

APPENDIX B

NOTICE OF DEVIATION

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

Dockets: 50-445
50-446
Permits: CPPR-126
CPPR-127

Based on the results of an NRC inspection conducted during the period of December 1-31, 1985, of Comanche Peak Response Team (CPRT) activities, three deviations from commitments to the NRC were identified. The deviations involved failure to document, disposition, and track drawing change discrepancies with respect to effect on preoperational tests; failure to comply with approved instructions in performance of reinspections; and inadequate engineering review of piping isometric for applicability of an inspection attribute. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the deviations are listed below:

- A. Section D of Appendix E to the CPRT Program Plan, Revision 2, commits to classify, evaluate, and disposition each CPRT-identified construction or design deficiency, and to track and document each. The CPRT elected to utilize an already established deficiency reporting system as implemented by CP-SAP-16, "Test Deficiency and Nonconformance Reporting," which is tracked by the CPSES Master Database.

In deviation from the above, the CPRT failed to document, disposition, and track discrepancies found during the CPRT Task Force review of drawing changes and their potential effect on related preoperational tests delineated in ISAP No. III.d. Upon followup inspection of the 60 sample sets randomly selected by the CPRT, the NRC inspector ascertained that 26 preoperational tests were conducted without the test procedure reference drawing sections having been updated as required by Section 4.9 of CP-SAP-21, "Conduct of Testing." (445/8518-D-05)

- B. Section 4 of CPRT Project Procedure for Issue Specific Action Plan VII.c. No. CPP-009, Revision 3, states, in part, "Qualified QA/QC Review Team personnel perform field reinspections of specific hardware items and reviews of appropriate documents in accordance with approved instructions"

In deviation from the above, the following examples were noted where field reinspections were not performed in accordance with approved instructions:

1. Attribute 1.d in Section 5.2.4 of QI-026, Revision 0, states, in part, "Ensure that the actual piping dimensions are in agreement with those shown on the piping isometric" For Verification Package No. I-M-SBCO-022, bill of material item 17, a socket welded

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coupling, was delineated on the piping isometric with distinct linear dimensions. The coupling was covered with insulation precluding verification of these dimensions. However, the checklist was signed off by the ERC inspector denoting that all linear dimensions were verified (445/8518-D-26).

2. Attribute 4.7 in Section 5.0 of QI-055, Revision 1, states, in part, "Verify that bolts are torqued to 70% of the requirements specified" For Verification Package No. I-S-INSP-023, support 023D, 70 percent of the specified test torque requirement is 50 pounds and the ERC inspector signed the checklist that this attribute was acceptable. However, an independent inspection showed that the bolt was torqued to 40 pounds which is just 56 percent of the value specified in the QI (445/8518-D-21).
3. Attribute 4.5 in Section 5.0 of QI-055, Revision 1, states with respect to spring nuts, "Verify that the serrated grooves align with the channel clamping ridge." For Verification Package No. I-S-INSP-023, supports 023A and 023C, the ERC inspector documented "N/A" for this attribute. However, an independent inspection showed that spring nuts did indeed exist for these supports and, accordingly, were required to be inspected (445/8518-D-22).
4. Attribute 1.1 in Section 5.0 of QI-012, Revision 0, states, in part, "Verify that the piping/tubing . . . material agree with the Bill of Materials shown on the Instrument Installation drawing. Note: Tubing is marked with longitudinal color coded marks for traceability. Use applicable drawing to identify tubing." Attribute 2.1 in Section 5.0 of QI-012, Revision 0, states, in part, "Verify that the instrument tag number is correct" Attribute 1.4 in Section 5.0 of QI-012, Revision 0, states, in part, "Verify that the installed tubing has the proper slope."

For Verification Package No. I-E-ININ-053, independent inspection revealed that ERC inspectors had failed to identify the following conditions:

- a. The tubing was not marked for size by color coding;
 - b. The identification tag on the root valve was stamped with an incorrect instrument number; and
 - c. The tubing had an inverse slope near the root valve (445/8518-D-14).
5. Section 5.5.2.A of QI-019, Revision 2, and Section 5.6.1.B of QI-029, Revision 1, state, in part, ". . . Verify weld size and length to the nearest 1/16 inch meets or exceeds the minimum specified."

In deviation from the above, ERC inspectors failed to identify that a fillet weld attaching item 1 to item 2 of pipe support MK. No. CS-1-SB-053B-008-2 was 1/16 inch undersize for 25% of the joint length and that the two fillet welds attaching item 29 of pipe support MK. No. SI-1-104-001-C425 to existing pipe support MK. No. SI-1-051-008-C42R were approximately 1 inch underlength. These particular attributes were checked off as being acceptable on the applicable verification package checklists (445/8518-D-17).

- C. Section 5.1.1 of CPRT Project Procedure for Issue Specific Action Plan VII.c No. CPP-008, Revision 1, states, in part, "Should an attribute appear on the generic checklist and not be applicable to the specified item, the engineer indicates 'N/A' and provides reasonable justification for the entry."

In deviation from the above, the engineer incorrectly indicated "N/A" for a checklist attribute which was applicable for Verification Package No. I-M-SBCO-022. As a result, attribute 1.i, dealing with dimensionally locating bolted flanges in accordance with the piping isometric, was not reinspected by ERC. During an independent inspection, it was observed that this attribute was applicable as evidenced by the presence of four bolted flanges. In addition, no justification had been entered by the engineer onto the checklist for the indicated "N/A" (445/8518-D-04).

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 reasons 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 at Arlington, Texas,
this 12th day of May, 1986.