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May 14, 1986  
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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

SUBJECT: PRELIMINARY COMMENTS - SECTION 1.0 AND 3.0, DRAFT SSER NO. 13,  
MAY 1986

Dear Mr. Noonan,

Attached please find the subject comments. We will forward additional comments on these and other sections of the Draft SSER as soon as they are available.

Very truly yours,

TELEDYNE ENGINEERING SERVICES

*Donald F. Landers*

Donald F. Landers  
Executive Vice President

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attachment

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PIPE AND METALLURGISTS

PRELIMINARY COMMENTS - SECTIONS 1.0 AND 3.0

DRAFT SSER NO. 13, MAY 1986

1.3 CPRT Terminology

page 1-4, Self-Initiated Evaluation - Is it true that the sample reinspection "represents 100% of the work activities ... of safety-related aspects of the plant."

The last sentence on page 1-4, continued on 1-5 is used in a number of places (pages 1-4, 1-7, 3-1 and 3-5) and is not consistent. The wording on page 1-7, beginning on the 4th line is the most appropriate.

1.4 (2) Determine Root Causes, Adverse Trends, and Generic Implications, page 1-6

The last word in this paragraph should be "deficiencies" not "deviations." By definition, deviations are not safety-significant.

1.5 (1) Discrepancy, page 1-7

This should be titled "Design Discrepancy" since the other disciplines (Construction, Testing, QA/QC) do not list this term. The first sentence should then read: "This term is used to convey any design problem ... the CPRT.

1.5 (3) Deviation, page 1-8

Under "Construction Adequacy" (page 3 of 13, App. E) this definition differs from that used in other disciplines in that it only refers to a verified failure to comply with safety-significant attributes and criteria.

1.5 (5) Programmatic Deficiency, page 1-8

In second line change "observations" to "discrepancies" to comply with page 2 of 13 of App. E.

1.5 (6) Safety-Significant, page 1-8, last paragraph

The addition by the NRC staff of "loss of margin" as a concern which is safety-significant and therefore triggers an evaluation is a new requirement. If this was a concern it should have been defined in the August 9, 1985 NRC Programmatic Response to Revision 2 of the CPRT Program Plan. In the normal regulatory process, "loss of margin" is a concern for a plant that has received an operating

license since one basis for that license is the so called "design margin" (i.e. ratio of actual stress or load to some allowable.) In the case of CPSES the "design margin" is unknown at this time and will be one output of the CPRT Program Plan. The real concern is compliance with licensing commitments (including allowable stresses or loads) and this issue is already addressed adequately by the staff on pages 1-9 and 1-10. The "loss of margin" concern as addressed on page 1-8 should be removed.

1.6 (2) Evaluation of Generic Implications, page 1-11

The second sentence should read: "The staff ... be the product of evaluations of root causes of deficiencies or adverse trends of deviations or ... nature."

1.6 (2) Evaluation of Generic Implications, page 1-12

The first sentence of second paragraph should read: "The staff ... determining generic implications and find ... evaluation."

The last sentence of second paragraph should read: "The staff will evaluate the generic ... phase."

1.6 (3) Initiation and Oversight of Corrective Action

The second sentence of second paragraph should read: "Because of ..., TUEC has committed that corrective ... the CPRT." (This is committed to on page 1 of 8 of App H, and is much more significant than a TUEC internal requirement.)

3.0 Design Adequacy, pages 3-1 and 3-5

See comment on 1.3 CPRT Terminology.

3.2 External Source Issues, pages 3-4 and 3-5

The second sentence of the last paragraph on page 3-4 needs to be expanded (ref. pages 7 and 8 of App. A).

On page 3-5 the discussion of the Fifth Step is inappropriate. It is recommended that the following be used: "Fifth, the need for corrective action will be determined as a result of design deviations and deficiencies. Corrective action can also be determined at the time of action plan development if it is determined to be more efficient to do so."

3.3 Self-Initiated Design Program, page 3-7

The last sentence of the first paragraph should read: "The design ... addresses consistency in the transferring of design information ... input."

Second paragraph, second sentence; replace "free of error" with "correct." The term "free of error" is used throughout Section 3.0 of the SSER. This is not CPRT terminology and to be "correct" does not necessarily mean to be "free of error." This difference should be corrected for all cases.

The third sentence of the second paragraph should be deleted.

The fifth sentence of the second paragraph should be corrected and made into two sentences as follows: "An item considered corrected based ... generic given. An example is the internal NSSS design scope."

3.4.1 Cable Tray and Conduit Supports, page 3-10

The first sentence of the second paragraph should read: "Dynamic ... supports for Unit 1."

3.4.2 Piping and Pipe Supports, page 3-11

The second paragraph should be eliminated or rewritten. If what is desired is to indicate that piping and pipe supports will comply with Code and regulatory requirements then the SSER should say that.

3.5.3 Evaluation of ... Verification, page 3-24

The third sentence of the first paragraph indicates that a separate group, not directly involved with the reanalysis effort, is resolving special technical issues. The group is composed of SWEC personnel who may be involved in the reanalysis effort. Page 12 of 14, Att. 2 to DSAP IX does not indicate that the "special task force(s)" are separate from, and not involved in, the reanalysis effort.