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October 30, 1987

Peter B. Bloch, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Kenneth A.. McCollom  
Administrative Judge  
1107 West Knapp  
Stillwater, Oklahoma 74075

Dr. Walter H. Jordan  
Administrative Judge  
881 W. Outer Drive  
Oak Ridge, Tennessee 37830

Re: Texas Utilities Electric Company, et al.  
Comanche Peak Steam Electric Station  
Docket Nos. 50-445-OL & 50-446-OL

Dear Administrative Judge:

In accordance with TU Electric's response dated August 24, 1987 to Judge Bloch's request therefor, we transmit herewith copies of the responses submitted by TU Electric during the period of September 25, 1987 through October 26, 1987, to Notices of Violation and "notices of deviation" rendered by the NRC Staff.

Very truly yours,

R. K. Gad III

RKG/plw  
Enclosure

cc: Service List

8711040097 871030  
PDR ADOCK 05000445  
G PDR

DS03



Log # TXX-6753  
File # 10130 #  
IR 86-26  
IR 86-22  
Ref # 10CFR2.201

William G. Council  
Executive Vice President

October 23, 1987

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION(CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR ADDITIONAL INFORMATION REGARDING  
INSPECTION REPORT: 50-445/86-26 AND 50-446/86-22

Ref: 1) NRC letter from E. H. Johnson to W. G. Council dated April 2, 1987  
2) TU Electric Letter TXX-6472 from W. G. Council to NRC dated  
June 5, 1987

Gentlemen:

Your letter dated September 3, 1987, requested additional information on the subject inspection report with respect to Notice of Deviation (NOD) Item B (445/8626-D-03; 446/8622-D-01) and Item C (445/8626-D-04; 446/8622-D-02).

On September 23, 1987, per a telephone conversation with your Mr. R. F. Warnick, we requested and received an extension until October 7, 1987. On October 7, 1987, per a telecon with your Mr. Ian Barnes, we requested and received an extension until October 23, 1987.

In pursuing the request for additional information, we have determined that a revision to our original response was required to clarify our position. Accordingly, a revised response, including the requested additional information, is enclosed. Since the entire response has been revised, no revision bars have been provided.

We hereby respond to the above items in the attachment to this letter.

Very truly yours,

*W.G. Council*  
W. G. Council

By:

*D.R. Woodlan*  
D. R. Woodlan  
Supervisor,  
Docket Licensing

RDD:grr

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)



REQUEST FOR ADDITIONAL INFORMATION  
NOTICE OF DEVIATION  
ITEM B (445/8626-D-03; 446/8622-D-01)

NOD ITEM B:

Your response to Item B of the NOD indicates disagreement with the stated deviation. Your response, however, fails to recognize that the ISAP I.d.3 requirements were being implemented prior to the SRI approval or issuance of the Results Report. Accordingly, we request that you provide the information originally requested for this deviation.

NOTICE OF DEVIATION  
ITEM B (445/8626-D-03; 446/8622-D-01)

- B. Section 4.1.2 of ISAP I.d.3, Revision 0, requires, in part, that ERC perform an evaluation of the craft training procedures including training and retraining, and that the following items will be considered during this evaluation:

"How craft personnel become aware of changes in design and construction requirements and how retraining occurs."

"How craft personnel are informed and become knowledgeable of QA/QC requirements/criteria and changes to those requirements/criteria."

Section 4.1.3 of the ISAP also states, in part, "Based on this review (of procedures), conclusions will be drawn by the QA/QC Review Team Leader as to the adequacy of both past and current practices used for craft selection and training. If current procedures are determined to be inadequate, recommendations for improvement will be provided to TUGCO prior to the closure of this action plan."

In deviation from the above, ISAP I.d.3 Results Report does not provide a recommendation that TUGCO revise the Bahson Service Company's craft training Procedure QCI-CPSES-013, "Indoctrination and Training of Personnel," which does not assure that: (1) "craft personnel become aware of changes in design and construction requirements"; and (2) "craft requirements/criteria and changes to those requirements/criteria" (445/8626-D-03; 446/8622-D-01).



REVISED RESPONSE  
ITEM B (445/8626-D-03; 446/8622-D-01)

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason for Deviation

This deviation occurred because the ISAP I.d.3 Results Report did not recommend that TU Electric revise the Bahnson craft training procedure QCI-CPSES-013, "Indoctrination and Training of Personnel". The reasons for not making the recommendation are:

- 1) Revision 0 of ISAP I.d.3 dated January 24, 1986, instructs the QA/QC Review Team Leader to "...If current procedures are determined to be inadequate, recommendations for improvement will be provided to TUGCO prior to the closure of this action plan." The Action Plan Change Request for Revision 0 of the ISAP dated August 27, 1986, removed this requirement. The Results Report was written according to the precepts of Revision 1 of the ISAP. At the time the NRC identified the alleged deviation, Revision 1 was not formally approved by the SRT, but was being used by the Issue Coordinator. (TU Electric recognizes that this situation is not in accordance with Revision 3 of the CPRT Program Plan which was in effect at that time). This is discussed further in our response to NOD Item C (445/8626-D-04; 446/8622-D-02).
- 2) Revision 1 of ISAP I.d.3 was designed to broaden the scope of adequacy assessment and to address use of results from other ISAPs. Section 4.1.2 states, in part, "...The assessment of craft personnel training programs was accomplished by reviewing craft training procedures, interviewing craft personnel, and observing training activities." Section 4.1.3 states, in part, "...The QA/QC Review Team used results of their activities to draw conclusions about the adequacy of past and current craft personnel training practices. These conclusions may be modified if shortcomings in the training of craft personnel are determined..."

Based on the above, the net result of the analysis performed in I.d.3 indicated that adequate re-training did in fact occur for Bahnson personnel even through QCI-CPSES-013 lacked specificity regarding re-training of craft personnel. Therefore, ISAP I.d.3 did not recommend a revision to the Bahnson procedure. However, upon further consideration of this matter, TU Electric agrees that the Bahnson procedure should have been revised to state clearly how re-training should occur. This would provide assurance that training and re-training would continue to occur in a timely and prudent fashion. However, since Bahnson is no longer onsite, revising their procedure is no longer a concern.

2. Corrective Steps Taken and Results Achieved

No corrective steps have been identified with regard to revising Bahnson Training Procedure QCI-CPSES-013 since Bahnson is no longer performing work at CPSES. HVAC construction work activity is currently controlled by TU Electric procedure ECC-1.16-1, "Orientation, Indoctrination and Training of Fluor Daniel Project Personnel." This procedure includes specific requirements for Project employee training and re-training.

Corrective steps taken for ISAP I.d.3 changes that were implemented prior to SRT approval is addressed in our response to NOD Item C (445/8626-D-04; 446/8622-D-02).

3. Corrective Steps Which Will be Taken to Avoid Further Deviations

Since Bahnson is no longer onsite and HVAC activities are controlled by TU Electric, no further action is required.

The corrective steps required to prevent recurrence of the situation where changes in ISAP implementation are made prior to SRT approval are addressed in the response to NOD Item C (445/8626-D-04; 446/8622-D-02).

4. Date When Full Compliance Will Be Achieved

The CPRT is now in full compliance.

REQUEST FOR ADDITIONAL INFORMATION  
NOTICE OF DEVIATION  
ITEM C (445/8626-D-04; 446/8622-D-02)

NOD ITEM C:

Your response to Item C of the NOD does not address how the SRT was aware of ISAP changes which were made in the Results Reports. In addition, you state corrective action was taken with the SRT on May 20, 1987. Either this date is in error or your corrective actions were not timely. Therefore, we request that you revise your response to this deviation to address the above two concerns.

NOTICE OF DEVIATION  
ITEM C (445/8626-D-04; 446/8622-D-02)

- C. The W. G. Council letter (CPRT 207) to the NRC, dated January 27, 1986, regarding CPSES submittal of Revision 3 of the Comanche Peak Response Team (CPRT) Program Plan and ISAPs, committed that, "...further substantive modifications to these documents (CPRT Program Plan ISAPs) will require the approval of the Senior Review Team prior to implementation."

Change Notice 001 to Comanche Peak Project Procedure CPP-024, "Issue Specific Action Plan Revision," dated April 4, 1986, requires that "...the SRT approves substantive changes prior to implementation."

In deviation from the above, substantive changes to ISAP I.d.3 were implemented prior to approval by the Senior Review Team (SRT). For example, in April 1986 the Special Evaluation Team's effort was transferred to Quality Assurance/Quality Control (QA/QC) Review Team personnel and the issue coordinator was changed; however, the SRT did not approve these and other changes until August 1986 (446/8626-D-04; 446/8622-D-02).

REVISED RESPONSE  
ITEM C (445/8626-D-04; 446/8622-D-02)

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason for Deviation

All substantive changes to CPRT Action Plans are approved by the SRT. However, on occasion, Action Plan changes have been implemented prior to receiving formal SRT approval, which is inconsistent with the guidance delineated in CPRT-207, PAG-01 and CPP-024. Therefore, on occasion, the SRT has deviated from program requirements by not formally approving substantive changes to Action Plans prior to their implementation. These deviations have occurred due to an oversight by the SRT.



2. Corrective Steps Taken and Results Achieved

The SRT has now formally approved the substantive changes to ISAPs as delineated in PAG-01, Revision 4. Any ISAP I.d.3 action plan changes that have been implemented and later included within the action plan results report have also been documented on Action Plan Change Requests.

The SRT is made aware of proposed changes to action plans through Action Plan Change Requests per PAG-01. The Action Plan Change Requests clearly identify proposed changes to action plans, provide justification for the changes and document approval by the SRT.

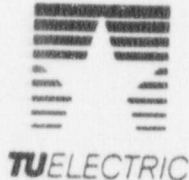
TU Electric was first informed of this deviating condition by the NRC during the NRC exit meeting held on October 9, 1986. Further information was obtained from the NRC to clarify the deviating condition during October and November 1986. An SRT meeting was held on January 27, 1987, to clarify the intent of PAG-01 regarding "substantive changes." Based on the results of the SRT meeting PAG-01 was revised (Revision 2, 2/3/87) to further define substantive changes. TU Electric officially received NRC Inspection Report 445/8626 and 446/8622 identifying this deviation on April 2, 1987, and a meeting was held with the SRT on May 20, 1987, to discuss the response to this NOD. The SRT agreed that, in accordance with procedural requirements, any future substantive changes to ISAPs that have not yet been completed will be formally approved by the SRT prior to implementation of the changes.

3. Corrective Steps Which Will Be Taken to Avoid Further Deviations

Presently, the investigative activities of all action plans have been completed or nearly completed. The completed action plans have had their respective results reports approved by SRT and issued. Any future substantive changes to ISAPs will be formally approved by the SRT prior to implementation in accordance with procedural requirements.

4. Date When Full Compliance Will Be Achieved

The SRT is now in full compliance.



Log # TXX-6775  
File # 10130  
IR-85-13  
IR-85-09  
Ref #10CFR2.201

September 30, 1987

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED RESPONSE REGARDING INSPECTION REPORT:  
50-445/85-13 AND 50-446/85-09

- REF: 1) NRC letter from E. H. Johnson to W. G. Council dated  
December 24, 1985  
2) TU Electric letter TXX-4740 from W. G. Council to NRC  
dated April 3, 1986  
3) TU Electric letter TXX-6342 from W. G. Council to NRC  
dated May 5, 1987  
4) TU Electric letter TXX-6697 from W. G. Council to NRC  
dated September 4, 1987

Gentlemen:

Reference (2) provided our original response to Notice of Deviation (NOD) Item C (445/8513-D-03) of Inspection Report 50-445/85-13 and 50-446/85-09. In reference (4) TU Electric committed to revise our original response in order to clarify our position. Accordingly, a revised response is enclosed. Since the entire response had been revised, no revision bars have been provided.

Very truly yours,

*W. G. Council*

W. G. Council

By: *G. S. Keeley*  
G. S. Keeley  
Manager Nuclear Licensing

RDD:tgj

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF DEVIATION  
ITEM C (445/8513-D-03)

Paragraph 5.0 of ERC Project Procedure No. QI-027, Revision 0, identifies the applicable inspection notes to be used, and requires that the reinspection checklist is to be used by the inspector to document the inspection results.

Note 30, an identified inspection note states, "In the course of inspection the inspector shall note any item not covered by reinspection/verification which appears out of the ordinary as related to the construction of the inspected item or surrounding area. Note such in the remarks column of inspection checklist."

Contrary to the above, the ERC inspectors failed to identify and note an out-of-the-ordinary condition in the remarks column of the inspection checklist for ASME pipe support MK No. CT-1-053-436-C52A; i.e., the existence of four 9/16" diameter holes in item 2 of the pipe support that were not shown on the applicable drawing.

REVISED RESPONSE  
ITEM C (445/8513-D-03)

TU Electric agrees with the alleged deviation and the requested information follows:

1. Reason For Deviation

Due to inspector error, a notation was not entered in the remarks column of the checklist identifying the out-of-the-ordinary condition observed by the inspector during the inspection on 9/11/85.

The original intent of Note 30 to QI-027 Rev. 0, was to provide a method of informing the responsible ERC Discipline Engineer of any apparent deviations, associated with the sample item being inspected, that were out-of-the-scope of the Quality Instruction. QI-027 included this note because it had been issued prior to the development and approval of ERC Project Procedure CPP-020, "Out-of-Scope Observations". Five other Quality Instructions also contained a note similar to Note 30 in QI-027. With the later approval of ERC Procedure CPP-020, in which all inspectors are trained, the requirements of Note 30 in QI-027 (and similar notes) became redundant and therefore were not included in other Quality Instructions that were subsequently issued.

This inconsistency between Quality Instructions was a contributing cause for the inspector's error.

2. Corrective Steps Taken and Results Achieved

An out-of-Scope Observation (OSO) #126 was written by the inspector on 9/19/85 to document the identified condition. Furthermore, since CPP-020 requires that all OSOs be distributed to the responsible ERC Discipline Engineer, Note 30 to QI-027 was no longer required and therefore deleted.



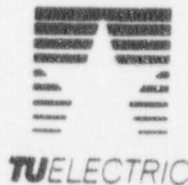
The similar notes referenced above have also been deleted from QI-019, QI-029, QI-045, QI-051 and QI-055.

3. Corrective Steps Which Will Be Taken To Avoid Further Deviations

The corrective steps described above adequately address the deviation and will prevent recurrence.

4. Date When Full Compliance Will Be Achieved

TU Electric is now in full compliance.



Log # TXX-6777  
File # 10130  
IR-87-11  
IR-87-09  
Ref # 10CFR2.201

October 2, 1987

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-445/87-11 AND 50-446/87-09

Gentlemen:

We have reviewed your letter dated September 2, 1987, concerning the inspection conducted by Mr. I. Barnes and other members of the Comanche Peak Project Division during the period from June 5 through July 7, 1987. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter was a Notice of Violation.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'W. G. Council'.

W. G. Council

RDD:tgj

Attachment

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION  
ITEM A (445/8711-V-02; 446/8709-V-02)

Criterion Y of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, dated July 31, 1984, of the TU Electric Quality Assurance Plan, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Section 3.7.6.1.1.b of TU Electric Specification 2323-MS-80B, Revision 0, dated May 17, 1976, states, in part, with respect to safety-related water chillers, "...Splicing of wiring connections or use of common wire nuts is forbidden."

Section 3.7.6.2.a of the above specification states, in part, "...All control and instrumentation wiring shall be brought to terminal blocks mounted within NEMA 12 boxes in accordance with NEMA standards..."

Contrary to the above, the NRC inspector identified the following:

1. Cap type, inline splice connectors were used to splice wires inside junction/outlet boxes and to terminate instruments and limit switches on all four of the safety-related water chiller units, CP1-CHCICE-05 and -06 and CP2-CHCICE-05 and -06.
2. A cap type, inline splice was installed on wire #110 between a relay and terminal strip inside the control panel mounted on chiller unit CP1-CHCICE-06. This splice was located inside a wiring trough.
3. One of the auxiliary oil pump motor leads was found terminated using a twist-on wire nut on chiller unit CP2-CHCICE-06, (445/8711-V-02; 446/8709-V-02).

RESPONSE TO NOTICE OF VIOLATION  
ITEM A (445/8711-V-02; 446/8709-V-02)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason For Violation

The violation was caused by a failure on the part of the equipment supplier (York-Borg Warner) to comply with specification requirements involving splices and wire nuts. As noted in the chiller procurement specification 2323-MS-80B, "Centrifugal Water Chillers," splices and the application of wire nuts are prohibited.

2. Corrective Steps Taken And Results Achieved

NCR's CE-87-9610 and CE-87-10026 were issued on August 11, 1987 and August 21, 1987 respectively, documenting the nonconforming conditions. These NCR's have been dispositioned to replace the unauthorized splices and wire nuts with approved connections.



3. Corrective Steps Which Will Be Taken To Avoid Further Violations  
The Approved Vendor List has been revised to restrict further purchases from York-Borg Warner pending receipt and approval of a revised QA program. Further purchases will be limited to spare parts. We have confirmed no other safety-related equipment has been procured from York-Borg Warner.

Issue Specific Action Plan (ISAP) VII.a.9 has been implemented to address concerns regarding vendor compliance with procurement/design requirements. A report detailing the results of the ISAP VII.a.9 findings is scheduled for issue by December 15, 1987. By January 30, 1988, we will provide a description of additional corrective actions (if any) planned as a result of the ISAP VII.a.9 Results Report.

4. Date When Full Compliance Achieved

Removal of unauthorized splices and wire nuts per NCRs CE-87-9610 and CE-87-10026 will be completed by November 30, 1987.



Log # TXX-6798  
File # 10130  
IR-87-02  
IR-87-02  
Ref # 10CFR2.201

William G. Council  
Executive Vice President

September 30, 1987

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED DATE OF FULL COMPLIANCE FOR NOTICE OF DEVIATION  
ITEM A (445/8702-D-03; 446/8702-D-03)

Gentlemen:

The TU Electric response to Notice of Deviation (NOD) Item A (445/8702-D-03; 446/8702-D-03) stated that full compliance would be achieved by September 30, 1987. Please be advised that this date has been revised to November 30, 1987.

Very truly yours,

*W. G. Council*

W. G. Council

By: *G. S. Keeley*  
G. S. Keeley  
Manager Nuclear Licensing

RDD:tgj

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)



Log # TXX-6803  
File # 10130  
IR-86-07  
IR-86-05  
Ref # 10CFR2.201

William G. Council  
Executive Vice President

October 1, 1987

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR ADDITIONAL INFORMATION REGARDING  
INSPECTION REPORT: 50-445/86-07 AND 50-446/86-05

Gentlemen:

Your letter dated September 11, 1987, requested additional information on the subject inspection report with respect to Notice of Violation (NOV) Item A (445/8607-V-24), Notice of Deviation (NOD) Item E (445/8607-D-01) and Notice of Deviation (NOD) Item I.3 (445/8607-D-11).

We hereby respond to the above items in the attachment to this letter.

Very truly yours,

*W. G. Council*

W. G. Council

By: *John W. Beck*  
John W. Beck  
Vice President,  
Nuclear Engineering

RDD:tgj

C- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)



REQUEST FOR ADDITIONAL INFORMATION  
NOTICE OF VIOLATION  
ITEM A (445/8607-V-24)

"...(W)ith respect to NOV Item A, the corrective steps taken appear inadequate in light of the reason given for not performing a technical evaluation of all 48 closed Corrective Action Reports (CARs) to assure that they have been properly dispositioned. Additionally, please inform us of actions taken to ascertain whether this problem exists in CAR systems used by other groups, such as Brown and Root."

RESPONSE TO  
ITEM A (445/8607-V-24)

In our original response to this Notice of Violation, we indicated that a review of 10 of the previously closed CARs had identified no additional inadequate justifications for closure. We believe that this result is indicative of the quality of actions taken to address previously closed CARs, and properly addresses the concerns raised in the violation.

To further demonstrate this, the 38 remaining CARs closed prior to the action taken to prevent further violations will also be examined. The review has been initiated, and will verify the adequacy of each CAR's disposition.

A similar review of the adequacy of the disposition of closed CARs which were issued by other organizations, such as Brown and Root, will also be performed.

The reviews are scheduled to be completed by October 30, 1987.

REQUEST FOR ADDITIONAL INFORMATION  
ITEM E NOTICE OF DEVIATION (445/8607-D-01)

With respect to NOD Item E, please provide the basis for the statement in your February 18, 1987, response (TXX-6222) indicating that the welding on the seismic arrestor brackets has been determined to be acceptable. Additionally, your response identified that your letter TXX-3657 would be supplemented to document why lack of welding documentation does not constitute a significant condition adverse to quality. TXX-3657 was supplemented by TXX-6526. Please clarify the statements in supplement, TXX-6526, relative to control of bracket materials and welding by the valve manufacturer.

RESPONSE TO  
ITEM E (445/8607-D-01)

Information concerning the acceptability of seismic arrestor bracket welds, acceptance criteria, and clarification of statements regarding the manufacturer's control of bracket materials and welding will be provided in our next update to SDAR CP-83-08. As stated in TXX-6526, we will review Fisher Control's Certificates of Conformance and will inspect the bracket attachment welds in accordance with the visual weld acceptance criteria (VWAC), and the weld sizes as depicted on the vendor's design drawings. Although our next report is scheduled for issue by January 14, 1988, in view of your concern regarding this issue we will submit an updated response to the SDAR which will include the additional information no later than November 30, 1987.

REQUEST FOR ADDITIONAL INFORMATION  
NOTICE OF DEVIATION  
ITEM I.3 (445/8607-D-11)

Please identify the actions taken in regard to NOD Item I.3 to avoid recurrence of further errors by the identified ERC inspector.

RESPONSE TO  
ITEM I.3 (445/8607-D-11)

No actions were taken in regard to NOD Item I.3 to avoid recurrence of further errors by the identified ERC inspector. The ERC inspector, who incorrectly documented the "out" side caliper reading, had been terminated due to a reduction in force (May 21, 1986) prior to this error being identified to TU Electric.



Log # TXX-6815  
File # 10130  
1R 86-06  
1R 86-04  
Ref # 10 CFR 2.201

October 1, 1987

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NO. 50-445/86-06 AND 50-446/86-04  
REVISED DATE OF FULL COMPLIANCE TO NOTICE OF  
VIOLATION (NOV) ITEM A(2)

- REFERENCE: 1) TUGCo Letter TXX-5037 from W. G. Council to  
E. H. Johnson dated October 9, 1986  
2) TUGCo Letter TXX-6071 from W. G. Council to  
E. H. Johnson dated October 31, 1986  
3) TUGCo Letter TXX-6213 from W. G. Council to  
E. H. Johnson dated January 22, 1987  
4) TU Electric letter TXX-6387 from W. G. Council  
to NRC dated May 8, 1987  
5) TU Electric Letter TXX-6481 from W. G. Council  
to NRC dated June 30, 1987  
6) TU Electric Letter TXX-6774 from W. G. Council  
to NRC dated September 14, 1987

Gentlemen:

Reference (6) stated that the cable rework associated with NCR CE-87-7481 would be completed by October 1, 1987. We have encountered additional delays in performing this rework. Accordingly, our date for completion of cable rework specified in NCR CE-87-7481 is hereby revised to be no later than November 1, 1987.

Very truly yours,

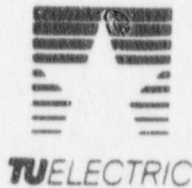
*W. G. Council*  
W. G. Council

By: *John W. Beck*  
John W. Beck  
Vice President,  
Nuclear Engineering

RSB/tgj

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)





Log # TXX-6832  
File # 10130  
IR 85-16  
IR 85-13  
Ref # 10CFR2.201

October 9, 1987

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REVISED RESPONSE REGARDING INSPECTION REPORT  
50-445/85-16 AND 50-446/85-13

Ref: 1) NRC letter from E. H. Johnson to W. G. Council dated April 4, 1986  
2) TU Electric letter TXX-4826 from W. G. Council dated June 16, 1986  
3) TU Electric letter TXX-6697 from W. G. Council dated September 4, 1987

Gentlemen:

Reference (2) provided our original response to Notice of Violation (NOV) Item C (445/8516-V-13) of Inspection Report 50-445/85-16 and 50-446/85-13. In reference (3) TU Electric committed to revise our original response in order to clarify our position. Accordingly, a revised response is enclosed. Since the entire response has been revised, no revision bars have been provided.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'W. G. Council'.  
W. G. Council

RDD:tgj

c- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

NOTICE OF VIOLATION  
ITEM C (445/8516-V-13)

- C. Criterion X of Appendix B to 10 CFR 50, as implemented by Section 10.0, Revision 1, dated July 31, 1984, of the TUGCO QAP, states, in part, "A program for inspection of activities affecting quality shall be established and executed ... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Paragraph 5.1.2 in B&R Procedure CP-NDEP-200, Revision dated September 27, 1979, states, in part, "The final surface condition of plate and piping welds shall be visually inspected after completion of the weld for ... fillet size (as applicable)." Revision 4 of Drawing CC-1-131-010-S43R requires welds on two sides for item 8 to item 9, with a fillet size of 1/4 inch. A weld fillet size of 1/4 is also specified for items 9 and 10.

Contrary to the above, inspection of Unit 1 ASME Pipe Support No. CC-1-131-010-S43R, which had been previously inspected and accepted by Quality Control, identified the presence of undersize welds. A total weld length of approximately 20 inches was found to be undersize by a minimum of 1/16 inch with respect to the item 8 to item 9 fillet welds. A consecutive 2-inch segment was also present in these welds which was 1/8 inch undersize. The vertical welds on the outside of the wide flange joining items 9 and 10 were also found to be undersize by a minimum of 1/16 inch for more than 25% of the weld length (445/8516-V-13).

REVISED RESPONSE  
ITEM C (445/8516-V-13)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The reason for the violation was inadequate QC inspection of the as-built weld size to the weld size required by the associated design documents.

2. Corrective Steps Taken and Results Achieved

To address the specific deficiencies identified in the violation, Nonconformance Report (NCR) XI-708 was issued on November 14, 1985. This NCR was subsequently transferred to NCR M-25650 on March 11, 1986. NCR M-25650 was dispositioned "accept as is" based on an evaluation of the as-built conditions.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

The Issue Specific Action Plan VII.c weld size reinspections



conducted on Unit 1 by the third party did not indicate the quality of pipe support welds to be a problem area. The reinspection results indicated a very low incidence of undersized welds, and none were identified that were considered safety significant. TU Electric believes that these results demonstrate the isolated nature of this violation and adequately address the undersize weld issue for Unit 1 weld inspection activities. We also believe that these results are indicative of the quality of work performed in Unit 2 since it was constructed and inspected using similar criteria and the same personnel.

Since initial inspection of the subject welds in 1979 and the final weld inspection in 1982, a number of revisions to the component support weld inspection program have been made. These revisions were aimed at improving the quality of weld inspections and their documentation. For example:

With the issuance of QI-QAP-11.1-28 Revision 16 on December 15, 1982, a Weld Inspection Checklist (WICL) was required to be completed by the QC Inspector (QCI) for each pipe support at the time of fabrication completion. Prior to this time, less stringent documentation requirements were applied. Completion of the WICL required the QCI to measure the actual weld size and record it on the WICL, initial and date the WICL, and sign and date the hanger design drawing and/or CMC. Since the hanger design drawing and/or CMC contained the design weld sizes, these provisions provided additional assurance that the inspectors were comparing the deposited weld size to the design weld size.

Revision 24 to QI-QAP-11.1-28 issued April 18, 1984 significantly expanded the scope of the Hanger Inspection Report completed for each hanger. This revision required the WICL to be completed for all Unit 2 supports regardless of the fabrication or installation status. Additionally, this revision was intended to assure objective evidence of QCI verification of each quantitative attribute considered relevant to the analysis by engineering.

Another significant change was implemented via Revision 11 of CP-QAP-12.1, which was issued on June 28, 1984. That revision required Brown and Root N-5 package reviewers to assure that individual weld inspections were performed and documented correctly by verifying the inclusion of a completed WICL in the completed work package. That revision also required reinspection of any component support welds which were submitted for package review in accordance with this procedure and not previously documented on a WICL per QI-QAP-11.1-28.

These revisions have resulted in an improved program which enhanced the assurance that weld inspections are properly performed. The majority of the Unit 2 component support weld inspections have been performed with these controls. Throughout implementation of these improvements, the individuals responsible for implementing the changes have been trained in their application.

#### 4. Date When Full Compliance Will be Achieved

NCR M-25650 was dispositioned on October 6, 1986, and will be closed prior to Unit 1 fuel load. Revision 11 to CP-QAP-12.1 was approved on June 28, 1984.





Log # TXX-6856  
File # 10130  
IR 86-15  
IR 86-12

October 15, 1987

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/86-15 AND 50-446/86-12  
REVISED DATE OF FULL COMPLIANCE FOR  
NOTICE OF VIOLATION (NOV) ITEM C (446/8612-V-03)

- REF:
- 1) NRC letter from E. H. Johnson to W. G. Council dated December 22, 1986.
  - 2) TU Electric Letter TXX-6250 from W. G. Council to NRC dated February 2, 1987
  - 3) TU Electric Letter TXX-6445 from W. G. Council to NRC dated May 22, 1987

Gentlemen:

Reference (3) provided our revised response to Notice of Violation (NOV) Item C (446/8612-V-03) of Inspection Report 50-445/86-15 and 50-446/86-12. In that response TU Electric stated that issuance of instructions, examination of enclosures, and resolution of NCRs on NEMA enclosures would be completed by October 15, 1987. For Unit 1 and Common Systems, these activities have been incorporated in the Post Construction Hardware Validation Program. For Unit 2 systems, these activities will be accomplished as required to support Unit 2 fuel load. Accordingly, our date of full compliance is revised as follows. The issuance of instructions, examination of enclosures, and resolution of NCRs will be completed by March 1, 1988, for Unit 1 and Common Systems and by March 1, 1989, for Unit 2 Systems.

Very truly yours,

*W. G. Council*  
W. G. Council

By: *John W. Beck*  
John W. Beck  
Vice President,  
Nuclear Engineering

RDD:tgj  
c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)



Log # TXX-6844  
File # 10130  
IR 86-06  
IR 86-04  
Ref # 10CFR2.201

William G. Council  
Executive Vice President

October 12, 1987

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NO: 50-445/86-06 AND 50-446/86-04  
REVISED DATE OF FULL COMPLIANCE TO NOTICE OF  
VIOLATION (NOV) ITEM B (446/8604-V-03)

- Reference: 1) TUGCO Letter TXX-5037 from W. G. Council to E. H. Johnson dated October 9, 1986
- 2) TU Electric Letter TXX-6387 from W. G. Council to NRC dated May 8, 1987
- 3) TU Electric Letter TXX-6481 from W. G. Council to NRC dated June 30, 1987

Gentlemen:

Reference (3) provided our response to NOV Item B (446/8604-V-03). In that response we stated that by October 15, 1987, Field Verification Method (FVM) procedures would be issued to determine where cable grips are required. The FVM for Unit 1 and common systems was issued July 29, 1987. The FVM for Unit 2 systems will be issued as required to support completion of walkdowns, generation of DCA's and installation of cable grips by December 31, 1988.

Very truly yours,

*W. G. Council*  
W. G. Council

RSB:tgj

C- Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)