

*Docket Files*

Docket Nos. 50-445  
and 50-446

APR 28 1986

Mr. W. G. Council  
Executive Vice President  
Texas Utilities Generating Company  
400 North Olive Street, L. B. 81  
Dallas, Texas 75201

REFERENCE: Letter to V. S. Noonan (NRC), from W. G. Council (TUGCO),  
Subject: Comanche Peak Steam Electric Station CPRT Results  
Reports, dated April 4, 1986.

Dear Mr. Council:

By the above referenced letter you provided the staff with five Comanche Peak Response Team results reports (I.a.4, I.b.3, II.b, III.d, VII.b.2). The staff has completed its initial review of these reports. Enclosed is the staff request for additional information. In order for the staff to comply with established schedules for an evaluation, we must receive your response no later than COB May 2, 1986. Should you have any questions or need further clarification, contact Annette Vietti-Cook, Project Manager on telephone number (301) 492-8525.

Sincerely,

Vincent S. Noonan, Director  
PWR Project Directorate #5  
Division of PWR Licensing-A

Enclosure:  
Request for Additional Information

cc: See next page

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

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Sincerely,

A handwritten signature in cursive script, appearing to read "V. S. Noonan", with the word "for" written below it.

Vincent S. Noonan, Director  
PWR Project Directorate #5  
Division of PWR Licensing-A

Enclosure:  
Request for Additional Information

cc: See next page

W. G. Council  
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Units 1 and 2

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Units 1 and 2

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## Request for Additional Information

For the five ISAP results reports (I.a.4, I.b.3, II.b, III.d, and VII.b.2) and future results reports.

1. Address those questions raised in ASLB Memorandum, Proposed Memorandum And Order dated April 14, 1986, and provide appropriate documentation.
2. Address whether the issues raised in the results reports had implications of deficiencies in the QA/QC program, design and/or construction and reference documents that will be provided to the staff that will address these implications.
3. Where an ISAP resulted in corrective action, address the status of the corrective action and identify the method you plan for communicating to the staff the corrective action is completed.
4. Describe how findings from one ISAP, which relate to a particular ISAP that is being addressed are considered.

### I.a.4 Agreement Between Drawings and Field Terminations

1. For the instances identified by the NRC TRT and Region IV, and CPRT where the drawings have not yet been revised to reflect the existing field termination conditions, provide the actions you are taking to upgrade your as-built field termination drawings.
2. What is the basis for considering terminated and non-terminated spare conductors as valid population sample items for essential Class 1E Systems.

### I.b.3 Conduit to Cable Tray Separation

Provide the following information:

- (1) Gibbs and Hill analysis report on conduit separation;
- (2) Documentation to indicate that TUGCO has approved the Gibbs and Hill analysis report;
- (3) DCA-15917 mentioned on page 2 of the results report which reduced the conduit separation to one inch (this may be included in the G&H analysis report), and
- (4) Gibbs and Hill memo EE-863, 1/17/84, which contained simplified analysis reviewed by NRC-TRT on site (this may be included in the G&H analysis report);

### II.b Concrete Compression Strength

1. Paragraph 2 on page 13 of ISAP II.b results report refers to errors in the Schmidt Hammer test program identified by third party review, and refers to them as "not significant." Provide the basis for your concluding that the errors are not significant



2. Review of Figure 1 of page 20 of ISAP II.b results report shows that CAI compression strength is approximately 9.4% less than CC compression strength at the 10th percentile level. It appears that this level of deviation was judged by applicants as not "significantly lower" than CC compression strength to trigger a need to implement calibration of the Schmidt Hammer test. Discuss the technical basis for the judgement.
3. The resolution to ISAP II.b as presented in the results report may not be able to identify localized problems where the number of falsified records is small. Discuss potential safety implications on overall adequacy of the concrete strength due to such localized problems.

#### III.d Preoperational Testing

1. Section 5.4.1 of the results report stated, in part, that System Test Engineers (STEs) "...did use current design documents in the conduct of preoperational and prerequisite testing activities." During an inspection of documentation related to the 60 preoperational test samples that were evaluated by the CPRT, the NRC inspector identified 26 preoperational tests that were performed where the STEs failed to update the revisions of design documents referenced in Section 3.0 of the test procedures. The documentation clearly showed the CPRT's awareness of this discrepancy, but it was not identified in accordance with Appendix E of the Program Plan. The NRC inspector informed the CPRT that failure to identify the discrepancy was deviation from Program Plan commitments. The results report should have addressed this discrepancy. The staff needs to know what actions were taken to determine whether this was a DCC problem or an STE problem, what impact this had on the objectives of the ISAP, and what assurance exists that other tests of safety related components and systems, not evaluated under this ISAP, were conducted using current design documents.
2. During the inspection of documentation related to the 60 preoperational test samples that were evaluated by the CPRT, the NRC inspector identified an unresolved issue regarding twelve screening checklists that were not completely filled in. Three of the twelve checklists failed to show the CPRT's review to ensure the associated preoperational tests were conducted using current design documents. This issue must be resolved before the staff will be able to accept the results report.

#### VII.b.2 Valve Disassembly

1. Section 4.1.2 of the results report states, "in addition to proper matching of components, the procedures were reviewed for damage during the disassembly, storage and reassembly process."

Please provide the results of this review.

2. Section 5.2 (page 12 of 20, last paragraph) addresses differences in non-ASME and ASME manufacturing processes for the bonnets. The results

report states that physical and chemical properties identified in the material specification would be the same for both and also that post manufacturing testing would be the same.

Please address how you considered the differences between ASME Code and commercial requirements such as material identification and traceability, welding and weld repairs, personnel qualifications, and nondestructive examinations.

3. It should be noted that NRC Inspection Report 50-445/85-14; 50-446/85-11 identified an unresolved item (Appendix E, paragraph 6.j) pertaining to the differences identified between the Westinghouse and Gibbs & Hill (G&H) Lines Designation Tables, and differences between G&H Tables and Code Data Sheets.

Please provide the necessary information for resolution of this unresolved item (445/85-14-U-15).

4. On page 1 in second paragraph under Section 3.0 reference is made to a valve testing program (a) Identify the program and/or programs and clearly indicate the scope i.e. how many and what type of valves are included, what types of valves are excluded, etc. (b) the loss or damage of valve parts is a QA programmatic concern when it's repetitive and uncontrolled, even if its documented. Explain how this issue is addressed in your implementation process.

Section 4.1.2 the third paragraph addresses an evaluation of the adequacy of present procedures. Was there a sampling inspection of valves (and documentation) installed under the present procedures? What are present procedures as opposed to past procedures?

5. Section 4.1.3 second paragraph states in part an evaluation was made to define potential code violations.  
- What are they? They should be identified.
6. Section 4.1.4 first sentence states that reinspection of valves which were disassembled was performed to provide assurance that the valves were reassembled using the correct components.

It is not clear how, or from what documentation, the correct components were identified.

7. Section 4.2 procedures are not identified per program plan attachment 3 ISAP format.
8. Section 4.6 appears to apply to only diaphragm valves - what was the basis acceptance of other types of valves with interchangeable top works and trim.

9. Section 5.1 second paragraph  
The review installation procedures, revisions and dates should be identified.
10. Section 5.0 page 11 first paragraph states that a lost bonnet and a damaged bonnet were not deviations because they were properly identified on NCRs and PETs.  
  
The valve type, size, gag numbers, date of installation, the NCR and PET numbers should also state if the NPV-1 form was revised, or annotated.
11. Section 5.0 page 11 fourth paragraph states that two types of ITT Grinnell valves were supplied. This paragraph should also provide complete identification of the valve types (manufacturer's drawing or identification numbers), valve sizes, rating and applicable code class.
12. Section 5.0 fifth paragraph states in part: For some applications...the applications should be identified.
13. Section 5.0 page 12 first paragraph is not clear in its description of valve modifications.
  - 1 - were the modifications made specifically for CPSES valves at the specified 300 PSIG, or
  - 2 - are these valves just different configurations furnished by the supplier when the user specifies service conditions, pressure/temperature, that are higher than design.
14. Section 5.0 page 13 second paragraph, identifies two valves by tag numbers.  
This paragraph should further identify the manufacturer's drawing or identification number, size, rating, code class and date of installation. Additionally this paragraph should identify the documents (e.g. NCR, IR, PET) that substantiated acceptance of the installed valve body and bonnet.
15. Section 5.0 page 13 the second and third paragraphs, identify two valves by tag number. These paragraphs should also identify the manufacturer's drawing or identification number, size, rating and code class and date of installation.
16. Section 5.0 page 14 first paragraph states that because the installed valves (with deviations) match the numbers recorded on the operations travellers, this means that the bonnets were interchanged prior to issue for installation.

The staff finds that this deduction may not be valid if the valve was disassembled, installed and reassembled on the same day. If the traveller records these operations as performed on the same date (same shift), there is no assurance that the required information was recorded prior to disassembly. Another potential is the switching of valve tags.



17. Section 5.0 page 14 second paragraph relates to travellers for the other two valves that were written prior to the practice of recording bonnet markings...

This paragraph should identify the two valves in question, the date installed, the procedure and applicable revision at the time of installation.

18. Section 5.0 page 15 second paragraph refers to early procedures. The specific procedures, revisions and dates should be identified.
19. Section 5.0 page 15 third paragraph last sentence states: sufficient information for evaluating valve storage prior to this time is not available.

The issue of concern was the storage of disassembled valve components. The TRT found that the storage at installation locations was poorly controlled. The paragraph should address the storage of disassembled valve components.

Additionally, this paragraph refers to an effective program implemented by Millwrights.

This "Effective Program" should be addressed in the aspect of the implementation of an identified procedure and the verification of training of millwright personnel in the applicable procedure.

20. Section 5.0 page 15 the fourth paragraph states that the issue related to documentation of the interchange of valve bonnets was recognized by TUGCO...

This paragraph should state the basis (NCRs, IRs, etc.) for TUGCO's recognition and address this subject by including the identification of the procedures, revisions and dates.

21. Section 5.0 page 16 the second paragraph states that the QC checklist requires recording of the bonnet identification number.

For the installation of valves, since valve tags can also be interchanged, the staff finds that the procedure should require that the checklist should record both the body and bonnet identification.

22. Section 5.0 page 16 third paragraph states the administrative action was taken (by TUGCO) in the startup test program.

The administrative action should be identified in terms of identification of any applicable procedures, revisions and the CPRT verification of the training of personnel.

23. Section 5.0 page 16, the fourth paragraph cites an example identified by the TRT as evidence of procedure implementation and effectiveness.

The TRT also identified (in SSER-11) numerous PETs that documented the interchange as replacements for lost and/or damaged valve components. The staff wishes to emphasize that the issue essentially was procedural inadequacy to control the interchange, loss and damage of disassembled valve components. The staff disagrees with the CPRTs reasoning that this is an example of procedure effectiveness. The TRT stated that although the deficiency was reported on the NCR, and procedures were in place, the loss and damage continued to occur.

24. Section 5.6 page 18 identification and discussion of Corrective Action first paragraph is vague.

The paragraph should identify the level of responsibility of the changed personnel and identify the procedures, revisions and dates as they apply to the subject of this paragraph.

25. Section 5.7 page 19 Out of Scope Observations.

The paragraph refers in part to: acceptable TUGCO Procedures...

The procedures should be identified.

26. Section 6.0 page 20 the second paragraph states that procedures were reviewed and found to be adequate except for..and further, the last sentence states that improvements to the control process since 1983...

The procedures, revisions and dates should be identified, and the improvements to the control process should be specifically detailed in this paragraph.

27. Section 7.0 page 20

Does not clearly identify any of the results of the implementation of this plan (e.g. procedure inadequacy, lack of control, etc.) that must be addressed by TUGCO, and then evaluated under ISAP VII.a.2.