

802
~~802~~
~~802~~

RELATED CORRESPONDENCE

DOCKETED
USNRC

BEFORE THE
UNITED STATES
NUCLEAR REGULATORY COMMISSION

'86 SEP 22 P1:08

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

TEXAS UTILITIES GENERATING COMPANY,
et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

)
)
) Dkt. NOS. 50-445-OL
) 50-446-OL
)
)
)

CPRT DISCOVERY - 8

February 6, 1986, Meeting Transcript
and
October 3, 1985, Meeting Transcript

February 6, 1986, Meeting

1. Was the problem with the Unit 1 heating, ventilating and air conditioning cable tray supports identified under the CPRT program (Transcript, p. 5)?

a. If yes, identify the (portion) of the CPRT in which the problem was discovered, the procedures under which it was discovered, and the circumstances surrounding the decision to issue a 50.55(e) report.

b. To what extent, if any, will the HVAC problem be evaluated by the CPRT program for root cause or generic implications and/or considered in the collective evaluations

c. Is the "sampling program" referred to by Mr. Council on page 7 of the Transcript a CPRT program? If not, what sampling program is he referring to?

d. Who is Mr. Council referring to in his statement

8609240025 860918
PDR ADOCK 05000445
G PDR

DS 03

"we physically reinspected 60 packages ourselves." (Tr.Ln.16-17)

e. who and what is Mr. Counsil referring to in his statement on Line 20-21, that "we believe at this point the balance of the program on unit 2 is satisfactory in their proceedings."

2. Are the EBASCo. quality Control teams referred to on Tr. page 9 CPRT inspection teams governed by the CPRT program, or CPSES project personnel under the supervision of TUGCo QA management (Tr. pp. 8-10)?

a. If the answer to the above question is that the EBASCo effort is being done under the CPRT, identify the procedures used for training each of the teams, the procedures the inspectors were trained to, and which Ebasco personnel (including consultants and job snopers) are involved who worked at the Comanche Peak plant site at any time prior to May 1985.

3. Identify all documents used by and prepared during the "experienced engineers walkdown" that was conducted in November 1985.

a. Identify all persons who participated in the walkdown (p. 11).

b. To whom is Mr. Klause referring on Tr. p. 11, line 12-14, when he stated that "we are reviewing those observations to determine what action is required by the project and TUGCo?"

c. was the "engineers walkdown" conducted under the CPRT program?

d. If not, will the findings of the walkdown be considered by the CPRT in any way?

e. If the findings of the walkdown are considered by the CPRT, identify in what phase and under what procedures the findings will be considered.

4. Identify all instances where procedures were required to be modified to give the engineers more specific instructions in the reanalysis effort (Tr. p. 11, Ln 15-19).

5. Explain, in precise details, what the "major generic technical issues tentatively resolved" are (Tr. p. 12, Ln 6-10). Define the steps that must be completed and the criteria and/or procedures used for "tentatively resolved" issues to become finally resolved.

6. Identify the person or persons who were included in the process of determining that it was necessary to replace Monty Wise in order to get a "completely fresh look" at the testing area, as described on page 12.

7. Explain in precise terms what Mr. Beck meant by his statement on page 12, ln 3-8 that:

"As that particular discipline was explored over the past year, SRT determined that we simply did not have a strong enough Third-Party flavor. The cleanest way to do that was to have a new set of eyes and a new mind to evaluate all the areas associated with

testing, ..."

Include in your explanation why a stronger "Third-Party flavor" was needed and in what way the existing sysytem didi not meet this need.

8. Describe, in precise detail, the changes made to the Safety Significance Evaluation group around the time period of the Feb. 6, 1986, meeting.

9. Explain the reason that it was necessary to add a senior level manager to the SSEG group.

10. What comments did Mr. Hansel receive from NRC staff (either TRT or Region) about the effectiveness and adequacy of the SSEG effort?

11. Identify all conversations between NRC staff members and Mr. Hansel, Mr. Beck, Mr. Council, or any other management personnel in which the SSEG was discussed.

a. For each conversation identify the date, place, participants.

b. For each conversation identified above identify all documents prepared during or after the meeting reflecting the comments of the NRC regarding the SSEG.

12. Identify and produce the "log" referenced on page 15 for logging the changes to the ISAPs.

13. Describe the criteria used by Mr. Terry Tyler to

determine whether a change to an ISAP is minor or substantive, and identify all procedures or written documents that describe or govern this determination.

14. Identify the person or persons who are responsible for the determination of whether an ISAP change is substantive or minor, and identify all procedures or written documents that describe or govern this determination.

15. Explain, in precise detail, the revision added to ISAP VII.A.2 for reviewing the technical adequacy of NCR dispositions (Tr. p. 23).

a. Identify the procedures developed to implement the revision.

b. Identify and explain the basis for the revision of the ISAP.

16. Identify the internal concerns referred to by Mr. Beck on Tr. p. 28.

a. For each concern identified above provide the details of how the concern was brought to the attention of Mr. Beck, and what specific portions of the CPRT program were involved.

17. Produce all documents developed during the course of the investigation and/or audit of the QOC program, including but not limited to all notes of interviews of any persons interviewed and all analysis of those interviews and any other information gleaned during the investigation or audit. (This

answer should include all information, in precise detail, developed or discovered during the investigation or audit about the quality instructions, including listing the procedure and the revision number or the procedure.)

18. Identify the individuals who participated in the retraining or "hand-in-hand exercise walkdown of QI's" referred to on Tr. pg. 29.

19. Explain in detail what is meant by the phrase "accuracy and completeness" as used on p. 30, Lines 12-15.

20. In reference to the stop work order, identify which ISAP's or portions of ISAP work was actually stopped, when work was actually stopped, and when it began for each ISAP.

a. Produce the stop work order instructions or other documents directing personnel at all levels to stop work.

b. Produce the documents directing personnel at all levels to restart work.

c. Produce all documents in which the decisions to stop and/or restart work were discussed and/or made.

21. Identify all cases in which "backfit" of the implemented CPRT work would be required as referenced by Mr. Tyler on Tr. p. 31, Line 7.

a. For each case in which backfit was anticipated if Rev. 3 was approved as written, identify the ISAP, the objective, and/or the specific portion of the CPRT which was anticipated to

require backfit as of February 6, 1986.

b. Explain, in precise details, Mr. Tyler's statement that the backfit would be "mainly in the area of how you categorize findings that come out of the program..."

c. Explain, in precise detail, Mr. Tyler's statement that the backfit will impact "how you go through and do evaluation for root cause generic implications..."

d. Explain, in precise detail, how the backfit would affect the method for overview of corrective actions by the CPRT.

e. Describe in detail the actual implementation of these backfits and identify all documents directing the backfit, all documents reflecting the changes caused by the backfit, including procedures and training manuals, and all documents reflecting the changes in implementation of the CPRT as a result of the backfit.

22. Explain why "the additional steps to the Action Plan" referred to by Mr. Tyler don't impact the status of the CPRT.

23. For each situation identified in response to question 21 above identify whether Revision 3, if approved as written in February 1986 would require expansion of work already finished or doing the CPRT, or any part of it, over again.

24. Identify and produce the audit described by Mr. Hansel on pg.32, line 10-11.

25. Identify and produce the "proposed Action Plan"

that Mr. Hansel referred to on Tr. p. 32, line 12-13.

26. Identify all documents prepared in the review of the safety significant evaluations described by Mr. Hansel on Tr. p. 32.

27. Identify the person or persons who participated in the review of the quality instructions.

28. Identify the procedures and describe in precise detail the process used to do the review of the instructions.

29. Identify the nine inspectors conducting the "over inspections" referred to on Tr. pg.33, line 21-24.

30. Identify the CPRT procedure or procedures used by the inspectors to do the over inspections.

31. Identify which ISAPs or portions of ISAP/DSAPs or the self-initiated inspection is covered by over inspections.

32. Identify all documents created by the overinspectors (or anyone else in the process) which was used to "evaluate each inspector" (pg.34, line 2-3).

33. Identify all documents created by the over inspection (or any other process) which was used to give "good insight as to the accuracy of inspections" (p. 34).

34. Identify the supervisor to the over inspectors referred to on page 34, line 17-19.

35. Identify the 66 inspections which were referred to by Mr. Hansel as complete on page 34, line 19-22.

36. Identify all documents which were created in the review of the 66 inspections referred to on page 34, line 19-20.

October 3, 1985, Meeting

37. What is meant by the phrase "adequacy of the construction" as used on p. 64, in 12-20 (Transcript, October 3, 1985, meeting)? Explain in precise detail, including identifying what is considered "adequate," and who makes that determination.

38. What is meant by the phrase "adequacy of the QA/QC program?" Explain in precise detail, including identifying what is considered "adequate" and who makes that determination.

39. Identify all documents developed in or for the work described on Tr. p. 66, in 24, to p. 68, in 20. This list should include but not be limited to:

- a. the list of questions or checkpoints used to determine if an activity was "reasonably homogenous" (in 1-4);
- b. the list of "all drawings, specifications, and the construction procedures," etc. (in 5-8) for each category;
- c. all analyses or review sheets for each category (in 14-17);
- d. all lists of questions used to "draw a finer tune and put into groupings the work processes (Tr. p. 67, on 22-24).

40. Explain in precise detail what was meant by the statement on p. 67, in 18-20, that "we didn't want to fluster [sic] into the same population the work done by two groups or two companies, or two different inspection groups."

41. Identify all documents developed in or for the second

phase of the analyses described on pp. 68-69.

42. On page 12, Mr. Hansel identified an "early verification" process in lines 4-8, which apparently provided the information to permit the grouping of different attributes. In regard to this early verification process, answer the following questions:

- a. Identify the date or dates, or time period, that the early verification process covered.
- b. Identify all the persons who participated in the early verification process by name, position, and employer.
- c. Identify the procedures and/or criteria by which the early verification process was conducted.
- d. Identify all project individuals (i.e., TTUEC, B&R, Gibb & Hill, etc.) who participated in the early verification process.
- e. Identify in precise detail what was being verified or reviewed.
- f. Provide the contract(s) that commissioned the work described above.
- g. Identify the documents that are the result of the early verification process and their location.

43. In reference to the discussion in the Oct. 3 transcript regarding the establishment of the Homogenous Work Attributes (HWAs), provide all preliminary assumptions used in developing HWAs and all bases you have for accepting these assumptions.

Example 1: There is an assumption that if the electrical

craft are trained for the most complex activities they "should be able to" handle lesser activities (see p. 79, 80).

Example 2: There is an assumption that the TUGCo turnover and checkout procedure was very effective (p. 104).

44. Provide the criteria used to decide whether there is sufficient commonality to determine that conclusions can be drawn from a single strata sample for:

- a. processes
- b. people
- c. procedures
- d. specifications.

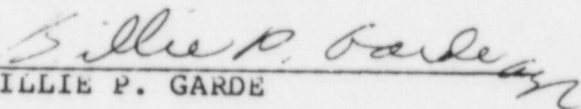
45. Explain in precise detail the basis for selection of each homogenous work activity and how it was accomplished (Tr. pp. 79-87, 106-109, 114-120).

Example: On p. 84 of the transcript, lines 21-24, Mr. Hansel states that "[w]e have looked at this sufficiently to answer in our own minds that the work processes are the same; no need to go back through all the other common attributes and commonality procedures and specs." Explain what the actual basis of determining the HWA was for each HWA in the electrical area, as well as for each other specific HWA.

46. Considering the explanation of the basis for each HWA provided in response to question 45, identify how the homogeneity was based on the people who did the work, not the attributes or procedures for each HWA.

47. Produce for inspection and copying all documents identified in the answers to these questions and all documents relied upon or examined in the preparation of the answers to these questions.

Respectfully submitted,


BILLIE P. GARDE

Trial Lawyers for Public Justice
3424 North Marcos Lane
Appleton, WI 54911
(414) 730-8534

Counsel for CASE

Dated: September 18, 1986