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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

V. S. Noonan, Director MEMORANDUM FOR: Comanche Peak Project

FROM

Herbert Livermore, QA/QC Group Leader Comanche Peak Technical Review Team

REFERENCES

Deposition Review of Transcripts, Respectively dated Feb 11 and T2, 1985 (Related to the logartment of Labor)

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SUBJECT:

The transcripts were reviewed for:

- To identify new concerns/issues/allegations(items)
- (2) Affect of concerns/issues/allegations on present SSERs
- (3) Identify those concerns/issues/allegations which do not affect present SSERs
- (4) Identify those items which should be referred to other TRT/ Region IV organizations
- Determine which items should be deferred as open action items (5) to be completed in Phase II of TRT's assessment of CPSES allegations.

transcript contained 12 concerns/issues/allegation (items). The result of their review is as follows:

Items 1, 2, 3, 4: Subject matter addressed and assessed in SSERs; no impact on SSERs.

Items 5 and 10: The effects of these items were addressed in SSERs. The actual destruction and falsification of records are considered "Wrong Doings". As such they were assessed by Region IV OI. See OI Report #4-84-025 "It is alleged inproprieties and wrong doing in B&R Document Control Center ... "

No impact on current SSERs.

Item 6: Non-QC issue. No impact on SSERs.

Items 7, 8, and 9: These are human relations interface problems. Their effects were factored in during the assessment of deficiencies in the document control system. No impact on the SSERs.

8606250205 860611 PDR FOIA GARDE85-59 PD PDR The result of the TRT's review of 18 items identified in deposition is as follows:

- Items 1, 2, 3, 4, 6, 7, 8, 12, 17 and 18. Subject matter addressed in SSERs; No impact.
- Item 9: Falsification of records, previously addressed above: No impact.
- Item 10: Non-QC Issue: No impact.
- Item 5, 11 and 13: Human relation issues: Their effects have been factored in SSERs; No impact.
- Items 14, 15 and 16: Drug abuse issue at CPSES was handled by Region IV resident inspectors. OI personnel and TUEC special investigative team, etc. No impact on SSERs.

In summary, based on reviewing items identified in the and and despositions against QA/QC SSERs, no impact on SSERs was noted, no new issues/ concerns/allegations were identified, no open action items for Phase II were identified, and no items were noted to be given to other TRT/Region IV organizations.

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H. H. Livermore QA/QC Group Leader Comanche Peak TRT

cc: V. Wenczel, TRT QA/QC C. Poslusny, TRT

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ABSTRACT

Supplement 10 to the Safety Evaluation Report for the Texas Utilities Electric Company application for a license to operate Comanche Peak Steam Electric Station Units 1 and 2 (Docket Nos. 50-445, 50-446), located in Somervell County, Texas, has been jointly prepared by the Office of Nuclear Reactor Regulation and the Comanche Peak Technical Review Team of the U.S. Nuclear Regulatory Commission. This Supplement provides the results of the staff's evaluation and resolution of approximately 400 technical concerns and allegations in the mechanical and piping area regarding construction practices at the Comanche Peak facility. This report does not address the Walsh/Doyle allegations regarding deficiencies in the pipe support design process. Issues raised by the Walsh/Doyle allegations as well as issues raised during recent Atomic Safety and Licensing Board hearings will be dealt with in future supplements to the Safety Evaluation Report as needed.

valid, would not have prevented the equipment, component or system of concern from performing its intended function.

The substantiated allegations which were of potential safety significance are summarized in five issues discussed in this SSER section (In spite of these foncerns, the staff found that, in general, the construction activities were performed in a manner which provided adequate assurance that installed components and systems would perform their intended function. This conclusion is based on the evaluations completed and documented in this SSER but cannot be considered final until evaluation of form the assimilated in the QA/QC SSER (SSER NO. 11)

The staff found five issues within the 50 categories reviewed by the TRT's M&P Group which have potential safety significance and generic implications. An issue of concern in the Welding Area is related to uncontrolled welding repair of misdrilled holes in piping and cable tray supports. Two issues of potential safety significance were found in each of the Piping Area and Hanger and Support Area. One of the Piping Area concerns is also related to temporary pipe supports. The specific issue is failure to assess temporary pipe and equipment supports. The other Piping Area safety significant issue is the failure to consider the potential damage to piping systems and pipe supports which are routed between seismic Category I and nonseismic Category I buildings. The two safety significant concerns found by the staff in the Hanger and Support Area are related to the shortening of bolts holding the upper steam generator lateral supports to wall plates and to the lack of a fillet weld inspection criteria for certain types of skewed welds. There were no adverse sarety significant findings in the Construction and Document Control Area or the Other Area. TUEC has been requested to take certain actions and to provide the NRC staff additional information before these issues can be resolved.

3.3.1 Welding Area Findings

One safety significant concern was identified in the welding area as a result of the staff's evaluations. This concern relates to uncontrolled weld repairs by plug welding. Alleged generic problems regarding uncontrolled repairs to holes in pipe and cable tray supports and in baseplates were reviewed for both Units 1 and 2. The holes, which had been misdrilled during fabrication, were repaired by plug welds. Because these supports are seismic Category I supports, the effects of the welds should have been evaluated. Although the effects of unauthorized, undocumented, and uninspected plug welds in some locations (e.g., the webs of I-beams or in structural members in compression) might be inconsequential, plug weld repairs in some critical locations (e.g., flanges of I-beams in flexure or in structural members in tension) could affect the support structural integrity or its ability to perform its intended function. The safety significance of these unauthorized repairs can be determined only if the specific repairs are identified, inspected, and evaluated in this and other areas of both Units. (See Attachment 2, Category 4.)

The staff concluded that additional actions, as noted in Section 4, are required before these issues can be completely resolved.

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3.4 Overall Assessment and Conclusion

See comment N-14. The staff reviewed and evaluated allegations in the Mechanical and Piping Category which were related to compliance with procedures, personnel qualifications, quality of workmanship, material traceability, adherence to codes and standards, or documentation. During its evaluation, the staff reviewed pertinent construction records, NCR's, design drawings, procedures, specifications, interviewed craft and TUEC personnel, and conducted plant inspections. The staff found that approximately 100 allegations were not substantiated or contained either insufficient evidence with which to substantiate the alleged concerns. Often, there was no connection between the concern and plant safety. Also, further contact with the individuals raising the concerns often did not provide the required specificiity to better focus the allegations. The staff's detailed review of each concern completely or partially substantiated approximately 55 allegations. Five issues evolved from the substantiated allegations which were of potential safety significance and required further action. Although about 50 allegations were at least partially substantiated, most did not affect plant safety because the concern, though valid, would not have prevented the equipment, component, or system of concern from performing its intended function.

4. ACTIONS REQUIRED OF TUEC IN THE MECHANICAL AND PIPING AREA

TUEC shall submit additional information to the NRC, in writing, including a program and schedule for completing a detailed and thorough assessment of the issues identified in the following subsections. This program plan and its implementation will be evaluated by the staff before NRC considers the issuance of an operating license for Comanche Peak, Unit 1. The program plan shall address the root cause of each problem identified and its generic implications on safety-related systems, programs, or areas. The collective significance of these deficiencies shall also be addressed. The program plan shall also include the proposed TUEC action to assure that such problems will be precluded from occurring in the future.

- 4.1 Inspection for Certain Types of Skewed Welds in NF Supports (M&P Category 31).
 - 4.1.1 Revise B&R weld inspection procedures CP-QAP-21.1 and QI-QAP-11.1-28 to properly address skewed welds of stanchion to stanchion and stanchion to pipe pad.
 - 4.1.2 Provide evidence to verify that previous inspections of these types of skewed welds were performed to the appropriate procedures or reinspect these welds.
- 4.2 Improper Shortening of Anchor Boits in Steam Generator Upper Lateral Supports (M&P Category 18).
 - Provide evidence, such as ultrasonic measurement results, to 4.2.1 verify acceptable bolt length.

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RECORD REVIEW GROUP FINDINGS

Over the past few months a contractor team has been reviewing Comanche Peak hearing transcripts, depositions, and alleger meeting transcripts for the purpose of insuring that no allegations have been missed by the TRT review. Attached is a list of 27 items which the group has identified as allegations which were potentially not followed up by the TRT. I am fairly confident that these can be tied to existing allegations or summary dispositions.

Please review these items, interface with Luke Jones (37991, NL, or Delray Bldg.) and Chet Poslusny (27066) to determine if in fact, any action items have been missed. Please provide feedback to me by May 1.

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cc: D. Eisenhut R. Keimig H. Livermore C. McCracken S. Phillips C. Hale C. Trammell E. Jordan

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