

JUL 13 1986

MEMORANDUM FOR: V. S. Noonan, Director  
PWR Project Directorate #5,  
Division of PWR Licensing-A

FROM: E. H. Johnson, Director, Division of Reactor Safety and  
Projects, Region IV

SUBJECT: REVIEW OF THREE NEW OR REVISED ISAPS - COMANCHE PEAK

In response to your June 13, 1986 memo same subject as above, we have the following comments:

A. ISAP III.a.1 (Revision 4) - Hot Functional Testing Data Packages

Ward Smith has indicated that he has no comments. He also does not believe that the comments by Mr. Malonson should be forwarded to TUGCo. Mr. Malonson's comments can, for the most part, be answered by review of the CPRT files. It is suggested that you discuss Mr. Ward's comment with Mr. Malonson and have him contact Ward Smith.

B. ISAP VII.a.9 (Revision 0) - Receipt and Storage of Purchased Material and Equipment

We do not consider that this ISAP appropriately addresses original Region IV concerns on this subject, in that it does not provide for detailed assessment of compliance of vendor items/components with procurement document requirements. The applicant has indicated that the ISAP will be revised and should provide a schedule for submittal.

C. ISAP VII.b.1 (Revision 2) - Onsite Fabrication

Sections 4.1.1.1 and 4.1.1.2 address concerns which may be evaluated by review of fabrication document packages or by review of procedures, surveillances, and audit records. However, the TRT findings are concerned with ongoing activities within the fab shop which may not have resulted in documentation e.g.,

1. Shop foremen lacking knowledge of shop procedures.
2. Craft being asked to perform work without knowledge of paperwork.
3. Failure to comply with material traceability or identity requirements.
4. Fabrication not in accordance with procedures.

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However, in view of the above specific concerns by the TRT of onsite fabrication activity, within the fab shop be evaluated in this ISAP or other ISAPs.

Describe how these concerns will be addressed.

The TES (Malonson) comments have been reviewed by Region IV. The information requested should provide additional clarification to the details of the ISAP. Much of the information has previously been provided orally to Region IV personnel.

Original signed by  
Ramon E. Hall

E. H. Johnson, Director  
Division of Reactor Safety  
and Projects