PG 0-155

ISAF(a) VII.A.7  
CAR 87-022

TKT  
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BASED ON ITS REVIEW OF RECORDS OF QC SURVEILLANCES FOR  
JANUARY AND FEBRUARY 1979, AND INSPECTION REPORTS FOR  
1981 AND 1982, TRT FINDS SOME MERIT IN THE ALLEGATION  
RELATING TO INADEQUATE CLEARLINESS CONTROLS DURING THE  
EARLY STAGES OF CONSTRUCTION. TRT CONCLUDES THAT THE  
CLEARLINESS CONTROLS IMPLEMENTED SINCE 1981 INDICATE  
THAT MANAGEMENT RECOGNIZED THE CLEARLINESS PROBLEM AND  
IMPLEMENTED PROCEDURES TO CORRECT IT.

TKT NOTED, HOWEVER THAT FP-55-08 REQUIRED ONLY TWO  
SWIPE TESTS OF THE RV (ONE ON THE SIDE ONE ON THE  
BOTTOM). ALTHOUGH THE PROCEDURE WAS STILL A DRAFT, TRT  
EXPRESSED ITS CONCERN IN REGARD TO THE ADEQUACY OF  
PERFORMING ONLY TWO SWIPE TESTS TO VERIFY CLEARLINESS  
OF AN ITEM THE SIZE OF THE REACTOR VESSEL.

COMPACHE PEAK STEAM ELECTRIC STATION (CPSES)

TRT ISSUES -- S088a 07, 08, 10 and 11  
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ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TRT/CPST RESOLUTION DOCUMENTS
** 11 11 24E S088 11 ALLEG: AQ-035 ITEM: 11 24E	AQ-035 A BAR QUALITY CTRL WRG ISSUED ORAL & WRITTEN INTR THAT STATED THAT IT'S WISE TO BE USED TO DOCUMENT DEFICIENCIES, RATHER THAN WR'S, BECAUSE WR'S REQUIRED ENGR REVIEW & DISPOSITION FOR CLOSURE, WHEREAS ITS COULD BE CLOSED BY ANYONE. REF. PG 0-161	TRT --- ALTHOUGH THE ALLEGATION WAS NOT SUBSTANTIATED, THE TRT REVIEW DID IDENTIFY SOME CONCERNS. THE GENERIC SIGNIFICANCE OF THESE CONCERNS IS DISCUSSED IN QA/QC CATEGORY 8. ALLEGATION AQ-135 WHICH STATES THE FOLLOWING: THE ALLEGATION OF INADEQUATE REVIEW OF IDENTIFIED DEFICIENCIES LED THE TRT TO DETERMINE A PROGRAMMATIC WEARNESS INVOLVING THE LACK OF GUIDANCE ON THE LEVEL OF EFFICIENCY NEEDED TO INITIATE AN MCR. THIS FINDING HAS GENERIC IMPLICATIONS FOR TU ELECTRIC & OTHER INSPECTION AND CORRECTIVE ACTION PROGRAMS FOR THE DESIGN AND CONSTRUCTION OF CPSES. REVIEW OF THIS ALLEGATION ALSO LED THE TRT TO CONCLUDE THAT TU ELECTRIC'S PROGRAM FOR TRENDING PERFORMANCE WAS WEAK.	ISAP(+) VII.A.2 (REFER TO ITEM 11.83L FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



COMANCHE PEAK STEAM ELECTRIC STATION (CP)  
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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.24Q SSER: 11 ALLEG: AQ-114 ITEM: 11.24Q	AQ-114 INSTEAD OF WRITING NCRs, BAR QC KEPT PERSONAL LOGS OF THE DEFICIENCIES THAT THEY DISCOVERED AND THEN OBTAINED THEIR DISPOSITION. REF. PG. 0-161.	TRT --- THE TRT REVIMED APPLICABLE PROCEDURES AND FOUND NO REFERENCE TO INSPECTORS KEEPING PERSONAL LOGS OF PROBLEMS. INTERVIEWS REVEALED THAT QC INSPECTORS KEPT LOGS OF ALL JOBS THEY INSPECTED DURING THE FIRST FEW YEARS OF THE CPSES PROJECT. SUCH LOGS WERE INDICATED TO BE NO LONGER MAINTAINED; SOME INSPECTORS DO MAINTAIN AN INFORMAL LOG OF JOBS WORKED IN CASE OF QUESTIONS BY SUPERVISION ABOUT THE AMOUNT OF WORK DONE. THE TRT DISCOVERED ONE PERSONAL QC LOG BOOK CONTAINING SOME ENTRIES THAT APPEARED TO BE SUBJECTS THAT SHOULD HAVE BEEN DOCUMENTED ON IIRs OR NCRs BUT THE TRT COULD NOT LOCATE IIRs OR NCRs RELATED TO THE ENTRIES. THE TRT WAS UNABLE TO LOCATE ADDITIONAL LOGS OF THIS NATURE. BASED ON THE LOGBOOK FOUND THE TRT CONSIDERS THE ALLEGATION SUBSTANTIATED.	ISAP(s) VII.A.2

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.24T SSER: 11 ALLEG: AQ-124 ITEM: 11.24T	AQ-124 SOME NONCOMFORMANCE REPORTS (NCRs) WERE DISPOSITIONED INACCURATELY. REF. PG. 3-161.	TRT --- DURING THE TRT'S INVESTIGATION OF THIS ALLEGATION THEY DID IDENTIFY SPECIFIC CASES OF IMPROPER DISPOSITIONING OF NCRs. ALLEGATION AQ-124 WAS THEREFORE, CONSIDERED TO BE SUBSTANTIATED.	ISAP VII.A.2 (REFER TO ITEM 11.84E FOR LISTING OF RESOLUTION DOCUMENTS RELATED TO THE TRT PROGRAMMATIC CATEGORIES)



CUMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

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TRT ISSUES -- SSERs 07, 08, 10 and 11

ISSUE SOURCE	ISSUE	TRT ISSUE SUMMARY	TUE/CPRT RESOLUTION DOCUMENTS
** 11 11.25 SSER: 11 ALLEG: AQ-005 ITEM: 11.25	AQ-005 THERE WAS A LACK OF MATERIAL TRACEABILITY FOR SAFETY-RELATED MATERIALS AND COMPONENTS. REF. PG. 0-175	TRT --- BASED ON ITS REVIEW, THE TRT CONCLUDES THAT THE ALLEGATION THAT TUEC FAILED TO MAINTAIN MATERIAL TRACEABILITY FOR SAFETY-RELATED MATERIAL FOR NUMEROUS HARMFUL COMPONENTS PRIOR TO OCTOBER 1981, WAS SUBSTANTIATED. TUEC DID HAVE PROCEDURES FOR MATERIAL TRACEABILITY, AS REQUIRED BY 10 CFR 50, APPENDIX B, CRITERION VIII. HOWEVER, TUEC DID NOT FOLLOW THESE PROCEDURES, RESULTING IN A PARTIAL BREAKDOWN IN THE QA PROGRAM. ALTHOUGH CORRECTIVE ACTIONS WERE TAKEN AND WERE DOCUMENTED (NCRS M-3033 AND M-3258) IN ACCORDANCE WITH TUEC QA PROCEDURE CP-QAP-8.5, TUEC FAILED TO REPORT THIS PARTIAL BREAKDOWN TO THE NRC PER 10 CFR 50.55(E) REQUIREMENTS.	ISAP(s) VII.A.1; VII.A.2

