APPENDIX F

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

CABLE TRAY SUPPORT MODIFICATIONS INSPECTIONS

NRC Inspection Report: 50-446/85-11 CP: CPPR-127

Docket: 50-446 Category: A2

Applicant: Texas Utilities Electric Company
400 North Olive Street
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Unit 2

Inspection At: Glen Rose, Texas

Inspection Conducted: September 30 - October 2, 1985

Inspector: L D Gilbert 3/4/86
L. D. Gilbert, Reactor Inspector Date

Reviewed By: I Barnes 3/3/86
I. Barnes, Group Leader, Region IV Date
CPSES Group

Approved: T. F. Westerman 3/3/86
T. F. Westerman, Chief, Region IV CPSES Group Date

R. E. Ireland 3/4/86
R. E. Ireland, Chief, Engineering Section Date
Reactor Safety Branch

Inspection Summary

Inspection Conducted September 30 - October 2, 1985 (Report 50-446/85-11)

Areas Inspected: Routine, unannounced inspection of cable tray support modifications. The inspection involved 24 inspector-hours onsite by one NRC inspector.

Results: Within the area inspected, no violations or deviations were identified.

DETAILS

1. **Persons Contacted**

Applicant Personnel

*P. Halstead, Site QC Manager

Brown & Root (B&R) Employees

W. E. Baker, Senior Project Welding Engineer
D. Mantz, Cable Tray Hanger General Foreman
D. Geeo, Cable Tray Hanger Foreman

Other contractor personnel were also contacted during the course of this inspection activity.

*Denotes those present at the exit interview.

2. **Safety-Related Cable Tray Support Modifications**

The NRC inspector reviewed the documentation traveler packages and inspected the weldments for 12 cable tray supports that had been modified using tube steel in the new design. The following support were inspected:

Support	Classification
CTH-2-11843	Class 1
CTH-2-11846	Class 1
CTH-2-11841	Class 1
CTH-2-11684	Class 1
CTH-2-10040	Class 1
CTH-2-9741	Class 1
CTH-2-11542	Class 1
CTH-2-11541	Class 1
CTH-2-11540	Class 1
CTH-2-9732	Class 1
CTH-2-9733	Class 1
CTH-2-10033	Class 1

In the areas inspected, the cable tray support weldments complied with the requirements for welding in Weld Procedure Specification No. 10046 and the requirements for visual weld inspection in Instruction QI-QP-11.21-1. The documentation for the supports was consistent with the status of the work.

No violations or deviations were identified.

3. Exit Interview

The NRC inspector met with the applicant representative denoted in paragraph 1 on October 2, 1985, and summarized the scope and findings of the inspection.

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U.S. NUCLEAR REGULATORY COMMISSION

INSPECTOR'S REPORT

Office of Inspection and Enforcement

PRINCIPAL INSPECTOR (name, last, first and middle initial): WESTERMAN, THOMAS F

REVIEWER: WESTERMAN, THOMAS F

INSPECTORS NRC: E. [illegible], D.L. Kelley, W.F. Smith, C.J. Hale, R.R. Johnson, L.D. Gilbert, M.E. Phillips, D.E. Norman, L.E. Ellershaw
Consultants: EG&G - W.J. McCloskey, R. [illegible], Parameter - T. Young, V. [illegible], D. Brown, J. Dale, T. Jones, R. [illegible], J. Gibson, [illegible], D. [illegible]

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT NO.	SEQ.	NEXT INSPEC DATE MO	YR
TEXAS UTILITIES ELECTRIC COMPANY	☒ I – INSERT	05000445	8514	A		
	☐ M – MODIFY	05000446	8511	B		
	☐ D – DELETE			C		
	☐ R – REPLACE			D		

PERIOD OF INVESTIGATION/INSPECTION

FROM MO	DAY	YR	TO MO	DAY	YR
9	30	85	10	31	85

INSPECTION PERFORMED BY
☐ 1 – REGIONAL OFFICE STAFF
☐ 2 – RESIDENT INSPECTOR
☐ 3 – PERFORMANCE APPRAISAL TEAM
☒ OTHER Combined Region, Residents & Consultants

ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IE MC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code)

REGION	DIVISION	BRANCH
4	2	

REGIONAL ACTION (Check one box only)
☐ 1 – NRC FORM 591
[✓ 2 – REGIONAL OFFICE LETTER]

TYPE OF ACTIVITY CONDUCTED (Check one box only)
☒ 02 – SAFETY
☐ 03 – INCIDENT
☐ 04 – ENFORCEMENT
☐ 05 – MGMT. AUDIT
☐ 06 – MGMT. VISIT
☐ 07 – SPECIAL
☐ 08 – VENDOR
☐ 09 – MAT. ACCT.
☐ 10 – PLANT SEC.
☐ 11 – INVENT. VER.
☐ 12 – SHIPMENT/EXPORT
☐ 13 – IMPORT
☐ 14 – INQUIRY
☐ 15 – INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (Check one box only)
☐ 1 – CLEAR
☒ 2 – VIOLATION
☐ 3 – DEVIATION
☐ 4 – VIOLATION & DEVIATION

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS: 0003

ENFORCEMENT CONFERENCE HELD: 1 – YES ☐

REPORT CONTAINS 2.790 INFORMATION: 1 – YES ☐

LETTER OR REPORT TRANSMITTAL DATE
NRC FORM 591 OR REG LETTER ISSUED: MO 03 DAY 06 YR 86
REPORT SENT TO HQ FOR ACTION: MO DAY YR

MODULE INFORMATION

PHASE	MODULE NUMBER INSP. (MANUAL CHAPTER / PROCEDURE NUMBER)	SEQ #	DIRECT INSPEC. EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP
2	30703	A	018			
		B	012			
3	42651	A	075	100	C	
3	71302	A	019	100	C	
3	92702	A	001			70370
3	92718	A	013			
3	92701	A	002			70541
3	92701	A	004			70324
3	92715	A	003			

CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

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(11-81)
IE MC 0535

U.S. NUCLEAR REGULATORY COMMISSION

INSPECTOR'S REPORT

Office of Inspection and Enforcement

PRINCIPAL INSPECTOR *(name, last, first, and middle initial)*

REVIEWER

INSPECTORS

LICENSEE/VENDOR

TRANSACTION TYPE
- ☐ I – INSERT
- ☐ M – MODIFY
- ☐ D – DELETE
- ☐ R – REPLACE

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)

REPORT: NO. | SEQ. A B C D

NEXT INSPEC. DATE: MO | YR

PERIOD OF INVESTIGATION/INSPECTION: FROM MO DAY YR | TO MO DAY YR

INSPECTION PERFORMED BY
- ☐ 1 – REGIONAL OFFICE STAFF
- ☐ 2 – RESIDENT INSPECTOR
- ☐ 3 – PERFORMANCE APPRAISAL TEAM
- ☐ OTHER

ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY *(See IE MC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code.)*: REGION | DIVISION | BRANCH

REGIONAL ACTION *(Check one box only)*
- ☐ 1 – NRC FORM 591
- ☐ 2 – REGIONAL OFFICE LETTER

TYPE OF ACTIVITY CONDUCTED *(Check one box only)*
- ☐ 02 – SAFETY
- ☐ 03 – INCIDENT
- ☐ 04 – ENFORCEMENT
- ☐ 05 – MGMT. AUDIT
- ☐ 06 – MGMT. VISIT
- ☐ 07 – SPECIAL
- ☐ 08 – VENDOR
- ☐ 09 – MAT. ACCT.
- ☐ 10 – PLANT SEC.
- ☐ 11 – INVENT. VER.
- ☐ 12 – SHIPMENT/EXPORT
- ☐ 13 – IMPORT
- ☐ 14 – INQUIRY
- ☐ 15 – INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS *(Check one box only)*: B C D
- 1 – CLEAR
- 2 – VIOLATION
- 3 – DEVIATION
- 4 – VIOLATION & DEVIATION

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS: A | B | C | D

ENFORCEMENT CONFERENCE HELD: A B C D — 1 – YES

REPORT CONTAINS 2.790 INFORMATION: A B C D — 1 – YES

LETTER OR REPORT TRANSMITTAL DATE
- NRC FORM 591 OR REG LETTER ISSUED: MO DAY YR
- REPORT SENT TO HQ. FOR ACTION: MO DAY YR

MODULE INFORMATION

REC ORD NUMBER	MODULE NUMBER INSP PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	SEQ #	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL
1	2	55	182		A								
					B		027	100	C				
					C								
					D								
1	2	51	053		A								
					B		018	0					
					C								
					D								
1	2	61	053		A								
					B		018	10					
					C								
					D								
1	2	51	053		A								
					B		023	010					
					C								
					D								

MODULE INFORMATION

REC ORD TYPE NUMBER	MODULE NUMBER INSP PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	SEQ #	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL
					A								
					B								
					C								
					D								
					A								
					B								
					C								
					D								
					A								
					B								
					C								
					D								
					A								
					B								
					C								
					D								

CIRCLE SEQUENCE # VIOLATION OR DEVIATION

1 2 3 | 4 | 5 10 | 11 | 12 | 13 15 | 16 - 18 | 19 | 20 | 21 25 | 1 2 3 | 4 | 5 10 | 11 | 12 | 13 15 | 16 18 | 19 | 20 | 21 25

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U.S. NUCLEAR REGULATORY COMMISSION

INSPECTOR'S REPORT

Office of Inspection and Enforcement

PRINCIPAL INSPECTOR (Name: last, first, and middle initial)

REVIEWER

INSPECTORS

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT NO.	REPORT SEQ.	NEXT INSPEC. DATE MO	NEXT INSPEC. DATE YR
	☐ I – INSERT ☐ M – MODIFY ☐ D – DELETE ☐ R – REPLACE			A B C D		

PERIOD OF INVESTIGATION/INSPECTION FROM MO	DAY	YR	TO MO	DAY	YR	INSPECTION PERFORMED BY	ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code) REGION	DIVISION	BRANCH
						☐ 1 – REGIONAL OFFICE STAFF ☐ 2 – RESIDENT INSPECTOR ☐ 3 – PERFORMANCE APPRAISAL TEAM ☐ OTHER			

REGIONAL ACTION (Check one box only)
☐ 1 – NRC FORM 591
☐ 2 – REGIONAL OFFICE LETTER

TYPE OF ACTIVITY CONDUCTED (Check one box only)
☐ 02 – SAFETY
☐ 03 – INCIDENT
☐ 04 – ENFORCEMENT
☐ 05 – MGMT. AUDIT
☐ 06 – MGMT. VISIT
☐ 07 – SPECIAL
☐ 08 – VENDOR
☐ 09 – MAT. ACCT.
☐ 10 – PLANT SEC.
☐ 11 – INVENT. VER.
☐ 12 – SHIPMENT/EXPORT
☐ 13 – IMPORT
☐ 14 – INQUIRY
☐ 15 – INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (Check one box only)

A	B	C	D

1 – CLEAR
2 – VIOLATION
3 – DEVIATION
4 – VIOLATION & DEVIATION

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS A	B	C	D

ENFORCEMENT CONFERENCE HELD

A	B	C	D

1 – YES

REPORT CONTAIN 2.790 INFORMATION

A	B	C	D

1 – YES

LETTER OR REPORT TRANSMITTAL DATE

NRC FORM 591 OR REG. LETTER ISSUED MO	DAY	YR	REPORT SENT TO HQ. FOR ACTION MO	DAY	YR

MODULE INFORMATION

MODULE NUMBER INSP.	SEQ	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP
277055	A		024	100	C	
	B		024	100	C	
	C					
	D					
292701	A		005			292703
	B		005			292703
	C					
	D					
292701	A		005			292706
	B		005			292706
	C					
	D					
292701	A		090			250090
	B		035			250090
	C					
	D					

MODULE INFORMATION

MODULE NUMBER INSP.	SEQ	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP
292701	A		005			248053
	B		005			248053
	C					
	D					
292702	A		043			
	B		042			
	C					
	D					
292703	A		020			
	B		016			
	C					
	D					
255172	A					
	B		027	100	C	
	C					
	D					

CIRCLE SEQUENCE # VIOLATION OR DEVIATION

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INSPECTOR'S REPORT
Office of Inspection and Enforcement

PRINCIPAL INSPECTOR (Name, last, first, and middle initial)

REVIEWER

INSPECTORS

LICENSEE/VENDOR

TRANSACTION TYPE
- ☐ I – INSERT
- ☐ M – MODIFY
- ☐ D – DELETE
- ☐ R – REPLACE

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)

REPORT: NO. / SEQ. A, B, C, D

NEXT INSPEC. DATE: MO / YR

PERIOD OF INVESTIGATION/INSPECTION: FROM MO. DAY YR. / TO MO. DAY YR.

INSPECTION PERFORMED BY
- ☐ 1 – REGIONAL OFFICE STAFF
- ☐ 2 – RESIDENT INSPECTOR
- ☐ 3 – PERFORMANCE APPRAISAL TEAM
- ☐ OTHER

ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IE MC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code): REGION / DIVISION / BRANCH

REGIONAL ACTION (Check one box only)
- ☐ 1 – NRC FORM 591
- ☐ 2 – REGIONAL OFFICE LETTER

TYPE OF ACTIVITY CONDUCTED (Check one box only)
- ☐ 02 – SAFETY
- ☐ 03 – INCIDENT
- ☐ 04 – ENFORCEMENT
- ☐ 05 – MGMT. AUDIT
- ☐ 06 – MGMT. VISIT
- ☐ 07 – SPECIAL
- ☐ 08 – VENDOR
- ☐ 09 – MAT. ACCT.
- ☐ 10 – PLANT SEC.
- ☐ 11 – INVENT. VER.
- ☐ 12 – SHIPMENT/EXPORT
- ☐ 13 – IMPORT
- ☐ 14 – INQUIRY
- ☐ 15 – INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (Check one box only): A B C D
- 1 – CLEAR
- 2 – VIOLATION
- 3 – DEVIATION
- 4 – VIOLATION & DEVIATION

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS: A B C D

ENFORCEMENT CONFERENCE HELD: A B C D — 1 – YES

REPORT CONTAIN 2.790 INFORMATION: A B C D — 1 – YES

LETTER OR REPORT TRANSMITTAL DATE: NRC FORM 591 OR REG. LETTER ISSUED (MO. DAY YR.) / REPORT SENT TO HQ. FOR ACTION (MO. DAY YR.)

MODULE INFORMATION

REC. SEQ. NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	SEQ.	PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP: PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL
	2	92	705		Ⓐ		2000						
					Ⓑ		350						
					C								
					D								

CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

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INSPECTOR'S REPORT
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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits): 05000446

REPORT NO.: 8514

SEQ: A ☒ B ☐ C ☐ D ☐

MODULE NUMBER: 362451

VIOLATION SEVERITY OR DEVIATION "D": 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5 ☐ 6 ☐ D ☐

SITE RELATED: A C ☒ B D ☐

VIOLATION OR DEVIATION (Enter up to 3400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

A. Contrary to Criterion XVII of Appendix B to 10CFR Part 50 as implemented by Section 3.8, Revision 4, of the Operations Administrative Control and Quality Assurance Plan:

1. A significant number of instances of missing data entries was noted in water chemistry records covering the period March 1983 through September 1985, with respect to the chemistry sampling frequency requirements of Procedures CHM-501, "Chemistry Control of the Steam Generators," and CHM-508, "Chemistry Control of the Primary Cooling Water Systems." No annotations were made in the records to explain why the samples were not taken.

2. Review of the water chemistry records showed instances of failure to make required entries to indicate when the Shift Supervisor was notified in regard to out-of-specification chemistry results.

3. The records did not identify what corrective actions were taken after entry of out-of-specification results.

4. Inadequate reviews were performed of the acceptability of water chemistry data, as evidenced by the presence of review and approval signatures on forms containing discrepant data results.

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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits): 05000446

REPORT NO.: 8511

SEQ: A B C D

MODULE NUMBER: 492702

VIOLATION SEVERITY OR DEVIATION: 1 2 3 [✓ 4] 5 6 D

SITE RELATED: A C [✓ B] D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

B. Contrary to Criterion X of Appendix B to 10CFR Part 50 and Brown & Root Procedures CP-QAP-16.1 Revision 25 and CP-CPM-6.9D, on October 9, 1985 ~~it~~ was observed that the repair of a minimum wall violation on weld 21-2 in component CC-2-RB-053 had been accomplished without documenting the condition on a nonconformance report form.

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DOCKET NO (8 digits) OR LICENSE NO (BY PRODUCT) (13 digits)	REPORT NO	SEQ	MODULE NUMBER
05000446	8511	B	292702

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D — X under 4

SITE RELATED: A C ☐ B D ☒

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

c. Contrary to Criterion V of Appendix B to 10CFR Part 50 and Brown & Root Procedures DCP-3 Revision 18

1. Satellite document control center 307 was noted on October 14, 1985, to be in possession of a controlled copy of Component Modification Card 96181 for which receipt had not been signed for and dated on the Document Distribution Log.

2. A copy of superseded Design Change Authorization (DCA) 21446, Revision 0, was noted on the same date to be present in two packages for Drawing 2323-E1-1702, Sheet 002, Revision 2. Both copies of DCA 21446, Revision 0, were not stamped "VOID" on the face of the document.

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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT NO.	SEQ
05000445	8514	A
05000446	8511	B
		C
		D

MODULE NUMBER: 92701

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D — 4

SITE RELATED: A C / B D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

b. Contrary to Criterion V of Appendix B to 10CFR Part 50, TUGCO QA Procedure 5.0 Revision 2, and FSAR Volume XIV, Section 17.1.17, the original and sole copy of design records were ascertained on October 16, 1985, to have been shipped to Stone and Webster Corporation, New York, without the establishment of procedures that address required control and inventory measures.

GPO 887-081

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INSPECTOR'S REPORT
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DOCKET NO (8 digits) OR LICENSE NO (BY PRODUCT) (13 digits): 05000445

REPORT NO: 8516

SEQ: A

MODULE NUMBER: 92705

VIOLATION SEVERITY OR DEVIATION: 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ D ☒

SITE RELATED: ☒ A C ☐ B D ☐

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

A. Contrary to Section 4.1.6 of ERC Procedure CPP-012,

~~Contrary to the above,~~ the QA/QC Records Administrator does not receive copies of requests to provide for control of these documents

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INSPECTOR'S REPORT
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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits): 05000445

REPORT NO.: 8514

SEQ: A B C D

MODULE NUMBER: 21927705

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D ☒

SITE RELATED: A C B D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

c Contrary to ERC Quality Instruction QI-009, Revision 0:

1. Review of ERC accepted documentation for conduit C14R13047 showed that the ERC inspector failed to identify that the certification to the applicable Procedure QI-QP-11.3-23 had lapsed for the TUGCO electrical inspector signing IR-E-46087.

2. The ERC completed inspection record checklist for conduit C13016037 in Verification Package No. R-E-CDUT-064 did not contain documentation of the SBM IR or latest construction operation traveler number ~~(445/8514-D-03)~~

U.S. NUCLEAR REGULATORY COMMISSION

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INSPECTOR'S REPORT
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DOCKET NO (8 digits) OR LICENSE NO (BY PRODUCT) (13 digits): 05000445

REPORT NO: 8514

SEQ: A B C D

MODULE NUMBER: 292705

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D ☒

SITE RELATED: ☒ A C ☐ B D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

4.3

B. Contrary to Section 4.1 of CPRT Issue-Specific Action Plan No. VII.c,

the following examples were noted of inadequate procedural guidance and document reviewer performance in regard to nonrecreatable and inaccessible attributes:

1. Quality Instruction (QI) QI-013, Revision 4, lists no specific attributes, but instead specifies that the inspector verify installations in accordance with one or more of a listing of TUGCO procedures; i.e., QI-QP-11.8-1, -5, -6, and -8. The list of appropriate procedures does not, however, indicate the applicable revision number of each procedure. In that the number of nonrecreatable or inaccessible inspection attributes can vary from revision to revision of a procedure (e.g., Revisions 0 and 1 of TUGCO Procedure QI-QP-11.8-8), the absence of guidance on applicable procedure revision numbers does not constitute detailed instructions.

2. During the documentation review of Verification Package No. R-E-CDUT-064, in accordance with QI-009, Revision 0, there was no evidence that a documentation check was made of inaccessible attributes for conduit C13016037 that were caused by the installation of separation barrier material. ~~(445/8514-B-08)~~

U.S. NUCLEAR REGULATORY COMMISSION

RM 766 A

INSPECTOR'S REPORT
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DOCKET NO (8 digits) OR LICENSE NO (BY PRODUCT) (13 digits): 05000445

REPORT NO: 8514 SEQ: A

MODULE NUMBER: 292705

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D ☒

SITE RELATED: ☒ A C B D

ATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

D Contrary to Section III.4 of CPP-009, Revision 3, the following examples were noted where field inspections of hardware were not performed in accordance with approved instructions:

1. Inspection of piping welds in accordance with QI-055, Revision 0.

2. Dimensional inspection of Verification Package No. I-S-LBSR-023

3. Inspection of instrumentation installation for Verification Package Nos. I-E-ININ-026 and I-E-ININ-04

U.S. NUCLEAR REGULATORY COMMISSION

PO 887-881

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INSPECTOR'S REPORT
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DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits): 05000445

REPORT NO.: 8514 SEQ: A

MODULE NUMBER: 292705

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D — 4: IV

SITE RELATED: A ☒ C ☐ B ☐ D ☐

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds that number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

E. Contrary to Criterion VI of Appendix B to 10CFR Part 50, paragraphs 2 and 4 of Station Administrative Manual Procedure STA-405 Revisions 7 and 8, and paragraph 4.0 of Nuclear Operations Engineering Manual Instruction NOE-201-5, nine as-built drawings were revised and distributed by TUGCO Nuclear Engineering to reflect NCR identified undersize welds, without receiving TUCGO Operations review, approval, and authorization to distribute the revised drawings.

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INSPECTOR'S REPORT
(Continuation)
Office of Inspection and Enforcement

DOCKET NO (8 digits) OR LICENSE NO (BY PRODUCT) (13 digits): 05000445

REPORT NO: 8514

SEQ: A B C D

MODULE NUMBER: 292705

VIOLATION SEVERITY OR DEVIATION: 1 2 3 4 5 6 D — ☒ 4

SITE RELATED: ☒ A C B D

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

F. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and paragraphs 3.0 and 3.7 of Procedure CP-QP-2.1, Revision 14,

it was noted on October 21, 1985, during review of documentation for Class 1E lighting system conduit EAB1-1 that the electrical inspector, who had signed inspection reports E-1-0024951 and E-1-0027419, had not been certified to the applicable Procedure QI-QP-11.2-25, Revision 17, dated February 13, 1984, "Inspection of New Installations for Class 1E Lighting Systems."

85-14/85-11

ATCH 6