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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

_____)	
In the Matter of)	
TEXAS UTILITIES ELECTRIC)	Docket Nos. 50-445-OL
COMPANY et al.)	50-446-OL
(Comanche Peak Steam Electric)	(Application for an
Station, Units 1 and 2))	Operating License)
_____)	

ANSWERS TO BOARD'S 14 QUESTIONS
(Memo; Proposed Memo of April 14, 1986)
Regarding Action Plan Results Report I.a.5

In accordance with the Board's Memorandum;
Proposed Memorandum and Order of April 14, 1986, the
Applicants submit the answers of the Comanche Peak
Response Team ("CPRT") to the 14 questions posed by the
Board, with respect to the Results Report published by
the CPRT in respect of CPRT Action Plan I.a.5.

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Opening Request:

Produce copies of any CPRT-generated checklists that were used during the conduct of the action plan.

Answer:

This action plan consisted of an engineering review of the disposition of NCR's. This activity did not require the use of any checklists, therefore no checklists were generated during the conduct of this action plan.

Question:

1. Describe the problem areas addressed in the report. Prior to undertaking to address those areas through sampling, what did Applicants do to define the problem areas further? How did it believe the problems arose? What did it discover about the QA/QC documentation for those areas? How extensive did it believe the problems were?

Answer:

This report addressed a problem found by TRT with the technical dispositioning of sixteen NCRs involving bent and/or twisted terminal connectors. The scope of the action plan included neither a sampling plan nor a review of QA/QC inspection reports. Note that the generic question of the adequacy of the CPSES Nonconformance System is being addressed separately by

ISAP VII.a.2.

Question:

2. Provide any procedures or other internal documents that are necessary to understand how the checklists should be interpreted or applied.

Answer:

Since no checklist was used, no interpretive procedures were necessary.

Question:

3. Explain any deviation of checklists from the inspection report documents initially used in inspecting the same attributes.

Answer:

Since no checklists were used and no QA/AC inspection report reviews were made, no such deviations were possible.

Question:

4. Explain the extent to which the checklists contain fewer attributes than are required for conformance to codes to which Applicants are committed to conform.

Answer:

Not applicable (see response to question 3).

Question:

5. (Answer question 5 only if the answer to question 4 is that the checklists do contain fewer attributes.) Explain the engineering basis, if any, for believing that the safety margin for

components (and the plant) has not been degraded by using checklists that contain fewer attributes than are required for conformance to codes.

Answer:

Not applicable, since there was no checklist.

Question:

6. Set forth any changes in checklists while they were in use, including the dates of the changes.

Answer:

Not applicable, since there was no checklist.

Question:

7. Set forth the duration of training in the use of checklists and a summary of the content of that training, including field training or other practical training. If the training has changed or retraining occurred, explain the reason for the changes or retraining and set forth changes in duration or content.

Answer:

Not applicable, since there was no checklist.

Question:

8. Provide any information in Applicants' possession concerning the accuracy of use of the checklists (or the inter-observer reliability in using the checklists). Were there any time periods in which checklists were used with questionable training or QA/QC supervision? If applicable, are problems of inter-observer reliability addressed statistically?

Answer:

Not applicable, since there was no checklist.

Question:

9. Summarize all audits or supervisory reviews (including reviews by employees or consultants) of training or of use of the checklists. Provide the factual basis for believing that the audit and review activity was adequate and that each concern of the audit and review teams has been resolved in a way that is consistent with the validity of conclusions.

Answer:

Not applicable, since there was no checklist.

Question:

10. Report any instances in which draft reports were modified in an important substantive way as the result of management action. Be sure to explain any change that was objected to (including by an employee, supervisor or consultant) in writing or in a meeting in which at least one supervisory or management official or NRC employee was present. Explain what the earlier drafts said and why they were modified. Explain how dissenting views were resolved.

Answer:

Neither the Review Team Leader nor the Issue Coordinator can think of any important substantive change that was due to any of the cited reasons.

Question.

11. Set forth any unexpected difficulties that were encountered in completing the work of each task force and that would be helpful to the Board in

understanding the process by which conclusions were reached. How were each of these unexpected difficulties resolved?

Answer:

One task of the action plan was to have the terminal vendor (AMP Inc.) substantiate their position on use of bent and/or twisted terminals. AMPs initial reply was a test program that CPRT did not consider adequate to address questions regarding the mechanical strength of bent and/or twisted terminals. As a result, AMP also completed a metallurgical analysis to further substantiate their position regarding the use of the terminals at issue.

Question:

12. Explain any ambiguities or open items left in the results report.

Answer:

Neither the Review Team Leader nor the Issue Coordinator consider that any ambiguities or open items remain in the Results Report.

Question:

13. Explain the extent to which there are actual or apparent conflicts of interest, including whether a worker or supervisor was reviewing or evaluating his own work or supervising any aspect of the review or evaluation of his own work or

the work of those he previously supervised.

Answer:

No such conflicts are known to exist by either the Review Team Leader or Issue Coordinator.

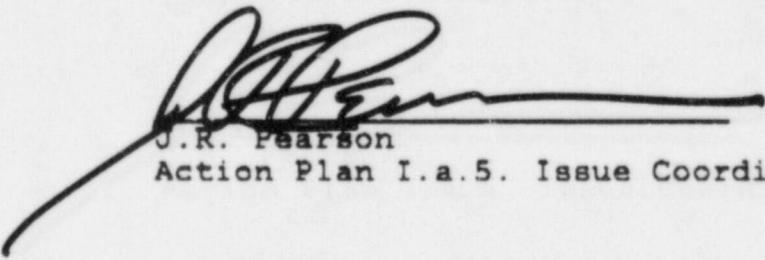
Question:

14. Examine the report to see that it adequately discloses the thinking and analysis used. If the language is ambiguous or the discussion gives rise to obvious questions, resolve the ambiguities and anticipate and resolve the questions.

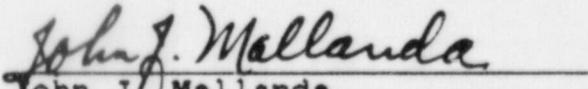
Answer:

The report has been so examined by both the Review Team Leader and Issue Coordinator. The report is judged to adequately disclose the thinking and analysis used.

Respectfully submitted,



J.R. Pearson
Action Plan I.a.5. Issue Coordinator



John J. Mallanda
CPRT Electrical Review Team Leader

The foregoing responses have been reviewed and are concurred in by the CPRT Senior Review Team.