



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

JUL 15 1985

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

FROM: L. Shac, Engineering Group Leader
Comanche Peak Project

SUBJECT: PRELIMINARY COMMENTS ON COMANCHE PEAK
RESPONSE TEAM PROGRAM PLAN

A few days ago we received the Comanche Peak Response Team (CPRT) Program Plan from TUGCC. The Program Plan is organized in a series of issue-specific action plans and discipline-specific action plans to address the concerns raised by various external sources. In addition, the CPRT Program Plan contains the consideration of self-initiated evaluations to be performed in the areas of design adequacy, quality of construction and QA/QC adequacy.

Obviously, it will take a long time to do a thorough review of this voluminous documentation. However, the following is the first reaction after browsing through the document. It is recommended that a series of working meetings be arranged to talk to various technical groups prior to meeting with TUGCO management. These meetings are needed to clarify the Program Plan approach to resolution of the issues in the areas of piping and pipe supports, cable tray/conduit supports, and structural disciplines.

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CPRT PROGRAM PLAN FIRST CONSIDERATION COMMENTS1. GENERAL COMMENTS

We consider the Program Plan to contain the essential elements required to accomplish CPRT objectives. The Applicant is to be commended for submitting a comprehensive plan in an attempt to address all the external issues and to describe a self-initiated evaluation intended to assure overall plant safety. The Plan is well organized and structured to accommodate revisions as will surely occur during Plan implementation. While we expect the overall goals and objectives (once agreed to) to remain fixed, many other aspects of this Program Plan are dynamic and hence, we expect this to be a "living" document. Finally, the Plan indicates to us a commitment on the part of the Applicant to resolve staff concerns and demonstrate overall plant safety.

2. LICENSING COMMITMENTS

On several occasions the CPRT makes reference to changes to FSAR commitments. It should be noted that we can feel more comfortable when the FSAR change is one which has previously been approved for other newly-licensed nuclear plants. Any FSAR change request that is unique to CPSES will be more difficult to justify. Regardless, the request for licensing commitment changes should be minimized and be used only as a last resort.

3. INDEX FOR ALL EXTERNAL SOURCE ISSUES

In the objective of the overall Program Plan and the Design Adequacy Program Plan, the CPRT commits to resolving the issues raised by the external sources (i.e., CAT, SIT, TRT, SRT, IAP and ASLB hearings). A review of the individual action plans does not indicate that a mechanism is in place to assure that all of these specific concerns are addressed. The CPRT should include as part of the overall Program Plan a cross-reference index that specifies in which action plan each of the specific external source concerns will be addressed.

4. COORDINATION OF ALL EFFORTS

We are concerned that the implementation of the complex nature of the tasks outlined in the Program Plan may be difficult due to the depth and breadth of the program scope. The CPRT should pay particular attention to the necessity of assuring proper coordination between all related efforts. The complexities inherent in such a program plan make it imperative to provide appropriate controls to assure nothing "falls through the cracks."

5. QA/QC ISSUES

The CPRT Program Plan addresses the QA/QC issues identified in the staff January 1985 letter concerning the TRT QA/QC findings. It presently does not address other QA/QC concerns including the interrelationship between the remaining TRT groups (i.e., mechanical piping, civil structural, electrical, and testing) as detailed in Appendix P of SSER #11. Since the CPRT review of SSER #11 will not be completed until August 1, 1985, we cannot provide a definitive review and comments on this portion of the Program Plan at this time.

6. QUALIFICATION OF MANAGEMENT

We are concerned that the Senior Review Team (SRT) management does not appear to have sufficient technical experience in certain disciplines, especially in the civil/structural and mechanical/piping areas. It is essential that the SRT, which has been charged with the overall responsibility for the development and implementation of the CPRT program, be staffed with personnel capable of carrying out this charge and assuring that all commitments are met.

7. WESTINGHOUSE INTERFACES WITH CLASS 1 SUPPORTS NOT DESIGNED BY WESTINGHOUSE

A. In the scope of the Piping and Pipe Support Action Plan the CPRT excludes pipe supports designed by Westinghouse. However, in the scope of the Stone and Webster Engineering Corporation (SWEC) Qualification Program, SWEC commits to the requalification of 100% of all large bore supports including those for Class 1 systems. This is an inconsistency since Westinghouse was responsible for most of the design and analysis of Class 1 large bore supports. The CPRT should clarify if SWEC is responsible for qualifying Class 1 supports designed by Westinghouse or by others.

B. If SWEC is committing to requalifying only those Class 1 large bore supports designed by other than Westinghouse, then the CPRT should ensure that the interface between Westinghouse and SWEC is functioning properly. This is required to account for any effects that pipe support deficiencies have on the existing Class 1 piping analyses (i.e., reduced pipe support stiffness).

8. ACTIVE VALVE ISSUE INFORMALLY REPORTED BY TUGCO

Recently, a new issue was identified by telephone from TUGCO concerning active valves. This issue stated that active valves were designed to accident conditions not in accordance with the FSAR commitment. The CPRT should include this issue in the Program Plan.

9. CABLE TRAY/CONDUIT SUPPORTS

On the surface, the program appears more like a research program than one intended to resolve licensing issues. The Program Plan proposes to conduct tests to justify the use of higher system damping valves, use of refined modeling methods to compute more realistic loads, and to develop new acceptance criteria based on system performance and functionality. The Program Plan does not clearly define how Unit 2 cable tray/conduit

supports are assessed and modified as needed. However, the Program Plan implies that the above mentioned criteria in general will not be used for Unit 2 items. Therefore, we see the necessity for conducting working meetings with the CPRT and its consultants prior to commenting on the adequacy and acceptability of the program.

10. PIPING AND PIPE SUPPORT REANALYSIS

- A. In response to an inquiry during the CPRT meeting with the NRC on June 14, 1985, the CPRT stated that the supports on large bore piping would be reanalyzed as part of SWEC's qualification program. However, the SWEC Qualification Program indicates that Class 1, 2 and 3 large bore pipe supports will be requalified using revised loads from newly-analyzed piping. The CPRT should clarify whether the Class 1, 2, and 3 supports will be reanalyzed as previously stated or requalified as indicated in the Program Plan.
- B. Also in the same meeting the CPRT stated that they would meet the existing FSAR licensing commitments. However, the Program Plan in various instances makes reference to changes in FSAR commitments that may be requested by the CPRT. This apparent discrepancy should be clarified by the CPRT and more specific details should be included in the Program Plan for any known FSAR commitment changes.
- C. We are concerned that previously identified external source issues such as SIT, IAP, ASLB hearings and staff concerns are still unresolved by the Applicant. The CPRT should assure that all external source issues are identified in the SWEC scope of responsibility. We request that a working meeting with SWEC be established to review their procedures and design criteria to assure that all external source issues are identified and understood.

11. CYGNA INTERFACE

We note that many external source issues had been identified by CYGNA during the four phases of the IAP. These issues are categorized as cable tray/conduit supports concerns and some piping and pipe support concerns. The CPRT should provide CYGNA the opportunity to review the Program Plan to assure that all CYGNA issues have been properly addressed.

12. NEW ALLEGATIONS

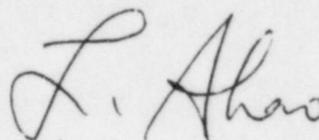
We are presently assessing new allegations that were not included in SSERs #8, 10 and 11. Since the assessment of these allegations will be presented in a future SSER, the CPRT should make provisions to include their response to this future SSER in the Program Plan.

13. SELF-INITIATED EVALUATION SCOPE - STRUCTURAL DISCIPLINE

The Program Plan does not seem to provide a basis for the selected scope with respect to structural discipline evaluation. A detailed discussion of the basis should be provided. On the first reaction basis, we feel that the proposed scope may not be broad enough to be representative of the CPSES Category 1 structures. A working meeting with the CPRT covering this area should be arranged.

14. EXCLUSION OF WESTINGHOUSE ACTIVITIES

While we agree with the Applicant's conclusion concerning the exclusion of Westinghouse activities from CPRT consideration, the rationale supporting this conclusion should be developed by the Applicant and included in the Program Plan.



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CPRT PROGRAM PLAN
GENERAL SUMMARY OF FORTHCOM
REQUESTS FOR ADDITIONAL INFORMATION FROM THE
SYSTEMS/OPERATIONAL GROUP
COMANCHE PEAK TASK FORCE

1. Establish action plans for all External Source Issues (presently only TRT and CYGNA IAP issues covered)
2. Justify the exclusion of the NSSS vendor activities from the evaluation of the design adequacy for CPSES.
3. Consider information regarding the potential root cause and generic implications associated with those issues which have been raised and subsequently closed by the External Source that raised the issue.
4. Describe the overview role of the CPRT concerning the implementation of CPTRT - recommended corrective actions by the CPSES project.
5. Expertise of the CPRT teams and persons responsible for making technical decisions for modifying and creating action plans as result of conclusive determinations of root causes, potential generic implications and safety significance.

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6. The proposed initial scope for the Design Adequacy Program Plan for the mechanical systems, and electrical, instrumentation and control systems does not have sufficient breadth and minimum depth.
7. Design Specific Action Plans for mechanical systems, electrical, instrumentation and control systems need to be augmented to include engineering walkdown of as-built.
8. The Construction Adequacy Program Plan need to be augmented to address Appendix P of the TRT QA/QC SSER-11 concerning the interrelationship of QA/QC concerns identified by the TRT groups.
9. Provide the basis and explanation for establishing categories of homogeneous populations of safety-related hardware constructed using similar work activities.
10. Justify using the CPSES Quality Assurance Program (questioned by the TRT) to qualify personnel involved in the implementation of construction-related electrical ISAPs.
11. There are approximately 125 RAI at this time from the Systems/Operational Group.