

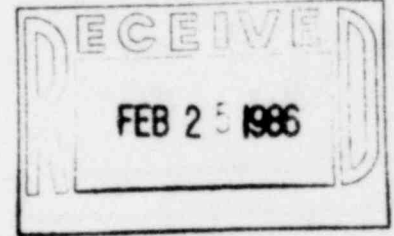
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TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

February 21, 1986

WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

Mr. Eric H. Johnson, Acting Director
Division of Reactor Safety and Projects
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NOS.: 50-445/85-13 AND 50-446/85-09

Dear Mr. Johnson:

We have reviewed your letter dated December 24, 1985, concerning the inspection conducted by Mr. T. F. Westerman and other members of the Region IV Comanche Peak Group during the period August 23, through September 30, 1985. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2.

We requested and received two extensions of two weeks each in providing our response during telephone discussions on January 23, 1986, and February 7, 1986, between yourself and Mr. John Marshall of TUGCO. These extensions were necessary because of holiday delays and the number of issues to be addressed.

We have responded to the Notice of Violation and have provided a partial response to the Notice of Deviation in the attachments to this letter. To aid in understanding our response, we have attached the Notice of Violation and Notice of Deviation. We consider the enclosed information to be responsive to the inspector's findings.

Very truly yours,

W. G. Council

W. G. Council

JWA/gj
Attachments

By: *G.S. Keeley*
G.S. Keeley
Manager, Nuclear Licensing

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PDR ADDCK 05000445
Q PDR

IC-030/86

c - Region IV (Original + 1 copy)
Director, Inspection and Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Mr. V. S. Noonan
Mr. D. L. Kelley

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station, Units 1 and 2

Dockets: 50-445/85-13
50-445/85-09
Permits: CPPR-126
CPPR-127

During an NRC inspection conducted on August 23 through September 30, 1985, five violations of NRC requirements were identified. The violations involved inspection failure to record a required pipe support dimension, inadequate provisions for control of deleterious materials, inadequate protection of installed components, incomplete and missing conduit identification, and unauthorized breaking of an accepted flange joint. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO Quality Assurance Program (QAP), Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Site Procedure QI-QAP-11.1-28 states that the Quality Control Inspector shall assign a number to each dimensional attribute identified as a specific dimension and shall record the actual measurements on this inspection report.

Contrary to the above, no number was assigned and no measurement result was recorded on the QC inspection report for the wall-to-pipe centerline dimension shown on pipe support drawing AF-2-006-412-533A. When this dimension was independently checked by NRC, it was found to be 13½-inches when the drawing showed it to be 11¼-inches.

This is a Severity Level V violation (Supplement II) (446/8509-V-01).

B. Criterion XIII of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 13.0, Revision 1, dated July 31, 1984, requires that measures be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

Section 2.17 of Gibbs and Hill Piping Erection Specification 2323-MS-100, Revision 8, dated July 5, 1984, defines the actions to be taken to limit contamination of reactor coolant equipment surfaces; e.g., prohibition of low melting point metals and their compounds, prohibition of use of

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instruments containing mercury, and restriction of halide content of products such as machining coolants, seals, and plug materials.

Contrary to the above, implementing site procedures do not address prohibition of use of instruments containing mercury, do not provide necessary craft guidance for contamination control, or include provisions to assure that procured consumables are in compliance with specification requirements.

This is a Severity Level IV violation (Supplement II) (446/8509-V-02).

- C. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Brown & Root Procedure MCP-10, paragraph 3.6, Revision 9, dated July 2, 1985, requires that items stored in place shall merit additional protection if construction work threatens the integrity of equipment and includes a prohibition in regard to placing work platforms or scaffolds on permanent plant installations, such as a pipe, tray hangers, etc., without written engineering authorization.

Contrary to the above:

1. On September 25, 1985, the NRC inspector observed in Room 16 (854 feet elevation) a wooden two by four which was laid across 3/4-inch pipe RC-2-095-501R-2 to serve as a work platform, but there was no evidence to indicate that engineering had authorized this temporary platform.
2. On September 24, 1985, the NRC inspector observed at the 905 feet elevation that welding had taken place above the reactor pressurizer and associated piping without adequately protecting the equipment, as evidenced by the presence of weld spatter on weld no. 42 in 6-inch line RC-2-096-2501R-1.

This is a Severity Level IV violation (Supplement II) (446/8509-V-03).

- D. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and

shall be accomplished in accordance with these instructions, procedures, or drawings.

Paragraph 3.1.1, subparagraphs b and c, of TUGCO Procedure QI-QP-11.3-8, Revision 0, issue date July 7, 1978, "Identification and Color-Coding Inspections," require that conduit designation shall be applied with black ink or paint and that identification of conduit be verified at both sides of all walls and slabs through which conduit passes.

Paragraph 3.1.1, subparagraph b, of TUGCO Procedure QI-QP-11.2-23.7, Revision 1, issue date January 5, 1980, "Verify Conduit Identifications," similarly requires that conduit be identified on both sides of all walls and slabs through which conduit passes. Subparagraph c. of this paragraph states, in part, "Groups of embedded conduits which are flush with the surface of walls, floors and manholes shall be identified on the surface or the wall, floor, or manhole by attaching an identification template near the conduit bank. . . ."

Contrary to the above, the following examples of incomplete and missing conduit identifications were noted in the Unit 1 lower cable spread room, auxiliary building, and safeguards building:

1. Two conduits attached to embedded conduit wall sleeve TSW-A-020 were not identified on the identification template and one conduit which was identified on the template as being present did not, in fact, exist.
2. Two banks of embedded conduit wall sleeves below sleeve TSW-A-023 had no form of identification.
3. At tray section T14GCDH27, there were four floor sleeves which were not identified by either identification template or conduit marking.
4. At tray section T24WAEF, there were two floor sleeves with an incomplete identification template; i.e., the template contained only the letters TFS.
5. Below battery pack CPI-ELBPSG-187 (Circuit ESB7-11), there were two floor sleeves which were not identified.
6. At a tray section above junction box JB1A-1332, the embedded conduit wall sleeves were not identified by either identification template or marking.
7. Three of five floor sleeves at tray section T220ABA41 were unmarked.
8. Four floor sleeves at tray section T120ABB23 were unmarked.

9. Conduits attached to embedded conduit wall sleeve TSW-A-030 were not identified on the identification template which was present.

This is a Severity Level IV violation (Supplement II) (445/8513-V-01).

- E. Criterion V of Appendix B to 10 CFR Part 50, as implemented by TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Paragraph 3.5.2.1 in Revision 7 of Brown & Root Procedure CP-CPM 6.9E states, in part, "When it becomes necessary to break an inspected flanged joint for any reason, QA/QC Building Superintendent shall be notified by the responsible craft foreman. This notification will be by the foreman completing an IRN (Item Removal Notice) in accordance with CPM 6.10. . . ."

Paragraph 3.11 states, in part, "Flanged pipe joints shall be tightened sufficiently to prevent leakage."

Contrary to the above, flange no. 6 in Unit 2 piping system BRP-SW-2-018, which was installed, inspected and accepted using Construction Operation Traveler No. MP-82-4117-0400 dated April 20, 1982, was observed in a broken condition as evidenced by loose nuts on 4 of the 12 studs, thus impairing its ability to sufficiently prevent leakage. Further, there were no available IRNs authorizing any activity which would require the breaking of this flanged joint.

This is a Severity Level IV violation. (Supplement II) (446/8509-V-04).

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted; (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

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

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:

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

Response to Notice of Violation
Item A (446/8509-V-01)

We do not feel that this item is a violation.

At the time the apparent deficiency was identified by the NRC, the initial response provided by the Brown & Root Site QA Manager to this item was that the dimension in question was not an attribute verified by QC, as it was a location dimension as identified in item A.2. of the attached QC Checklist. However, after discussing the intent of ".....each dimensional attribute...." addressed in item A.1., he incorrectly agreed that failure of the QC inspector to measure this dimension appeared to violate the words of QI-QAP-11.1-28.

Subsequent to this discussion, he verified items A.2. and A.3. of the QI-QAP-11.1-28 checklist provided exceptions to the requirements of A.1. and all QC personnel were cognizant of the intent. Accordingly, failure of the QC inspector to measure this dimension did not violate the inspection program.

BRH AF-2-006-412-S33A Rev.0 and CMC-86747 Rev.2, were used by the QC inspector in completing the Component Support Structural Inspection Report on 4/27/85. At that time, the revised pipe location had been determined by Field Engineering and CMC-86747 Rev.0 included the change of the location dimension. For unknown reasons the drawing package provided to the NRC inspector did not contain the CMC's issued against the BRH. Therefore, he was not aware that the dimension had been revised. The NRC measurement is within the QI-QAP-11.1-28 requirement of plus/minus 1 inch of the revised dimension and well within the 2323-MS-100 tolerance of plus/minus 2 inches for pipe location.

The complete support package is available for review by your inspector.

Response to Notice of Violation
Item B (446/8509-V-02)

1. Reason for the Violation

Our review of this issue indicates that the procedures in place for control of chemical substances need to be strengthened. The current controls in this area specify that chemicals defined by specifications and existing procedures may be used in accordance with the prescribed requirements and may not be used elsewhere without Engineering approval.

2. Corrective Steps Which Have Been Taken and Results Achieved

In order to strengthen the project control program, CP-CPM-9.2, "Control of Chemical Substances", will be revised to specifically note the application of approved substances. Provisions will be included for the identification of noncompliances by nonconformance reports.

Upon issuance of the revised procedure, an in-depth survey will be made of applicable plant structures to ensure compliance with prescribed directions. Training of construction personnel will be conducted upon issuance of the procedure in accordance with the established training program.

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

The revision of CP-CPM-9.2 will include measures to prevent recurrence by the implementation of construction surveillance activities. This program will be further supported by the training specified above and trending activities for related nonconformance reports.

4. Date When Full Compliance

Construction Procedure CP-CPM-9.2 is scheduled for revision no later than March 7, 1986. The survey for compliance and training will be completed by March 21, 1986.

Response to Notice of Violation
Item C (446/8509-V-03)

1. Reason for the Violation

The two findings noted were confirmed following the exit interview with the NRC. Further investigation could not determine the individual or group responsible for these items. We attribute these deficiencies to a lack of awareness by craft personnel of the importance of protecting permanent installed equipment.

2. Corrective Steps Which Have Been Taken and Results Achieved.

Both of the conditions identified were corrected during the first week of October, 1985. No damage was noted to the equipment involved. These findings were discussed with all Superintendents at the weekly staff meeting on October 1, 1985. Additional emphasis was requested of supervision to preclude recurrence of these types of deficiencies and to assure the integrity of permanent installations. These findings were a topic for discussion at the weekly safety meeting with the craft personnel on January 27, 1986.

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

Craft awareness of these concerns will continue to be emphasized through supervision. Monitoring of the construction activities by supervision will continue in order to prevent further violations.

Quality Surveillance of this activity will be performed by March 28, 1986, to assess the effectiveness of training.

4. Date When Full Compliance Will Be Achieved.

The full compliance date was January 27, 1986.

Response to Notice of Violation
Item D (445/8513-V-01)

1. Reason for the Violation

We have reviewed each of these findings and concluded that a lack of understanding of the requirements for sleeve identifications was the cause of those findings. Many of the sleeves noted are unused and do not require identifications until they are utilized. Those sleeves which were found to have incorrect/incomplete identification are being corrected.

2. Corrective Steps Which Have Been Taken and Results Achieved

To ensure compliance within the ES-100 Specification requirements for sleeve identification, we will be performing walkdowns of all power and non-power through-wall and through-floor sleeves. In addition, we have initiated a comparison review of ES-100, Drawing 2323-E1-1701, DCA 2464 and Installation and Inspection procedures to ensure that design requirements are consistently implemented.

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

Following the documentation review we will train personnel to ensure proper understanding of these requirements. It is anticipated that the above actions will be completed by June 1, 1986.

Quality Surveillance of the activity will be performed by July 2, 1986, to assess the effectiveness of training.

4. Date When Full Compliance Will Be Achieved

The date of full compliance will be June 1, 1986.

Response to Notice of Violation
Item E (446/8509-V-04)

1. Reason for the Violations

We have confirmed that an Item Removal Notice did not exist for this broken flange joint. Further investigation did not reveal the reason or the individuals responsible for breaking open this flange joint.

2. Corrective Steps Which Have Been Taken and the Results Achieved.

A Non-conformance Report (NCR-M-18697) was written and the flange was repaired. No damage to any equipment resulted from this item.

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

Additional training was prescribed for construction personnel to provide additional emphasis regarding the proper documentation required for work on previously inspected components. This training was completed on February 5, 1986.

Quality Surveillance of this activity will be performed by March 28, 1986, to assess the effectiveness of training.

4. Date When Full Compliance Will Be Achieved.

The date of full compliance was February 5, 1986.

Response to Notice of Deviation
Item A (445/8513-D-01)

1. Reason for the Deviation

Due to a misunderstanding of the action plan by the personnel responsible for selecting the sample, the intent of the V.d action plan to inspect ASME supports was interpreted as being supports where ASME welding procedures were used during fabrication and erection rather than ASME-NF supports. At the time of the NRC inspection, the third-party overview had focused on the random sampling methodology, the inspection procedure and inspector training, and the initial field inspections.

A project report, which included the list of all pipe supports inspected, was in preparation at the time of the NRC Inspection but had not yet undergone final review. It is quite likely that the deviation identified by the NRC inspection would have been detected by either the project or the third-party during this final review.

2. Corrective Steps Which Have Been Taken and Results Achieved

To correct the identified discrepancy, additional NF pipe supports have been selected and inspected to achieve a sample of 60 ASME-NF supports in each unit.

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

The necessity of completing project checks and third-party overviews of key aspects earlier in the process has been reemphasized to all affected parties.

4. Date When Full Compliance Will be Achieved

The full compliance date was February 1, 1986.

Response to Notice of Deviation
Item B (445/8513-D-02) and Item C

Based on recent findings by the NRC as exemplified by these items and by Evaluation Research Corporation (ERC), while conducting internal surveillance activities, the Senior Review Team (SRT) suspended Quality of Construction (QOC) ISAP VII.c reinspection activities on January 8, 1986. The purpose of the suspension of activities was to evaluate the specifics of these two Notices of Deviation items and to assess, specify and implement any necessary corrective actions. Until the ERC evaluation is complete and the SRT has concurred with the results, the specifics of these items cannot be addressed. It is anticipated that the ERC response will be finalized and approved by the SRT in late February. A response to the specifics of those deviations will be provided to NRC by mid-March 1986.