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IR 88-20
IR 88-17
Ref. # 10CFR2.201

William G. Council
Executive Vice President

May 23, 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.
50-445/88-20 AND 50-446/88-17

Gentlemen:

TU Electric has reviewed your letter dated April 22, 1988, concerning the inspection conducted by Mr. P. Stanish and other NRC consultants during the period March 2 through April 5, 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.

On May 17, 1988, per a telephone conversation with Mr. R. F. Warnick, we requested and received an extension for NOV Item A (445/8820-V-01; 446/8817-V-01) until June 20, 1988.

We hereby respond to the balance of 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', written in dark ink.

W. G. Council

RDD/grr
Attachment

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

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NOTICE OF VIOLATION
ITEM A (445/8820-V-01; 446/8817-V-01)

- A. Criterion IX of Appendix B to 10 CFR Part 50, as implemented by Section 9.0, Revision 0, of the TU Electric Quality Assurance Manual, dated February 1, 1988, requires the establishment of measures to assure that nondestructive testing is accomplished using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Contrary to the above, ultrasonic digital thickness measurements of site fabricated pipe bends to verify acceptable post-bend wall thickness, a Corrective Action Program commitment, were performed through protective coatings (primer and paint) without consideration of the impact of protective coatings on accuracy of measurements (445/8820-V-01; 446/8817-V-01).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8820-V-01; 446/8817-V-01)

Response will be provided by June 20, 1988.

NOTICE OF VIOLATION
ITEM B (445/8820-V-02; 446/8817-V-02)

- B. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 0, of the TU Electric Quality Assurance Manual dated February 1, 1988, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Brown and Root ASME Quality Procedure AQP-10.7, "Nondestructive Examination Marking Requirements," Revision 0, dated July 10, 1987, paragraph 6.3, approves the use of Nissen ink markers and Marsh stencil ink markers for temporary marking of stainless steel surfaces. No other ink markers are approved by this procedure.

Contrary to the above, while witnessing an ultrasonic digital thickness measurement inspection of a pipe bend on Spool 103 of Piping Isometric BRP-WP-X-AB-041, the NRC inspector observed the QA inspector marking the stainless steel pipe surface with ballpoint pen ink, which is not an approved ink marker (445/8820-V-02; 446/8817-V-02).

RESPONSE TO NOTICE OF VIOLATION
ITEM B (445/8820-V-02; 446/8817-V-02)

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

1. Reason for Violation

The use of an unauthorized marker on stainless steel pipe during ultrasonic thickness (UT) measurement of the pipe bend noted in this violation resulted from QC inspector error. This conclusion is based upon discussions held with QC inspectors responsible for performing the UT measurements. We believe the use of an unauthorized marker was limited to one QC inspector.

2. Corrective Steps Taken and Results Achieved

Nonconformance Report (NCR) 88-05684 was initiated to resolve the specific instance of unauthorized marker use noted in this violation. Additionally, one other instance of unauthorized marker use has been identified and documented on NCR 88-05685. To confirm that unauthorized marker use was limited to one QC inspector, the disposition for Corrective Action Request (CAR) 88-019 will require that all stainless steel pipe bends evaluated under the Post Construction Hardware Validation Program (PCHVP) prior to March 25, 1988, be inspected to verify that UT layout marks have been made using approved markers. If additional unauthorized marker use is identified, the area will be cleaned and "leachability" tests conducted in accordance with approved project procedures to assure acceptability. Stop Work Order (SWO) 88-008 was issued on March 25, 1988, which stopped PCHVP UT examination of pipe bends pending resolution of UT method concerns. SWO 88-008 will be lifted upon development of a satisfactory disposition to CAR 88-019.

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

The actions taken as a result of CAR 88-019 will be sufficient to avoid further violations. The inspector responsible for use of improper marker is no longer onsite.

4. Date When Full Compliance Will be Achieved

Full compliance will be achieved upon completion of the inspections required by CAR 88-019 and disposition of NCRs 88-05684 and 88-05685. These actions will be completed by August 20, 1988.

NOTICE OF VIOLATION
ITEM C (445/8820-V-04)

- C. Criterion X of Appendix B to 10 CFR Part 50, as implemented by Section 10.0, Revision 1, dated July 31, 1984, of the TU Electric Quality Assurance Plan, states, in part, "A program for inspection of activities affecting quality shall be established and executed . . . to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Contrary to the above, the following conditions which had been inspected and accepted by the applicant's inspection programs were identified as being nonconforming during independent inspection of Unit 1 cable tray supports.

Section 3.2.2.B.2.a.1.d of TU Electric Field Verification Method TNE-FVM-CS-001, Revision 5 dated July 1, 1986, states, in part, "Welding shall be verified for quantitative attributes as listed below without paint removed . . . weld size (to be measured)."

Section 3.2.2.B.2.2.b, states, in part, "A fillet weld shall be permitted to be less than the size specified by 1/16" for 1/4 (25%) the length of the weld."

Section 1.5, "Visual Weld Acceptance Criteria for Structural Welding at Nuclear Power Plants," Revision 2 dated May 7, 1985 states: "The workmanship provisions of AWS D1.1 are not modified by the acceptance criteria presented in this document" Section 3.3.1 of AWS D1.1 dated 1975 states, in part, concerning gaps between members, ". . . if the separation is 1/16 inch or greater, the leg of the fillet weld shall be increased by the amount of the separation or the contractor shall demonstrate that the effective throat has been obtained."

Section 4.1.2.2, "Visual Weld Acceptance Criteria for Structural Welding at Nuclear Power Plants," NCIG-01, Revision 2 dated May 7, 1985, states, in part, "A fillet weld shall be permitted to be less than the size specified by 1/16" for 1/4 the length of the weld."

Contrary to the above, independent inspection identified the following conditions in two supports:

- a. An 8" long, 5/16" fillet weld required by the drawing for a cable tray support was measured as being 1/4" for the full length.
- b. Two 6" long, 1/4" fillet welds required by the drawing, for a cable tray support were measured as being 1/8" (due to an 1/8" gap between members) for the full length of both welds (445/8820-V-04).

RESPONSE TO NOTICE OF VIOLATION
ITEM C (445/882J-V-04)

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

1. Reason for Violation

The reason for this violation is attributed to limited QC inspector error. This conclusion is based upon review of QA Surveillance reinspection results. The ongoing QA Surveillance program performs overview reinspections of previously accepted checklist attributes to monitor the performance of QC inspection personnel. A review of Cable Tray Hanger (CTH) surveillance reinspection results indicated that neither of the QC inspectors involved had accepted any undersized welds in the samples examined - a total of 101 welding checklist attributes were reinspected for the two inspectors involved, 39 and 62, respectively. These results, along with the results of the NRC inspection noted in the details related to this violation, formed the basis for our conclusion.

2. Corrective Steps Taken and Results Achieved

Nonconformance Reports (NCRs) 88-08411 and 88-08412 have been initiated to resolve the discrepancies. Although the NCRs have not been formally dispositioned, preliminary engineering review indicates the described conditions do not represent significant structural discrepancies.

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

The QC inspectors who accepted the CTH welds described in the violation have been made aware of these errors. We believe this action to be sufficient to avoid further violations.

4. Date When Full Compliance Will be Achieved

NCRs 88-08411 and 88-08412 will be dispositioned by August 20, 1988.