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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

before the  
ATOMIC SAFETY AND LICENSING BOARD

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

ANSWERS TO BOARD'S 14 QUESTIONS  
(Memo; Proposed Memo of April 14, 1986)  
Regarding Action Plan Results Report VIII

In accordance with the Board's Memorandum; Proposed Memo-  
randum and Order of April 14, 1986, the Applicants submit the  
answers of the Comanche Peak Response Team ("CPRT") to the 14  
questions posed by the Board, with respect to the Results Report  
published by the CPRT in respect of CPRT Action Plan VIII,  
"Civil/Structural - Cable Trays and Supports."

Opening Request:

Produce copies of any CPRT-generated checklists that were  
used during the conduct of the action plan.

Response:

CPRT-generated checklists used to support the conclusions  
summarized in the DSAP VIII Results Report for cable trays and

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supports are described as follows and included as Attachments I and II:

The Design Criteria Review Checklist served as documentation to verify the cable tray and support design criteria (Attachment I).

The Cable Tray Supports Design Procedure Review Checklist (Attachment II) was used to document review of Ebasco and Impell procedures for compliance with design criteria.

Implementation Review Checklists were also prepared in order to implement Appendix H of the Program Plan. These are not included in this response, as they were not used to support the conclusion reached in the Results Report, since Revision 4 of the Program Plan terminated implementation reviews (Appendix H) in this design area. As indicated in the Results Report, follow-up responsibility in this area is now within the scope of the TU Electric QA Technical Audit Program.

Question No. 1:

1. Describe the problem areas addressed in the report. Prior to undertaking to address those areas through sampling, what did Applicants do to define the problem areas further? How did it believe the problems arose? What did it discover about the QA/QC documentation for those areas? How extensive did it believe the problems were?

Response:

The Results Report for the portion of the Discipline-Specific Action Plan (DSAP) on cable trays and supports summarizes the results of third-party review of Ebasco and Impell resolutions to a number of issues identified by sources external to the Comanche Peak Response Team (CPRT), including

the Independent Assessment Program (Cygna), ASLB, CASE, and NRC review teams (TRT, SIT, and CAT).

To resolve the external source issues in cable trays and supports design and to assure that all cable trays and supports are appropriately designed and qualified, TU Electric committed to perform a comprehensive design validation program.

Consequently, this Design Adequacy Program (DAP) Action Plan does not include sampling to identify problem areas that were a part of the previous design for cable trays and supports. In order to define the potential cable trays and supports issues fully, the DSAP VIII Action Plan required that external issues be identified and documented in the DAP tracking system for the purpose of monitoring their resolution and closure. The Senior Review Team (SRT) determined that the review was extensive enough to conclude that all substantive cable-tray-related external source issues had been identified.

Root cause of external source issues was redefined by Revision 4 of the CPRT Program Plan to be outside the scope of the "Cable Trays and Supports" Results Report. The extent of the problem was not quantified; however, the design validation program is extensive enough to assure that cable trays and supports are in conformance with applicable commitments. The third party did not review QA/QC documentation as part of this Action Plan.

Question No. 2:

2. Provide any procedures or other internal documents that are necessary to understand how the checklists should be interpreted or applied.

Response:

The following DAP procedures were used in generating and implementing the checklists:

DAP-1, Preparation and Review of Criteria List

DAP-4, Preparation of Checklists

DAP-5, Review of Calculations, Evaluations and other Implementing Documents

DAP-6, Review of Drawings, Specifications and Other Design Output Documents

DAP-20, DAP Overview of Activities Performed by the CPSES Project or Other External Organizations

These are included as Attachments III through VII. Each DAP procedure contains descriptions of scope, responsibilities, and instructions, including documentation requirements.

Question No. 3:

3. Explain any deviation of checklists from the inspection report documents initially used in inspecting the same attributes.

Response:

For the purpose of answering this question, the assumption is made that "inspection report documents initially used" refers to Gibbs and Hill design review documentation. Gibbs and Hill design verification procedures and documentation were not reviewed as a part of the cable-tray-related portions of this DSAP. The checklists generated by the CPRT resulted from a comprehensive review of CPSES licensing commitments and criteria

and the external issue source documentation, as described in response to question 1.

Question No. 4:

4. Explain the extent to which the checklists contain fewer attributes than are required for conformance to codes to which Applicants are committed to conform.

Response:

To our knowledge, the design review checklists for cable tray and supports contain all attributes required to assess design procedure conformance to the CPSES committed codes and standards.

Question No. 5:

5. (Answer Question 5 only if the answer to Question 4 is that the checklists do contain fewer attributes.) Explain the engineering basis, if any, for believing that the safety margin for components (and the plant) has not been degraded by using checklists that contain fewer attributes than are required for conformance to codes.

Response:

This question is not applicable by reason of the response to question 4.

Question No. 6:

6. Set forth any changes in checklists while they were in use, including the dates of the changes.

Response:

The Design Criteria Review Checklist was not revised during conduct of the reviews, but the Cable Tray Supports Design Procedure Review Checklist was revised twice. The revisions used during the reviews were as follows:

<u>Checklist Form Number</u>	<u>Revision Number</u>	<u>Date</u>
DAP Form No. C/S-131	Rev. 1	6/30/86
DAP Form No. C/S-131	Rev. 2	10/15/86
DAP Form No. C/S-131	Rev. 3	2/23/87

Checklist revisions consisted of minor additions and refinements to attributes, which were made to check for specific aspects of external source issue resolutions or details of procedure-related studies. Copies of revisions of the checklist are provided as Attachments VIII, IX, and II, respectively. In addition, please note that a Rev. 0 version of this same checklist was prepared but was never used for any reviews.

Question No. 7:

7. Set forth the duration of training in the use of checklists and a summary of the content of that training, including field training or other practical training. If the training has changed or retraining occurred, explain the reason for the changes or retraining and set forth changes in duration or content.

Response:

Personnel assigned to review of criteria lists and procedures were trained before and during reviews as revisions to procedures were issued. Training consisted of reading assignments and on-the-job training and was intended to produce an overall understanding of the CPRT Program Plan, the portions of DSAP VIII related to cable trays and supports, and the Design Adequacy Program procedures, coordinated with specific review responsibilities. DAP-15, "Training and Qualifications," specifies requirements of the DAP training program. DAP files include training documentation.

Question No. 8:

8. Provide any information in Applicants' possession concerning the accuracy of use of the checklists (or the inter-observer reliability in using the checklists). Were there any time periods in which checklists were used with questionable training or QA/QC supervision? If applicable, are problems of inter-observer reliability addressed statistically?

Response:

As stated in response to question 7, training was conducted in a timely fashion to ensure proper implementation of checklists. All training was finished before the final evaluations using the checklists were completed. When the cable tray/supports Design Procedure Review Checklist was first executed, training had been completed but not properly documented for one reviewer. This documentation problem was subsequently corrected. Inter-observer reliability is not applicable to this Action Plan.

Question No. 9:

9. Summarize all audits or supervisory reviews (including reviews by employees or consultants) of training or of use of the checklists. Provide the factual basis for believing that the audit and review activity was adequate and that each concern of the audit and review teams has been resolved in a way that is consistent with the validity of conclusions.

Response:

Internal audits of DSAP VIII were performed by DAP Quality Assurance. These audits included reviews to evaluate compliance of training and checklist implementation with DAP procedures. No specific concerns were identified for cable trays and supports.



Question No. 10:

10. Report any instances in which draft reports were modified in an important substantive way as the result of management action. Be sure to explain any change that was objected to (including by an employee, supervisor, or consultant) in writing or in a meeting in which at least one supervisory or management official or NRC employee was present. Explain what the earlier drafts said and why they were modified. Explain how dissenting views were resolved.

Response:

The DSAP VIII Results Report, "Civil/Structural - Cable Trays and Supports," was not modified in any important or substantive way as the direct result of management action. Changes from early drafts to the final report reflect actual changes in technical resolution status that occurred as a result of additional work performed by the Project. No dissenting views are known.

Question No. 11:

11. Set forth any unexpected difficulties that were encountered in completing the work of each task force and that would be helpful to the Board in understanding the process by which conclusions were reached. How were each of these unexpected difficulties resolved?

Response:

No unexpected difficulties arose of the type that would likely be helpful to the Board in understanding the process by which conclusions were reached.

Question No. 12:

12. Explain any ambiguities or open items in the Results Report.



Response:

To the best of our knowledge, the Results Report contains no ambiguities. Any open items are clearly identified and explained in the Results Report.

Question No. 13:

13. Explain the extent to which there are actual or apparent conflicts of interest, including whether a worker or supervisor was reviewing or evaluating his own work or supervising any aspect of the review or evaluation of his own work or the work of those he previously supervised.

Response:

As part of the training and qualifications requirements of the DAP, reviewer objectivity was evaluated, based on responses to Attachment D of DAP-15. These evaluations indicate no evidence of any conflicts of interest.

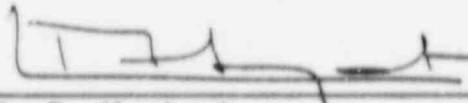
Question No. 14:

14. Examine the report to see that it adequately discloses the thinking and analysis used. If the language is ambiguous or the discussion gives rise to obvious questions, resolve the ambiguities and anticipate and resolve the questions.

Response:

In the process of preparing responses to questions 1-13 above, the Review Team Leader, DAP Manager, and Discipline Coordinator reread the Results Report specifically to identify any such ambiguities. None were noted.

Respectfully submitted,

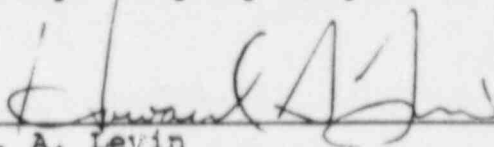


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The CPRT Senior Review Team has reviewed the foregoing responses and concurs in them.

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CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing Answers To Board's 14 Questions was served this 3rd day of February 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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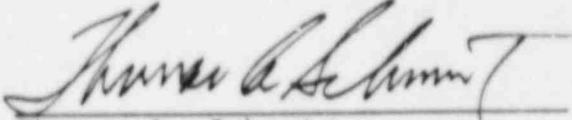
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