APPENDIX B

NOTICE OF DEVIATION

50-440/05-15	
rmits: CPPR-126 CPPR-127	
r	mits: CPPR-126 CPPR-127

Based on the results of an NRC inspection conducted on November 1-30, 1985, of Comanche Peak Response Team (CPRT) activities, three deviations from commitments to the NRC were identified. The deviations involved failure to comply with approved instructions in performance of reinspections, inadequate quality instruction (QI) for liner measurements, and inadequate review of inspection documentation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the deviations are listed below:

A. Section 4 in Revision 3 to CPRT Project Procedure CPP-009 for Issue -Specific Action Plan VII.c 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

Contrary to the above, the following examples were noted where field reinspections of hardware items were not performed in accordance with approved instructions:

- Attribute 4.5 in Section 5.0 of QI-055, Revision 0, states for spring nuts, "Verify that the serrated grooves align with the channel clamping ridge." For Verification Package No. I-S-INSP-033, Support No. 033A, the ERC inspector signed the checklist that this attribute was acceptable. However, an independent inspection showed that the spring nut serrated grooves did not align with the channel clamping ridge on this support (445/8516-D-50).
- 2. Section 5.1.A3c of QI-031, Revision 0, states, in part, with respect to reinspection of containment liner and tank stainless steel liner, "Verify that the height of the reinforcement on each face of the seam does not exceed 3/32-inch." Section 5.1 addresses reinspection of the weld seam surface and states, "If the . . . weld seam surface does not meet the above criteria the checklist shall be marked reject and the weld and rejectable item shall be identified by a deviation report." However, the ERC inspector did not identify excessive reinforcement for containment liner weld joint P52, Verification Package No. I-S-LINR-61. An independent reinspection of this weld identified excessive reinforcement for approximately 80% of the weld length with reinforcement up to 7/32 inch when measured from the liner plate to the center of the weld (446/8513-D-11).

8604100264 860404 PDR ADUCK 05000445 G PDP Section 5.3.A of QI-043, Revision 1, states with respect to concrete surface inspection, "Inspect all accessible surfaces for honeycombing and voids (Inaccessible surfaces are those cast against earth, backfilled, or coated)."

Review of Verification Package No. 1-S-CONC-057 revealed that the ERC inspector entered "N/A" (for not applicable) on the checklist for attribute 3.A (surface inspection of walls, etc.), and "coated" in the remarks column. However, an independent inspection revealed that the surface was not coated. In addition, the NRC inspector identified a void with a depth of at least 1 1/2 inch and dirt in the construction joint. These conditions were not identified by ERC (445/8516-D-47).

- 4. Section 5.1.Al of QI-031, Revision O, states, in part, with respect to attribute A.1.a, "The following local contour deviations are to be verified: A maximum of 1-inch gap between the cylindrical liner or dome shell plate and a six feet long template curved to the required radius . . . "This attribute applies to both the cylindrical and dome liners. However, the ERC inspector concered "N/A" for not applicable on the checklists and "(dome only)" in the remarks column for attribute A.1.a for Verification Package Nos. I-S-LINR-08, I-S-LINR-12, and I-S-LINR-61. These verification packages involved the cylindrical liner and attribute A.1.a did, in fact, apply (445/8516-D-42).
- 5. Section 1.3 of QI-012, Revision 0, states, in part, "Verify that the tubing is correctly routed . . . check tag numbers of instruments and proper hook-up of high/low pressure connections . . . " Section 1.5 states, in part, "Verify that there is proper air gap. The minimum gap spacing shall always be 1/8 inch (between) . . . adjacent sensing lines, other equipment, concrete or steel building members." Section 1.7 states, in part, "Verify that bends have a minimum of four (4) times the nominal tube size by using a template or the following procedure: . . Enter measured and calculated values on Attachment 6.1, Initial and date each entry." Section 2.3 states, in part, ". . . For differential pressure type instruments, verify the proper hook-up of high/low pressure connections . . . "

Contrary to the above, the following conditions were identified:

- a. The installation identification tag showing the low pressure root valve numbers and instrument number for equipment in Verification Package No. 1-E-ININ-049 was incorrectly marked as follows:
 - The tag on Valve No. 1-RC-8061B, which was associated with Instrument No. 1-FT-425, was identified with Instrument No. 1-FT-424.

- b. Less than the required minimum 1/8-inch air gap spacing was identified at the following locations:
 - Verification Package No. I-E-ININ-049 Between the high pressure sensing line and a steel member adjacent to the isolation valve location.
 - Verification Package No. I-E-ININ-059 Between the tubing and header pipe routed through the same wall penetration at the inside face of the excess letdown heat exchanger orifice room. The swagelock fitting near Support No. C-24-04-51 was also touching the wall.
- Verification of minimum bend radii for tubing was not performed on the following:
 - Bend No. 5 in Verification Package No. 1-E-ININ-051, which was accessible, was neither identified nor inspected by the ERC inspector.
 - Bend No. 5 in Verification Package No. 1-E-ININ-041, which was accessible, was identified by the ERC inspector as being inaccessible and was thus not inspected.
- d. An improper hook-up (i.e., loose bolt) was identified between the low pressure sensing line flange attachment and the differential pressure type instrument in Verification Package No. 1-E-ININ-049 (445/8516-D-30).
- Section 5.6.1.A of QI-027, Revision 0, states, "Verify welds are located as shown on design drawings. Record any welds that are in addition to those specified on the drawings. (Attachment 6.6)."

Contrary to the above, the ERC inspector failed to record the presence of existing additional welds to those specified on the drawing for Verification Package No. I-1-LBSR-041. Independent review of the original installation documentation package, Mark No. CC-1-126-702-F43R, established from examination of "Vendor Supplied Component Records" that field welds, which were not identified on the drawings, had been performed on the two sway struts (445/8516-D-35).

- 7. The cable tray configuration acceptance criteria contained in Section 5.3.6 of QI-016, Revision 1, requires the inspector to verify that all bolts have a nut and a locking device. Independent inspection of Verification Package No. I-E-CATY-077 revealed that the ERC inspector did not identify a missing bolt and locking device on the splice plate joining tray section T14BREC28 to T14BREC27 (445/8516-D-18).
- Section 5.6 of QI-014, Revision 0, requires verification that the cable routing agrees with References 3.2 and 3.3; i.e., 2323-EI-1700, Cable and Raceway Schedule. Independent reinspection of Verification

Package No. I-E-CABL-102 (Cable EG139517) revealed that ERC inspectors had failed to identify that the cable routing was not in agreement with Cable and Raceway Schedule 2323-EI-1700, issue 334, page 720.354 dated November 21, 1984. The cable was noted to be physically routed into tray T13GCCP80 and then tray T13GCCP81. The cable schedule routed the cable into T13GCCP81 and then T13GCCP80 (445/8516-D-17).

B. Section 5.1 of ERC Procedure CPP-001, Revision 1, states, in part, ". . Each Quality Instruction (QI) shall specify what is to be inspected or reviewed and the associated accept/reject criteria based on appropriate specification, drawings, codes, procedures, etc. . . ." This procedure also indicates with respect to QI format that Section 5.0 of a QI provides comprehensive instructions of what is to be done to fulfill the purpose of the document.

Contrary to the above:

- 1. The ERC Description Memorandum QA/QC-RT-293 lists Gibbs & Hill (G&H) Containment Liner Specification 2323-SS-14, Revision 4, as the reference for developing QI-031, Revision 0. Paragraph 8.2.2.1.2.b of the above G&H specification states, in part, "The following deviations are acceptable: . . A 1 1/2 inch gap when the template . . . (the 6 foot long curved template) is placed across one or more welded seams." This applies to both the cylindrical liner and the dome liner. However, Section 5.1.A.1 of QI-031, Revision 0, states, in part, with respect to surface contour attribute A.1.b, "The following local contour deviations are to be verified: . . . A maximum 1 1/2 inch gap when the six foot long template is placed across the dome weld seams when measuring horizontally or vertically." This applies only to the dome liner and does not include the cylindrical liner measurement requirement of the G&H specification.
- 2. Section 5.0 in Revision 0 to QI-031 does not provide comprehensive instructions of what is to be done with respect to reinspection of the containment liner. It states, in part, "The following local contour deviations are to be verified: . . . A maximum of 3/4 inch deviation from a 10 foot straight edge placed in the vertical direction between the horizontal weld seams." Deviation values measured using this instruction can vary by as much as a factor of two depending on the method used to hold the straight edge against the cylindrical liner. If the surface is convex, for example, the deviation could be measured with the straight edge touching at either the center of the liner plate or at one of the edges resulting in differing measurements. Section 5.0 of QI-031, Revision 0, does not clarify this situation (445/8516-D-41).
- C. Paragraph 5.2.4 of ERC Procedure CPP-009, Revision 1, requires the lead inspector (Level III) and lead discipline engineer to ". . . ensure that reinspection/documentation review results are clear, accurate, and complete."

Contrary to the above, attribute 3.A of the completed checklist for Verification Package No. I-S-CONC-015 was neither accepted nor rejected (i.e., not signed off), and thus actual reinspection for this attribute could not be verified. The checklist was approved and signed by both the lead inspector and the lead discipline engineer (445/8516-D-47).

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 4th day of April, 1986