



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 6, 1988

Docket Nos. 50-445
and 50-446

TU Electric
ATTN: Mr. William G. Council
Executive Vice President
400 North Olive Street, Lock Box 81
Dallas, TX 75201

Gentlemen:

SUBJECT: Allegation No. OSP-87-0021

We hereby request that you review the attached allegations received by NRC that relate to your operations. As part of your review, we furthermore request that you conduct whatever inspections or investigations necessary to reasonably prove or disprove the allegations. Finally, we request that you inform NRC of the resolution of this matter and make records of your completed action available for NRC inspection. Of course, a substantiated allegation may warrant corrective action or may be the subject of a completed or ongoing corrective action. Where a substantiated allegation is encompassed by ongoing or completed corrective action programs, your response should clearly reference these programs and describe how they address the issue. Where a substantiated allegation is not addressed by an ongoing program, please provide to us your plans and schedule for addressing the issue.

Should your review of the allegation bring into question a safety issue (such as the adequacy of a safety component, system, or analysis), we expect that that issue will be promptly brought to our attention.

Should you have any questions concerning our requests or our role in this matter, please contact me or our Allegations Coordinator, George Gower.

Sincerely,

A handwritten signature in cursive script that reads "Phillip F. McKee".

Phillip F. McKee, Deputy Director
Comanche Peak Project Director
Office of Special Projects

Enclosure:
As stated

cc: See next page

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A PDR

W. G. Council
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Comanche Peak Steam Electric Station
Units 1 and 2

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W. G. Council
Texas Utilities Electric Company

- 2 - Comanche Peak Electric Station
Units 1 and 2

cc:

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Administrative Judge Peter Bloch
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Allegations:

1. Numerous problems were alleged concerning the documentation maintained in the Document Control Center. These problems which were alleged to be present in 1986 included:
 - a. Timeliness for updating drawings. The allegor stated that at times as many as 600 or more Design Change Authorizations (DCAs) and Component Modification Cards (CMCs) were outstanding without the affected drawing being updated. This was alleged to create serious problems for someone trying to use the drawing to determine the currently applicable design. As an example, the allegor stated that several hundred DCAs were associated with the drawings for the placement of the hydrogen supply line from bulk storage to the plant. Because of the number of DCAs, the required placement of the hydrogen supply line could not be determined, and sketches were required.
 - b. Inadequate Cross-Referencing For DCAs. As an example, the allegor stated that there were significant problems in determining which DCAs were applicable to a specific system component such as a valve. It was stated that one DCA might be written on the valve operator, one on the valve body and another on the control devices to the valve operator. When such a situation occurred, the allegor stated that the combined effect of the DCAs on the operation of the valve or the effect of one DCA on another was often not considered.
 - c. Some DCAs and CMCs, which were rejected by design reviewers, were alleged to have disappeared from the DCC.
2. It was alleged that (circa 1985, 1986) often the design basis for certain features was not available. As an example, the allegor stated that the design criteria for accounting for the effects of the length of instrumentation tubing on temperature instruments was not available in DCC (e.g., drawings and specifications). In such cases, it was alleged that criteria not specifically applicable to the Comanche Peak configuration were used. The pressure and temperature instrumentation tubing associated with the main steam system was cited as a specific example.
3. The allegor stated that documentation for the sizing of an orifice plate used for pressure control/reduction in the nitrogen system could not be found. The problem with the lost documentation appeared to coincide with reclassification of the system from nuclear safety related to non-nuclear safety related. The orifice plate in question was the one from the nitrogen supply line supplying blanketing nitrogen to the NaOH tank in the Containment Spray System.
4. It was alleged that several preoperational test procedures were poorly prepared and that the tests did not adequately include anticipated operational conditions. As an example, preoperational tests for the service water pumps were alleged to not adequately reflect conditions

when water hammer (water column separation and cavity collapse) might occur following pump trips. Also, it was alleged that the test data packages for the service water pumps were poorly documented.

5. The allegor stated that during a hot functional testing (circa mid-1984) inspection of the gaps between the pipe wall and the pipe whip restraints found various cases where the gap exceeded a specified tolerance (1/8-1/4 inch) so that reanalysis of the pipe restraint interaction was required. With one telephone call made between the Gibbs & Hill onsite and New York offices, a new tolerance of 1/2 inch was shortly obtained (one or two days). Such new tolerance served to eliminate many of the tolerance deviations which may have required reanalysis and eventual re-evaluation of the restraint design (load carrying capability). Given the quickness of the turnaround on the tolerance re-evaluation by G&H's New York office, the allegor questioned the adequacy of the analysis supporting the allowance of larger tolerances.

TU Electric
Mr. William G. Council

May 6, 1988
Allegation No. OSP-87=0021

Docket File

NRC & Local PDRs
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OSP Reading
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ACRS (10)

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