

APPENDIX B

NOTICE OF DEVIATION

Texas Utilities Electric Company (TUEC)
Comanche Peak Steam Electric Station, Unit 1

Docket: 50-445/85-13
Permit: CPPR-126

Based on the results of an NRC inspection conducted on September 1-30, 1985, of Comanche Peak Response Team (CPRT) activities, three deviations from commitments to the NRC were identified. The deviations involved inclusion of non-ASME pipe supports and base plates in the Issue-Specific Action Plan (ISAP) No. V.d ASME population; issue of reinspection verification packages containing missing, incomplete, and/or incorrect documents; and failure of ERC inspectors to note conditions which violated drawing requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the deviations are listed below:

- A. Paragraph 4.1 in CPRT ISAP No. V.d states, in part, "...the absence or presence of unauthorized or undocumented plug welds in ASME pipe supports and base plates will be verified. . . ." Paragraph 4.1.1 states, in part, "Two random samples of ASME pipe supports and base plates will be selected for inspection. One sample will be drawn from the population representing Unit 1 and common and the second sample from the population representing Unit 2. The Sample Plan will be based on identifying, with a 95% confidence, a rate of detectable plug welds of 5% or greater. The smallest random sample which will achieve this confidence level and rate ... is 60"

Contrary to the above, a review of the 2 selected random samples which were inspected revealed that the 2 random samples contained just 39 and 35 ASME pipe supports and base plates, respectively (445/8513-D-01).

- B. Paragraph 5.1 of Procedure CPP-007, Revision 1 entitled "Preparation of checklists and Data Base Reports," states, in part, "Responsible QA/QC Discipline Engineers review the latest Gibbs and Hill, Brown and Root, and subcontractor design documents relating to the population. As applicable, the latest installation procedures, construction drawings (including as-builts) and manufacturer's prints and manuals are also reviewed." Paragraph 5.2.1 of the above procedure states, in part, "On receipt of the memorandum with attachments, the QA/QC Lead Discipline Engineer reviews the documents for accuracy, completeness, and conformance with this procedure. . . ."

Contrary to the above requirements, verification packages have been issued by the discipline engineers to inspectors with missing, incomplete, and/or incorrect documents. Examples identified by NRC inspectors include the following:

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1. Verification Package No. I-S-LBSR-047 for large bore pipe supports had an incorrect checklist. The responsible QA/QC discipline engineer wrote "NA" for not applicable on the checklist for Richmond inserts, when in fact, Richmond inserts were present as listed on the bill of materials and shown on the design drawing.
 2. Verification Packages Nos. I-S-LINR-6 and I-S-LINR-51 for the containment liner and tank stainless steel liner had incorrect checklists. The responsible QA/QC discipline engineer wrote "NA" for not applicable on the checklists for two base material local contour attributes. The attributes were found during the physical inspection to be inspectable. New checklists were requested by the ERC inspector.
 3. Verification Packages Nos. I-E-EEIN-029, I-E-EEIN-042 and I-E-ININ-005 were missing documents required for physical inspections. For the first two packages, generic design change authorizations had been issued but were not specifically identified or included in the verification packages. For the third package, three documents required to determine tubing size were not included in the verification package.
 4. Verification Package No. I-S-PS7N-187 contained two rather than the required number of four forms to document inspection of snubber brackets. The inspection package also contained a form for pipe clamp inspection although a pipe clamp did not exist (445/8513-D-02).
- C. Paragraph 5.0 of ERC Project Procedure No. QI-027, Revision 0, identifies the applicable inspection notes to be used, and requires that the reinspection checklist is to be used by the inspector to document the inspection results.

Note 30, an identified inspection note states, "In the course of inspection the inspector shall note any item not covered by reinspection/verification which appears out of the ordinary as related to the construction of the inspected item or surrounding area. Note such in the remarks column of inspection checklist."

Contrary to the above, the ERC inspectors failed to identify and note an out-of-the-ordinary condition in the remarks column of the inspection checklist for ASME pipe support MK No. CT-1-053-436-C52R; i.e., the existence of four 9/16" diameter holes in item 2 of the pipe support that were not shown on the applicable drawing.

Texas Utilities Electric Company is hereby requested to submit to this office, within 30 days of the date of this Notice of Deviation, a written statement or explanation in reply, including for each deviation: (1) the reason for the deviations if admitted, (2) the corrective steps which have been taken and the

results achieved, (3) corrective steps which will be taken to avoid further deviation from commitments made to the Commission, and (4) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated in Arlington, Texas,
this 24th day of December, 1985