

*Attachment 3*  
TELEDYNE  
ENGINEERING SERVICES

130 SECOND AVENUE

WALTHAM, MASSACHUSETTS 02254

(617) 890-3350 TWX (710) 324-7508

May 16, 1986  
6410-60

Mr. V. Noonan, Project Director  
Comanche Peak Project  
United States Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Division of Licensing  
Mail Stop P-234  
Washington, DC, 20555

Reference: TES Letter 6410-59, dated May 14, 1986

Subject: Additional Comments, Draft SSER No. 13, May 1986

Dear Mr. Noonan,

Attached please find a copy of subject additional comments which were transmitted to you by Telefax today, May 16, 1986.

Very truly yours,

TELEDYNE ENGINEERING SERVICES

*James A. Flaherty for*  
Donald F. Landers  
Executive Vice President

DFL:mld  
attachment

cc: JQC  
JAM  
6410 file

*FOIA-86-657*

*B/16*

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PDR FOIA  
GARDE86-657 PDR

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TELEDYNE ENGINEERING SERVICES

TELECOPY FORM

DATE: 5/16/86

TELECOPY TO: MR VINCE NOONAN

COMPANY: NRC-NRR PHILLIPS BLDG,  
BETHESDA MD.

TELEPHONE NUMBER FOR TELECOPY: 301-492-7371

TES PROJECT NUMBER: 6410 R TES PERSONNEL: DFL/JHM

TES TRANSMITTING ON RAPICOM 3100

AUTOMATIC

MANUAL

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(INCLUDING THIS PAGE)

SPECIAL INSTRUCTIONS:

J. MALONSON WILL CONFIRM RECEIPT  
BY NRC. *CONFIRMED RECEIPT BY J. MALONSON 5/16/86*

TES WILL FOLLOW UP AND MAIL A COPY OF THE  
COMMENTS TO V. NOONAN.

The telephone number for verification or problems with transmission is (617) 890-3350.

For Reply Telecopies - Call (617) 890-0771

ADDITIONAL TES COMMENTS - REVIEW OF DRAFT SER-13, received 5/12/86

COMMENTS

Page 1-4, Self Initiated Evaluation

TES recommends that the paragraph remain as originally stated. The words "100% of the work" and "envelops all" are not those stated in the Program Plan, last paragraph on page 3 of 45. The interpretation - 100% and all - is too liberal and not absolutely accurate. Compare this paragraph with that given on page 2-1, the second paragraph:

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Page 1-5, Issue Specific Action Plans (ISAPs)

The first sentence states ... and some design issues...

The sentence should state: some design related issues.

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Page 1-5, Discipline Specific Action Plans

Editorial, first paragraph, third sentence, suggest that the third sentence be revised to read - "Those DSAPs encompassing ... supports, include a significant..."

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Page 1-7, first paragraph, next to last sentence should state: ...consists of a sample reinspection and/or documentation review.

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Page 1-11, third paragraph - grammar

Sentence reads: at this time ... fully enough resolved as yet ...

Suggest revising the sentence to read: "Few of the issues have been evaluated sufficiently..."

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Page 1-17, first paragraph, second sentence

Editorial - change to read: ... evaluations are appropriate mechanisms...

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Page 2-3, third paragraph

Editorial - last sentence - ... information such that a valid concern...

Same sentence - ... to the ISAP governing the concern, should the word be "covering"?

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Page 2-3, Section 2.2, Self Initiated Program

The last line on the page states: common areas, supplemented by a review...

Documentation reviews are not a supplementary action. It is an either or condition. See App. B, Page 9, third paragraph.

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Page 2-4, first paragraph, second sentence should be revised to read: the population ... attributes or documentation reviews of inaccessible or nonrecreatable attributes.

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Page 2-4, last paragraph, last full sentence should state: both reinspection...

Additionally the sentence refers to Quality Instructions. Something is missing in context. The Quality Instructions (CPRT??) have not been previously addressed.

Suggest rephrase ... Quality Instructions prepared and issued by the CPRT QA/QC review team or ??

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Page 2-5, first paragraph, third sentence.

NOTE: It is not an assurance level. Suggest revise sentence to read: This was selected by the CPRT...

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Page 2-5, second paragraph, last sentence explains that as a result of audits the staff determined sample augmentation. (Ref: App. B, page 9, third paragraph).

- o This should be addressed in terms of the basis for augmentation as described in the Plan. Does it mean 60 times?
  - o If not defined in the Plan, and the staff requires this, it should be stated in Appendix B as a concern to be addressed. Perhaps it can be restated to clarify.
  - o Also, when CPRT inspection activity is addressed, the word reinspection should be used.
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Page 2-6, First paragraph, second sentence states:

...according to the applicant.

This subject should be addressed in terms of "according to the plan."

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Page 2-6, second paragraph, sentence beginning: If no additional deficiencies...

Should this be addressed as a new sample? New population?? e.g. the total population is not new.

Suggest delete the word new, where used.

Same paragraph, next sentence, suggest revise to read: ... is detected and a different root cause is not identified...

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Page 2-7, Section 2.4, Staff Evaluation

Suggest comparing and replace with wording from page 3-2, last sentence, first paragraph reads better. Or, consider using words of page 2-9 under 2.4.2.

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Page 2-7, Section 2.4.1, Evaluation of QOC, etc.

It is suggested that explanation of reviews by consultants, etc., is not meaningful. Also, page 2-8, the first full paragraph, suggest deletion/revision.

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Page 2-9, Section 2.4.2, Evaluation of Self Initiated Programs

The third sentence states: the audits did not address...

If what the audits did address is stated, why is it necessary to say what wasn't addressed.

Suggest deletion of this sentence.

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Page 2-10, first (partial) paragraph

What does it mean? Irrespective of human and administrative factors?

Editorial - second paragraph: It was noted in the, delete the word the.

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Page 2-10, third paragraph

The Closed External Source Issues should be identified as those that were closed by sources external to the CPRT.

Editorial - spelling, word affect should be effect.

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Page 2-11, Item (d) editorial, delete word both.

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Page 2-12, fourth paragraph

Suggest that the word "dichotomous" should be expressed for a layman's understanding, or in simple terms - explanation??

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Page 2-14, first full paragraph

The first sentence is confusing. Should this be stated: ... based on on-site audits.

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Page 3-3, first paragraph states: ... pages 9 thru 14.

Since the DSAPs also resolve ESIs, this should be stated as pages 6 thru 14.

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Page 3-5, the first paragraph states that the issues are classified.

It is the results (findings) of the CPRT's activity that are classified, not the issues. (Ref. App. E)

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Page 3-5, bottom of page - sentence beginning: This process - continued on page 3-6.

Suggest revise the sentence to read: This process results in the establishment of matrices...

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Page 3-9, Section 3.4

Sentence beginning: For the tray/conduit...

Should read: For the cable tray/conduit...

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Page 3-11, Section 3.4.2

Sentence beginning: As a result...

Suggest delete word special.

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Page 3-12, sentence after item f

Editorial - use plural verb are. Viz. details are...

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Page 3-22, first paragraph, sentence beginning with Thus.

Syntax - suggest "can be demonstrated better"...

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Page 3-25, Section 3.6, conclusion first paragraph

Suggest revise to read: ... source issues related to design.

It is also suggested that this section offer its conclusion identifying the Design Adequacy Program, not the CPRT program plan.

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Page 4-6, the second full paragraph

It should be noted that the current plan allows SRT review and approval of corrective actions after implementation.

TES previously expressed a concern that the SRT should be involved in review of the ongoing process of recommendation and implementation of corrective action.

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App. B, page B-5, staff comment on ISAP V.d

It is not clear why the sampling plan utilized by the ISAP did not yield an acceptable confidence level.

Shouldn't the ISAP adjust or modify its sampling plan or initiate a special sampling plan that does comply with Appendix D rather than perform the bounding analysis. Since an effective sampling plan can be implemented it appears that compliance with the program plan is the requisite, and it is suggested that the CPRT should not be granted an alternative.

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App. B, page B-6, item (1)

It is not clear what the provisions for additional third party investigations should be. Why isn't third party design reverification acceptable?

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App. B, page B-8, staff comments on ISAP II.a

How can the plan address the corrective action until the CPRT finds what the problem is (if any)? However, it is agreed that the ISAP should address corrective action for deficiencies.

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App. B, page B-8, staff comments on ISAP II.e

See comments as above.

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App. C, page C-2, first paragraph

The first sentence should be revised to read: This matter is... of discrepancies related to the self initiated construction program...

The sentence beginning: The major reason... should be revised to read: ... related to design optimization or resolution of deficiencies.

The next sentence should be revised to read: Therefore, new design documents and loads/stress values which form the basis for the safety significance evaluations would be available.

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App. C, page C-2, item 2 Description

The first sentence should be revised to read: ... using Code or regulatory criteria.

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App. C, page C-3, item 3 description and staff comments

Should be deleted. This is an old DFL comment, no longer valid.

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App. C, page C-4, item 4 description and staff comments

Delete - same as above.

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App. C, page C-5, item 5

Delete - same as above.

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App. C, page C-10, item 1 Description

Editorial: ... discrepancies (or deviations) for...

Editorial: ... modifications may be made to piping and supports by SWEC...

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App. C, page C-12 Staff comment

The paragraph states that active valves should be considered in root cause/generic implications evaluations.

Root cause/generic implications evaluations are described in DSAP X on page 21, third paragraph. Since active valves are an issue to be resolved in this DSAP, is it apparent that the topic is covered?

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App. C, page C-17, Staff comment

Editorial - second sentence, delete word but.

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App. C, page C-18, Staff comment

Editorial - spelling, word approach.

Item 2 - Description

Editorial - spelling, word pump.

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