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OF COUNSEL  
NOT ADMITTED 1-1-82

June 6, 1988

Peter B. Bloch, Esquire  
Chairman  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. Walter H. Jordan  
881 West Outer Drive  
Oak Ridge, Tennessee 37830

Dr. Kenneth A. McCollom  
Administrative Judge  
1107 West Knapp  
Stillwater, Oklahoma 74075

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' ninth 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 April 29, 1988 to May 27, 1988.

Respectfully submitted,

*George L. Edgar*  
George L. Edgar

Enclosures

cc: Service List

8806140147 880606  
PDR ADOCK 05000445  
G PDR

DS03



Log # TXX-88449  
File # 10130  
IR 86-26  
IR 86-22  
Ref. # 10CFR2.201

William G. Council  
Executive Vice President

May 16, 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. 50-445/86-26; 50-446/86-22  
REVISED RESPONSE TO NOTICE OF VIOLATION  
(NOV) ITEM A (445/8626-V-02)

REF: TU Electric Letter TXX-7120 from W. G. Council  
to NRC dated December 31, 1987

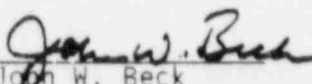
Gentlemen:

The referenced letter provided our revised response to Notice of Violation Item A (445/8626-V-02). In that response we stated that the Unit 1 walkdown for pulling aids per CPE-SWEC-FVM-EE/ME/IC/CS-90 would be completed in order to correct this finding. As a result of activities completed in December 1987 and other installation practices, the walkdowns need not be performed for this issue. Our response to Notice of Violation 445/8626-V-02 is hereby revised to reflect these changes and to update the status of our revision to specification 2323-ES-100.

Where revised responses are provided, the revised sections are denoted by a revision bar in the right margin.

Very truly yours,

W. G. Council

By:   
John W. Beck  
Vice President,  
Nuclear Engineering

RDD/grr

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

NOTICE OF VIOLATION  
ITEM A (445/8626-V-02)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO Quality Assurance Plan (QAP), Section 5.0, Revision 3, dated July 31, 1984, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Paragraph 3.1.2.e of TUGCO Procedure QI-QP-11.3-40, Revision 14, dated January 9, 1984, states, in part, "Verify that ... all cable pulling aids have been removed (i.e., fish tape, tape rope, etc.)."

Paragraph 3.1.1.2.c of the above procedure, Revision 18, dated May 18, 1984, states, "Verify that ... pulling aids (i.e., rollers, fish tape, tag rope) have been removed from raceway."

Contrary to the above, TUGCO inspectors performing post construction inspections failed to identify cable pulling ropes remaining in Class 1E conduit C12018896 and Class 1E cable tray T130ACG57 located in the Unit 1 reactor building and auxiliary building, respectively (445/8626-V-02).

REVISED RESPONSE TO ITEM A  
(445/8626-V-02)

TU Electric accepts the alleged violation and the requested information follows:

1. Reason for Violation

Regarding cable tray T130ACG57, construction procedures controlling cable pulling activities performed subsequent to QC acceptance of raceway systems did not require QC reverification of pulling aid removal.

Regarding conduit C12018896, Revision 14 of QI-QP-11.3-40 in effect at the time of post construction inspection required QC inspectors to identify visible pulling aids but did not require the removal of junction box, pull box or conduit covers to verify that pulling aids had been removed.

2. Corrective Steps Taken and Results Achieved

Nonconformance Report (NCR) E-86-103883S and Construction Deficiency Report (CDR) 87-4746EC (previously NCR E-86-103981) were issued to address pull ropes in conduit C12018896 and cable tray T130ACG57, respectively. Both documents have been dispositioned "rework" by directing the removal of the pull ropes. NCR E-86-103883S has been closed.

Corrective Action Request (CAR) 87-59 has been initiated which will address the generic implications of this violation and will define appropriate corrective actions.

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

On July 24, 1987, Procedure EEI-7, "Cable Pulling," was revised to require removal of all pulling aids (pull ropes, fish tape, etc.) after cable pulls into covered cable trays or conduit are completed. After further evaluation it was determined that, with certain restrictions, it is acceptable to leave pull ropes in conduit runs. On October 28, 1987, Design Change Authorization (DCA) 58763, Rev. 0 to 2323-ES-100 was issued providing this allowance and detailing the restrictions.

A DCA to revise 2323-ES-100 has been issued which emphasizes that pull ropes are to be left in conduits only when their removal may result in damage to adjacent cables.

Quality Instruction QI-QP-11.3-40, "Post Construction Inspection of Electrical Equipment and Raceways," has been deleted. In process inspections for pulling aids are performed in accordance with procedures NQA-3.09-3.02, "Electrical Raceway-Cable Tray," and NQA-3.09-3.03, "Electrical/Raceway Conduit Procedure." These procedures provide inspection criteria commensurate with the requirements contained in Specification 2323-ES-100.

On November 6, 1987, the Director of Construction issued a directive requiring that all visible metal fish tapes be removed from Unit 1 and Unit 2 raceways, or if removal was not feasible an NCR was to be written. This action was reported complete on December 18, 1987. The completion of this activity and inspection attributes which require that conduits be free of foreign debris prior to the installation of electrical penetration seals completes our corrective action for this finding.

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.



Log # TXX-88450  
File # 10130  
IR 87-16  
IR 87-13  
R.T. # 10CFR2.201

William G. Council  
Executive Vice President

May 16, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/87-16; 50-446/87-13  
REVISED RESPONSE TO NOTICE OF VIOLATION (NOV)  
ITEM C (445/8716-V-12)

REF: TU Electric Letter TXX-88221 from W. G. Council to NRC dated  
March 15, 1988

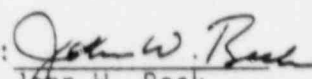
Gentlemen:

The referenced letter provided our updated response to Notice of Violation Item C (445/8716-V-12). In that response we stated that by May 15, 1988, a program would be established whereby a team would observe ongoing work to assess whether the activities were within the scope of applicable work documents, and whether damage was occurring to equipment in the area. We have determined that this observation of ongoing work should be incorporated into our existing Quality Assurance surveillance program. As a result of the surveillance activity, additional sampling is not required. Our response has been revised accordingly. Our response has also been revised to reference an October 16, 1987 Vice-Presidential Directive to engineering and construction personnel rather than the previously discussed NEO policy statement. The Vice-Presidential Directive was considered to be more appropriate for emphasizing requirements to perform work only within the scope of authorized documents. Other sections of our response have been revised to indicate actions completed.

Where revised responses are provided, the revised sections are denoted by a revision bar in the right margin.

Very truly yours,

W. G. Council

By:   
John W. Beck  
Vice President,  
Nuclear Engineering

RDD/grr

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



NOTICE OF VIOLATION  
ITEM C (445/8716-V-12)

- C. Criterion XVI of Appendix B to 10CFR Part 50, as implemented by Section 16.0, Revision 0, of the TU Electric QA Plan, states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition..."

TU Electric, in response to Corrective Action Report (CAR) 65X, which identified a missing cotter pin as a Construction Deficiency, established the Hardware Validation Program (HVP) for safety-related pipe supports. Included in this program is a required verification that locking devices are present and correctly installed.

Contrary to the above, the sway strut rear bracket load pin on safety-related pipe support CC-1-295-006-C53R, Revision 4, was observed on August 21, 1987, to have two missing cotter pins although this support had been reworked by craft and accepted by QC in accordance with the HVP (445/8716-V-12).

UPDATED RESPONSE TO VIOLATION  
ITEM C (445/8716-V-12)

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

1. Reason for Violation

The subject pipe support was inspected and accepted in accordance with the Hardware Validation Program (HVP) in May of 1987. Although our findings cannot be confirmed, TU Electric believes that the subject cotter pins may have been removed during painting activities which are known to have occurred subsequent to the HVP inspection and prior to the NRC inspectors observation of missing cotter pins.

2. Corrective Steps Taken and Results Achieved

On August 26, 1987, Non-Conformance Report (NCR) 87-A01243 was written documenting the missing cotter pins. To determine the extent of the problem, a reinspection was initiated of 10% of the approximately 3000 pipe supports which had been inspected per the HVP. On September 4, 1987, after reinspecting 45 pipe supports, a loose jam nut was found on pipe support CC-X-079-004-A43R. NCR 87-A01446 was written and the reinspection effort was terminated. Based on the identification of an additional discrepancy relating to configuration control, further sampling was not considered necessary and Corrective Action Request (CAR) 87-075 was initiated.

UPDATED RESPONSE TO VIOLATION  
ITEM C (445/8716-V-12) (Cont'd)

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

On September 9, 1987, the Director of Construction directed that the missing/loose pipe support hardware be investigated and personnel retrained as required.

On September 14, 1987, the Director of Construction ordered that painting, insulating, and cleaning of safety related systems and components be stopped pending retraining of appropriate Construction Department personnel.

On September 15, 1987, Corrective Action Request (CAR) 87-075 was issued to document the generic concerns raised by the discovery of the loose/missing hardware.

On September 18, 1987, following completion of the required training, the Work hold of September 14, 1987, was lifted.

On October 27, 1987, a training memo was issued for sign-off by all Comanche Peak Engineering personnel. This memo included instructions on the protection of permanent plant equipment, and was transmitted to all engineering contractors for training of their personnel.

On February 1, 1988, operations procedure STA-606, "Work Requests and Work Orders," was revised to require specific instructions for the removal and restoration of interferences.

On February 1, 1988, startup administrative procedures CP-SAP-13, "Temporary Modifications," and CP-SAP-6, "Control of Work on Station Components After Release from Construction to Startup," were revised to contain a cautionary statement indicating that only the work contained in the work documents is permitted.

On February 4, 1988, the Construction Department issued ECC Policy Statement No.2, "Maintaining Component Integrity," which emphasized the responsibility of individuals concerning component integrity.

On October 16, 1987, memo NE-13371 from the Vice President of Engineering and Construction was issued to engineering and construction personnel reiterating the CPSES policy that all nuclear safety-related work must be performed in accordance with written engineering direction and approved procedures. Reading of this memo will be made part of our badging process.

Our QA surveillance organization will incorporate observation of work in the area of pipe supports into their surveillance program. Field activities will be surveyed during the remainder of the construction phase to provide assurance that the activities being performed are within the scope of the applicable work documents. The QA Surveillance program and personnel qualifications are governed by procedures NQA 3.23, "Surveillance Program," and NQA 1.16-4.01, "Indoctrination, Training and Qualification of QA Surveillance Personnel," respectively.



Construction Procedure CP-CPM-7.1 "Package Flow Control" has been revised to require that work instructions contain specific direction to only perform those activities within the scope of the authorized documentation. The requirements of procedure CP-CPM-6.10, "Inspected Item Removal Form," have been revised and incorporated into new procedure ECC 2.13-5, "Construction Travelers," and ECC 2.13-5A "Construction Traveler Generation" which will include appropriate guidance for working on or around accepted hardware.

The twelve CPE procedures that require personnel to enter Category I buildings have been revised to include cautionary statements regarding the alteration of installed and accepted equipment.

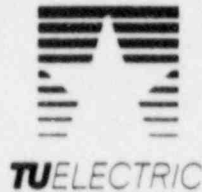
Painting Specifications 2323-AS-30 & 31 are being revised to include guidance for working on or around installed and accepted safety related equipment.

4. Date When Full Compliance Will be Achieved

Memo NE-13371 will be incorporated into our badging process no later than June 16, 1988.

The modification to our QA surveillance program described above will be completed no later than July 1, 1988.

The revisions to Specification 2323-AS-30 and 2323-AS-31 will be completed by June 16, 1988.



Log # TXX-88460  
File # 10130  
IR 87-31; 87-23  
IR 87-35; 87-26  
Ref. # 10CFR2.201

William G. Council  
Executive Vice President

May 16, 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  
REVISED DATE OF FULL COMPLIANCE FOR  
NOTICE OF VIOLATION (NOV) ITEM A (445/8731-V-01)  
AND NOV (445/8735-V-02)

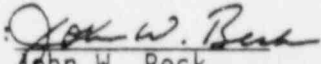
REF: TU Electric letter TXX-88367 from W. G. Council to  
NRC dated March 31, 1988

Gentlemen:

The referenced letter provided our updated responses to NOV Item A (445/8731-V-01) and NOV (445/8735-V-02). In those responses we stated that by May 15, 1988, Ebasco walkdown procedures would be revised to minimize the need for personnel to measure to hypothetical lines such as conduit centerlines. Revision of the applicable procedure has taken longer than expected. Accordingly, our date for issuance of this revision is hereby revised to be no later than July 15, 1988.

Very truly yours,

W. G. Council

By:   
John W. Beck  
Vice President,  
Nuclear Engineering

RDD/grr

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



Log # TXX-88468  
File # 10130  
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', is written over the typed name.

W. G. Council

RDD/grr  
Attachment

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

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 1Q3 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., 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 (445/8820-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.



Log # TXX-88470  
File # 10130  
IR 87-31  
IR 87-23  
Ref. # 10CFR2.201

William G. Council  
Executive Vice President

May 20, 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  
REVISED DATE OF FULL COMPLIANCE FOR  
NOTICE OF VIOLATION (NOV)  
ITEM B (445/8731-V-02; 446/8723-V-01)

REF: TU Electric letter TXY-88324 from W. G. Council to NRC  
dated March 18, 1988

Gentlemen:

The referenced letter provided our revised date of compliance to Notice of Violation Item B (445/8731-V-02;446/8723-V-01). In that letter we stated that reinstruction to NEO 3.06 of engineering personnel responsible for NCR dispositions, and that closure of DRs C-88-00040, C-88-00041, and P-88-00054 would be completed by May 20, 1988. The subject DRs have been closed. Reinstruction of engineering personnel has not been completed. Our date for completion of the reinstruction of engineering personnel is hereby revised to be no later than July 18, 1988.

Very truly yours,

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

W. G. Council

RDD/grr

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. )  
 ) (Application for an  
 ) Operating License)  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )  
\_\_\_\_\_ )

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the  
foregoing letter was served this 6th day of June 1988,  
by mailing copies thereof (unless otherwise indicated),  
first class mail, postage prepaid to:

\*Peter B. Bloch, Esquire  
Chairman  
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  
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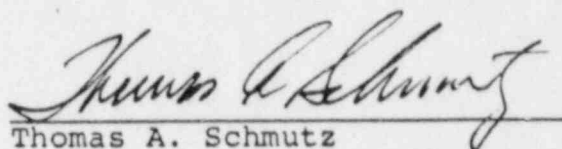
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