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William G. Council  
Executive Vice President

February 5, 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  
HARTFORD STEAM BOILER (HSB) REVIEW OF WELD  
DOCUMENTATION PACKAGES - NCR No. M-2690

Gentlemen:

This is in response to your Mr. C. Williams request for clarification concerning the nonconforming conditions delineated in NCR No. M-2690. This request was made as a result of discussions held on October 8, 1987, between the Texas Department of Labor and Standards, NRC, and CPE.

The nonconforming conditions are concerned with field welding documentation packages being issued and worked without the Authorized Nuclear Inspectors (ANI) preliminary review and stipulation of inspections as required by Section III of the ASME Code. The attached information is given in response to this request for clarification.

Very truly yours,

W. G. Council

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

DAR/grr  
Attachment

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

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Nonconforming Conditions:

Between February 25, 1980 and March 2, 1981, field welding documentation packages were issued and worked without prior review and stipulation of inspections by the Authorized Nuclear Inspector (ANI) as required by subsubarticle NA-5241 of Section III of the ASME Code.

Discussion:

Prior to February 25, 1980, a series of meetings and correspondences between the Authorized Inspection Agency, Hartford Steam Boiler (HSB), and the NA Certificate Holder, Brown & Root (B&R), discussed the need to reduce the amount of ANI paperwork and record keeping concerning welding documentation packages. It was mutually agreed upon by HSB and B&R that the ANI's overall inspection system could be modified, and compliance with the Code maintained, by utilizing inspection plans, monitoring construction activities, performing field inspections and auditing QA records. The new system, authorized by a February 15, 1980, memorandum issued by HSB, resulted in the ANIs no longer reviewing each process sheet or weld documentation package prior to its issuance for work.

HSB has since indicated in writing (ref. HSB letter dated 10/20/87) that its decision to discontinue the ANI preliminary review of field weld packages was determined to be incorrect by a new Senior Regional Manager.

Corrective Action and Measures to Prevent Recurrence

NCR No. M-2690 was generated on March 5, 1981, by the site Gibbs & Hill QA Manager, Mr. J. Hawkins. The NCR described a condition in which the ANIs were not performing a preliminary review of process control documents as required by subsubarticle NA-5241 of Section III of the ASME Code.

The NCR disposition states in part that:

"All ASME weld documentation packages are being routed through the ANI for review at this time."

"All WDCs (Weld Data Card) that were issued for Unit 1 were presented to the ANI for review, either during preparation of the package or during N-5 review."

"WDCs for Unit 2 that were issued during the time frame identified in NCR No. M-2690 (2/24/80 through 10/23/81) that have not been corrected shall be corrected in accordance with CP-QAP-12.1, Rev. 14, paragraph 3.2.2.2, which states that if unacceptable review characteristics are found during review of inprocess documentation, the document shall be returned to the responsible organization for correction. If correction cannot be made, the unacceptable item(s) shall be reported in accordance with CP-QAP-16.1."

B&R Quality Engineering has since submitted (11/4/85) a closed copy of this NCR to the ANI, B&R Welding Engineering, ASME Document Review Group, for assurance that unacceptable documentation, in the possession of those organizations, will be corrected per CP-QAP-12.1.

Conclusion

The decisions and code interpretations made concerning subsubarticle MA-5241, described herein, were determined to be incorrect. However, the ANIs did remain intimately involved in the construction and quality activities at CPSES during this period. The actions taken pursuant to this NCR, including the thorough documentation review, ensures the quality of related past activities. Existing procedural requirements and ongoing personnel indoctrination ensures the quality of current related activities and precludes the recurrence of this type of situation.