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*NOT ADMITTED IN D.C.

May 4, 1988

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Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box X, Building 3500
Oak Ridge, Tennessee 37830

Re: Texas Utilities Electric Company, et al.
Docket Nos. 50-445-OL and 50-446-OL

Dear Administrative Judges:

Enclosed herewith please find Applicants' eighth submission in response to the Board's request of August 12, 1987, for copies of Applicants' response to "Notices of Violation" and "Notices of Deviations" issued by the NRC Staff. The enclosed responses cover the period of March 29, 1988 to April 28, 1988.

Respectfully submitted,

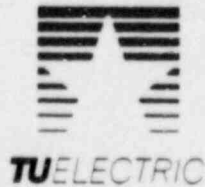
George L. Edgar

Enclosures

cc: Service List

8805200178 880504
PDR ADDCK 05000445
G PDR

D503



Log # TXX-88300
File # 10130
IR 88-05
IR 88-04
Ref # 10CFR2.201

March 31, 1988

William G. Council
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
RESPONSE TO NRC INSPECTION REPORT NOS. 50-445/88-05
AND 50-446/88-04

Gentlemen:

TU Electric has reviewed your letter dated March 2, 1988, concerning the inspection conducted by NRC consultants during the period January 5, 1988 through February 2, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter were a Notice of Violation and a Notice of Deviation.

We hereby respond to the Notice of Violation and the Notice of Deviation in the attachment to this letter.

Very truly yours,

W. G. Council
W. G. Council

By: *D. R. Woodlan*
D. R. Woodlan
Docket Licensing Manager

RDD/clk

Attachment

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

NOTICE OF VIOLATION
ITEM A (445/8805-V-02)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, of the TU Electric Quality Assurance Plan (QAP), requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Comanche Peak Engineering Specification 2323-MS-85, Revision 5, dated September 15, 1987, Appendix I, paragraph 6 requires that depressions produced by grinding will not exceed 1/32" for 18 gauge metal and thicker. Sheet metal thinner than 18 gauge must be evaluated by an engineer.

Contrary to the above:

1. On Duct Segment B-1-658-015, the NRC inspector observed a depression that appeared to have been caused by grinding. An Ultrasonic Digital Thickness Report stated that this section of duct was fabricated from 16 gauge material which is thicker than 18 gauge material. This depression exceeded 1/32" in depth which is a minimum wall violation. The NRC inspector could not find any indication that the minimum wall violation in question had been evaluated by engineering or QC (445/8805-V-02).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8805-V-02)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The Notice of Violation identified "a depression that appeared to have been caused by grinding" on duct segment B-1-658-015. Following receipt of this Notice of Violation, inspections were conducted to determine the actual depth of the depression identified. Measurements of the identified grinding depression determined that the depth was less than or equal to 1/32 inch and therefore is acceptable.

A separate depression was identified approximately 1/2 inch from the grinding depression identified above. This depression (which appears to be due to welding, not grinding) was measured by a number of inspectors and technicians using various devices. Some of the measurements determined the depth to be 1/32 inch or slightly less, while others determined the depth to be slightly over 1/32 inch. In order to determine that the depression exceeded 1/32 inch, measurement sensitivity greater than that normally associated with the measurement technique was required.

TU Electric considers the safety significance of the welding depression to be minimal since the violation of acceptance criteria was marginal.

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8805-V-02) (Cont'd)

This violation is attributed to the failure of the QC inspector to identify the welding depression as unacceptable. This was apparently due to the small amount by which the depression violates the acceptance criteria and the conditions which are present at the location of the depression.

2. Corrective Steps Taken and Results Achieved

NCR 88-03838 has been issued to disposition the welding depression.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

The QC inspector involved has been informed of this condition. Because of the lack of safety significance and the marginal nature of this defect, additional actions are not planned.

4. Date When Full Compliance Will be Achieved

NCR 88-03838 will be closed by July 1, 1988.

NOTICE OF DEVIATION
(445/8805-D-01)

TU Electric FSAR Section 17.1.15, Amendment 65, dated November 20, 1987, states that, "Procedures require trending of deficiencies reported on inspection reports, deficiency reports, and nonconformance reports to identify trends adverse to quality."

Contrary to the above, NCR-87-A00491, which identifies a base material reduction on Pipe Support DO-1-067-708-S53R, and a QC hold point which was bypassed when reworking the base material reduction, was not trended as required by the FSAR to identify any trend adverse to quality (445/8805-D-01).

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason for Deviation

The cause of this deviation was failure to maintain controls to address trending of NCRs internal to B&R, during the period from July 11 to October 5, 1987. This lack of controls was due to the programmatic changes initiated during the period. As a result, the requirement for B&R NCRs to be trended was overlooked during the assignment of responsibilities and interfaces associated with trending.

2. Corrective Steps Taken and Results Achieved

Of the 2024 B&R NCRs issued during the period, approximately 1410 were transferred to other deficiency documents, because they were assigned dispositions other than "scrap" or "rework," and were therefore included in trended data. The remaining NCRs, dispositioned "scrap" or "rework", will be screened to remove deficiencies identified as part of a previously defined corrective action plan. The remaining NCRs will then be reviewed to identify adverse trends. These trend results will be examined to determine the need for additional action.

3. Corrective Steps Which Will be Taken to Avoid Further Deviations

Since the implementation of NQA 3:05, "Reporting and Control of Nonconformances" Revision 0, on October 5, 1987, the method for trending NCRs has been NQA 2.11 "Quality Assurance Trending," which describes the trending of various types of data (including NCRs issued by B&R).

QA will informally perform periodic reconciliation of trend data with the source of the data (e.g. NCRs received for trending versus the NCR log of issued NCR numbers) to identify potential trend input data problems.

RESPONSE TO NOTICE OF DEVIATION
(445/8805-D-01) (Cont'd)

4. Date When Full Compliance Will be Achieved

The review of the B&R NCRs which were not trended and the evaluation of trend data for additional action (if any) will be completed by May 1, 1988.



Log # TXX-88316
File # 10130
IR 86-03; 86-02
IR 86-22; 86-20
Ref # 10CFR2.201

March 30, 1988

William G. Council
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
INSPECTION REPORTS NOS. 50-445/86-03 AND
50-446/86-02; 50-445/86-22 AND 50-446/86-20
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF
VIOLATION (NOV) ITEM E (446/8602-V-17) AND
(NOV) ITEM C (446/8620-V-02)

- REFERENCE: 1) TU Electric Letter TXX-6394 from W. G. Council to
NRC dated May 6, 1987
- 2) TU Electric Letter TXX-6396 from W. G. Council to
NRC dated April 27, 1987
- 3) TU Electric Letter TXX-6089 from W. G. Council to
NRC dated January 12, 1987
- 4) TU Electric Letter TXX-6443 from W. G. Council to
NRC dated May 15, 1987

Gentlemen:

Reference (1) and (2) provided our response to Notice of Violation (NOV) Item E (446/8602-V-17) and (NOV) Item C (446/8620-V-02) respectively. In those responses we stated that the corrective actions for Unit 1 and common HVAC systems would be completed by March 1988. Also in Reference (4), we stated that the HVAC reverification program NOD (446/8602-D-12) would be completed by January 29, 1988. Completion of these actions has been rescheduled. Accordingly, our response to (NOV) Item E (446/8602-V-17) and (NOV) Item C (446/8620-V-02) is revised to indicate that the Unit 1 and common HVAC corrective actions will be completed no later than December 23, 1988.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

RDD/clk

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



Log # TXX-88339
File # 10130
IR 85-13
IR 85-09
Ref # 10CFR2.201

March 30, 1988

William G. Council
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
INSPECTION REPORT NO. 50-445/85-13 AND 50-446/85-09
UPDATED RESPONSE TO NOTICE OF VIOLATION (NOV)
446/8509-V-02

REFERENCE: TU Electric Letter TXX-6200 from W. G. Council to NRC dated
January 6, 1987.

Gentlemen:

The referenced letter advised Region IV that the date for completion of the corrective action for Notice of Violation 446/8509-V-02 was being revised. We specifically stated that Procedure STA-606, "Work Orders/Work Requests" will be issued no later than February 28, 1987, rather than December 31, 1986, with its supporting procedures STA-630, "Station Priorities" and EDA-213, "Engineering Review of Work Orders".

Procedure STA-606, Revision 7, was issued on February 27, 1987, to meet the original corrective action response commitment. Reference to supporting procedures STA-630 and EDA-213 is clarified as follows:

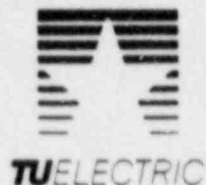
1. Procedure STA-630, "Station Priorities", was not part of the original corrective action response commitment and otherwise not needed for plant operation. Plans to issue Procedure STA-630 were cancelled.
2. Procedure EDA-213, "Engineering Review of Work Orders" was issued as REI-202, "Engineering Review of Work Orders and Post Work Test Reports".

Very truly yours,

Handwritten signature of W. G. Council.
W. G. Council

RDD:clk

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



Log # TXX-88353
File # 10130
IR 87-27
IR 87-20
Ref # 10CFR2.201

March 30, 1988

William G. Council
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DUCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/87-27 AND 50-446/87-20
REVISED DATE OF FULL COMPLIANCE
FOR AFW NOTICE OF VIOLATION, ITEM 1

REF: TU Electric Letter TXX-88192 from W. G. Council
to NRC dated February 1, 1988

Gentlemen:

In the referenced letter, we stated that the training of appropriate CPE and engineering contractor personnel on the circumstances involved in this violation and the importance of thoroughly investigating potential nonconformances and deficiencies would be completed no later than April 1, 1988. Training of engineering contractor personnel has taken longer than expected. The training will be completed no later than June 1, 1988.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".
W. G. Council

RDD/clk

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



Log # TXX-88366
File # 10130
IR 87-11
IR 87-09
Ref # 10CFR2.201

William G. Council
Executive Vice President

March 30, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
INSPECTION REPORT NOS. 50-445/87-11 AND 50-446/87-09
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF VIOLATION
(NOV), ITEM A (445/8711-V-02; 446/8709-V-02)

- REF: (1) TU Electric Letter TXX-6777 from W. G. Council
to NRC dated October 2, 1987
- (2) TU Electric Letter TXX-7015 from W. G. Council
to NRC dated November 30, 1987
- (3) TU Electric Letterer TXX-88165 from W. G. Council
to NRC dated January 29, 1988

Gentlemen:

In Reference (3) we stated that removal of unauthorized splices and wire nuts from the Unit 1 chiller panels per LCR CE-87-10026 would be completed no later than March 31, 1988. The Unit 1 work has taken longer than expected. Accordingly, our date for completion of this work is hereby revised to be no later than May 31, 1988.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

RDD/gj

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



Log # TXX-88367
File # 10130
IR 87-31; 87-23
IR 87-35; 87-26
Ref. # 10CFR2.201

March 31, 1988

William G. Council
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
UPDATED RESPONSE TO NOTICE OF VIOLATION (NOV) ITEM A
(445/8731-V-01) AND NOV (445/8735-V-02)

REF: (1) TU Electric Letter TXX-88081 from W. G. Council
to NRC dated January 18, 1988
(2) TU Electric Letter TXX-88298 from W. G. Council
to NRC dated March 14, 1988

Gentlemen:

Reference (1) and (2) provided our responses to NOV Item A (445/8731-V-01) and NOV (445/8735-V-02), respectively. In those responses, we stated that updates would be submitted describing any additional actions taken to assess the generic implications of the subject discrepancies. Our responses have also been updated to reflect the completion of retraining, and the number of painting discrepancies and their resolution.

Attached is our updated response. Those portions of the response which have been revised are denoted by a revision bar in the right margin.

Very truly yours,

W. G. Council

W. G. Council

By: *D. P. Woodlan*
D. P. Woodlan
Docket Licensing Manager

RDD/gj
Attachment

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

NOTICE OF VIOLATION
ITEM A (445/8731-V-01)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. . . ."

Section 7.7.1 of Revision 2 to EBASCO'S Field Verification Method (FVM) CPE-EB-FVM-CS-033, states, in part, "The Walkdown Engineer will identify each type of support by comparison with Supplement I and/or 2323-S-0910 sketches or drawings, and will as-built the support on the applicable sketch or drawing" Paragraph K of this section of the FVM further states, "All dimensions and/or attributes shown will be verified If the designed dimensions/attribute recorded." Further, paragraph N states that the walkdown engineer will redline ". . . any HKB/HSKB spacing violation per Table 2."

Contrary to the above, the following conditions were identified:

1. For support C13007808-04, which is a 2323-S-0910 Type CA-1a support, the anchor bolts identified as bolts A, E, and F were lined out. This implied that anchor bolts did not exist at these locations for this unique support. During a subsequent walkdown by the NRC inspector, however, an anchor bolt was found to exist at the location designated for anchor bolt A. This bolt was determined to be a 1/4" Hilti Kwik bolt with the letter designation "D" and a projection of 1". While the existence of this additional anchor bolt will have a detrimental effect on the structural integrity of the support, the fact that it was not identified during the EBASCO walkdown is of significance relative to the adequacy of the walkdown itself.
2. On support C14G21398-03 the walkdown engineer failed to record one of the dimensions required to fully locate the structural tubing on the base plate. This information is required in order to calculate base plate stress and anchor bolt loads. This dimension is one of the dimensions required to be reported for this type of support (2323-S-0910 sh. CSM-18 type support).
3. On support C14B13125-02, the walkdown engineer failed to note a spacing violation between the 1/4" Hilti Kwik bolt designated as Bolt F on the support in question, and a 3/8" HKB on an adjacent conduit support. The NRC inspector found these anchor bolts to be 2 1/4" apart; while the FVM required a spacing of at least 3 1/8" (445/8731-V-01).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8731-V-01)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The violation resulted from errors on the part of personnel recording and checking walkdown data.

2. Corrective Steps Taken and Results Achieved

The discrepant conditions described in the Notice of Violation have been examined by Ebasco personnel. In each case the NRC inspectors observation was confirmed. The information contained on the applicable walkdown forms have been revised. None of the discrepancies affected the structural integrity of the support. Deficiency Reports (DRs) C-87-C4771 and C-87-05411 have been written to document the discrepancies and resolutions.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

All appropriate Ebasco walkdown personnel have been retrained on the importance of documenting walkdown data completely and accurately.

Ebasco has determined that changes to the conduit walkdown procedure should reduce the occurrence of some types of errors. The conduit walkdown procedure is being revised to minimize the need for personnel to measure to hypothetical lines such as conduit centerlines.

The Comanche Peak Manager of Civil Engineering has met with several groups involved in structural walkdowns, including the Ebasco conduit walkdown personnel. Examples of recently identified walkdown discrepancies were presented and the importance of accurate recording and checking of walkdown data was re-emphasized.

To assess the generic implications of walkdown discrepancies, Ebasco selected two different samples of existing walkdown data and re-examined the attributes in these samples. One sample was biased toward walkdowns performed by an individual who appeared to be responsible for two of the NRC identified discrepancies. The sample consisted of 40 packages (each package covers a single conduit run in given room). The second sample was chosen from the total population of existing walkdown packages without bias toward a time frame or individual. This sample consisted of 63 packages.

The two samples encompassed over 20,000 attributes. The error rate was found to be less than 2% for both samples. None of the discrepancies resulted in the disqualification of the associated support. Ebasco has also reviewed the results of audits and surveillances of the conduit support walkdown program. This review also indicates an error rate of less than 2%. This error rate is similar to that found at other sites for the same type activity. Based on these results TU Electric does not consider additional reinspection to be warranted. However, we are concerned with such errors and are endeavoring to reduce personnel errors through the training described above.

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8731-V-01) (Cont'd)

4. Date When Full Compliance Will be Achieved

The retraining of walkdown personnel was completed by January 29, 1988.

Revision of conduit walkdown procedures as described above will be completed no later than May 15, 1988.

NOTICE OF VIOLATION
(445/8735-V-02)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, of the TU Electric Quality Assurance Plan (QAP), requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Section 7.7.1 of Revision 2 of Ebasco's Field Verification Method (FVM) CPE-EB-FVM-CS-033, states, in part, "The Walkdown Engineer will identify each type of support by comparison with Supplement I and/or 2323-S-0910 sketches or drawings, and will as-built the support on the applicable sketch or drawing . . ." Paragraph K of this section of the FVM further states, "All dimensions and/or attributes shown will be verified . . . If the designed dimensions/attributes are incorrect they shall be lined out and the actual dimension/attribute recorded." Also, Section 13.1, of this FVM further states, "Deficiencies identified in conjunction with the implementation of this procedure shall be documented on a Nonconformance Report (NCR) . . ." Examples of deficiencies are: . . . D. Missing washers on Hilti Bolts . . ."

Comanche Peak Engineering Procedure CPE-EB-FVM-CS-029, "Procedure For Seismic HVAC Duct and Duct Hanger As-Built Verification in Unit 1 and Common Areas," Revision 5 dated September 21, 1987, requires that welding shall be identified for type of weld (fillet, flare bevel, groove, etc.), weld length, and weld size.

Comanche Peak Engineering Specification 2323-MS-85, Revision 5 dated September 15, 1987, Appendix K, paragraph 4.6, requires that a galvanized coating shall be applied to areas where galvanizing has been removed due to welding or other fabrication/installation operations.

Engineering and Construction Procedure ECC 1.04, "Preparation, Issuance, and Control of Construction Department Procedures and Instructions," Revision 0 dated August 27, 1987, requires that any change to controlled construction procedures be made by formally revising the existing procedure.

Contrary to the above, the following conditions were identified:

1. On Conduit Support C13G04860-02, the walkdown engineer failed to note that there were no washers installed under the hex nuts on the Hilti Kwik bolts. Because of this, there was no NCR written to correct the situation as required by the FVM.

NOTICE OF VIOLATION
(445/8735-V-02) (Cont'd)

2. For Conduit Support C14G20243-01, the walkdown engineer reported the length of the support baseplate to be 9 7/8". The NRC inspector measured this dimension to be 9 1/2".
3. Conduit Support C14G11447-03, a No. 2323-S-0910 Type 1A support utilizing P5000 Unistrut members with one main member and three outriggers, supports two 3/4" conduits. For the westernmost end of the main Unistrut member to the centerline of the west conduit, the walkdown engineer reported this dimension to be 5 1/8" and the NRC inspector measured this dimension to be 5 7/8". For the center outrigger, the walkdown engineer reported 7 1/8" and the NRC inspector measured this dimension to be 8 5/8". For the easternmost outrigger, the walkdown engineer reported it to be located 15/16" from the end of the main Unistrut member and the NRC inspector measured this dimension to be 1 1/4".
4. For Conduit Support C14G11447-04, the dimension locating the center outrigger was reported by the walkdown engineer to be 6 5/8" from the westernmost end of the main Unistrut member. The NRC inspector measured this distance to be 7 1/2".
5. On Conduit Support C14G11447-14, the walkdown engineer reported a total of eight Hilti Kwik bolts (HKBs) - two 1/4" HKBs in each of the three outriggers and two 3/8" HKBs in the main Unistrut member. The NRC inspector noted that there were actually nine HKBs (there were three 3/8" HKBs in the main Unistrut member and not two as reported).
6. A fillet weld 3/16" x 5/8" long, which exists at the location identified by note 3 on seismic duct hanger Drawing DH-1-844-1K-4F, Revision 1, was incorrectly identified by engineering personnel during the Post Construction Hardware Validation Program as a tack weld.
7. Five finished welds located on seismic Duct Hanger DH-1-844-1K-WP13 and portions of three welds located on seismic Duct Hanger Drawing DH-1-844-1K-1R did not have the required galvanized coating.
8. Administrative and technical information corrections were made to figure 7.6 of Construction Procedure CHV-106, Revision 1, a form used to document the results of an engineering qualitative walkdown of Duct Segment B-1-658-016 without performing a formal revision to the procedure (445/8735-V-02).

RESPONSE TO NOTICE OF VIOLATION
(445/8735-V-02)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

Items 1 through 5

These items resulted from errors on the part of personnel recording and checking conduit walkdown data.

RESPONSE TO NOTICE OF VIOLATION
(445/8735-V-02) (Cont'd)

1. Reason for Violation (Cont'd)

Item 6

Walkdown Procedure CPE-EB-FVM-CS-029, Rev. 5, "Field Verification Method Procedure for Seismic HVAC Duct and Duct Hanger As-built Verification in Unit 1 and Common Areas," describes tack welds as including fillet welds less than 1/2 inch long. The procedure does not address welds that are longer than 1/2 inch. The walkdown engineer took a conservative approach and designated the subject weld as a tack weld, knowing that no credit is taken for tack welds during structural analysis.

Item 7

The failure to apply galvanized coating to five welds on hanger DH-1-844-1K-WP13 occurred because the craft workers misinterpreted a note concerning inspection requirements on the associated drawing. The failure to apply coating to portions of three welds on hanger DH-1-844-1K-1R resulted from inadequate painting by the craft workers and failure of the QC inspector to note the inadequate coating.

Item 8

The improperly controlled changes to figure 7.6 of procedure CHV-106, "Qualitative Walkdown of HVAC Supports & Ducts," were the result of errors on the part of personnel initiating the change. Although the changes were minor and technically acceptable, they were promulgated via a memo rather than a formal procedure revision as required by ECC 1.04, "Preparation, Issue and Control of Construction Department Procedures and Instructions."

2. Corrective Steps Taken and Results Achieved

Items 1 through 5

The discrepant conditions described in Items 1 through 5 of the NOV have been examined by Ebasco personnel and the NRC inspector's observations have been confirmed. The information contained on the applicable walkdown forms has been revised accordingly. None of the discrepancies affected the structural qualification of the support. Nonconformance Report (NCR) 87-04505 was written on the missing washers discussed in Item 1. Deficiency Report (DR) C-88-01176 has been initiated to document the discrepancies.

Item 6

Revision 6 to CPE-EB-FVM CS-029 has been issued stating that welds longer than 1/2 inch may be designated as tack welds. Based on this revision, no change to the subject walkdown data sheet was required.

RESPONSE TO NOTICE OF VIOLATION
(445/8735-V-02) (Cont'd)

2. Corrective Steps Taken and Results Achieved (Cont'd)

Item 7

Nonconformance Reports (NCRs) 87-04198 and 88-00962 were written on the discrepancies on hangers DH-1-844-1K-WP13 and DH-1-844-1K-1R, respectively. The NCR on hanger DH-1-844-1K-WP13 was dispositioned to recoat the welds. It was determined that seven other hangers are covered by drawings containing the same note. These seven hangers were field checked and two of them were found to have uncoated non-structural welds. NCRs were written on these welds and were dispositioned to recoat the welds. The NCR on hanger DH-1-844-1K-1R was dispositioned to recoat all welds on the subject hanger.

Item 8

Deficiency Report (DR) C-87-0593 was issued to document the improperly controlled procedure change. Revision 2 has been issued to procedure CHV-106 to formally change figure 7.6.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

Items 1 through 5

Appropriate Ebasco walkdown personnel have been retrained on the importance of documenting walkdown data completely and accurately.

Ebasco has determined that changes to walkdown procedures should reduce the occurrence of some types of errors. Conduit walkdown procedures are being revised to minimize the need for personnel to measure to hypothetical lines such as conduit centerlines.

The Comanche Peak Manager of Civil Engineering has met with several groups involved in structural walkdowns, including the Ebasco conduit walkdown personnel. Examples of recently identified walkdown discrepancies were presented and the importance of accurate recording and checking of walkdown data was re-emphasized.

To assess the generic implications of walkdown discrepancies, Ebasco selected two different samples of existing walkdown data and re-examined the attributes in these samples. One sample was biased toward walkdowns performed by an individual who appeared to be responsible for two of the NRC identified discrepancies. The sample consisted of 40 packages (each package covers a single conduit run in given room). The second sample was chosen from the total population of existing walkdown packages without bias toward a time frame or individual. This sample consisted of 63 packages.

RESPONSE TO NOTICE OF VIOLATION
(445/8735-V-02) (Cont'd)

3. Corrective Steps Which Will be Taken to Avoid Further Violations (Cont'd)

Items 1 through 5

The two samples encompassed over 20,000 attributes. The error rate was found to be less than 2% for both samples. None of the discrepancies resulted in the disqualification of the associated support. Ebasco has also reviewed the results of audits and surveillances of the conduit support walkdown program. This review also indicates an error rate of less than 2%. This error rate is similar to that found at other sites for the same type activity. Based on these results TU Electric does not consider additional reinspection to be warranted. However, we are concerned with such errors and are endeavoring to reduce personnel errors through the training described above.

Item 6

Appropriate walkdown personnel have been trained on Revision 6 to CPE-EB-FVM-CS-029.

Item 7

Appropriate craft personnel have been reinstructed on the need to apply adequate coating to all welds specified by the controlling document and that an exemption from inspection requirements on nonstructural welds does not constitute an exemption from coating requirements. The QC inspector has been made aware of the error by copy of the NCR.

Item 8

The personnel involved in the improperly controlled change to procedure CHV-106 will be reinstructed in the requirements of procedure ECC 1.04 regarding procedure changes.

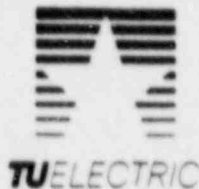
4. Date When Full Compliance Will be Achieved

Revision of conduit walkdown procedures as described in our response to Items 1 through 5 will be completed no later than May 15, 1988.

Full compliance has been achieved for Item 6.

Recoating of welds per Item 7 will be completed no later than May 15, 1988.

Reinstruction of personnel described in Item 8 will be completed no later than May 15, 1988.



Log # TXX-88394
File # 10130
IR 86-22
IR 86-20
Ref # 10CFR2.201

William G. Council
Executive Vice President

April 15, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
INSPECTION REPORT 50-445/86-22 AND 50-446/86-20
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF
VIOLATION ITEM A (445/8622-V-02; 446/8620-V-03)

REFERENCE: (1) TU Electric letter TXX-88219 from W. G. Council
to NRC dated February 15, 1988.

Gentlemen:

Reference (1) provided a revised date of full compliance to NOV Item A (445/8622-V-02; 446/8620-V-03). In that letter we stated that nonconformance documents would be dispositioned and closed by April 15, 1988. The additional information needed from the valve supplier (Crosby) to disposition the nonconformance documents was only recently received. Consequently, the disposition and closure of the nonconformance documents is now expected to be complete by July 15, 1988.

Additionally, Reference (1) stated that a response delineating any required additional action that may result from ISAP VII.a.9 would be provided. The ISAP VII.a.9 Results Report, Section 5.0 "...Discussion of Results" regarding manufacturing processes, indicates that additional corrective action is not required with respect to NOV Item A (445/8622-V-02; 446/8620-V-03).

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".
W. G. Council

RDD/gj

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



Log # TXX-88395
File # 10130
IR 87-30
IR 87-22
Ref # 10CFR2.201

William G. Council
Executive Vice President

April 15, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/87-30 AND 50-446/87-22
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF VIOLATION
ITEM B (445/8730-V-07)

REFERENCE: TU Electric Letter TXX-88220 from W. G. Council
to NRC dated February 16, 1988

Gentlemen:

In our referenced letter, we stated that sheet 3 of the vendor drawing would be made inactive no later than April 15, 1988. The processing of the DCA to render the drawing inactive has taken longer than expected. The drawing will be made inactive no later than June 15, 1988.

Very truly yours,

A handwritten signature in cursive script that reads 'W. G. Council'.

W. G. Council

RDD/gj

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



Log # TXX-88396
File # 10130
IR 88-12
IR 88-10
Ref # 10CFR2.201

William G. Council
Executive Vice President

April 15, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO NRC INSPECTION REPORT NOS.
50-445/88-12 AND 50-446/88-10

Gentlemen:

TU Electric has reviewed your letter dated March 17, 1988, concerning the inspection conducted by Mr. H. S. Phillips, during the period February 3, 1988, through March 1, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. G. Council", is written over the typed name.

W. G. Council

RDD/gj
Attachment

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

NOTICE OF VIOLATION
ITEM A (445/8812-V-01; 446/8810-V-01)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Paragraph 6.3.4.7, "Affected Licensing Documents," of TU Electric Procedure ECE 5.01-03/R1 dated December 1, 1987, states, in part, "Design changes may affect the text, tables, figures, charts, and/or drawings of one or more sections of a licensing document and may affect more than a single document. The Responsible Engineer shall thoroughly review all related licensing documents to identify potential conflicts. For a design change that affects the Final Safety Analysis Report (FSAR), an FSAR change request shall be prepared in accordance with Reference 3.9 and shall reference the DCA."

TU Electric response (R130.36) to NRC staff question (Q130.36) of FSAR - Volume XVI states, in part, "Elevation 830' 0" - seven block walls were evaluated. Two were removed and replaced with seismic Category II Gypsum walls, two were modified to prevent a seismic interaction with ductwork, and three were found to be acceptable based on no seismic interaction with safety-related equipment."

Contrary to the above, the responsible engineer did not "thoroughly review all related licensing documents to identify potential conflicts." For example, Design Change Authorization (DCA) 23040, Revision 3, conflicts with the FSAR statement, ". . . two walls were modified to prevent a seismic interaction with ductwork," in that the DCA states, "no modifications required to masonry wall between Room 136 and 137; except for west wall of Room 139. For technical justification see pages 3, 4, and 5." As a result, Block 15 (Does Design Change Affect a Licensing Document) was marked no and no FSAR change request was prepared (445/8812-V-01; 446/8810-V-01).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8812-V-01; 446/8810-V-01)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The violation resulted from an oversight by the responsible engineer. Although the design change was technically acceptable, the responsible engineer failed to review the Question and Response (Q & R) Section of the FSAR for conflicts with the DCA.

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8812-V-01; 446/8810-V-01) (Cont'd)

2. Corrective Steps Taken and Results Achieved

Deficiency Report (DR) C-88-00906 has been written to document the failure to initiate an FSAR change request as required by ECE 5.01-03.

A sample of DCAs prepared by the responsible engineer is being reviewed to determine if similar errors have occurred. If errors are identified additional DRs will be initiated.

FSAR response R130.36 was revised by Amendment 69.

DCA 23040 will be revised to reflect that the design change requires a change to the FSAR.

3. Corrective Steps Which Will Be Taken to Avoid Further Violations

The responsible engineer has been made aware of the need to include the Q & R Section when conducting FSAR reviews required by ECE 5.01-03.

Training on Q & R Section of the FSAR will be provided for personnel currently preparing and reviewing DCAs. Applicable TU Electric and contractor training programs will be enhanced to familiarize personnel with the Q & R Section.

We have surveyed previous deficiency reports and past surveillances that examined the implementation of the DCA program. No other instances of DCAs conflicting with the Q & R Section of the FSAR have been identified. Where instances of DCAs conflicting with other sections of the FSAR were identified, the conflicts were not significant and did not affect the function or design of components or systems. For these reasons we do not consider additional actions to be warranted.

4. Date When Full Compliance Will be Achieved

DCA 23040 will be revised no later than June 15, 1988.

Training of personnel currently preparing and reviewing DCAs and enhancement of training programs will be completed no later than July 15, 1988.

The review of DCAs prepared by the responsible engineer and the initiation of any required DRs will be completed no later than June 15, 1988.



Log # TXX-88409
File # 10130
IR 87-18
IR 87-14
Ref. # 10CFR2.201

William G. Council
Executive Vice President

April 22, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
INSPECTION REPORT NOS. 50-445/87-18 AND 50-446/87-14
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF
VIOLATION (NOV) ITEM B (445/8718-V-09) AND (NOV) ITEM C
(445/8718-V-08)

REFERENCE: TU Electric letter TXX-88246 from W. G. Council to
NRC dated February 19, 1988.

Gentlemen:

The referenced letter provided a revised date of full compliance for NOV Item B (445/8718-V-09) and NOV Item C (445/8718-V-08). In that letter we stated that CAR 87-78 and NCR CM-87-11028 would be closed by April 22, 1988. NCR CM-87-11028 has been closed; however, the verification of corrective action completion prior to closure for CAR 87-78 has taken longer than expected. Our date for closure of the CAR is revised to July 22, 1988.

Very truly yours,

A handwritten signature in cursive script that reads 'W. G. Council'.

W. G. Council

RDD/gj

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing letter was served this 4th day of May 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Alan S. Rosenthal, Esq.
Chairman
Atomic Safety and Licensing
Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

*Adjudicatory File (2 copies)
Atomic Safety and Licensing
Board Panel Docket
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Assistant Director for
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Comanche Peak Project Division
U.S. Nuclear Regulatory
Commission
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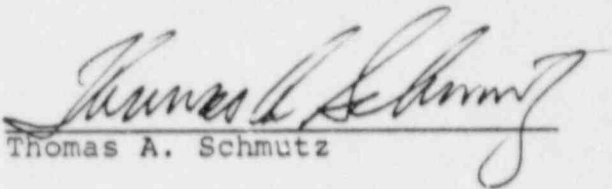
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Thomas A. Schmutz

Dated: May 4, 1988