



Log # TXX-88527
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Ref. # 10CFR2.201

June 22, 1988

William G. Counsil
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
REVISED RESPONSE TO NOTICE OF
DEVIATION ITEM E (445/8607-D-01)

- REF: 1) TU Electric Letter TXX-6222 from W. G. Counsil to USNRC dated February 18, 1987
- 2) TU Electric Letter TXX-6526 from W. G. Counsil to USNRC dated July 1, 1987
- 3) USNRC Letter dated September 11, 1987 from R. F. Warnick to W. G. Counsil Dockets 50-445/87-07 and 50-446/87-05

Gentlemen:

Reference (1) transmitted our response to Notice of Deviation Item E, 445/8607-D-01. Reference (2) transmitted our interim report concerning SDAR CP-83-08. Reference (3) transmitted your request for additional information regarding statements made in References (1) and (2).

Reference (1) stated that the welding on the subject brackets had been determined to be acceptable. Reference (1) also stated that our correspondence pertaining to SDAR CP-83-08 (TXX-3657) would be supplemented to document why lack of welding documentation does not constitute a significant condition adverse to quality. These statements were made based on the disposition of Nonconformance Reports (NCR) M-9575 through -9636. These NCRs identified a lack of documented evidence of welding acceptability and bracket material for ASME certification. The welds and brackets were determined to be outside the ASME N-5 boundary; therefore, documentation to support ASME N-5 certification of the brackets and welds was not required and on that basis the NCRs were dispositioned use-as-is. The Certificate of Conformance which had been provided by the vendor (Fisher Controls Company) was judged to be sufficient to accept the valves and brackets for seismic qualification. It was our belief that the subject brackets and welds were acceptable based on the vendor supplied documentation.

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Reference (2) contained the following statements:

"The clip [bracket] was procured by Fisher Control in accordance with their QA Program. The welding of the clips [brackets] to the skirt [actuator] was performed by qualified welders to qualified welding procedures, with qualified filler material and in accordance with the Fisher Control QA Program (for ASME Section IX). The welds were inspected per the Fisher Control QA Program and released under the Vendor Control Program.

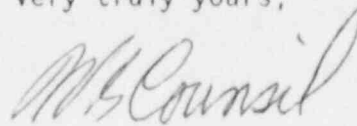
Compliance with the requirements of the component design specification, and seismic qualification was certified by Fisher Control."

These statements were made based on the disposition of NCRs M-9575 through -9636. Subsequently, additional concerns regarding the subject brackets have been identified. These concerns and our planned actions are discussed in an update to SDAR CP-83-08 (TXX-88526 dated June 22, 1988).

Reference (1) also included a discussion in our actions regarding the technical adequacy of NCR dispositions as documented in Significant Deficiency Analysis Report (SDAR) CP-86-48. Our actions relative to SDAR CP-86-48 are discussed in separate correspondence. We have made programmatic changes that should prevent recurrence of this Deviation. Improvements have been made in our 10CFR50.55(e) reportability program, nonconformance control program, and commitment tracking methods which provide assurance that commitments to the NRC are tracked and are either met or modified via docketed correspondence.

Our response to Notice of Deviation Item E (445/8607-D-01) is hereby revised to reflect the above considerations. The changed portions of the text are indicated by revision bars in the right margin.

Very truly yours,



W. G. Council

JCH/grr
Attachment

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

NOTICE OF DEVIATION
ITEM E (445/8607-D-01)

- E. Section 16.0, Revision 0, of the TUGCo Quality Assurance Plan states, in part, "In the case of significant conditions adverse to the quality, which are reportable to NRC under the provisions of 10 CFR Part 50.55(e), measures are taken to assure that the cause of the condition is determined and corrective action is implemented"

TUGCo Letter TXX-3657 dated April 21, 1983, submitted to NRC in accordance with 10 CFR 50.55(e), identified a significant condition adverse to quality (no objective evidence is available documenting acceptable weld quality on seismic arrestor brackets) and stated that the corrective actions would be to discard and replace the arrestor brackets, and that the corrective action would proceed immediately.

In deviation from the above, the committed corrective actions had not been implemented as of the end of this inspection period (445/8607-D-01).

RESPONSE TO ITEM E
(445/8607-D-01)

We admit the deviation and the requested information follows.

1. Reason for Deviation

Subsequent to issuance of TU Electric Letter TXX-3657, the NCRs documenting bracket welding documentation deficiencies were revised and dispositioned "use-as-is" because the brackets were judged to be outside the ASME N-5 certified boundary. However, the NCR form then in use per Construction Procedure CP-QAP-16.1, Rev. 17, "Control of Nonconforming Items," did not contain provisions to indicate whether or not the "nonconforming condition" had been judged to be reportable per 10CFR50.55(e) or 10CFR21. Consequently, the engineer who specified the "use-as-is" disposition on the revised NCRs was not aware that the "Nonconforming condition" had been reported to the NRC and that TU Electric had committed to replacing the subject brackets.

2. Corrective Steps Taken and Results Achieved

The absence of ASME documentation has been determined to be acceptable. Other aspects of bracket weld acceptability are documented in TU Electric letter TXX-88526 dated June 27, 1988.

3. Corrective Steps Which Will Be Taken To Avoid Further Deviation

Provisions to prevent recurrence of these conditions were implemented by revision to procedure CP-QAP-16.1 (Rev. 25, dated September 12, 1985). These provisions consisted of including a block on the NCR form which identified the evaluations conducted pursuant to 10CFR50.55(e). In providing this identification, docketed commitments can be considered in subsequent revisions to the NCR (procedure CP-QAP-16.1 has since been replaced by procedure AAP-16.1). Corporate procedures NEO 3.05, "Reporting and Control of Nonconformances" and NEO 9.01, "Evaluation and Reporting of Adverse Conditions Under 10CFR21 and 10CFR50.55(e)" have been issued. These procedures provide increased assurance that nonconformances are promptly reviewed for reportability and that commitments made to the NRC pertaining to reportable items are tracked and either met or modified via docketed correspondence. Our commitment tracking mechanisms have also been improved and a sitewide commitment tracking system is being implemented.

4. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.