TU ELECTRIC

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File # 10130
IR 88-20
IR 88-17
Ref. # 10CFR2.201

William G. Counsil
Executive Vice President

June 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
RESPONSE TO INSPECTION REPORT NOS.
50-445/88-20 AND 50-446/88-17,
NOTICE OF VIOLATION ITEM A

REF: TU Electric letter TXX-88468 from W. G. Counsil to the NRC dated May 23, 1988

Gentlemen:

Our referenced letter stated that 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 Notice of Violation in the attachment to this letter.

Very truly yours,

W. G. Counsil

By: John W. Beck
John W. Beck
Vice President,
Nuclear Engineering

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, required 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)

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

1. Reason for Violation

Ultrasonic digital thickness (UT/DT) measurements of carbon steel pipe bends through primer was considered an acceptable practice based on the accuracy deemed necessary for the purposes of the Post Construction Hardware Validation Program (PCHVP). While the lower ultrasonic acceleration rate through primer results in a indicated wall thickness which is greater than actual, the actual wall thickness would still exceed the stress analysis assumptions for minimum pipe wall thickness if the UT/DT reading met or exceeded the manufacturers' nominal wall thickness. Since pipe was routinely verified to be within the manufacturers' tolerances upon receipt at CPSES and pipe bends were made using a qualified bending process the PCHVP UT/DT verification through primer was considered sufficiently accurate to assure the absence of safety significant deficiencies related to minimum pipe wall thickness. However, the affect of spot primer thickness in excess of nominal primer thickness was not appropriately considered during development of this verification process.

The UT/DT of carbon steel pipe bends through primer and finish coat (i.e. paint) was the result of QC inspector error. Although the inspection procedure did not specifically prohibit UT/DT through paint, UT/DT inspection personnel had been directed to have paint removed prior to UT/DT inspection.

2. Corrective Steps Taken and Results Achieved

Stop Work Order (SWO) 88-008 and Corrective Action Request (CAR) 88-019 dated March 25, 1988, were issued to document and resolve the issue of UT/DT through coated carbon steel pipe surfaces. The disposition of CAR 88-019 requires that carbon steel pipe bends evaluated under PCHVP prior to March 25, 1988, be re-examined for pipe wall thickness with protective coatings (primer and paint) removed. SWO 88-008 was lifted May 18, 1988, to allow implementation of the CAR disposition.

An alternate UT/DT method is currently being evaluated which would eliminate the need for removal of primer and paint prior to UT/DT. Should this alternate method be found acceptable, CAR 88-019 will be revised accordingly.

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

Brown and Root procedure AQP-10.9, "Ultrasonic Digital Thickness Measurement," has been revised by Document Change Notice (DCN) to prohibit UT/DT of pipe, plate or structural shape through primer or paint. Further revisions may be required based upon the evaluation of the alternate UT/DT method described above.

4. Date When Full Compliance Will be Achieved

Full compliance will be achieved upon completion of the re-examination required by CAR 88-019 which will be completed by August 31, 1988.