U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF SPECIAL PROJECTS

NRC Inspection Report: 50-445/88-13
50-446/88-13

Permits CPPR-126
CPPR-127

Docket Nos. 50-445
50-446

Category: A2

Construction Permit
Expiration Dates:
Unit 1: August 1, 1988
Unit 2: August 1, 1987
(Extension request
submitted)

Applicant: Texas Utilities Electric Company
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES)
Units 1 and 2

Inspection At: Comanche Peak Site, Glen Rose, Texas

Inspection and Review Period: July 29, 1987 through February 12, 1988

Inspector: Cordell C. Williams — 3/4/88
Date

Cordell C. Williams
Technical Assistant to the Director
Comanche Peak Project Division
Office of Special Projects

Reviewed By: C I Grimes — 3/4/88
Date

C. I. Grimes, Director
Comanche Peak Project Division
Office of Special Projects

Inspection Summary

Inspection and review of ASME related issues was conducted during the indicated period. Contact was made with the applicant regarding these issues at other times during this inspection period. July 29, 1987 through February 12, 1988 (Report No.50-445/88-13; 50-446/88-13)

Areas Inspected: Special announced and unannounced safety inspections including: (1) interviews and discussions with managers, supervisors, and engineers; (2) special meetings on and off site; (3) meetings with the Jurisdiction, Chief Inspector, State of Texas, on and off site; and (4) review of ASME related documentation.

Results: Within the areas inspected, no violations or deviations were identified. One Open Item was identified concerning the status of the Unit-1 primary system hydrostatic test and its governing codes (paragraph 3.D).

Background:

In September 1984, the applicant formulated a number of programs to broadly examine the adequacy of design and construction of the Comanche Peak Steam Electric Station Units 1 and 2, as recently described in the staff's Program Evaluation, dated January 22, 1988. In early 1987, TU Electric initiated a comprehensive Corrective Action Program (CAP). The purpose of this program is to address and assess the adequacy of the overall design and to validate installed hardware. A significant effort under the Corrective Action Program is the CPSES piping and pipe support activities being performed by the Stone and Webster Engineering Company (SWEC).

In connection with the staff's review of the CAP, in July 1987, the staff included a program of increased involvement in the applicant's resolution of issues impacting compliance to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Review of the TU Electric ASME Code interface was initiated during the July 29, 1987 public meeting between the NRC and TU Electric in Dallas, Texas. This effort included frequent and collaborative interfacing with the Jurisdiction (Texas Department of Labor and Standards) and its principal, "Director and Chief Inspector, Boiler Division" (Texas Chief Inspector). The staff's review regarding this issue also included a number of consultations and discussions with the third-party inspection agents, the Authorized Nuclear Inspectors (ANIs).

The code of record for the Comanche Peak Steam Electric Station (CPSES) piping is the ASME Boiler and Pressure Vessel Code Section III, 1974 Edition, including Summer 1974 Addenda Subsection NC/ND. In response to ASME Code requirements, by letter dated October 16, 1984, the Licensee filed completed N-3 and N-5 Data Reports for Unit-1 with the Texas Department of Labor and Standards. Unit 2 N-3 and N-5 Data Reports have not been completed by TU Electric.

The Texas Chief Inspector identified several issues regarding the completeness and adequacy of the ASME N-3 and N-5 Data Reports for CPSES Unit-1. These administrative and technical issues are in the process of being completely clarified and resolved by the Texas Chief Inspector and TU Electric.

The Nuclear Regulatory Commission and TU Electric have also identified a number of potential violations, unresolved and open issues based on ASME Code requirements for both Unit 1 and 2. Each of these issues are in the process of being resolved in conjunction with the CAP implementation. Some are substantially complete and will be reviewed and examined by the NRC and the Jurisdiction (Texas Chief Inspector) as appropriate.

The ASME Code Authorized Nuclear Inspectors (ANIs) at the CPSES site were the subject of Nonconformance Report Number NCR-M-2690. NCR-M-2690 concerned field welding documentation packages being issued and worked without the Authorized Nuclear Inspector's prior review and stipulation of inspections as required by Section III of the ASME Code. This Code nonconformance occurred for a period of approximately 13 months (1981-1982). This concern has been addressed and resolved by TU Electric in that Brown and Root (B&R) submitted (11/4/85) a closed copy of the NCR M-2690. The Texas Chief Inspector re-examined this issue with TU Electric, the inspection agency (Hartford Steam Boiler ANIs), the NRC, and Comanche Peak Engineering Department on October 8, 1987. As a result of these discussions, NRC requested that the licensee further clarify this matter. This clarification was submittted in a letter with attachment, dated February 5, 1988, and will be evaluated during subsequent inspections.

Details

1. Persons Contacted

W. G. Counsil, Executive Vice President, Texas Utilities Electric Company
L. D. Nace, Director of Engineering, Texas Utilities Electric Company
*M. Skaggs, ASME Coordinator, Texas Utilities Electric Company
*F. W. Madden, Mechanical Engineering Manager, Texas Utilities Electric Company
R. P. Baker, Regulatory Compliance Manager, Texas Utilities Electric Company
T. L. Heatherly, Regulatory Compliance Engineer, Texas Utilities Electric Company
J. F. Streeter, Director, QA, Texas Utilities Electric Company
G. R. Purdy, ASME Site QA Manager, Brown & Root (B&R)
J. M. Lyons, ASME Consultant, Texas Utilities Electric Company/Stone and Webster (SWEC)
S. M. Mathews, Chief Inspector, State of Texas
W. J. Tilman, Authorized Nuclear Inspector Supervisor, Hartford Steam Boiler Co. (HSB)
C. P. Wendler, Authorized Nuclear Inspector, HSB
J. Harper, Authorized Nuclear Inspector, HSB

Other TU Electric personnel were also interviewed during the course of this inspection.

*Denotes personnel contacted and present at the meeting constituting the exit interview on February 12, 1988. These applicant representatives were subsequently contacted by telephone to complete this process on February 26, 1988.

2. TU Electric programs to address ASME issues (Module 49051)

As previously stated, the NRC and the Texas Chief Inspector identified a programmatic need for additional clarification and elaboration of TU Electric's documented programs and management controls to address the ASME Code issues. The significant areas defining these programmatic considerations have been established and are in the process of being implemented by TU Electric. The areas of principal importance are as follows:

A. CPSES Unit 1

(1) With participation of the NRC and at the direction of the Texas Chief Inspector, TU Electric has established a "Memorandum of Understanding" (MOU) titled "Comanche Peak Steam Electric Station, Unit 1 ASME Activities and Responsibilities" dated December 14, 1987. The purpose of this MOU is summarized as follows: "This Memorandum was developed to describe the CPSES activities associated with the execution of the N-5 and N-3 Data Report(s). The purpose of this Memorandum is to document a mutual understanding between TU Electric and the Texas Department of Labor And Standards regarding design and procurement activities and responsibilities for ASME Class 1, 2, and 3 items and the execution of the Unit 1 N-5 data reports and the filing of the owner's N-3 data report." A copy of the MOU is attached to this report as Exhibit #1.

(2) As a direct result of the construction history and revalidation activities at CPSES, procedures have been established by TU Electric to address those circumstances "when a system design change necessitates a rerate modification of an ASME N-stamped component's hardware or design documentation." This procedure is titled "Comanche Peak Steam Electric Station ASME Section XI Component Rerating Procedure" dated December 3, 1987, Document No. NE 14535, with Attached Procedure No. ECE 2.26-07. The cover letter for this procedure is attached to this report as Exhibit #2.

(3) The tentative time scheduled for accomplishing the necessary ASME Code activities for CPSES Unit 1 has been provided by TU Electric and is attached to this report as Exhibit #3.

B. CPSES Unit 2

(1) In documents addressed to the Texas Department of Labor and Standards (Chief Inspector) dated December 15, 1987, the applicant indicate that they will "... augment our existing program for the completion of ASME activities on Comanche Peak Steam Electric Station (CPSES) Unit II. We are arranging for Stone and Webster Engineering Corporation (SWEC) to provide additional services to assist in our completion of Unit II ASME activities." SWEC is to accomplish this by:

"Performing piping system design activities on Class 2 and 3 piping systems and Class 1, 2, and 3 piping supports."

"Acting as Owner Agent for development and certification of ASME Code III Code Class 1, 2 and 3 piping Support Design Specifications."

(2) On December 15, 1987 and during several preliminary meetings, the NRC, the Texas Chief Inspector, and TU Electric discussed the ASME Code Control Consideration for CPSES Unit 2. As a result of the applicant's present and past efforts in this regard, the following instructions and procedures have been provided:

(a) A Stone and Webster document titled "ASME III Code Control Program Proposal Comanche Peak Steam Electric Station Unit #2," dated December 15, 1987 and presented for NRC review at the SWEC Boston, Massachusetts offices on December 15, 1987. The proposed plan appeared to be comprehensive.

(b) On January 18, 1988, TU Electric presented a SWEC document titled "ASME III Code Control Program Comanche Peak Steam Electric Station Unit II " dated January 18, 1988. This document has been reviewed by NRC and appears appropriately comprehensive. A copy is attached to this report as Exhibit #4.

(c) During an NRC CPSES site meeting on February 11, 1988, the applicants presented the CPSES Unit 2 tentative ASME schedule which is attached to this report as Exhibit #5.

Each of the "global" instructions and/or procedures described in 1.A. and B. above are supported by other detailed instructions or procedures which will be reviewed appropriately by the NRC as these procedures are finalized and implemented. The elements of this program discussed above appear to be adequately comprehensive.

C. ASME-Related Open Items List

As stated in paragraph 2 above, in September 1987, the NRC requested and TU Electric agreed to identify and consolidate, from existing sources, all issues involving ASME Code Compliance into a single document (a matrix).

This is to concisely document for each unique issue: the item control number, the organization or person who identified it, the date of identification, the enforcement classification (if applicable), the proposed corrective action and its acceptability to ASME Code and NRC, TU Electric's estimated close-out date, and the date of final closure. This matter was described in a memorandum (Williams/Warnick - September 24, 1987) attached to NRC CPSES Inspection Reports Nos. 50-445/87-20; 50-446/87-16.

The content and the status of the development of the resulting "ASME Open Items List" was discussed on numerous occasions with TU Electric's representatives during the course of its development. On January 15, 1988, an adequate document was presented to the NRC and subsequently to the Texas Chief Inspector. This document will be updated periodically and is, by definition, a significant device for the control and resolution of the applicant's overall control program and procedures, as outlined above.

A total of 141 issues are documented on the first copy of the consolidated "ASME Open Items List," dated January 15, 1988, which includes a number of historical issues. Nineteen of the ASME items documented on the January 15, 1988 "List" are reported by TU Electric to be closed by the NRC but were included for comprehensiveness at NRC's request. The adequacy of the closure of these 19 issues will be reexamined by the NRC in the context of the applicant's current ASME compliance control programs. Seventeen (17) of the open issues on the January 15, 1988 " Open Items List" are complete by TU Electric and are ready for NRC review. Now that TU Electric has compiled a comprehensive ASME control program, that has been reviewed by the Jurisdiction (State of Texas) and the NRC, the NRC's review of each issue can be expeditiously completed. The Texas Chief Inspector and his staff will participate in the review of these issues at their discretion.

D. ASME Issues Associated With Unit 1

(1) On January 4, 1988, the applicant's submitted a potential 50.55(e) report indicating that "hydrostatic testing on Unit-1 has been performed such that the required system test pressure is met only at the lowest elevation within the test boundary." The applicant's interim response during NRC followup on this issue indicates that the issue has been resolved, based in part on ASME Code Interpretation No. III-1-78-11. The Code of Record for CPSES is ASME Section III, 1974 edition, including Summer 1974. The Unit 1 primary system hydrostatic test was completed in July 1982.

(2) Relevant to the issue described above, the NRC has re-reviewed the applicant's documentation of their "ASME Section III NA-1140 Review For Piping and Supports," File R4.8 (15454-N(c)-007), dated September 30, 1987. Item No. 10 of this document addresses the ASME Code "1974 Edition - Winter 1975 Addenda, paragraph NC-6221 - Minimum Required Hydrostatic Test Pressure." "The Winter 1975 Addendum revised the minimum system hydrostatic test pressure from 1.5 times to 1.25 times the design pressure. This, in effect, restored the pre-1974 Code requirement of 1.25 times the design pressure as documented in Code Interpretation III-1-83-96." This Code Interpretation identifies the Code of Record requirements as an error, (emphasis added) the correction of which should have been identified as Errata in the Summer 1985 Addendum. TU Electric concluded that, "Therefore there is no related requirement affected by this change."

However, as is noted in (D)(1) above, the hydrostatic test was completed in July 1982. Further, the applicant is relying in part on Code Interpretation No. III-1-78-11 to resolve the potential 50.55(e) item regarding the adequacy of the hydrostatic test pressure (1.25 of design) actually applied to the primary system. This Code Interpretation (No. III-1-78-11) appears to contradict a provision of Code Interpretation No. III-1-83-96 in that it states in Reply (2) "The Winter Addenda ... revision changing the test pressure from '1.5' to '1.25' times Design Pressure represents a change in Code Rules, (emphasis added) not a clarification."

The two Code Interpretations, upon which the applicant are partly relying to resolve the issues involving hydrostatic test pressure requirements, are in apparent conflict. This conflict may directly affect the technical and administrative resolution of these issues. This matter will be further discussed with TU Electric and the Jurisdiction (Texas Chief Inspector) (Open Item, 50-445/88-13-0-01; 50-446/88-13-0-01)

E. Chronology of Significant Events, Discussions and Meetings Regarding ASME Code Issues At CPSES

(1) During the public meeting in Dallas, Texas on July 29, 1987, the NRC asked the applicant to indicate their status in resolving issues between them and the ASME Jurisdiction (State of Texas). The applicant indicated that the issue was in the process of resolution and would be available for audit in September 1987.

(2) September 24, 1987 - The NRC requested and TU Electric agreed that an "ASME Open Items List" (Matrix) would be provided, maintained and made available to all parties. A Memorandum of Understanding with the State of Texas had not yet been established.

(3) September 30, 1987 - TU Electric addressed a change in hydrostatic test code requirements as impacted by subsequent Code Interpretation (Stone and Webster Document No. 15454-N(c)-007).

(4) October 8, 1987 - The NRC participated in a meeting at the CPSES site between the Texas Chief Inspector, TU Electric and Hartford Steam Boiler Co. regarding ASME Code Nonconformance Report No. NCR M-2690. TU Electric's response to questions asked by NRC during this meeting is attached as Exhibit #6 to this NRC Report.

(5) October 16, 1987 - The NRC witnessed an ASME meeting in Houston, Texas involving, in part, Code issues at CPSES.

(6) November 4, 1987 - The NRC continued discussions with the applicant regarding the open items matrix for Unit 1, Memorandum of Understanding, Unit Code Control Program, and the Application of ASME Section XI to certain areas of Unit 1.

(7) December 5, 1987 - The NRC continued discussions with TU Electric and the State of Texas regarding the Memorandum of Understanding and other related programmatic considerations.

(8) December 14, 1987 - Unit 1 Memorandum of Understanding established between the State of Texas and TU Electric.

(9) December 15, 1987 - TU Electric, NRC, the Texas Chief Inspector, and SWEC met in Boston, Massachusetts SWEC offices regarding ASME issues. The Unit 2 Code control program proposal was presented.

(10) January 7, 1988 - Discussed continuing ASME Code Compliance issues with TU Electric at the CPSES site.

(11) January 15, 1988 - The applicants presented an acceptable "ASME Code Open Items List" to the NRC at the CPSES site.

(12) January 18, 1988 - The applicant documented Unit 2 "ASME Code Control Program Comanche Peak Steam Electric Station."

(13) February 5, 1988 - TU Electric submitted its response to NRC questions raised during October 8, 1987 meeting on site, regarding Nonconformance Report M-2690 involving activities of the ANIs.

(14) February 13, 1988 - NRC met at CPSES site to discuss ASME Open Items resolution and further program developments.

4. Summary

Based on the establishment of comprehensive ASME Code control programs and instructions by the applicant, as outlined in part above, it is concluded that adequate provisions have been established to effectively address the remaining ASME Code compliance issues. TU Electric's resolution of these issue will be audited by the NRC in the context of these instructions and procedures. NRC will continue coordination of its inspection activity with the ASME Code authorities and the Texas Chief Inspector. TU Electric's efforts to address the ASME Code programmatic issues appears to be effective.

5. Open Items

Open items are matters which have been discussed with the applicant, will be reviewed further by the inspector, and involve some action on the part of the NRC or applicants or both. Open Items identified during this inspection are discussed in Section 3.D(2).

6. Exit Meeting (30703)

An exit interview was conducted on February 12, 1988 with TU Electric representatives identified in paragraph 1 of this report. This meeting was supplemented by telephone contact with the same TU Electric personnel on February 26, 1988. During these discussions, the scope and findings of this inspection activity were summarized.

Attachments are Exhibits 1-6 as follows:

1. TUE/State of Texas "Memorandum of Understanding" dated December 14, 1984
2. ASME Section XI "Rerating" considerations
3. CPSES Unit 1 tentative schedule for ASME activities
4. Code control program for Unit 2
5. CPSES Unit 2 tentative schedule for ASME activities
6. Applicant's response to Nonconformance Report No. NCR 2690.

Exhibit 1

MEMORANDUM OF UNDERSTANDING

COMANCHE PEAK STEAM ELECTRIC STATION

UNIT 1 ASME ACTIVITIES AND RESPONSIBILITIES

DECEMBER 14, 1987

TEXAS DEPARTMENT OF LABOR AND STANDARDS — DATE 12/14/87

TU ELECTRIC — DATE 12/14/87

ABSTRACT

This Memorandum of Understanding was developed to describe the Comanche Peak Steam Electric Station activities associated with the execution of the N-5 and N-3 Data Reports. The purpose of this memorandum is to document a mutual understanding between TU Electric and the Texas Department of Labor and Standards regarding design and procurement activities and responsibilities for ASME Class 1, 2 and 3 items, the execution of the Unit 1 N-5 Data Reports and the filing of the Owners N-3 Data Report.

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UNIT 1 ASME ACTIVITIES AND RESPONSIBILITIES

1.0 PURPOSE

The purpose is to summarize ASME Boiler and Pressure Vessel Code (B&PVC) Section III, Division 1 activities and responsibilities at Comanche Peak Steam Electric Station (CPSES) Unit 1.

2.0 SCOPE

The scope is limited to ASME Section III, Division 1 design, procurement and Data Report activities and responsibilities at CPSES Unit 1.

3.0 DEFINITIONS

3.1 CODE

Code (ref NA-1140(c)) as used in this document shall be defined as ASME Section III, Division 1, 1974 Edition through the Summer 1974 Addenda for piping systems and 1974 Edition through the Winter 1974 Addenda for pipe supports

3.2 EXTENSION PIPING

A segment of a Class 1 ASME piping system which is included in the stress analysis boundary but not defined as ASME Class 1.

3.3 HIGH ENERGY

A system whose design pressure is greater than 275 psig, or design temperature is greater than 200°F.

3.4 LARGE BORE PIPING

A nominal pipe size greater than two (2) inches.

3.5 MODERATE ENERGY

A system whose design pressure is less than or equal to 275 psig, and design temperature is less than or equal to 200°F.

3.6 PIPING SYSTEM DESIGNER

The organization that takes overall responsibility for the design of the piping system (ref. N-5 Data Report, 1974 Ed. W 74 Ad.).

3.7 SMALL BORE PIPING

A nominal pipe size of two (2) inches or smaller.

4.0 RESPONSIBILITIES

The responsibilities for the major organizations involved in ASME Section III, Division 1 activities are defined below. Attachment 1, "ASME Section III, Division 1 Responsibility Matrix, CPSES Unit 1," identifies the organization, as defined by ASME Section III and the CPSES organization that implemented specific Code programmatic requirements.

4.1 TEXAS UTILITIES GENERATING COMPANY (TUGCO)

TUGCO, as the owner (ref. NA-3210), was responsible for the operation, maintenance, safety and power generation of CPSES. TUGCO was responsible for the certification and filing of the Owner's Data Report (ref. NA-3220(f) and NA-3270). It was the responsibility of TUGCO, to provide or cause to be provided, CPSES specific Quality Assurance (QA) Programs which establish the requirements for:

1. Organization
2. Quality Assurance Program
3. Design Control
4. Procurement Document Control
5. Instructions, Procedures, and Drawings
6. Document Control
7. Control of Purchased Material, Equipment, and Services
8. Identification and Control of Materials, Parts, and Components
9. Control of Special Processes
10. Inspection
11. Test Control
12. Control of Measuring and Test Equipment
13. Handling, Storage and Shipment
14. Inspection, Test and Operating Status
15. Nonconforming Materials, Parts and Components
16. Corrective Action
17. Quality Assurance Records
18. Audits

For the purpose of this document Texas Utilities Services Incorporated (TUSI) shall be considered part of the TUGCO organization. In February, 1987 TUGCO was recognized as TU Electric.

4.1.1 TUGCO Piping Support Engineering (PSE)

TUGCO PSE was identified as the organization formally responsible to W (ref. CP-0001 Technical Attachments) for providing

1) the design of small bore Class 1 pipe supports.
2) the certified Stress Reports for small bore Class 1 pipe supports (ref. NA-3352), and
3) the coordination of small bore Class 1 pipe support field modifications.

TUGCO PSE was identified as the organization formally responsible to G&H (ref. 2323 - Project Guide) for providing

1) the piping analysis for small bore moderate energy piping,
2) the design of small bore pipe supports for moderate energy piping,
3) the design of selective large bore pipe supports resulting from the iterative design process, and
4) the coordination of pipe support field modifications.

4.1.2 TUGCO Technical Services

TUGCO Technical Services was responsible for NRC IE Bulletin 79-14 as-built walkdowns, and the transmittal of as-built data to the applicable design organization.

4.2 GIBBS AND HILL (G&H)

TUGCO designated G&H as the Architect Engineer (A/E) for CPSES. With respect to ASME design:

1. G&H was contracted as the ASME Class 2 and 3 piping system designer,

2. G&H was the Owner's agent for the development and certification of the design specifications for ASME Class 2 and 3 piping, and piping analysis, and ASME Class 1, 2, and 3 pipe supports and pipe support design (ref. NA-3220 (c) and (d), NA-3250).

3. G&H developed the plant layout and, as the owner's agent performed structural design (ref. NA-3220(b), NA-3240),

4. G&H performed the Owner's review of Stress Reports of Class 1 pipe supports (ref. NA-3220(c), NA-3260),

5. G&H performed the function of an Engineering Organization for Class 2 and 3 piping design and analysis only and Class 1, 2, and 3 pipe support design and analysis only (ref. Table NA-3120-1 Item 7(a)), and

6. G&H accepted overall design responsibility for Class 2 and 3 systems and completed the reconciliation of the Class 2 and 3 stress analysis including the input from the various other design organizations (e.g., ITTG, NPSI, and TUGCO PSE)(ref. Attachment 2).

G&H supported ASME Class 2 and 3 design activities at CPSES with two groups:

- Site Stress Analysis Group (SSAG), and
- New York based analysis group.

These two G&H groups were primarily responsible for computer aided stress analysis using the computer code "ADLPIPE."

4.3 WESTINGHOUSE (W)

TUGCO designated W as the Nuclear Steam Supply System (NSSS) Supplier. With respect to ASME design:

1. W was contracted as the Class 1 and extension piping system designer,

2. W was the Owner's agent for the development and certification of the design specifications for ASME Class 1 and extension piping,

3. W certified the Stress Reports for Class 1 piping (ref. NA-3352),

4. W performed the function of an Engineering Organization for Class 1 and extension design and analysis only (ref. Table NA-3120-1, Item 7(a)),

5. W accepted overall design responsibility for Class 1 system and extensions and completed the final stress reports including the input from various other design organizations (e.g., TUGCO PSE, NPSI)(ref. Attachment 3), and

6. W performed the Owner's review of Stress Reports for Class 1 components and Class 2 vessels (designed to NC-3200).

4.4 NPS INDUSTRIES (NPSI)

NPSI was responsible for the design of ASME Class 1, 2 and 3 large bore pipe supports in Unit 1 containment except as noted in paragraph 4.1.1. NPSI held a Certificate of Authorization, Code Symbol Stamp NPT, as a Component Support Manufacturer (ref. NA-3120, Table NA-3120-1, Item 14 and NA-3300). In addition NPSI's NPT Certificate of Authorization included material supply within its scope. NPSI performed welding on component supports in accordance with their Certificate of Authorization (ref. NA-3130). NPSI was also responsible for:

1. Maintaining a Quality Assurance Program in accordance with NA-3320(g) and NA-8120.

2. Providing Stress Reports when required, for items in their scope of work, as the organization responsible to W (ref. NA-3352).

4.5 ITT GRINNEL (ITTG)

ITTG was responsible for the design of ASME Class 2 and 3 large bore pipe supports outside of Unit 1 containment except as noted in paragraph 4.1.1. ITTG held a Certificate of Authorization, Code Symbol Stamp NPT, as a Piping Subassembly Fabricator and Component Support Manufacturer (ref. NA-3120, Table NA-3120-1 Items 8a and 14 and NA-3300). In addition, ITTG's NPT Certificate of Authorization included material supply within its scope. ITTG performed welding on component supports and piping subassemblies in accordance with their Certificate of Authorization (ref. NA-3130). ITTG was also responsible for:

1. Maintaining a Quality Assurance Program in accordance with NA-3320 (g) and NA-8120.

4.6 BROWN AND ROOT (B&R)

TUGCO designated B&R as the Installer (ref. NA-3400) for CPSES in February 1973. B&R obtained a Certificate of Authorization and a Code Symbol Stamp NA (ref. NA-3430, Table NA-3120-1, Item 11 and NA-3300). Included in B&R's responsibilities as the Installer, was receipt inspection of ASME N-stamped components, piping subassemblies, fabricated pipe supports (ref. NA-3310), material and parts. As Installer, B&R was responsible for procurement of ASME materials and services. B&R conducted Code welding except as noted in paragraphs 4.4 and 4.5 (ref. NA-3130). B&R was also responsible for maintaining a Quality Assurance Program in accordance with NA-3320(g) and NA-8120.

4.7 HARTFORD STEAM BOILER (HSB)

HSB was contracted by B&R as the Authorized Inspection Agency (ref. NA-3500 and NA-5111) for CPSES.

5.0 DISCUSSION

5.1 DESIGN

G&H was the engineering organization (ref. paragraph 4.2) for the design and the stress analysis of Class 2 and 3 piping systems. W was the engineering organization (ref. paragraph 4.3) for the design and the stress analysis of Class 1 piping systems.

G&H provided TUGCO with design specifications 2323-MS-46A, "Nuclear Safety Class Hangers and Supports," and 2323-MS-200, "Design Specification for ASME Section III Code Classes 2 and 3 Piping". W provided TUGCO with design specification 955125 for Class 1 and extension piping. The design specifications developed by W and G&H provided a complete basis for construction in accordance with ASME Section III paragraph NA-3250.

G&H, W, ITTG and NPSI established Quality Assurance (QA) programs which included the requirements for:

- Design Control
- Instructions, Procedures and Drawings
- Document Control
- Identification and Control of Materials, Parts and Components
- Special Processes
- Inspection
- Nonconforming Items
- Corrective Action

The G&H QA Program (ref. G&H 2323 Project Guide) and W QA Program (ref. CP-0001 Technical Attachments) clearly establish the CPSES engineering interfaces (e.g. design and design analysis) (ref. NA-3650). The right of these responsible organizations (e.g. G&H and W) to obtain engineering services is recognized by the Code; nevertheless the ultimate responsibility for the structural adequacy including the completeness and adequacy of the Stress Report rests with the organization responsible (ref. paragraph 4.3) for the completed component. The interfaces and arrangements, as described in paragraphs 5.1.1, 5.1.2, 5.1.3, 5.1.4 and 5.1.5 and delineated in the referenced QA Programs, were satisfactory to W and G&H and permitted both to fulfill their responsibilities of providing a complete and adequate design and design analysis.

The design processes and arrangements for the assignment of responsibilities (ref. Section 4.0) governing ASME Class 1, 2, and 3 piping systems are described below:

5.1.1 ASME Class 1 and Extensions - Small Bore Piping and Supports

The following were the major steps in the design process for Class 1 small bore piping and extensions and their supports.

(1) G&H developed piping system layout.

(2) G&H located pipe supports (prior to work scope being shifted to W).

(3) W developed design specification 955125 for Class 1 piping and extensions.

(4) TUGCO PSE provided conceptual pipe support designs and stiffness values to W (NOTE: all designs were completed in accordance with approved G&H design specifications).

(5) W performed initial stress analysis. The results of the analysis were transmitted to TUGCO PSE.

(6) TUGCO PSE completed designs, including stiffness reevaluations. The completed designs were released to Construction.

(7) Any changes made by TUGCO PSE from the initial information supplied by W were sent to W by TUGCO PSE.

(8) W performed reanalyzes, if required, based on the data supplied and transmitted resultant analysis to TUGCO PSE.

(9) TUGCO PSE requalified pipe supports and implemented design modifications accordingly.

(10) TUGCO Technical Services, upon completion of design and implementation, performed an NRC IE Bulletin 79-14 walkdown. If required, TUGCO Technical Services revised and issued BRP's as a result of the walkdowns. B&R QC performed verifications and inspections as an integral part of the walkdown effort.

(11) The NRC IE Bulletin 79-14 walkdown information provided by TUGCO Technical Services plus the as-built stiffness values provided by TUGCO PSE were transmitted to W by TUGCO Technical Services.

(12) W performed an as-built analysis and transmitted resultant information identifying open items and modifications to TUGCO Technical Services. TUGCO Technical Services prepared and maintained an open items list. Open items were assigned to appropriate groups by TUGCO Technical Services and closed when completed.

(13) TUGCO Technical Services transmitted W as-built analysis to TUGCO PSE.

(14) TUGCO PSE performed as-built pipe support analysis, resolved applicable open items, implemented modifications and issued final review drawings. Resulting information was transmitted to TUGCO Technical Services.

(15) TUGCO Technical Services submitted information to W for final reconciliation.

(16) W performed final reconciliation piping analysis, transmitted analysis to TUGCO Technical Services and provided certified stress reports (ref. NA-3352).

(17) TUGCO Technical Services transmitted analysis to TUGCO PSE.

(18) TUGCO PSE performed final reconciliation of pipe support loads, issued/revised final review drawings, and certified stress reports (ref. NA-3352) for small bore ASME Class 1 pipe supports.

5.1.2 ASME Class 1 and Extensions - Large Bore Piping and Supports

The following were the major steps in the design process for Class 1 large bore piping and extensions and their supports:

(1) G&H developed piping system layout.

(2) G&H located pipe supports.

(3) W developed design specification 955125.

(4) NPSI provided conceptual designs and stiffness values to TUGCO and W.

(5) W performed initial stress analysis. W transmitted results to TUGCO and NPSI.

(6) NPSI completed designs, including stiffness reevaluations, and transmitted to TUGCO and W. The completed designs were released to Construction.

(7) Any changes made by NPSI from the initial information supplied by W were sent to TUGCO and W.

(8) W performed stress reanalysis, if required, based on the data supplied and transmitted resultant analysis to TUGCO and NPSI.

(9) NPSI requalified the pipe supports and implemented design modifications accordingly.

(10) TUGCO Technical Services, upon completion of design and implementation, performed NRC IE Bulletin 79-14 walkdown. If required, TUGCO Technical Services revised and issued BRP's as a result of the walkdowns. B&R QC performed verifications and inspections as an integral part of the walkdown effort.

(11) The NRC IE Bulletin 79-14 walkdown information provided by TUGCO Technical Services plus the as-built stiffness values provided by NPSI were transmitted to W by TUGCO Technical Services.

(12) W performed as-built analysis and transmitted resultant information identifying open items and modifications to TUGCO Technical Services. TUGCO Technical Services prepared and maintained an open items list. Open items were assigned to appropriate groups by TUGCO Technical Services and closed when completed.

(13) TUGCO Technical Services transmitted the as-built analysis to NPSI.

(14) NPSI performed as-built pipe support analysis, resolved applicable open items, implemented modifications, and transmitted Vendor Certified Drawings (VCD) to TUGECO Technical Services.

(15) TUGCO Technical Services submitted information to W for final reconciliation.

(16) W performed final reconciliation analysis, transmitted analysis to TUGCO Technical Services and provided certified Stress Reports (ref. NA-3352).

(17) TUGCO Technical Services transmitted analysis to NPSI.

(18) NPSI performed final reconciliation of pipe support loads and issued/revised VCD's and provided certified Stress Reports (ref. NA-3352).

5.1.3 ASME Class 2 & 3 - Small Bore Moderate Energy Piping and Supports

The following were the major steps in the design process for Class 2 and 3 small bore moderate energy piping and their supports.

(1) G&H developed and issued Specification 2323-MS-46A ("Nuclear Safety Class Hangers and Supports") and Specification 2323-MS-200 ("Design Specification for ASME Section III Code Classes 2 and 3 Piping").

(2) G&H developed piping system layout.

(3) TUGCO PSE located pipe supports.

(4) TUGCO PSE performed initial stress analysis. The stress analysis was performed by one of the following groups:

- TUGCO PSE using the Nomograph Method provided in G&H Design Specification 2323-MS-200
- G&H SSAG using computer program "ADLPIPE"

(5) TUGCO PSE completed pipe support design and released support drawings to construction.

(6) TUGCO PSE, upon completion of design and implementation, performed an as-built walkdown.

(7) TUGCO PSE performed as-built stress analysis. The stress analysis was performed by one of the following groups:

- TUGCO PSE using the Nomograph Method provided in G&H Design Specification 2323-MS-200
- S. G using computer program "ADLPIPE"

(8) TUGCO PSE performed as-built analysis of pipe supports and released final review support drawings.

5.1.4 ASME Class 2 and 3-Small Bore High Energy Piping and Supports

The following were the major steps in the design process for ASME Class 2 and 3 small bore high energy piping and supports:

(1) G&H, Inc. developed and issued Specification 2323-MS-46A ("Nuclear Safety Class Hangers and Supports") and Specification 2323-MS-200 ("Design Specification for ASME Section III Code Classes 2 and 3 Piping").

(2) G&H developed piping system layout.

(3) G&H located pipe supports.

(4) G&H SSAG or G&H New York performed the initial stress analysis by using computer program "ADLPIPE." The analysis results were transmitted to TUGCO.

(5) TUGCO PSE completed pipe support design and released pipe support drawings to Construction.

(6) Any changes made by TUGCO PSE from the initial information supplied by G&H were sent to G&H by TUGCO PSE.

(7) G&H performed stress reanalysis, if required, based on the data supplied and transmitted resultant analysis to TUGCO PSE.

(8) TUGCO PSE requalified pipe supports and implemented design modifications accordingly.

(9) TUGCO Technical Services, upon completion of design and implementation, performed an NRC IE Bulletin 79-14 as-built walkdown. If required, TUGCO Technical Services revised and issued BRP's as a result of the walkdowns. B&R QC performed verifications and inspections as an integral part of the walkdown effort.

(10) The results of the as-built walkdown were transmitted to G&H by TUGCO Technical Services.

(11) G&H performed an as-built analysis and transmitted resultant information identifying open items and modifications to TUGCO Technical Services. TUGCO Technical Services prepared and maintained an open items list. Open items were assigned to appropriate groups by TUGCO Technical Services and closed when complete.

(12) TUGCO Technical Services transmitted G&H analysis to TUGCO PSE.

(13) TUGCO PSE performed an as-built pipe support analysis, resolved applicable open items, implemented modifications and issued final review drawings. Resulting information was transmitted to TUGCO Technical Services.

(14) TUGCO Technical Services submitted information to G&H for final reconciliation.

(15) G&H performed final reconciliation of the piping analysis and transmitted analysis to TUGCO Technical Services.

(16) TUGCO Technical Services transmitted results to TUGCO PSE.

(17) TUGCO PSE performed final reconciliation of pipe support loads and issued/revised final review drawings.

5.1.5 ASME Class 2 and 3 - Large Bore Piping and Supports

The following were the major steps in the design process for Class 2 and 3 large bore piping and supports:

(1) G&H developed and issued Specification 2323-MS-46A ("Nuclear Safety Class Hangers and Supports") and Specification 2323-MS-200 ("Design Specification for ASME Section III Code Classes 2 and 3 Piping").

(2) G&H developed piping system layout.

(3) G&H located pipe supports.

(4) G&H SSAG or G&H New York performed the initial stress analysis by using computer program "ADLPIPE." The analysis was transmitted to TUGCO PSE or NPSI or ITTG.

(5) NPSI or ITTG or TUGCO PSE completed pipe support design based on G&H analysis and transmitted design to TUGCO. TUGCO released pipe support drawings to Construction.

(6) Any changes made from the initial information supplied by G&H were sent to G&H.

(7) G&H performed stress reanalysis if required, based on the data supplied and transmitted resultant analysis to TUGCO or NPSI or ITT.

(8) TUGCO PSE or NPSI or ITTG requalified the pipe supports and implemented design modifications accordingly.

(9) TUGCO Technical Services, upon completion of design and implementation, performed an NRC IE Bulletin 79-14 walkdown and transmitted to G&H. If required, TUGCO Technical Services revised and issued BRP's as a result of the walkdowns. B&R QC performed verifications and inspections as an integral part of the walkdown effort.

(10) G&H performed an as-built analysis of the piping system. Results were transmitted to TUGCO Technical Services including any identified open items. TUGCO Technical Services prepared and maintained an open items list. Open Items were assigned to appropriate groups by TUGCO Technical Services and closed when completed.

(11) TUGCO Technical Services transmitted as-built analysis to NPSI or ITTG or TUGCO PSE.

(12) NPSI or ITTG or TUGCO PSE performed as-built pipe support analysis, resolved applicable open items, implemented modifications and transmitted VCDs to TUGCO Technical Service.

(13) TUGCO Technical Services submitted information to G&H for final reconciliation.

(14) G&H performed final reconciliation of the piping analysis and transmitted analysis to TUGCO Technical Service.

(15) TUGCO Technical Services transmitted analysis to NPSI or ITTG or TUGCO PSE.

(16) NPSI or ITTG or TUGCO PSE performed final reconciliation of pipe support loads and issued/revised VCD's.

5.2 PROCUREMENT

Milestone events and responsibilities associated with the procurement of ASME items is shown on the attached chart (Attachment 4). Procurement of permanent plant equipment (i.e., N-Stamped components, piping subassemblies, and fabricated pipe supports) was initiated in 1973.

The following table provides the responsible organization for procurement of components, parts and appurtenances from N-type Certificate Holders:

Activity Performed	Responsible Organization
Prepare and certify procurement specification	TUGCO (G&H as agent)
Initiate purchase inquiries	TUGCO (G&H as agent)
Receipt of bid package	TUGCO (G&H as agent)
Evaluation of bids	TUGCO (G&H as agent)
Vendor evaluations	TUGCO (G&H as agent)
Recommendation of purchase source (based on price and engineering evaluation)	G&H as agent

Issue purchase orders	TUGCO
Source inspections	TUGCO (G&H as agent) TUGCO QA
Provide technical recommendations on vendor initiated deviation requests	G&H as agent
Resolution of deviation requests	TUGCO
Receipt inspection	B&R
Vendor surveillances	TUGCO (G&H as agent) B&R

The following table provides the responsible organization for procurement of ASME materials from material manufacturers and/or material suppliers:

Activity Performed	Responsible Organization
Prepare and certify procurement specification	TUGCO (G&H as agent)
Initiate purchase inquiries	B&R, when applicable
Receipt of bid package	B&R, when applicable
Evaluation of bids	B&R, when applicable
Vendor evaluations	B&R
Recommendation of purchase source (based on price and engineering evaluation)	B&R
Issue purchase orders	B&R, TUGCO
Source inspections	B&R, TUGCO QA, TUGCO (G&H as agent, at ITTG, NPSI only)
Provide technical recommendations on vendor initiated deviation requests	N/A
Resolution of deviation requests	N/A
Receipt inspection	B&R
Vendor surveillances	B&R

The B&R and TUGCO QA Programs established measures to assure that all purchased material, items, and services conformed to the requirements of the Code. These measures included identification for traceability and provisions, as appropriate, for source evaluations, objective evidence of quality furnished by the supplier, examination at the source and examination upon delivery (NA-4440).

Based on these requirements the purchasing group of TUGCO began issuing purchase orders for ASME N-Stamped components in 1974. Material Suppliers and Material Manufacturers who were not holders of a Quality System Certificate were not used until there were surveyed and qualified by the Installer, B&R (ref. NA-3451).

In 1975, B&R implemented warehouse operations and performed receipt inspection of N-Stamped components, ASME piping subassemblies, ASME fabricated pipe supports and ASME material (ref. NA-3400) in accordance with the requirements of the B&R Corporate QA Manual.

As the Installer, B&R also utilized their corporate QA Manual to survey and qualify ITTG and NPSI as suppliers of piping subassemblies and pipe supports in 1976 (ref. NA-3451). As Material Suppliers, ITTG and NPSI had the appropriate Quality Program including an Identification and Verification Program which controlled the quality of the work they performed and complied with the applicable requirements of the Code for material handling, storage, shipping, marking, examination, testing, certification and reporting of nonconformances (ref. NA-3700). These programs also included provisions for qualification of material manufacturers and suppliers of subcontracted services as required (ref. NA-3732).

TUGCO issued purchase orders to ITTG for piping subassemblies and pipe supports in 1975 and to NPSI for pipe supports in 1978. B&R received the following initial shipments from these suppliers on the dates shown below:

o	ITTG	Piping	January 1977
o	ITTG	Pipe Supports	September 1977
o	NPSI	Pipe Supports	May 1978

In January 1978, B&R established a Material Procurement Group (MPG). The responsibility of this group was handling procurement of ASME materials, equipment and services to support CPSES. This group reviewed requisitions to assure compliance with design specifications, ASME Code and QA requirements. The MPG developed an approved bidders list (ABL) of qualified bidders for ASME related

materials, equipment and services (ref. NA-3451). In January 1979, B&R received ASME accreditation and an NA Certificate (ref. NA-3420). Upon accreditation of B&R, ASME activities, including procurement, were conducted in accordance with the approved ASME B&R QA Manual (ref. NA-4000).

5.3 N-5/N-3 EXECUTION

TUGCO contracted B&R as the Installer (ref. NA-3410) for CPSES in February 1973. ASME III activities began in January 1977 and B&R contracted Hartford Steam Boiler for Authorized Inspection Agency Services (ref. NA-5111 and NA-8124) at CPSES in 1977. ASME accreditation of B&R as an NA Certificate holder (ref. NA-3430 and NA-8123) was received in January 1979. ASME related activities prior to January 1979 were performed in accordance with the B&R Corporate QA Manual approved by Hartford Steam Boiler as the designated Authorized Inspection Agency. ASME related activities after ASME accreditation was conducted in accordance with the ASME approved B&R CPSES QA Manual (ref. NA-3452).

5.3.1 N-5 Certification

The Unit 1 N-5 program was formally initiated in April 1983. The B&R Quality Engineering (QE) System N-5 Group was responsible for the preparation of the applicable code data reports for the N-5 certification (ref. NA-3460) of the Unit 1 ASME systems.

The N-5 Data Report was prepared on an ongoing basis as items in the applicable subsystem/system were completed and completion/acceptance of required pressure testing. Partial N-5 Data Reports was prepared for certification of a single isometric drawing or groups of piping isometric drawings in a subsystem.

The following is the process by which the B&R QE System Group developed the N-5 packages:

(1) Verification that the applicable process documentation is completed and located in the QA Records Vault (ref. NA-4800), and that Authorized Nuclear Inspector (ANI) review of the in-process documentation is complete.

(2) Ensuring that the applicable piping isometric drawings reflect the as-built conditions and compiling all documentation pertinent to the certification of ASME Class 1, 2 or 3 systems (e.g., MRS, NPP-1, CMTR).

(3) Completing the preparation of the partial N-5 Data Reports, including all pertinent ASME documentation needed for certification.

(4) Presenting the partial N-5 Data Reports to the B&R Site QA Manager for review and completion of the Installer's certification section.

(5) Presenting the partial package, including all ASME documentation needed for ASME Code certification, to the ANI for signature.

(6) Preparing of the System N-5 Data Reports by B&R upon system completion (ref. NA-8416). Each of the System N-5 Data Reports referenced the applicable certified partial N-5 Data Reports.

Following the ANI signature of a N-5 Data Report the name plate for the system was stamped with the "NA" Code symbol indicating that installation was complete and in compliance with the requirements of ASME B&PVC, Section III, Division 1 (ref. NA-8233.7). After the stamping of these systems, the N-5 Data Reports were sent to TUGCO for certification of stress reconciliation. TUGCO signed for W (piping system designer for Class 1 systems) and, G&H (piping system designer for Class 2 and 3 systems), in accordance with written authorization, certifying reconciled Class 1 stress reports and Class 2 and 3 stress analysis respectively (refer to Attachments 2 and 3).

5.3.2 N-3 Certification

The B&R Site QA Manager, acting in behalf of TUGCO, was responsible for compiling the Unit 1 N-3 Data Report package (ref. NA-8430 and NA-3270). The N-3 program included the following activities:

(1) Verification of NIS-2 forms for repairs and replacements for items documented on the N-5 Data Report, including reconciliation with the stress report.

(2) Entering all vessels which are part of ASME jurisdictional systems, but not previously included on the applicable N-5 Data Reports.

(3) Attaching all system N-5 Data Reports certified by B&R.

(4) Entering all ASME jurisdictional piping not included on the System N-5.

(5) Addressing all pumps and valves which are part of ASME jurisdictional systems not included on the N-5 Data Reports.

(6) Providing ANI signature of the N-3 Data Report.

(7) Certification of the N-3 Data report by TUGCO.

5.3.3 Administrative Changes to N-5/N-3 Code Data Reports

During TU Electric and B&R review of the Unit 1 and Common N-5 Code Data Reports involving Class 1 components, it was noted that the W information which should have also been included in the "Certification of Design" section was inadvertently omitted. The fact that this data was relevant to the piping certification and was a fundamental element in the certification process is evident from the piping designer's certification on the N-5 Code Data Report(s) and the Texas Utilities Electric N-3 Code Data Report program and documentation package. To clearly address the W design scope with respect to these subsystems/systems however, the ANI and B&R added a standard supplement to the applicable Data Reports. Additionally, a revised Certificate of Conformance addressing installation of the NSSS Equipment Supports was prepared to clearly indicate exemption of the supports from Code certification and stamping requirements; and, a supplement was added to the NSSS/Bottom Mounted Instrumentation N-5 Code Data Report to reflect Stress Report completion.

To preclude the necessity for document correlation by TDLS the administrative clarifications identified above and those Code Data Reports initiated to certify work conducted on a system N-3 Certification will be compiled into a system package by TU Electric and submitted to TDLS prior to commercial operation.

ATTACHMENT 1

ASME SECTION III, DIVISION 1
RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX

CPSES UNIT 1

PURPOSE - The purpose of this document is to address the following:

1) Identify ASME Section III, Division 1, programmatic requirements,

2) identify, as defined by ASME Section III, the organization responsible for the Code programmatic requirement and

3) identify the CPSES specific organization that implemented the Code programmatic requirement.

SCOPE - This document is applicable to ASME Section III, Division 1 items at CPSES Unit 1.

DISCUSSION

Column 1 - ASME Code Paragraph - Identifies ASME Code paragraph by number.

Column 2 - Subject - Identifies subject of ASME Code paragraph.

Column 3 - 6 - ASME Authorization to Conduct Activity - Columns 3-6 identify the organization(s) that were authorized by ASME Section III and implemented that subject Code requirement at CPSES.

Column 7 - Discussion - Provides explanatory comments and/or references. A reference to a Code paragraph in Column 7 is referencing that paragraph identified in Column 1.

LEGEND:

A - REPRESENTS AN ASME SECTION III REQUIREMENT

C - REPRESENTS CPSES IMPLEMENTATION OF SUBJECT REQUIREMENT, WHEN APPLICABLE

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
-1110	COMPONENTS THAT ARE APPLICABLE CLASSIFICATION	A	AC			CLASSIFICATION DELINEATED IN DESIGN SPECS
-1120(a)	DEFINITION OF APPLICABILITY	A	AC			
-1120(b)	CONTAINMENT SYSTEMS DEFINITION	A	AC			
-1130)(b)(c)	LIMITS OF THESE RULES	N/A				NOT APPLICABLE TO THIS MATRIX
-1140	CODE OF RECORD	AC	A			PIPING SYSTEMS - 74 ED. SUMM. 74AD. PIPE SUPPORTS - 74 ED. W 74 AD.
-1140(h)	CERTIFICATE OF AUTHORIZATION OWNER'S	AC	A			TUGCO RECEIVED 5/26/76
-1200	GENERAL REQUIREMENTS AND DEFINITIONS	N/A				NOT APPLICABLE TO THIS MATRIX
-2110 (c)	CLASSIFICATION OF EQUIPMENT	A	AC			WESTINGHOUSE/G&H PROVIDED CLASSIFICATION IN DESIGN SPECIFICATIONS
-2120	PURPOSE OF CLASSIFYING ITEMS	N/A				REF. NA-1110
-2130	CODE CLASSES & RULES OF DIVISION 1	N/A				NOT APPLICABLE TO THIS MATRIX

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
A-2140, 150, 2160	LOADING CONDITIONS	A	AC			PROVIDED IN DESIGN SPECS
A-3120 F. TABLE A-3120-1	TABLE NA-3120-1 INDICATES THE RESPONSIBILITES ASSUMED BY THE HOLDER OF EACH CERTIFICATE	N/A (REF. NOTE)				NOTE: EACH ITEM WILL BE DEALT WITH AT THE APPROPRIATE CODE PARA.
A-3130 a)(b)(c) d)(e)(f)	WELDING DURING CONSTRUCTION			AC	AC	AS DESCRIBED IN THE QA PROGRAM OF THE MANUFACTURERS OR INSTALLER
A-3210	DEFINITION OF OWNER	AC				RESPONSIBLE FOR OPERATION MAINTENANCE, SAFETY & POWER GENERATION
ABLE NA-3120-1 EM 13	OWNER OR HIS AGENTS	AC	AC			1) CERTIFICATION OF DATA REPORT N-3 (REF. NA-8430) 2) INSPECTION CONTRACT - NSB 3) RESPONSIBLE FOR DESIGN SPECIFICATIONS 4) COORDINATION OF CONSTRUCTION
A-3220	CATEGORIES OF THE OWNER'S RESPONSIBILITIES (OR AGENTS)					
A-3220 a)	OBTAINING A CERTIFICATE OF AUTHORIZATION (REF. NA-3230, NA-1140 (h))	AC				TUGCO RECEIVED 5/26/76

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3220 (b)	PROVIDING ADEQUATE STRUCTURES FOR SUPPORTING ASME ITEMS (REF. NA-3240)	A	AC			PROVIDED IN DESIGN SPECIFICATIONS
NA-3220 (c)	DESIGN SPECS PROVIDE FOR CONSTR. AND ESTABLISHING BOUNDARIES	A	AC			REF. NA-3251
NA-3220 (d)	CERTIFICATION OF DESIGN SPECS	A	AC			REF. NA-3255
NA-3220 (e)	REVIEW OF STRESS REPORTS	A	AC			REF. NA-3260
NA-3220 (f)	FILING OF OWNER'S DATA REPORT, FORM N-3	AC				REF. NA-3270
NA-3220 (g)	DOCUMENTATION QA PROGRAM	AC				REF. NA-8120
NA-3230	OWNER'S CERT. OF AUTHORIZATION	AC				REF. NA-1140 (h) REF. NA-3220(a)
NA-3240	PROVIDING ADEQUATE SUPPORTING STRUCTURES	A	AC			REF. NA-3220(b) PROVIDED IN DESIGN SPECS
NA-3251	PROVIDE AND CORRELATE DESIGN SPECS	A	AC			G&H & WESTINGHOUSE DEVELOPED DESIGN SPECS AS AGENTS FOR TUGCO. (REF. NA-3220(c))

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3252	CONTENTS OF DESIGN SPECS	A	AC			DESIGNS SPECS PROVIDED BY G&H, WESTINGHOUSE MEET THE REQUIREMENTS OF NA-3252 (a)-(f) REF. NA-3220(c) & NA-3251
NA-3253	CLASSIFICATION OF COMPONENTS AND APPURTENANCES	A	AC			REF. NA-3220(c), NA-2110(c), NA-1110 & NA-2120
NA-3254	JURISDICTION BOUNDARIES AND DEFINITION	A	AC			PROVIDED IN DESIGN SPECIFICATION. REF. NA-3220(c), NA-3251
NA-3255	CERTIFICATION OF DESIGN SPECS IAW NA-3250	A	AC			DESIGN SPECS WERE CERTIFIED BY PROFESSIONAL ENGINEERS (G&H OR WESTINGHOUSE AS APPLICABLE).
NA-3256	FILING OF DESIGN SPECS	A	AC			
NA-3260	OWNER'S REVIEW OF STRESS REPORT	A	AC			G&H AND WESTINGHOUSE, AS AGENTS, CERTIFIED BY REVIEW THAT THE STRESS REPORTS MET THE DESIGN SPECS. (REF. NA-3352, NA-3220(e))
NA-3270	OWNER'S DATA REPORT AND FILING	AC	A			TUGCO CERTIFIED THE FORM N-3 AS OWNER. (REF. NA-3220(e))

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3310	DEFINITION OF MANUFACTURER				AC	MANUFACTURER AS DEFINED APPLIED TO B&R, WPSI, ITTG. B&R, WPSI, ITTG HELD THE APPROPRIATE CERTIFICATE FOR ACTIVITIES BEING CONDUCTED. NA-3310(a), (b), (c), (d) PROVIDE TYPICAL ARRANGEMENTS.
TABLE NA-3120-1 ITEM #1	VESSEL MANUFACTUER				AC	N-STAMPED
NA-3310 TABLE NA-3120-1 ITEM #2	PUMP MANUFACTURER				AC	N-STAMPED
						STRESS REPORT, IF REQUIRED, WAS PREPARED BY MANUFACTUER
NA-3310 TABLE NA-3120-1 ITEM #3	SAFETY VALVE MANUFACTURER				AC	STRESS REPORT, IF REQUIRED, WAS PREPARED BY MANUFACTURER NV-STAMPED
NA-3310 TABLE NA-3120-1 ITEM #4	LINE VALVE MANUFACTUER				AC	STRESS REPORT, IF REQUIRED, WAS PREPARED BY MANUFACTURER N-STAMPED
NA-3310 TABLE NA-3120-1 ITEM #5	STORAGE TANK MANUFACTUER				AC	N-STAMPED CLASS 2 & 3 ONLY
NA-3310 TABLE NA-3120-1 ITEM #6	PART & APPURTENANCE MANUFACTURER				AC	NPT-STAMPED

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
4A-3310 TABLE NA-3120-1 ITEM #8	PIPING SUB. ASSEMBLY FABRICATOR			AC	AC	NPT-STAMPED
TABLE NA-3120-1 ITEM #14	COMPONENT SUPPORT MANUFACTUER			AC	AC	STRESS REPORT, IF REQUIRED, WAS PREPARED BY MANUFACTURER NPT-STAMPED
4A-3320	CATEGORIES OF MANUFACTURER'S RESPONSIBILITIES					
4A-3320 (a)	OBTAINING CERTIFICATE OF AUTHORIZATION				AC	REF TABLE NA-3120-1, ITEMS #1, 2, 3, 4, 5, 6, 8, 14 & NA-3330
4A-3320 (b)	COMPLIANCE WITH ASME III				AC	REF. NA-3340
4A-3320 (c)	ACHIEVEMENT OF STRUCTURAL INTEGRITY				AC	MANUFACTURER'S RESPONSIBILITY REF. NA-3350, NA-3340
4A-3320 (d) 1-6	PROVISION OF STRESS REPORTS WHEN REQUIRED		AC (REF. NA-3352)		AC	INCLUDES: PARTS, APPURTENANCES, RECONCILIATION OF DESIGN CHANGES TO STRESS REPORT, RPE CERTIFICATION (REF. NA-3353, NA-3354, NA-3355, NA-3356, NA-3357, NA-3358)
4A-3320 (e)	QUALIFICATION OF MATERIAL MANUF., MATERIAL SUPPLIERS AND SUPPLIERS OF SERVICES		AC NOTE 1		AC	REF. NA-3361(a) NOTE 1: APPLICABLE FOR SUPPLIERS OF SERVICES ONLY

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
4A-3320 (f)	ESTABLISHING/MAINTAINING QA PROGRAM				AC	REF. NA-3362
4A-3320 (g)	DOCUMENTING QA PROGRAM				AC	REF. NA-3362
4A-3320 (h)	FILING QA MANUAL				AC	REF. NA-3363
4A-3320 (i)	CERTIFICATION OF COMPLIANCE WITH ASME III				AC	REF. NA-3370
4A-3330	CERTIFICATE OF AUTHORIZATION				AC	PRIOR TO CONSTRUCTION, THE MANUFACTUER SHALL OBTAIN A CERTIFICATE OF AUTHORIZATION (REF. NA-3320(a))
4A-3340	THE MANUFACTURER HAS THE RESPONSIBILITY FOR STRUCTURAL INTEGRITY USING THE DESIGN SPECS AS A BASIS				AC	REF. NA-3320(c)
4A-3340 (a)	CONTROL OF QUALITY BY MEANS OF A QA PROGRAM				AC	REF. NA-3320(f)
4A-3340 (b)	DOCUMENTING QA PROGRAM				AC	REF. NA-3320(g)
4A-3340 (c)	CERTIFICATION THAT WORK PERFORMED BY SUPPLYING FABRICATORS COMPLIES WITH ASME III.				AC	REF. NA-3320(i)

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
4A-3351	PROVISION OF STRUCTURAL INTEGRITY OF A COMPONENT OR APPURTENANCE				AC	REF. NA-3340
4A-3352. 1 & 2	THE MANUFACTURER OR AN AGENT FORMALLY RESPONSIBLE TO HIM SHALL PROVIDE A STRESS REPORT FOR: CLASS 1 COMPONENT, CLASS 2 VESSEL (NC-3200), CLASS 1 COMPONENT SUPPORTS		AC		AC	REF. NA-3320(d) & GENERAL COMMENT #1
4A-3353	STRESS ANALYSIS OF PARTS				AC	THE COMPONENT MANUFACTURER HAS THE ULTIMATE RESPONSIBILITY FOR THE ADEQUACY OF THE STRESS REPORTS. (REF. NA-3320(d))
4A-3354	STRESS ANALYSIS OF APPURTENANCES				AC	THE APPURTENANCE MANUFACTURER OR COMPONENT MANUFACTUER SHALL PROVIDE A STRESS REPORT, WHEN REQUIRED. (REF. NA-3320(d))
4A-3355	MODIFICATION OF DESIGN AND RECONCILIATION OF STRESS REPORT		AC		AC	REF. 3320(d), GENERAL COMMENT #1 & NA-3352.1 & .2
4A-3356	CERTIFICATION OF STRESS REPORT BY MANUFACTURER		AC		AC	THE STRESS REPORT SHALL BE CERTIFIED BY A REGISTERED PROFESSIONAL ENGINEER(S). REF. NA-3320(d), NA-3353 NA-3352.1 & .2 & GENERAL COMMENT #1

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3357	PROVISION OF STRESS REPORT TO OWNER FOR CERTIFICATION				AC	REF. NA-3260 & NA-3320(d)
NA-3358	AVAILABILITY OF STRESS REPORT				AC	PROVIDE STRESS REPORT TO INSPECTOR (REF. NA-3320(d))
NA-3361 (a)	RESPONSIBILITIES FOR QA				AC	THE MANUFACTURER SHALL SURVEY AND QUALIFY THE QUALITY SYSTEM PROGRAMS OF SUPPLIERS, MATERIAL SUPPLIERS, MATERIAL MANUFACTURERS. THE SURVEY/QUALIFY IS NOT REQUIRED IF THE MS/MM IS A HOLDER OF A QUALITY SYSTEM CERTIFICATE. (REF NA-3700)
NA-3361 (b)	MANUFACTURER SHALL CONTROL, AS APPLICABLE, QUALITY DURING CONSTRUCTION				AC	REF. NA-8000
NA-3362	DOCUMENTING QA PROGRAM				AC	REF. NA-8120
NA-3363	FILING QA MANUAL				AC	THE MANUFACTURER SHALL FILE WITH THE AIA THEIR QA MANUAL, INCLUDING CHANGES.
NA-3370	CERTIFICATION OF COMPLIANCE				AC	THE MANUFACTURER SHALL CERTIFY COMPLIANCE THROUGH APPROPRIATE MANUFACTURER'S DATA REPORTS (N-1, NPV-1, NV-1, N-6/N-7, N-2, NF-2, NPP-1, NF-1) (REF. TABLE NA-3120-1 #1-6, 8 AND 14).

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3410	DEFINITION OF INSTALLER			AC		ORGANIZA** WHICH INSTALLS AND JC /EMS IN THE FIELD
TABLE NA-3120-1 ITEM 11	INSTALLER			AC		COMPLETES N-5 DATA REPORT FORM
NA-3420	CATEGORIES OF INSTALLER'S RESPONSIBILITIES					
NA-3420 (a)	OBTAINING CERTIFICATE OF AUTHORIZATION AND N-TYPE SYMBOL STAMP			AC		REF. NA-3430
NA-3420 (b)	COMPLIANCE WITH ASME III			AC		REF. NA-3440
NA-3420 (c)	ESTABLISHING/MAINTAINING A QA PROGRAM			AC		REF. NA-3450
NA-3420 (d)	DOCUMENTING QA PROGRAM			AC		REF. NA-3452
NA-3420 (e)	FILING OF QA MANUAL			AC		REF. NA-3453
NA-3420 (f)	CERTIFICATION OF COMPLIANCE WITH ASME III			AC		REF. NA-3460
NA-3430	CERTIFICATE OF AUTHORIZATION			AC		SHALL BE OBTAINED PRIOR TO INSTALLATION REF. NA-3420(a)

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3440	RESPONSIBLE FOR THE STRUCTURAL INTEGRITY OF ANY WELDED OR MECHANICAL CONNECTION			AC		REF. NA-3410
NA-3440 a)	CONTROL OF QUALITY DURING INSTALLATION BY MEANS OF A QA PROGRAM			AC		REF. NA-8000 AND NA-3420(b)
NA-3440 b)	DOCUMENTING THE QA PROGRAM			AC		REF. NA-8120 AND NA-3420(d)
NA-3440 c)	CERTIFICATION THAT WORK PERFORMED BY SUBCONTRACTORS FOR THE INSTALLER MEETS ASME III			AC		REF. NA-3420(f) AND NA-3460(a)
NA-3451 a)	RESPONSIBILITIES FOR QA			AC		THE INSTALLER SHALL SURVEY AND QUALIFY THE QUALITY SYSTEM PROGRAMS OF SUPPLIERS, MATERIAL SUPPLIERS, MATERIAL MANUFACTURERS. THE SURVEY/QUALIFY IS NOT REQUIRED IF THE MS/MM IS A HOLDER OF A QUALITY SYSTEM CERTIFICATE (REF. NA-3700).
NA-3451 b)	THE INSTALLER SHALL CONTROL, AS APPLICABLE, QUALITY DURING INSTALLATION INCLUDING SUBCONTRACTED WORK		AC	AC		REF. NA-3440(a) AND NA-8120

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
IA-3452	DOCUMENTING QA PROGRAM			AC		REF. NA-8120
IA-3453	FILING QA MANUAL			AC		THE INSTALLER SHALL FILE WITH THE AIA THE QA MANUAL, INCLUDING ANY CHANGES.
IA-3460	CERTIFICATION OF COMPLIANCE			AC		THE INSTALLER SHALL CERTIFY COMPLIANCE THROUGH THE APPROPRIATE DATA REPORT (N-5) (REF. TABLE NA-3120-1, #11).
A-3500	RESPONSIBILITIES OF INSPECTION AGENCIES AND INSPECTORS					THIS SECTION IS NOT APPLICABLE TO THE PURPOSE OF THIS MATRIX.
A-3610	DEFINITION OF AN ENGINEERING ORGANIZATION (EO)		AC (NOTE 1)		A (NOTE 2)	NOTE 1 - AN EO PERFORMING DESIGN OR STRESS ANALYSIS DOES NOT REQUIRE A CERTIFICATE OF AUTHORIZATION.
A-3610 CONT'D)						NOTE 2 - AN EO WHOSE RESPONSIBILITIES INCLUDE THOSE OF A MANUFACTURER, INSTALLER FOR SUCH ACTIVITIES AS PURCHASING AND CONTRACTING FOR FABRICATION SHALL HAVE A CERTIFICATE OF AUTHORIZATION.
A-3610 CONT'D)						REF. GENERAL COMMENT #2 AND #3.

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
4A-3620	CATEGORIES OF EO's RESPONSIBILITIES					
4A-3620(a)	OBTAINING CERTIFICATE OF AUTHORIZATION				A	REF. NA-3630--N/A TO CPSES (REF. NA-3610 NOTE 1)
4A-3620(b)	COMPLIANCE WITH ASME III				A	REF. NA-3610 NOTE 1 AND NA-3640
4A-3620(c)	PROVISION OF STRESS REPORT WHEN REQUIRED				A	REF. NA-3610 NOTE 1 AND NA-3650
4A-3620(d)	ESTABLISHING AND MAINTAINING A QA PROGRAM				A	REF. NA-3661, NA-3662, NA-3610 NOTE 1
4A-3620(e)	QUALIFICATION OF INTERFACE WITH SUBCONTRACTED SERVICES				A	REF. NA-3661 AND NA-3610 NOTE 1
4A-3620(f)	DOCUMENTING QA PROGRAM				A	REF. NA-3662, NA-3664, AND NA-3610 NOTE 1
4A-3620(g)	FILING QA MANUAL				A	REF. NA-3663, NA-3610 NOTE 1
4A-3620(h)	MAINTENANCE AND ACCESS TO RECORDS				A	REF. NA-3664, NA-3610 NOTE 1
4A-3630	CERTIFICATE OF AUTHORIZATION				A	REF. NA-3620(a) AND NA-3510 NOTE 1

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3640	RESPONSIBILITY FOR COMPLIANCE WITH ASME III				A	AS APPLICABLE REF. NA-3620(b)
NA-3650	RESPONSIBILITY FOR STRESS REPORTS				A	THE EO, WHEN HE HAS RESPONSIBILITY FOR THE COMPLETED COMPONENT, HAS THE ULTIMATE RESPONSIBILITY FOR THE ADEQUACY/COMPLETENESS OF THE STRESS REPORT. REF. NA-3352.
4A-3661	SCOPE OF RESPONSIBILITIES FOR QA				A	REF. NA-3662, NA-3610 NOTE 1 AND GENERAL COMMENT #3.
4A-3662.1	DOCUMENT CONTROL				A	
4A-3662.2	CONTROL OF PURCHASED MATERIALS, PARTS AND SERVICES				A	
4A-3662.3	DESIGN CONTROL				A	
4A-3663	FILING OF QA MANUAL AND SUBSEQUENT CHANGES				A	
4A-3664.1	RECORD MAINTENANCE BY OWNER				A	
4A-3664.2	MAINTENANCE AND ACCESS TO RECORDS				A	

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-3700	MATERIAL MANUFACTURERS AND MATERIAL SUPPLIERS RESPONSIBILITIES			AC	AC	REF. GENERAL COMMENT #4.
NA-4111	QUALITY ASSURANCE SCOPE	AC	C (REF. NA-3610 NOTE 1) NOTE 2	AC	AC NOTE 1	NOTE 1 - MM/MS REF. NA-3700. NOTE 2 - AGENT SHALL HAVE A QA PROGRAM APPROPRIATE TO THEIR SCOPE
NA-4112	ESTABLISHMENT OF QA PROGRAM	AC	C	AC	AC	REF. NA-4111
NA-4113	INTERIM LETTER OF AUTHORIZATION					NA TO THIS SITE.
NA-4120	EVALUATION OF QA PROGRAM	AC	C NOTE 1	AC	AC	NOTE 1 - PROGRAM EVALUATION CONDUCTED BY ORGANIZATION ARRANGING FOR THE AGENT.
NA-4130	DEFINITIONS: 1) QUALITY ASSURANCE 2) IDENTIFICATION AND VERIFICATION PROGRAM					N/A TO THE PURPOSE OF THIS MATRIX.
NA-4140	DOCUMENTING THE QA PROGRAM FILE WITH AIA	AC	NOTE 1	AC	AC	NOTE 1 - REF. NA-4120 NOTE 1.
NA-4210	AUTHORITY AND RESPONSIBILITY	AC	C	AC	AC	
NA-4220	PERSONNEL	AC	C	AC	AC	

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-4320	CATEGORIES OF QUALITY ORGANIZATION RESPONSIBILITIES	AC	C	AC	AC	APPLICABLE TO A CERTIFICATE OF AUTHORIZATION HOLDER ONLY.
NA-4320 (a)	CONTROL OF OPERATIONS AND MATERIALS					REF. NA-4400
NA-4320 (b)	CONDUCTING EXAMINATIONS AND TESTS					REF. NA-4500
NA-4320 (c)	CONTROL OF M&TE					REF. NA-4600
NA-4320 (d)	AUDITS					REF. NA-4700
NA-4320 (e)	CORRECTIVE ACTIONS					REF. NA-4800
NA-4320 (f)	RECORDS AND SUBMITTING DATA REPORTS					REF. NA-4900
NA-4410	DESIGN CONTROL	AC	C	AC	AC	NOTE 1 - THE ORGANIZATION SHALL HAVE A QA PROGRAM APPROPRIATE TO ITS SCOPE.
NA-4420	INSTRUCTION, PROCEDURES AND DRAWINGS	AC	C	AC	AC	REF. NA 4410 NOTE 1
NA-4430	DOCUMENT CONTROL	AC	C	AC	AC	REF. NA-4410 NOTE 1

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
NA-4440	CONTROL OF PURCHASED MATERIAL, ITEMS, AND SERVICES	AC	C	AC	AC	REF. NA-4410 NOTE 1
NA-4441	MEASURES TO CONTROL PURCHASES	AC	C	AC	AC	REF. NA-4410 NOTE 1
NA-4442	IDENTIFICATION AND CONTROL OF MATERIALS AND ITEMS	AC	C	AC	AC	REF. NA-4410 NOTE 1
NA-4450	CONTROL OF FABRICATION PROCESSES			AC	AC	REF. NA-4410 NOTE 1
NA-4460	HANDLING, STORAGE, SHIPPING AND PRESERVATION			AC	AC	REF. NA-4410 NOTE 1
NA-4500	EXAMINATIONS, TESTS AND INSPECTIONS	AC	C	AC	AC	NOTE 1 - THE ORGANIZATION SHALL HAVE A QA PROGRAM APPROPRIATE TO ITS SCOPE.
NA-4600	CONTROL OF M&TE			AC	AC	
NA-4700	AUDITS	AC	C	AC	AC	
NA-4800	CORRECTIVE ACTION	AC	C	AC	AC	
NA-4900	RECORDS AND DATA REPORTS	AC	C	AC	AC	NOTE 1 - THE ORGANIZATION SHALL HAVE A QA PROGRAM APPROPRIATE TO ITS SCOPE.
NA-8110	RULES FOR OBTAINING AUTHORIZATION TO USE N-TYPE SYMBOL STAMPS					NOT APPLICABLE TO THE PURPOSE OF THIS MATRIX.

ASME SECTION III, DIVISION 1 RESPONSIBILITY MATRIX
CPSES UNIT 1

ASME CODE PARAGRAPH	SUBJECT	OWNER (TU)	AGENT W/O CERT.	NA CERT.	CERT. REQ.	DISCUSSION
A-8120	QA PROGRAM REQUIREMENTS	AC	AC	AC	AC	
A-8200	REQUIRED NAMEPLATES AND STAMPING			AC	AC	
A-8300	NAMEPLATES AND STAMPING			AC	AC	
A-8400	DATA REPORTS	AC	A	AC	AC	

ATTACHMENT 2

Gibbs & Hill, Inc.

11 Penn Plaza
New York, New York 10001
212 760-
Telex: 4438
Domestic: 127834/968894
International: 428813/234473
A Dravo Company

August 5, 1985

GTN-70375

Texas Utilities Generating Company
Post Office Box 1002
Glen Rose, Texas 76043

Attention: Mr. J. B. George
Vice President/Project Gen. Mgr.

Gentlemen:

TEXAS UTILITIES GENERATING COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION
G&H PROJECT NO. 2323
UNIT 1 AND COMMON
N-5 CODE DATA REPORT CERTIFICATION

This letter is to certify that the Comanche Peak Steam Electric Station Engineering Project Manager, L. M. Popplewell, signed the Comanche Peak Steam Electric Station Unit 1 and Common N-5 Code Data Reports as our agent, in accordance with prior oral agreements and based upon receipt and on-site filing of all reconciled Class 2 and 3 stress analyses.

Very truly yours,

GIBBS & HILL, Inc.

R. E. Ballard

Robert E. Ballard, Jr.
Director of Projects

REBa:lc
1 Letter
CC: ARMS (B&R Site) OL
R. E. Camp (TUSI Site) 1L
L. M. Popplewell (TUSI Site) 1L (telecopy)
G. R. Purdy (TUSI Site) 1L
J. R. Wells (TUGCo Dallas) 1L
J. C. Finneran (TUSI Site) 1L

Dravo

ATTACHMENT 3

WPT-8010

Westinghouse Electric Corporation
Water Reactor Divisions

Nuclear Operations Division
Box 355
Pittsburgh Pennsylvania 15230

August 20, 1985

S.O. No: TBX-145

Mr. J. T. Merritt, Jr.
Assistant Project Generating Manager
Texas Utilities Generating Company
P.O. Box 1002
Glen Rose, Texas 76043

TEXAS UTILITIES GENERATING COMPANY
COMANCHE PEAK STEAM ELECTRIC STATION
N-5 Code Data Report Certification

Dear Mr. Merritt:

This letter is to certify that the Comanche Peak Steam Electric Station Engineering Project Manager, L. M. Popplewell, signed the Comanche Peak Steam Electric Station Unit 1 and Common N-5 Code Data Reports as our agent, in accordance with prior verbal agreements, based on your receipt and on-site filing of all Westinghouse certified Class 1 stress reports.

Very truly yours,

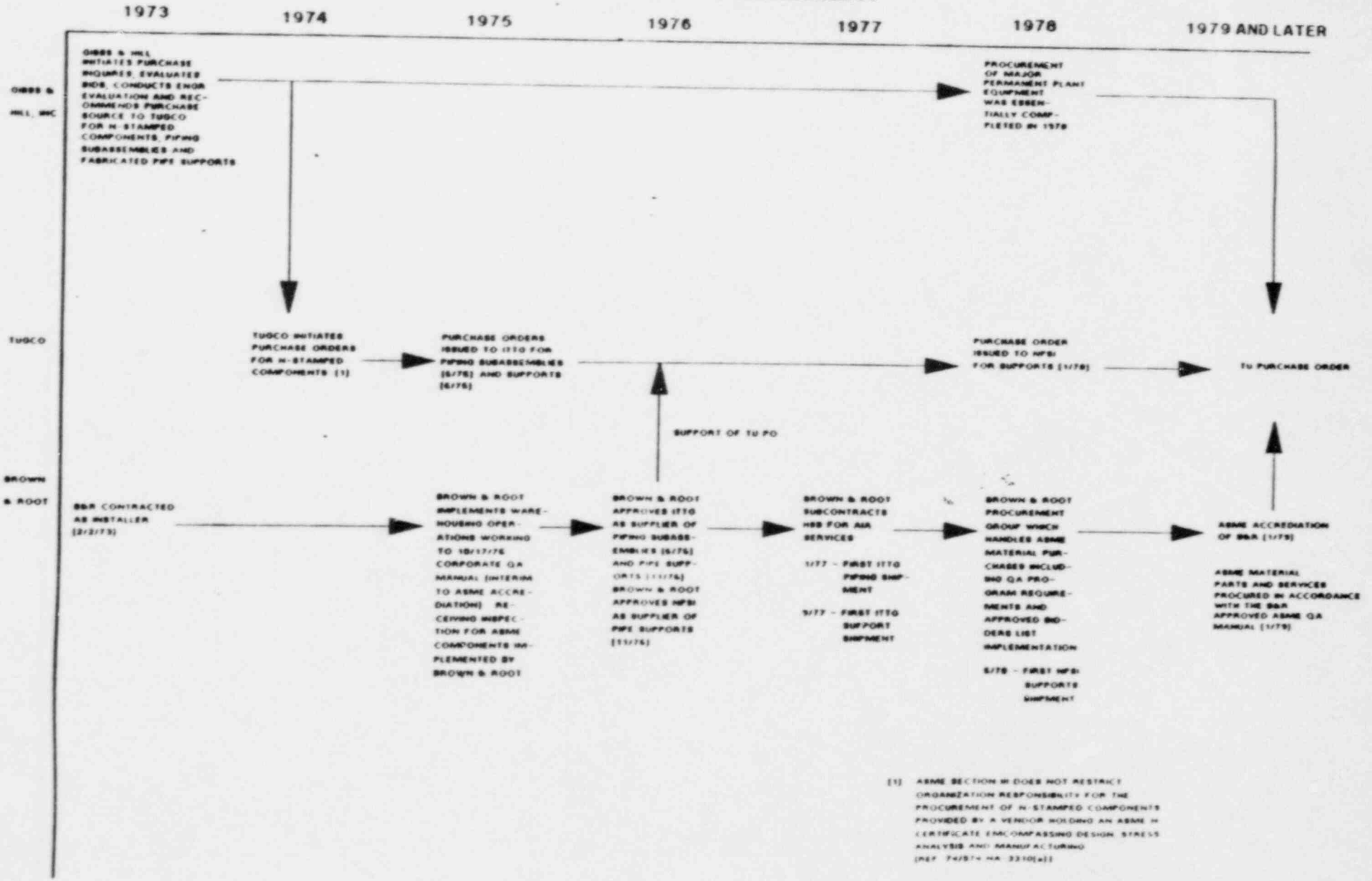
WESTINGHOUSE ELECTRIC CORPORATION

R. S. Howard, Manager
WRD Comanche Peak Projects

RSH/jjs/6563d:1

cc: J. T. Merritt 1L
R. D. Calder 1L
J. W. Beck 1L
C. B. Hartong 1L
J. C. Kuykendall 1L
ARMS 1L
J. B. George 1L
R. A. Jones 1L
L. Popplewell 1L

ATTACHMENT 4
ASME PROCUREMENT



(1) ASME SECTION III DOES NOT RESTRICT ORGANIZATION RESPONSIBILITY FOR THE PROCUREMENT OF N-STAMPED COMPONENTS PROVIDED BY A VENDOR HOLDING AN ASME N CERTIFICATE ENCOMPASSING DESIGN, STRESS ANALYSIS AND MANUFACTURING (REF. PARA. NA-3310[a])

GENERAL COMMENTS

1. The component Manufacturer has the ultimate responsibility for the completeness and adequacy of the stress report. However an agent, formally responsible to the component Manufacturer, may prepare and certify the stress report (Ref. NA-3350).

2. G&H/W, as an EO, performed only design and design analysis activities. G&H performed certain ASME procurement activities as directed by TUGCO.

3. The EOs involved at CPSES performed design and stress analysis only, therefore they did not require a Certificate of Authorization (Ref. NA-3610). The following subsubarticles are not applicable at CPSES:

   a) NA-3620
   b) NA-3630
   c) NA-3640
   d) NA-3650
   e) NA-3660

4. The component Manufacturer and/or the Installer has the responsibility to ensure that all material suppliers and material manufactures providing items at CPSES complied with NA-3700. The component Manufacturer and/or Installer also had the responsibility to survey and qualify the suppliers of subcontracted services.

Exhibit 2

TUELECTRIC

NE-14535
December 3, 1987

Steve Matthews
Director and Chief Inspector
Boiler Division
Texas Department of Labor and Standards
Austin, Texas

COMANCHE PEAK STEAM ELECTRIC STATION
ASME SECTION XI
COMPONENT RERATING PROCEDURE

As you are aware, TU Electric has implemented the "CPSES ASME Section XI Program" (NEO 2.26). One of the lower tier procedures, ECE 2.26-07, constitutes the CPSES requirements governing "ASME Section XI Rerating Activities." It is intended that this procedure be invoked when a system design change necessitates a rerate modification of an ASME N-stamped component's hardware or design documentation. Please note that if a situation ever exists where it is not practical to obtain the services of an organization possessing the appropriate ASME certification then the applicable Repair/Replacement Program will contain CPE's approval and justification for using another organization. CPSES Repair/Replacement Programs require ANII concurrence prior to work and are subject to NRC review.

As previously agreed upon, this specific procedure is now being made available to you for review and comment.

Please forward any comments or questions to M. D. Skaggs, CPE, by December 19, 1987.

O. W. Lowe
Director of Engineering

JFD:pm

cc: ARMS
B. Parr ANII Q02

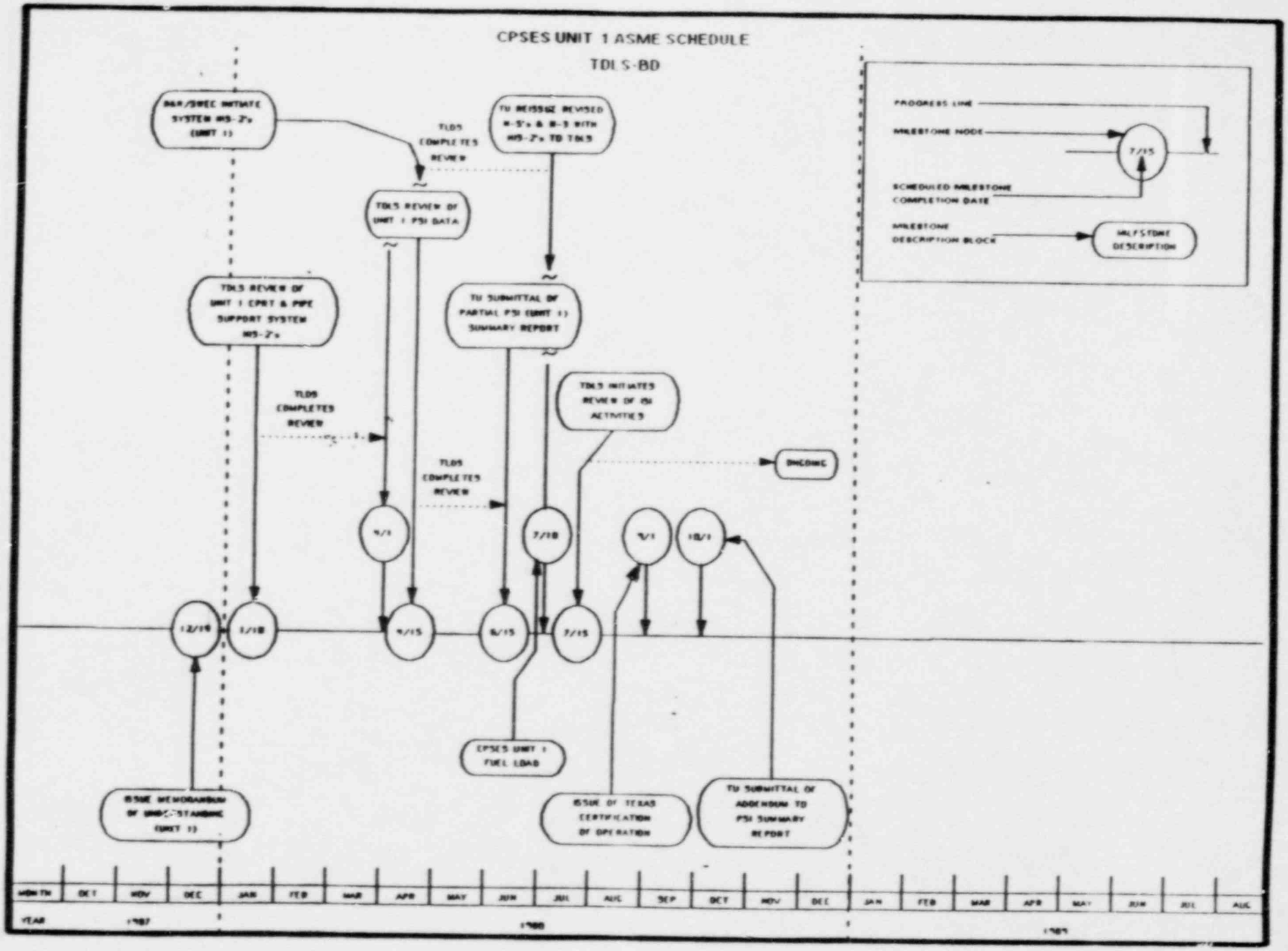

CPSES UNIT 1 ASME SCHEDULE
TDLS-BD
PROGRESS LINE
MILESTONE NODE
7/15
SCHEDULED MILESTONE COMPLETION DATE
MILESTONE DESCRIPTION BLOCK
MILESTONE DESCRIPTION
TDLS COMPLETES REVIEW
TU REISSUE REVISED M-5's & M-3 WITH MS-2's TO TDLS
TDLS REVIEW OF UNIT 1 PSI DATA
TDLS REVIEW OF UNIT 1 CPRT & PIPE SUPPORT SYSTEM MS-2's
TU SUBMITTAL OF PARTIAL PSI (UNIT 1) SUMMARY REPORT
TDLS INITIATES REVIEW OF ISI ACTIVITIES
TDLS COMPLETES REVIEW
TDLS COMPLETES REVIEW
ONGOING
9/1
7/18
9/1
10/1
12/15
1/18
9/15
6/15
7/15
CPSES UNIT 1 FUEL LOAD
ISSUE OF TEXAS CERTIFICATION OF OPERATION
TU SUBMITTAL OF ADDENDUM TO PSI SUMMARY REPORT
MONTH
OCT
NOV
DEC
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
YEAR
1987
1988
1989

Exhibit 3

Exhibit 4

ASME III
CODE CONTROL PROGRAM
COMANCHE PEAK STEAM ELETRIC STATION
UNIT #2

JANUARY 18, 1988

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ASME III CODE CONTROL PROGRAM OUTLINE
COMANCHE PEAK STEAM ELECTRIC STATION - UNIT 2

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ASME PROGRAM CORRELATION MATRIX

SWEC COMPANY QUALITY ASSURANCE AND CONTROL MANUAL ASME III

COMANCHE PEAK STEAM ELECTRIC STATION – UNIT 2
ASME III CODE CONTROL PROGRAM

SEC. NO.	SECTION TITLE	1 POLICY & AUTHORITY	2 SWEC ORGANIZATION	3 PROJECT FUNCTIONAL ORGANIZATION	4 AUTHORIZED INSPECTION AGENCY INTERFACE	5 INDOCTRINATION AND TRAINING	6 MANUAL CONTROL AND IMPLEMENTING PROCEDURES	7 ENGINEERING AND DESIGN	8 CONTROL OF DOCUMENTS	9 OVERVIEW OF INSTALLER ACTIVITIES	10 NONCONFORMANCES AND CORRECTIVE ACTION	11 INTERNAL & EXTERNAL AUDITS	12 ASBU'S VERIFICATION AND FINAL DOCUMENTATION REVIEW	13 ACTIVITIES IN SUPPORT OF N-5 REVIEW AND PROCESSING	14 ACTIVITIES IN SUPPORT OF N-3 PREPARATION AND PROCESSING	15 DEFINITION OF TERMS AND CODES	COMMENTS
1	POLICY & AUTHORITY	X															
2	DEFINITION OF TERMS															X	
3	ORGANIZATION		X	X													INTERFACES WITH OTHER PROJECT ORGANIZATIONS WILL BE DESCRIBED
4	TRAINING					X				X							
5	DESIGN SPECIFICATIONS							X									
6	ENGINEERING, DESIGN & DOCUMENT CONTROL							X	X	X							FOR OVERVIEW OF INSTALLER ACTIVITIES, DOCUMENT CONTROL ONLY. ENGRG. & DESIGN IS NOT APPLICABLE
7	PROCUREMENT CONTROL									X		X					
8	RECEIVING INSPECTION, IDENTIFICATION, STG & HANDLING CONTROL									X							
9	FABRICATION & INSTALLATION CONTROL									X			X				
10	WELDING & BRAZING CONTROL									X							
11	BOLTED & OTHER MECHANICAL JOINTS									X							

ASME PROGRAM CORRELATION MATRIX

SWEC COMPANY QUALITY ASSURANCE AND CONTROL MANUAL ASME III

COMANCHE PEAK STEAM ELECTRIC STATION - UNIT 2
ASME III CODE CONTROL PROGRAM

SEC NO	SECTION TITLE	POLICY & AUTHORITY (0)	SWEC ORGANIZATION (1)	PROJECT FUNCTIONAL ORGANIZATION (2)	AUTHORIZED INSPECTION AGENCY INTERFACE (3)	INDOCTRINATION AND TRAINING (4)	MANUAL CONTROL AND IMPLEMENTING PROCEDURES (5)	ENGINEERING AND DESIGN (6)	CONTROL OF DOCUMENTS (7)	OVERVIEW OF INSTALLED ACTIVITIES (8)	NONCONFORMANCES AND CORRECTIVE ACTION (9)	INTERNAL & EXTERNAL AUDITS (10)	ASBUILT VERIFICATION AND FINAL DOCUMENTATION REVIEW (11)	ACTIVITIES IN SUPPORT OF N-5 REVIEW AND PROCESSING (12)	ACTIVITIES IN SUPPORT OF N-3 PREPARATION AND PROCESSING (13)	DEFINITION OF TERMS AND EXHIBITS (14)	COMMENTS
12	HEAT TREATMENT, SPECIAL OPERATIONS AND REPAIRS									X							
13	FABRICATION AND INSTALLATION INSPECTION									X			X				
14	NONDESTRUCTIVE TESTING									X							
15	NONCONFORMANCES									X	X						
16	CONTROL OF M & TE									X							
17	AUTHORIZED NUCLEAR INSPECTOR & CODE CERTIFICATION				X					X			X	X			CODE CERTIFICATION & STAMPING REQUIREMENTS ARE NOT APPLICABLE
18	QUALITY ASSURANCE AUDIT PROGRAM									X		X					
19	COMPANY QUAL. ASSUR. & CONTROL MANUAL & IMPLEMENTING PROC.						X			X							
20	FINAL DOCUMENTATION								X	X			X	X			
21	N CERTIFICATE HOLDER (SUBCONTRACTING)									X							SWEC INTERFACE/AUDIT/SURVEIL. REQTS ONLY. OVERALL CODE RESPON. & ASME CERT./STAMP REQTS ARE NOT APPLICABLE
22	PRESSURE TESTING									X							

ASME PROGRAM CORRELATION MATRIX

SWEC
COMPANY QUALITY ASSURANCE AND CONTROL MANUAL
ASME III

COMANCHE PEAK STEAM ELECTRIC STATION - UNIT 2
ASME III CODE CONTROL PROGRAM

SEC NO.	SECTION TITLE	1 POLICY & AUTHORITY	2 STATE ORGANIZATION	3 PROJECT FUNCTIONAL ORGANIZATION	4 ESTABLISH INTERFACE RESPONSIBILITY	5 INDOCTRINATION AND TRAINING	6 CONTROLLED PROCESSING AND FABRICATION	7 ENGINEERING AND DESIGN	8 CONTROL OF PURCHASED MATERIAL	9 IDENTIFICATION AND CONTROL OF MATERIAL	10 CONTROL OF SPECIAL PROCESSES	11 INTERNAL & EXTERNAL AUDITS	12 ASME VERIFICATION AND FINAL DOCUMENTATION REVIEW	13 ACTIVITIES IN SUPPORT OF N-5 CERTIFICATION	14 ACTIVITIES IN SUPPORT OF N-3 CERTIFICATION	15 DEVIATION OF ITEMS	COMMENTS
23	SWEC RESPONSIBILITY WHEN OWNER'S DESIGNEE														X		SWEC WILL PERFORM DUTIES OF THE PIPING SYSTEM DESIGNER FOR CLASS 2 & 3 SYSTEMS
24	EXHIBITS															X	
25	SWEC OPS UNDER ASME XI CODE & NAT'L BOARD NR RULES																NOT WITHIN SCOPE
26	SUPPLEMENTAL REQTS FOR NQA-1 COMPLIANCE																OPSES IS NOT COMMITTED TO NQA-1
27	SUPPLEMENTAL REQTS FOR SUPPLY OF ASME III MATERIAL															X	INSTALLER IS RESPONSIBLE FOR PROCUREMENT OF MATERIAL

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 1

"Statement of Policy and Authority"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
	• Commitment to ASME Code compliance	X	-	Policy and Authority	Commitment to ASME Code for compliance with all applicable requirements, except for ASME certificates, stamping and assumption of overall code responsibility.
	• Identify location where various activities are being performed	X	-	Policy and Authority	
	• Identify types of activities being performed supporting overall goal (i.e. certification)	X	-	Policy and Authority	Brown and Root is responsible for all Code installation activities requiring Code certification and stamping
	• Commitment for all individuals to be responsible for compliance with the applicable responsibilities assigned by this Manual	X	-	Policy and Authority	

SWEC ASME III CONTROL FEATURE MATRIX
for
SWEC Corporate ASME III Program

SECTION - 1
-
"Statement of Policy and Authority"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
	• Commitment for Vice President (VP) of QA to be overall responsible for this program	X	-	Policy and Authority	
	• Commitment for VP of QA to keep President advised of Program status and adequacy	X	-	Policy and Authority	
	• Commitment for Manager of QA to be responsible for Quality for activities other than engineering and design activities	X	-	Policy and Authority	
	• Commitment for Chief Engineer, Engineering Assurance (EA) to be responsible for Quality for engineering and design activities	X	-	Policy and Authority	
	• Commitment for Manager of QA and Chief Engineer, EA, to keep VP of QA advised of Program status and adequacy	X	-	Policy and Authority	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 1

"Statement of Policy and Authority"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No	Title	Comments
	• Commitment for President to resolve problems that cannot be resolved by VP's	X	-	Policy and Authority	

SWEC ASME III CONTROL FEATURES MATRIX
For
SWEC Corporate ASME III Program

SECTION 1

"Organization"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1	• Presents logic for the control of technical and operational activities	X	1	SWEC Organization	
1.2	• Establishes the Office of the Chief Executive as the director of all SWEC activities	X	1	SWEC Organization	
1.3	• Establishes SWEC departments and operations centers with ASME responsibilities	X	1	SWEC Organization	
1.4	• Provides for delegation of duties and establishes controls when duties include specialized tasks requiring qualification, (i.e., welding)	X	1	SWEC Organization	
1.4.3	• Requires special controls for delegation of duties.	X	1	SWEC Organization	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 1

"Organization"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		Comments
Paragraph	Control Feature		Section No.	Title	
1.0	• Provides for appendices to show interface with non-SWEC organizations when responsibilities require the interface	N/A	Not Applicable (N/A)		There is no need for project appendices since the CCP will be a site specific (CPSES-Unit 2) program as opposed to an extension of SWEC's Corporate program. The necessary interfaces will be described in the CCP.
2.0, 3.0, 4.0, 5.0, and 6.0	• Provides a description of departmental organization and ASME program responsibility for each corporate department down through site supervisor	X	1 2	SWEC Organization Project Functional Organization	
7.0	• Provides a description of the organizational structure and responsibilities for ASME functions performed at operations centers	X	1 2	SWEC Organization Project Functional Organization	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 4

"Training"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.0	• Assigns department heads the responsibility to identify necessary personnel training and to assure training is received, and appropriate retraining conducted	X	4	Indoctrination and Training	SWEC overview of Installers training activities will be included in Section 8 of the CPSES - CCP
3.0	• Establish a control coordination point for department interface	X	4	Indoctrination and Training	
3.0	• Describes forms of training to be used, (i.e., OJT, formalized courses)	X	4	Indoctrination and Training	
4.0	• Describe the responsibilities of each department for the training and where required, the certification of personnel who perform under the program	X	4	Indoctrination and Training	
5.0	• Establish training schedules with documented attendance records that are maintained	X	4	Indoctrination and Training	
5.0.	• Requires suitable training prior to being assigned responsibility	X	4	Indoctrination and Training	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 4

"Training"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
6.0	• Describe the responsibility for records and establish minimum controls	X	4	Indoctrination and Training	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 5

"Design Specifications"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1	• Commitment to code required contents of a Design Specification	X	6	Engineering and Design	SWEC reviews and accepts responsibility for the design specifications initiated by Gibbs & Hill
1.2	• Reference to Design Specifications prepared by NSSS supplier	X	6	Engineering and Design	SWEC overviews Westinghouse's ASME activities
1.4	• Address that a Component Design Specification may consist of multiple specs with the main specification as an umbrella specification for the other specifications	X	6	Engineering and Design	
2.0	• Design Specification preparation requirements	X	6	Engineering and Design	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 5

"Design Specifications"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
3.0	• Design Specification review and approval requirements including review by: a. Equipment Specialist b. Chief Engineer - Power c. Construction Manager (Field Fab. & Installation specs only) d. Chief Engineer - QSD e. Registered Professional Engineer (R.P.E.) f. Project Engineer	X	6	Engineering and Design	
4.0	• Design Specification Change Control	X	6	Engineering and Design	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 5

"Design Specifications"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
5.0	• Design Specification availability to:				
	a. ANI	X	6	Engineering and Design	Brown Root makes the Design Specification available to their ANI. SWEC makes it available to SWEC's AIA.
	b. Enforcement Authority	X	6	Engineering and Design	SWEC provides the Design Specification to TU Electric who makes it available to the enforcement authority.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 6

"Engineering, Design and Document Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1.2	• Define Design Documents	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems
1.1.3	• Independent Review of Design Documents	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems
1.1.5	• Commitment to process design changes through the same approval cycle as the original design	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.1.6	• Commitment to post design change documents against the original design document and to provide control features for the incorporation of these design changes	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 6

"Engineering, Design and Document Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.2.1	• Project drawing preparation	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.2.2	• Review and approval of project drawings	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.2.3	• Project drawing change control	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.2.4	• Control features for when an installation control drawing (i.e., process control sheet) is always used as an engineering drawing	N/A	Not Applicable (N/A)		This is a control feature used when SWEC performs hardware fabrication and installation activities.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 6

"Engineering, Design and Document Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.3	• Control of Seller drawings	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.4	• Control of Stress/Design Reports and Load Capacity Data Sheet when prepared	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
1.5	• Control of Overpressure Protection Reports	X	6	Engineering and Design	
1.6	• Interface Controls with other design organizations	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems. SWEC shall overview ASME activities performed by other Engineering contractors.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 6

"Engineering, Design and Document Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.7	• Controls for Design Reviews	X	6	Engineering and Design	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
2.0	• Document Controls for Headquarters (Design Documents)	X	7	Control of Documents	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
3.0	• Document Controls for site (Design Documents)	X	7	Control of Documents	
4.0	• Control of Implementing Procedures	X	5	Manual Control and Implementing Procedures	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 7

"Procurement Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, 3.0 4.0, 5.0, 6.0 & 7.0	• Control of Procurement Activities	N/A	Not Applicable (N/A)		B&R is responsible for all ASME procurement activies. SWEC shall review procedures, overview B&R procurement activities including supplier qualifications in accordance with Section 8 of the CCP. SWEC will perform external audits in accordance with Section 10 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 8

"Receiving Inspection, Identification, Storage and Handling Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, 3.0 4.0 & 5.0	• Control of Receiving Inspection, Identification, Storage and	N/A	Not Applicable (N/A)		B&R has responsibility for all ASME receipt inspection, identification, storage and handling activities. SWEC shall review procedures, & overview activities in accordance with Section 8 of the CCP. Independent document review shall be performed by SWEC in accordance with Section 11 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 9

"Fabrication & Installation Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, 3.0 4.0, 5.0, 6.0 & 7.0	• Control of Fabrication & Installation activities	N/A	Not Applicable (N/A)		B&R is responsible for the control of fabrication and installation activities onsite including the as-built condition and final documentation. SWEC reviews procedures, performs independent verification of as-built condition, performs independent document review and overviews Installer activities in accordance with Sections 8 and 11 of the CCP

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 10

"Welding & Brazing Control"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
10, 20, 30 40, 50, 60 70, 80, 90 & 100	• Control of Welding & Brazing	N/A	Not Applicable (N/A)		B&R is responsible for control of welding and brazing, SWEC reviews procedures and overviews activities in accordance with Section 8 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 11
"Bolted and Other Mechanical Joints"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, & 3.0,	• Control of Bolted & Other Mechanical Joints	N/A	Not Applicable (N/A)		B&R has responsibility for the control of bolted and other mechanical joints. SWEC reviews procedures and overviews activities in accordance with Section 8 of the CCP

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 12

Heat Treatment and Special Operations And Repairs"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, & 3.0,	• Control of Heat Treatments, Special Operations and Repairs	N/A	Not Applicable (N/A)		B&R has responsibility for the control of heat treatments, special operations and repairs. SWEC reviews procedures and overviews activities in accordance with Section 8 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 13

"Fabrication & Installation Inspection"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, 3.0 4.0, 5.0, 6.1, 6.3, & 7.0	• Control of Fabrication & Installation Inspection activities	N/A	Not Applicable (N/A)		B&R has responsibility for control of fabrication and installation inspection activities.
6.2 & 6.3	• Inspection of Contractor Activities	X	8	Overview of Installer's Activities	SWEC reviews procedures, overvies activities, and perform independent verification of as-built condition in accordance with Sections 8 and 11 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 14

"Nondestructive Testing"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM	
Paragraph	Control Feature		Section No. Title	Comments
1.0, 2.0, 3.0, & 4	• Control of Nondestructive Testing testing to Code and SWEC Specification	N/A	Not Applicable (N/A)	B&R has responsibility for the control of nondestructive testing. SWEC reviews procedures and overviews activities in accordance with Section 8 of the CCP

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 15

"Nonconformances"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1 & 1.2	• Deviations from Engineering or Code requirements requires engineering disposition	X	9	Nonconformances and Corrective Action.	SWEC is responsible for engineering dispositions for Class 2&3 systems. Westinghouse is responsible for engineering dispositions for Class 1 systems.
1.1 & 1.2	• System for handling deviations not requiring engineering disposition	N/A	Not Applicable (N/A)		B&R is responsible for correcting deviations not requiring engineering disposition in accordance with their ASME Program.
1.1	• N&D's will be generated for all nonconformances	X	9	Nonconformances and Corrective Action	Nonconformances will be documented on a Nonconformance Report (NCR) in lieu of an N&D
1.4 & 1.5	• Central control for numbers and processing which shows periodic status	X	9	Nonconformances and Corrective Action	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 15

"Nonconformances"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No	Title	Comments
2.1 & 2.2	• Establishes FQC and PQA responsibilities	X	9	Nonconformances and Corrective Action	SWEC CCG will handle both seller and installer deviations
2.3 & 2.4	• Establishes central review and concurrence through the processing authority	X	9	Nonconformances and Corrective Action	
2.5	• Establishes content of problem description	X	9	Nonconformances and Corrective Action	
2.6	• Establishes control to segregate nonconforming items	N/A	Not Applicable (N/A)		B&R has responsibility to control and segregate nonconforming items. SWEC shall overview Installer's activities as described in Section 8 of the CPSES-CCP
2.7	• Makes Project Engineer responsible for disposition	X	9	Nonconformances and Corrective Action	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 15

"Nonconformances"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.7	• Establish and define acceptable disposition, (e.g. accept as-is, repair etc)	X	9	Nonconformances and Corrective Action	
2.7	• Requires design report reconciliation when a disposition affects a drawing used in stress analysis	X	9	Nonconformances and Corrective Action	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
2.7	• Requires dispositions to meet Code requirements	X	9	Nonconformances and Corrective Action	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.
2.8	• Establishes controls for additional documents necessary to support N&D disposition	X	9	Nonconformances and Corrective Action	
2.9	• Establish requirement for engineering review and approval	X	9	Nonconformances and Corrective Action	SWEC is responsible for Class 2&3 systems. Westinghouse is responsible for Class 1 systems.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 15

"Nonconformances"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.9	• Establish requirement for QA review and approval of all disposition which change specification requirements	X	9	Nonconformances and Corrective Action	
2.10 & 2.11	• Establishes implementation review and provides for resolution	X	9	Nonconformances and Corrective Action	
2.11	• Provides for ANI review for hold point assignment and control	N/A	Not Applicable (N/A)		B&R has responsibility for obtaining the ANI review, SWEC shall overview in accordance with Section 8 of the CPSES-CCP.
2.14 & 2.15	• Establishes implementation verification and N&D closure control describing action for unsatisfactory conditions	X	9	Nonconformances and Corrective Action	In conjunction with TU Electric
2.15, 2.16 & 2.17	• Establishes requirements for final document retention in the items file and project files	X	9	Nonconformances and Corrective Action	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 15

"Nonconformances"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.17	• Provides for ANI notification	X	9	Nonconformance and Corrective Action	B&R is responsible for notifying their ANI. SWEC is responsible for monitoring activity
2.18	• Provides for trending and reports	X	9	Nonformance and Corrective Action	In conjunction with TU Electric
3.0	• Provides a system and controls for storing in place, installing, or using nonconforming items	N/A	Not Applicable (N/A)		B&R has responsibility for controlling nonconforming items; SWEC shall overview in accordance with Section 8 of the CPSES-CCP.
4.0	• Provides a system and controls to identify conditions adverse to quality which require corrective actions beyond the capability and scope of the N&D system	X	9	Nonconformances and Corrective Action	In conjunction with TU Electric
5.0	• Provides direction for filing the documentation generated by this process	X	9	Nonconformances and Corrective Action	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 16
-
"Control of Measuring and Test Equipment"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0, 2.0, 3.0, & 4.0	• Control of Measuring & Test Equipment	N/A	Not Applicable (N/A)		B&R has responsibility for the control of measuring and test equipment used by B&R personnel. SWEC reviews procedures and overviews activities in accordance with Section 8 of the CCP.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 17
"Authorized Nuclear Inspection and Code Certification"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1	• SWEC shall establish a corporate agreement with an Authorized Inspection Agency for third party inspection services.	X	3	Authorized Inspection Agency Interface	Agreement will be a special services agreement for CPSES Unit 2 activities.
1.2.1 & 1.2.2	• Site Purchase Order to be initiated which invokes corporate agreement and establishes AIA services at site.	X	3	Authorized Inspection Agency Interface	Corporate P.O. for special services to be issued as SWEC has no site procurement functions.
1.2.3	• Establish an initial conference between SWEC and AIA for the purpose of briefing the AIA on the planned implementation of the ASME Program.	X	3	Authorized Inspection Agency Interface	
1.3.1	• Chief Engineer, QSD maintain liaison with Authorized Nuclear Inspector Supervisor (ANIS) for Program and AIA audits.	X	3	Authorized Inspection Agency Interface	This liaison activity will be performed by the CCP QA Manager

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 17
"Authorized Nuclear Inspection and Code Certification"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.3.2, 1.3.4, & 1.3.5	• Senior FOC representative interfaces with ANI, arranges for an ASME manual to be assigned to the ANI, arranges free access for the ANI, gives the ANI opportunity to designate hold or notification points on process sheets, drawings, etc. and notifies ANI when work approaches stipulated ANI hold or notification points	X	1	Authorized Inspection Agency Interface	CCG Manager will interface with ANI. SWEC AIA services will be a monitoring function for SWEC activities only. Hold or notification points for hardware work is the responsibility of Brown & Root's ANI.
1.3.3	• ANI has authority to make inspections, witness or verify examinations, and make additional investigations which in his judgement are necessary to ascertain whether Code work is being performed in accordance with the manual and the Code	X	1	Authorized Inspection Agency Interface	SWEC ANI has authority for SWEC activities. Brown & Root ANI has authority for B&R ASME activities

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 17
"Authorized Nuclear Inspection and Code Certification"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.1	• Preparation and Certification of Code Data Reports	X	12	Activities in Support of N-5 Review and Processing	Code Certification of the work is the responsibility of Brown and Root as the ASME Certificate holder. SWEC will sign the N-5 Data Report as the Class 2 & 3 Piping System designer. Westinghouse will sign the N-5 Data Report as the Class 1 Piping System Designer. Additionally, SWEC will sign the N-5 as TU Electric's Agent for completion of CCP activities and SWEC's ANI will sign the N-5 for completion of AIA monitoring activities. These signatures are beyond code required certification signatures.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 17
"Authorized Nuclear Inspection and Code Certification"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.2	• Code Symbol Stamping	N/A	Not Applicable (N/A)		Responsibility of Brown & Root as the ASME certificate and stamp holder. SWEC does not hold an ASME Certificate for SWEC activities at CPSES.
2.3	• Certification of ASME III Data Reports and Code Stamping when SWEC is an N Certificate Holder (subcontracting)	N/A	Not Applicable (N/A)		
2.4	• When the system pressure test has been substituted for the shop component pressure test, a representative of the component manufacturer shall be present to witness the system pressure test and accept responsibility as a component pressure test including Data Report signature and component N stamping.	X	8	Overview of Installer's Activities	B&R to arrange in conjunction with SWEC.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 17
"Authorized Nuclear Inspection and Code Certification"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.5	• SWEC certification of site assembly work and pre-assembly work performed in the onsite shops	N/A	Not Applicable (N/A)		B&R has responsibility as the holder of an ASME NPT Certificate at CPSES.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 18

"Quality Assurance Audit Program"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0	• Establish basis for schedule of audits to cover all program elements	X	10	Internal and External Audits	
1.0	• Establish basis for adjusting audit frequency	X	10	Internal and External Audits	
1.0	• Establish requirements for auditors and audit plans	X	10	Internal and External Audits	
2.0	• Establish requirements for audit of external organizations providing products, or services	X	10	Internal and External Audits	
2.2	• Establish the controls when the option to accept an ASME certificate in lieu of an audit for external organizations is used.	X	10	Internal and External Audits	
2.3, 2.4 & 2.5	• Establish QA department division responsibility for external organization audits	X	10	Internal and External Audits	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 18

"Quality Assurance Audit Program"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
3.0	• Establish the requirement for internal audits for program compliance	X	10	Internal and External Audits	
3.0	• Establish QA department division responsibility for internal activity audits	X	10	Internal and External Audits	
4.0	• Establish requirements for timely audit reports and their control	X	10	Internal and External Audits	
4.0	• Assign responsibility for action when infractions or conditions of a serious nature are identified	X	10	Internal and External Audits	
4.0	• Establish distribution of audit reports including AIA interfaces	X	10	Internal and External Audits	
4.2	• Establish requirement and schedule for audit responses and corrective and preventive action	X	10	Internal and External Audits	Coordinated with TU Electric

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 18

"Quality Assurance Audit Program"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
5.0	• Establish requirement and responsibility for followup to assure adequate corrective/preventive action	X	10	Internal and External Audits	Coordinated with TU Electric
6.0	• Establish requirement and responsibilities for audit of QA divisions for program responsibility effectiveness	X	10	Internal and External Audits	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 19

"Company QA and Control Manual and Implementing Procedures"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0	• Manual Content	X	5	Manual Control and Implementing Procedures	
1.0	• Identifies responsibility for controlling the contents of Manual	X	5	Manual Control and Implementing Procedures	
1.0	• Table of Contents Control features	X	5	Manual Control and Implementing Procedures	
2.0	• Periodic Review Controls	X	5	Manual Control and Implementing Procedures	
3.0	• Manual Revision Controls	X	5	Manual Control and Implementing Procedures	
4.0	• Manual Change (insignificant alterations) Controls	X		Manual Control and Implementing Procedures	
5.0	• Control of Manual Cancellations	X	5	Manual Control and Implementing Procedures	
6.0	• Control of Appendices	N/A	Not Applicable (N/A)		

SWEC ASME III CONTROL FEATURES MATRIX
For
SWEC Corporate ASME III Program

SECTION - 19

"Company QA and Control Manual and Implementing Procedures"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
7.0	• Control of Manual Distribution	X	5	Manual Control and Implementing Procedures	
9.0	• Control of Implementing Procedures and their Distribution	X	5	Manual Control and Implementing Procedures	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 20

"Final Documentation"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0	• Provides definition and scope of QA records	X	7	Control of Documents	
1.1	• Establish requirement, schedule and responsibility for a documentation check list and required documents for piping systems.	X	7	Control of Documents	
	• Identify the minimum records required for life/nonpermanent retention	X	7	Control of Documents	In conjunction with TU Electric
1.2	• Establish requirement for retention and submittal to TU Electric of overpressure protection reports/ analysis, when required.	X	7	Control of Documents	
1.3	• Establish requirement and responsibilities to build record file during fabrication/installation	X	7	Control of Documents	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 20

"Final Documentation"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.3	• Establish requirement and responsibilities for final review of the record file prior to pressure testing	X	7	Control of Documents	
1.3	• Establish responsibility for: N-5 Data Report Preparation after completion of incremental file reviews	X	12	Activities in Support of N-5 Review and Processing	
1.4	• Establish requirement for N-1 Data Report Preparation	X	13	Activities in Support of N-3 Review and Processing	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 20

"Final Documentation"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.5	• Establish the required content of record files for SWEC-certified and N-Symbol stamped components, parts, and appurtenances	N/A	Not Applicable (N/A)		SWEC does not hold an ASME Certificate of Authorization at the CPSES site and therefore has no responsibility for Code certification or stamping, including assumption of overall Code responsibility
1.6	• Establish the required content of record files when SWEC performs the activities of NA/NPT certificate holder without accepting overall responsibility as an N Certificate Holder	N/A	Not Applicable (N/A)		SWEC does not hold an ASME Certificate of Authorization at the CPSES site and therefore has no responsibility for Code certification or stamping, including assumption of overall Code responsibility

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 20

"Final Documentation"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
2.0	• Establish responsibility and manual requirement for the control and storage of QA records	X	7	Control of Documents	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 21

"N Certificate Holder (Subcontracting)"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.2	• Commitment to contract for fabrication and installation with appropriate ASME certificate holders and to be responsible for the completed component	N/A	Not Applicable (N/A)		TU Electric is responsible for the overall coordination of construction activities
1.3	• Commitment to accept overall responsibility and to certify and stamp the component	N/A	Not Applicable (N/A)		TU Electric is responsible for the overall coordination of construction activities
1.3	Commitment to witness pressure test	X	8	Overview of Installer activities	
1.4	• Commitment for material responsibility	N/A	Not Applicable (N/A)		B&R is responsible for the procurement of ASME material

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 21

"N Certificate Holder (Subcontracting)"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.5	• Requirements for extension of SWEC's N Certificate	N/A	Not Applicable (N/A)		An extension of SWEC's N Certificate is not required since SWEC functions as an Owners Agent and as an engineering organization for design and engineering services only
2.1	Requirements to establish interfaces with NSSS supplier, seller, and subcontractor involved in design and stress analysis work	X	6	Engineering and Design	SWEC CCG will establish these interfaces
2.2	Requirements to establish QA interfaces with subcontractors	X	8 6	Overview of Installer's Activities Engineering and Design	
2.3	Requirements for QSD & PQA to review installers/subcontractors/sellers QA manuals	X	8 6	Overview of Installer's Activities Engineering and Design	SWEC CCG will perform this review

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 21

"N Certificate Holder (Subcontracting)"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
3.0	Requirements for processing Code Data Reports	X	12	Activities in support of N-5 Review and Processing (See matrix on Section 17 for appropriate comment on Data Report Signature)	

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 22

"Pressure Testing"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.1	• Establishes requirement for pressure testing to Code and SWEC Specification Requirements	X	8	Overview of Installer Activities	B&R performs pressure test and SWEC reviews procedures and witnesses the test.
2.0 & 3.0	• Establish responsibility for pressure test procedure development, control, and content including testing requirements acceptance criteria, and prerequisites	X	8	Overview of Installer Activities	B&R has responsibility for these activities; SWEC reviews procedures
2.0 & 3.0	• Establish requirements and responsibility for pressure test procedure review	X	8	Overview of Installer Activities	
4.0	• Assign responsibility for Test Personnel Qualification Program	N/A	Not Applicable (N/A)		B&R has responsibility for test personnel qualification which is subject to overview by SWEC

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 22

"Pressure Testing"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
5.1, 5.2	• Establish responsibility for scoping and controlling pressure test performance and coordination of affected departments	X	8	Overview of Installer Activities	
5.3	• Establish requirement for QC pre-test inspection of installation and associated documentation	N/A	Not Applicable (N/A)		B&R has responsibility for these activities and SWEC performs an overview in accordance with Section 8 of the CCP.
5.3	• Provide responsibility and requirement for Lead Advisory Engineer to evaluate and document approval to pressure test with incomplete or unsatisfactory conditions	N/A	Not Applicable (N/A)		B&R has responsibility for these activities. Unsatisfactory conditions requiring engineering disposition will be documented on NCR's for Westinghouse/SWEC disposition.
5.4, 5.6	• Provide for notification of ANI and others required to witness the testing	N/A	Not Applicable (N/A)		B&R has responsibility for these activities.

SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION - 22
-
"Pressure Testing"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
5.5	• Establish prerequisites for inspection including criteria for insulation, painting and entrapped air	X	8	Overview of Installer Activities	B&R has responsibility for these activities; and SWEC reviews procedures.
5.7, 5.8, 5.9	• Establish responsibility for inspection review, and documentation of pressure test results	X	8	Overview of Installer Activities	
5.10	• Describe scope and control for welding, grinding and machining which may be reviews procedures. allowed after pressure testing without requiring retest	X	8	Overview of Installer Activities	B&R has responsibility for these activities; and SWEC reviews procedures
5.11	• Assign responsibility for obtaining ANI signature on appropriate ASME III Data Reports when all required pressure tests are completed	X	12	Activities in Support of N-5 Review and Processing	B&R is responsible to interface with their ANI and SWEC is responsible to interface with their AIA.

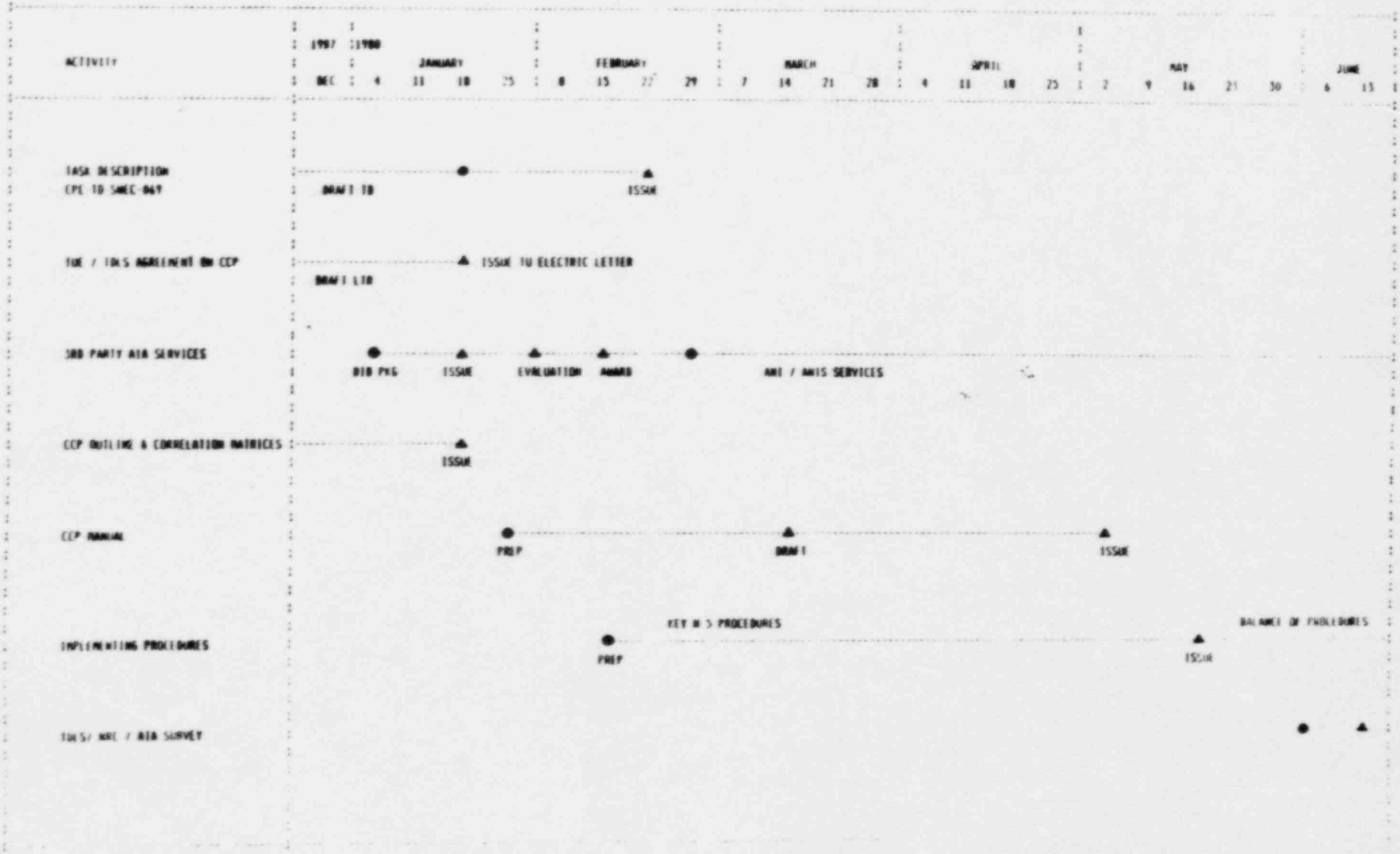
SWEC ASME III CONTROL FEATURE MATRIX
For
SWEC Corporate ASME III Program

SECTION 23

"SWEC Responsibilities When Owner's Designee"

SWEC CORPORATE ASME III PROGRAM FEATURES		SWEC CCP APPLICABILITY	CPSES ASME III CODE CONTROL PROGRAM		
Paragraph	Control Feature		Section No.	Title	Comments
1.0	Defines which activities SWEC is authorized by Contract to do on behalf of the Owner.	X	Various	Various	Entire CCP manual defines activities SWEC is performing as TU Electric's Agent in discharging TU Electric's Code responsibility for coordinating construction of CPSES Unit 2 per Note 7 of Table NA 3120-1 of the ASME Code Section III Division 1.
2.0	Requirements for Design Specifications	X	6	Engineering and Design	
3.0	Owner's review of Stress/Design Reports	X	6	Engineering and Design	
4.0	Overpressure Protection Report or Analysis	X	6	Engineering and Design	
5.0	Owner's N-3 Code Data Report	X	13	Activities in Support of N-3 Preparation and Processing	SWEC-CCG will prepare N-3 and process to TU Electric for signature

CCP MILESTONES



☐ PARTIALLY ☐ COMPLETELY FILLS REQ. NO. ....

TO BE USED FOR: Third Party Authorized Inspection Agency Services for SWEC's Code Control Program at Comanche Peak Steam Electric Station (CPSES) Unit 2

ACCOUNT NO

ALLOWANCE IN CONTROL ESTIMATE

→ OBTAIN PRICE & PLACE ORDER: X AFTER RELEASE BY ENGINEERS — WITH LOWEST RESPONSIVE BIDDER ←

PURCHASE REQUISITION

STONE & WEBSTER ENGINEERING CORPORATION

P.O. NO

PAGE 1 OF 2 — 16346.03

DATE: January 14, 1988

VENDOR

DESIRED BIDDERS (COMPANY NAME IS SUFFICIENT)

Arkwright-Boston Manufacturers Insurance Co.

Hartford Steam Boiler Inspection and Insurance Co.

☐ ADDITIONAL BIDDERS ON PAGE NO

ITEM NO	QUANTITY	DESCRIPTION OF MATERIAL	UNIT PRICE	AMOUNT
		Services of an Authorized Inspection Agency (AIA) to review documentation and to monitor Stone & Webster Engineering Corporation (SWEC) activities in the implementation of a quality assurance program to confirm compliance with project ASME III Code commitments at Comanche Peak Steam Electric Station (CPSES) - Unit 2. AIA services to be provided in accordance with the attached special services agreement. CPSES Unit 2 is a standard four (4) loop Westinghouse pressurized water reactor plant rated at 1111 MW and located in Glen Rose, Texas. The effective ASME III Code of Record at CPSES is the 1974 Edition with Addenda up to and including the summer 1974 Addenda for piping and the 1974 Edition with Addenda up to and including the winter 1974 Addenda for component supports. It is anticipated that special AIA services under this contract will commence during the first quarter of 1988 to support the processing of eight to nine N-5 Code Data Reports in the second quarter of 1988 for Unit 2 Piping. Additional N-5 Code Data Reports for the secondary side of loop 4 are scheduled for completion during the fourth quarter of 1988. A total of 50 N-5 Code		

SPEC NUMBER | TITLE | REV | DATED | LATEST ADDENDUM

REQUISITIONER: R Stevenson — DATE 1/14/88

APPROVED FOR INQUIRY (PROJECT ENGR): SIGN SE [signature] DATE 1-15-88

DATE BIDS REQUIRED: 2-1-88

COMPLETE BELOW ONLY WHEN RELEASING FOR PURCHASE

CLIENT AUTHORIZATION TO PURCHASE — ☐ NOT REQUIRED ☐ WRITTEN ☐ ORAL — DATE OF AUTHORIZATION

COST DIVISION | DELIVERY REQUIRED | FROM (CLIENT REP) | TO (S&W REP)

→ ROUTING ① ②

BX1-16346-30/12

PURCHASING DEPARTMENT | RELEASED (PROJECT ENGINEER) | DATE RELEASED

NO. 205350

STONE & WEBSTER ENGINEERING CORPORATION

P.O. NO.

PURCHASE REQUISITION CONTINUATION

PAGE 2 of 2

S.R. NO. 16346

DATE January 14, 1988

ITEM NO	QUANTITY	DESCRIPTION OF MATERIAL	UNIT PRICE	
		Data Reports are expected for Unit 2 with the last to be signed in the second quarter of 1990. The following information is requested to be provided prior to Contract award for use in the review and evaluation of prospective AIA's. 1) Resumes of AIA personnel who are considered typical of the individuals who would be proposed to provide the services of Authorized Nuclear Inspectors and Authorized Nuclear Inspector Supervisor. 2) Schedule of Rates proposed for these Special AIA services. 3) The AIA office and location which is proposed as the office for the administration of these special AIA services. 4) A statement of the AIA's technical capabilities and past experience with ASME III N-5 Code Data Report preparation and certification activities for Nuclear Power Plant construction sites having the same or similar ASME III Code of Record requirements. 5) Any exceptions taken or changes proposed to the terms and conditions of the attached Special Services Agreement. The above information is to be provided by February 1, 1988. Evaluation of the information submitted by each prospective AIA is to be performed by the QA Department. Submittals are to be forwarded to Mr. R. R. Stevenson, senior supervisor, Quality Systems Division via SWEC Purchasing Department.		

SPECIAL SERVICE AGREEMENT

FOR

AUTHORIZED INSPECTION AGENCY

MONITORING ACTIVITIES

I. The _____ Insurance Company (herein referred to as "the Seller" agrees to perform the special services described in Section II of this agreement on behalf of Stone & Webster Engineering Corporation (herein referred to as "the Purchaser") at the Comanche Peak Steam Electric Station (CPSES) Unit 2.

Such special services shall be executed by qualified personnel meeting the requirements of Sections III and IV of this agreement and in accordance with sound practice and conforming insofar as possible with standard field procedure. The Seller agrees to do all things necessary to complete the work forthwith, but shall not be liable for delays from causes beyond its control. The Seller agrees to document the conclusions or opinions reached during performance of the work in a manner mutually agreeable to the Seller and the Purchaser and to provide reports as requested by the Purchaser describing the special services performed and the conclusions or opinions reached as a result thereof. Such opinions or conclusions shall represent the best judgement of the Seller as to the conditions presented or observed and shall not constitute any other agreement with respect to such conditions. Upon completion of the special service the seller agrees to provide a certification statement as described in Section V of this agreement.

II. Description of Special Services To Be Performed

1) The Seller agrees to provide the services of an Authorized Inspection Agency (AIA) including the services of Authorized Nuclear Inspectors (ANI) and Authorized Nuclear Inspector Supervisor(s) (ANIS) to review documentation and to monitor the activities of the Purchaser who is acting as Agent for TU Electric (herein referred to as "the Owner"), in the implementation of a quality assurance program (herein referred to as "The Code Control Program or CCP") to confirm compliance with project ASME III Code Commitments at CPSES - Unit 2.

2) The Seller agrees to provide ANI and ANIS representatives to serve as members of a joint team composed of representatives from the Owner, the State of Texas and the Nuclear Regulatory Commission for the purpose of surveying or auditing the CCP.

3) The Seller agrees to provide ANI and ANIS services for twice yearly audits to evaluate ANI services and CCP activities.

ATTACHMENT A TO SPECIAL

SERVICES AGREEMENT

RATE SCHEDULE

(To be added later)

ATTACHMENT B TO SPECIAL SERVICES AGREEMENT

OWNERS AGENT COMPLIANCE STATEMENT

AND AIA MONITORING STATEMENT

FORM N-4 (back)

CERTIFICATION OF DESIGN
FOR PIPING SYSTEM INSTALLATION

Design Information on file at _____

Stress analysis report on file at _____

Design data reviewed and by _____ Prof. Eng. State _____ Reg. No. _____

Stress analysis report reviewed by _____ Prof. Eng. State _____ Reg. No. _____

* Signature not required. Use rubber stamp.

Design Conditions of Piping _____

Pressure _____ psi _____ °F
Temp.

We certify that the information contained in this report has been performed in accordance with the Section of the Code and the requirements listed in 3(b) above.

Date _____ Signed _____ By _____
Authorized **

Certificate of Authorization Expires _____

CERTIFICATE OF INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and/or the State or Province of _____ and employed by _____ of _____ have inspected the piping described in this Data Report on _____, 19____, and state that to the best of my knowledge and belief the Manufacturer has constructed this piping in accordance with the applicable Subsections of ASME Code, Section III.

By signing this certificate, neither the inspector nor his employer makes any warranty, expressed or implied, concerning the piping described in this Data Report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Date _____, 19____

_____ Commissions _____
Inspector National Board, State, Province and No.

We certify that the Data Report has been reconciled with the drawings in 3(b), above.

Date _____ Signed _____
Class 1 Piping System Designer

We certify, that the stress analysis has been reconciled with the drawings in 3(b), above.

Date _____ Signed _____
Class 2 and 3 Piping System Designer

COMPLIANCE STATEMENT

FOR OWNERS AGENT

Apart from Code of record requirements and the above preceding Code Certifications, we have performed reviews, inspections, surveillances, verifications and audits of the Code process in accordance with our Site Code Control Program, as agent for the Owner, and state that to our current knowledge the information contained on the Data Report is correct, and that the piping system conforms to the rules of the ASME Code, Section III, Division 1 as evidenced by the preceding Code Certification statements and our site Code Control Program activities.

Date _____ Signed _____
Site Qty Manager

MONITORING STATEMENT

FOR OWNERS AGENT

Apart from Code of record requirements and the above preceding Code Certifications, I, the undersigned holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ have monitored the activities of the Owner's Agent for the piping system described in this Data Report and state that to my current knowledge such activities were performed in accordance with the site Code Control Program accepted by my Company.

By signing this Certificate, neither the inspector nor his employer makes any warranty, expressed or implied, concerning the piping system described in this Data Report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this activity.

Date _____ Signed _____
Authorized Inspector

Commissions _____
National Board, Inspectors, State or Province and No.

ATTACHMENT C TO SPECIAL SERVICES AGREEMENT

STATEMENT REGARDING INDEPENDENCE AND POTENTIAL OR APPARENT CONFLICTS OF INTEREST

TO: _____ Insurance Company

Whereas, the undersigned employee ("Employee") understands that he or she is being considered as a participant to provide services to Stone & Webster Engineering Corporation with respect to the Code Control Program at the Comanche Peak Steam Electric Station and

Whereas, Employee understands that it is necessary that proposed participants be screened for independence, conflict of interest and for potential or perceived conflicts of interest with respect to this assignment, the Employee makes the following representations to _____ Insurance Company for the above stated purposes:

1. Employee has not engaged in any business involved with or related to the ASME III Piping and ASME III Component Support Work of the Comanche Peak Steam Electric Station;

2. Neither Employee, nor any members of his or her immediate family, own any beneficial interest in TU Electric, including but not limited to common or preferred stock, bonds, or other securities issued on behalf of TU Electric;

3. None of the members of Employee's immediate family are employed by TU Electric;

4. Employee does not have a conflict of interest and is not aware of any potential conflicts of interest or conditions which could be perceived as conflicts of interest with respect to this assignment.

This statement is based upon the Employee's best information and belief and any exceptions to the representations contained herein have been described below.

_____

_____

_____

_____

NAME _____ Date _____
Printed

Signature _____

4) The Seller agrees to provide ANIS services for the review and acceptance of the CCP. This review shall use the criteria applied to a quality assurance program of an Engineering organization or N Certificate Holder where fabrication and installation including procurement is performed by appropriate ASME NPT and NA Certificate Holders.

III. General Requirements For Special Services

1) The Seller is expected to supply these special services upon activation of this agreement and in accordance with the Purchaser's requirements. Special service periods and schedules are subject to change in accordance with any construction or startup schedule changes or any other Purchaser requirements. The Purchaser will endeavor to provide to the extent possible, fifteen (15) days advance notice of changes to special service schedules; however, the Seller shall be expected to supply increased or reduced services with a minimum notice of 24 hours when necessary. The special services will generally be conducted on a level of effort basis and should generally be unaffected by short term changes in the level of effort for the piping system installation, test and acceptance process.

2) The Seller's Authorized Nuclear Inspectors and Authorized Nuclear Inspector Supervisors shall identify those code control program activities, events and/or CPSES documents which they determine must be witnessed, monitored, reviewed, or otherwise verified in the performance of these special services in order to satisfy themselves that the CCP is complied with. The Purchaser will provide access to such identified documents, and timely notification of such identified activities or events. The Seller is expected to conduct its pre-and-post-activity services, to the extent possible, in its own offices or at office facilities provided by the Purchaser. The Purchaser will provide such information and documentation necessary for the pre-and-post activity work.

3) The Seller shall be an Inspection Agency fully meeting the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, American National Standards Institute (ANSI) Standard ANSI/ASME N626.0 and the Boiler Safety Act of the State of Texas as an Authorized Inspection Agency. Similarly, the Seller's personnel shall be nuclear inspectors and nuclear supervisors fully meeting the requirements of the ASME Code, ANSI/ASME N626.0 and the Boiler Safety Act of the State of Texas as Authorized Nuclear Inspectors and Authorized Nuclear Inspector Supervisors, respectively, as necessary to provide the special services described herein. Additionally, the Authorized Nuclear Inspectors and Authorized Nuclear Inspector Supervisors shall be experienced with site Code construction activities but shall have no prior experience with the CPSES project (see Section IV of this agreement). Administration of the special services described

herein shall be out of an office of the Seller which has not administered ANI or ANIS services at CPSES in the past.

4) The Sellers ANI's will either accept the activity, event and/or document witnessed, monitored, reviewed, or otherwise verified or identify them as unacceptable as soon as possible after completion of their activity. In the event this period exceeds twenty-four (24) hours, the Purchaser may contact the Seller's ANIS to obtain a documented conclusion or opinion. The ANI will notify the Purchaser's representative in writing of reasons for not accepting, giving specific reference to section and paragraph of the Code, or of the CCP which applies to the activity.

5) All special service work will be billed per the rate schedule of Attachment A. including overtime for the special services described herein.

6) This contract shall be activated with a Purchase Order and subsequent releases issued by the Purchaser.

IV Independence of AIA Personnel

The seller shall not assign or provide personnel or supervision with prior involvement with the CPSES project. Independence is essential to the AIA third party role being discharged under this agreement. For these reasons, persons assigned shall have no substantial beneficial interest in TU Electric, or its subsidiaries. Each person assigned shall be required to document their independence by signing the statement of Independence shown in attachment C.

V Certification Statement For Special Services

1) Upon completion of the special services described herein for each ASME III Piping System at CPSES - Unit 2 and upon resolution of all outstanding unacceptable conditions identified in performing the special services described herein for the ASME III Piping System, the Seller shall provide a monitoring statement added to the Certified Code N-5 Data Report as shown in Attachment B.

2) The Seller's representative shall sign the monitoring statement after verifying proper completion and certification of the Code N-5 Data Report by the parties required by the ASME Code to certify and after completion of a compliance statement added to the Certified Code N-5 Data Report as shown in Attachment B by the Purchaser as Agent for the Owner.

VI. Special Service Warranty

The Seller shall perform the special services as an independent contractor in accordance with its own methods, the terms of the agreement, and the applicable laws and regulations of the state of Texas. The Seller's liability arising out of or in connection with

the special services described herein shall be limited to re-performing at its own expense special services which (1) are deficient because of Seller's failure to perform said services in accordance with the standards imposed by law upon professional nuclear inspection personnel performing services of a similar nature and (2) are reported in writing to the Seller after discovery thereof.

VII. Terms

1) For the special services described herein, the Purchaser agrees to pay the Seller the rates identified in the rate schedule of Attachment A for each Authorized Nuclear Inspector and Authorized Nuclear Inspector Supervisor performing such special services.

2) As to all invoices submitted, terms of payment shall be net cash, payable thirty (30) days after receipt of invoice. Any release or like authorization submitted by the Purchaser for services covered in this agreement, which is in conflict or in any manner inconsistent with the provisions thereof, shall not supersede or alter the provisions of this agreement.

3) This agreement may be terminated by either party giving sixty (60) days written notice to the other party.

Accepted by and on behalf of the Purchaser

By: _____
Signature

_____
Name

_____
Title

Date: _____

Accepted by and on behalf of the Seller

By _____
Signature

_____
Name

_____
Title

Date: _____

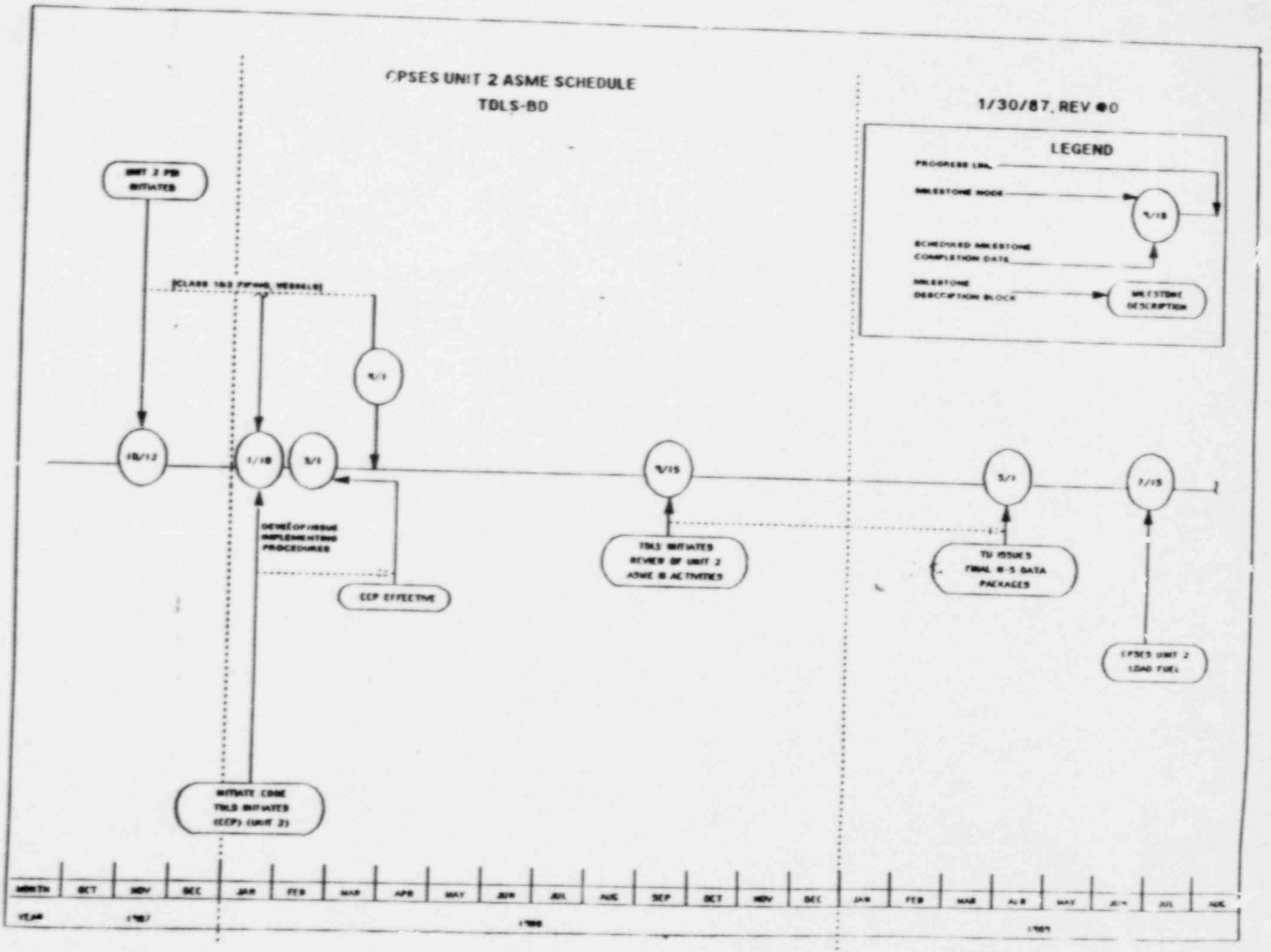

OPSES UNIT 2 ASME SCHEDULE
TDLS-BD
1/30/87, REV #0
LEGEND
PROGRESS LINE
MILESTONE NODE
SCHEDULED MILESTONE COMPLETION DATE
MILESTONE DESCRIPTION BLOCK
MILESTONE DESCRIPTION
UNIT 2 PSR INITIATES
CLASS 1&2 PIPING, VESSELS
10/12
1/18
5/1
5/1
V/15
5/1
7/15
DEVELOP/ISSUE IMPLEMENTING PROCEDURES
CCP EFFECTIVE
TDLS INITIATES REVIEW OF UNIT 2 ASME III ACTIVITIES
TU ISSUES FINAL N-5 DATA PACKAGES
OPSES UNIT 2 LOAD FUEL
INITIATE CODE TDLS INITIATES (CCP) (UNIT 2)
MONTH
OCT
NOV
DEC
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
YEAR
1987
1988
1989

Exhibit 5

Exhibit 6

TU ELECTRIC

Log # TXX-88167
File # 10010
903.2
Ref. # 10CFR50.55a(g)

February 5, 1988

William G. Counsil
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
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. Counsil

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)

D029
1/1

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 NA-5[illegible], 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.