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William J. Cahill, Jr.
Executive Vice President

June 15, 1989

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

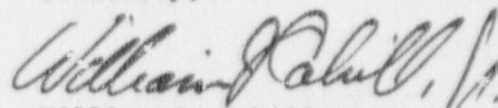
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO NRC INSPECTION REPORT NOS.
50-445/89-26 AND 50-446/89-26

Gentlemen:

TU Electric has reviewed your letter dated May 16, 1989, concerning the inspection conducted by Mr. Michael Runyan and NRC consultants during the period April 5 through May 2, 1989. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachments to this letter.

Sincerely,


William J. Cahill, Jr.

BSD/bsd
Attachments

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

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NOTICE OF VIOLATION
ITEM A (445/8926-V-01)

- A. Criteria XVI of Appendix B to 10CFR Part 50, as implemented by Section 16.0, Revision 0, of the TU Electric Quality Assurance Manual requires that "Measures shall be established to assure that conditions adverse to quality, . . . are promptly identified and corrected."

Contrary to the above, nonconformance reports (NCRs) 88-19673 and 88-18905 were closed out without all identified discrepancies being corrected. During the NRC inspector's verification of the corrective action on NCRs 88-19673 and 88-18905, which required that a galvanized coating be applied to those areas of duct segments B-1-658-028, 041, 043, 045, 047 and B-1-658-032 bereft of a galvanized coating, the following was observed:

- Welds on the north face of the referenced duct segments still lacked the NCR required galvanizing.
- Raw exposed edges of structural components located on the internal portion of one duct segment were still uncoated.

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8926-V-01)

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

1. Reason for Violation:

Nonconformance Reports (NCRs) 88-19673 and 88-18905, require that coatings be applied to duct segments B-1-658-028, 041, 043, 045, 047, and B-1-658-032. Craft personnel completed this activity and QC inspectors verified the presence of coating as required by the implementing procedures and the specification existing when the coating verification was performed. The NCRs were closed based on this verification.

In performing the coating activity the coating verification was performed while the galvanic coatings were wet. In this condition, the duct appeared to be fully covered. However, the coating method used did not yield a fully covered area which was not apparent until the duct surface dried.

2. Corrective Steps Taken and Results Achieved:

A deficiency report (DR) was written concerning the closure of the NCRs. An engineering evaluation of the duct segments indicated that they were acceptable in their present condition. This conclusion was based on an engineering walkdown of the duct segments and a review of a CPRT evaluation of similar duct conditions previously identified. Re-coating of the duct segments, therefore, was unnecessary. The NCRs were closed based on the verification of the presence of coating as required by implementing procedures and existing specifications. The DR disposition, therefore, concluded that the NCRs had been properly closed and the duct segments are acceptable in their present condition despite the circumstances described in Item 1.

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

Duct segment galvanic coatings had been previously determined to be a non safety-related attribute. Design Change Authorization (DCA) 75357, Rev. 6 was issued on January 27, 1989, to clarify the HVAC ductwork and support specification, 2323-MS-85, Rev. 7, "HVAC - Ducts, Louvers, and Accessories" to include duct segment coating verification as a non-quality attribute. Therefore, this verification activity is now performed by the Construction Department. Construction procedure CHV 101, Rev. 6, "HVAC - Detailing, Installation, Rework and Repair (Unit 1 and Common Areas)" verification was also revised to caution applicable Construction Department personnel that coating verification should be performed when coatings are dry. Applicable personnel in this department have received training to this procedure revision.

4. Date of Full Compliance:

Full compliance has been achieved.

NOTICE OF VIOLATION
ITEM B (445/8926-V-02)

- B. Criterion X of Appendix B to 10 CFR 50, as implemented by Section 10, Revision 0, of the TU Electric Quality Assurance Manual states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Contrary to the above, the following conditions were not identified during PCHVP inspection of structural steel Class I and II platforms.

Platform AB-0241-01

A 6" x 3 1/2" angle shown in Section F-F, page 14 of DCA 62581 is specified to be 3 feet 9 inches in length. The actual length is 3 feet 10 inches.

Platform SG1-77N-01

The NRC inspector requested QC to verify dimensions on Section 1-1 of drawing 2323-S1-0637. The QC inspector determined that an error had been made in one dimension and issued an NCR to address the condition.

Platform AB-113-01

- (1) Page 5 of DCA 1508, Revision 7, shows a typical brace connection with 1 1/2-inch (\pm 1/4-inch) spacing between the center line of a 3/4-inch A-325 bolt and the end of a 4" x 4" x 1/4" angle. On the east face of the southwest column, the spacing is 2 1/16 inches.
- (2) Page 7 of DCA 1508, Revision 7, shows a minimum edge distance of 1 1/4 inch for a 3/4-inch Hilti bolt on the southeast baseplate. The actual distance is 1 1/16 inch.

Platform FB-271B-01

A 3" x 3" x 1/4" angle, MK C-12 on drawing MFB-0803-DCA, sheet 2, Revision 1, is shown to be 36 5/16 inches in length. The installed length is 42 3/4 inches.

Platform AB-206-01

- (1) DCA 5465, Revision 9, page 5, Section 5-5, calls for single bevel groove welds. Near side and far side fillet welds were installed.

- (2) DCA 5465, Revision 9, page 7, Section AA, calls for single bevel groove welds. Fillet welds were installed.
- (3) Drawing figure 706-001, Revision 1, shows 3 1/2" x 3 1/2" x 1/2" angles, members 6-Y1, to be 7 feet 4 3/16 inches in length. The installed length is 8 feet 7 1/4 inches. Also, the angles are shown welded using 3/8-inch single bevel groove welds. These welds are undersized.

RESPONSE TO NOTICE OF VIOLATION
ITEM B (445/8926-V-02)

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

1. Reason for the Violation

The conditions identified by the NRC inspector resulted from QC inspector error. Based upon review of various overviews of this PCHVP activity, such as QA audits and surveillances, we believe that these discrepancies represent isolated failures by QC personnel to properly verify required attributes.

It should be noted that platform FB-271B-01 has not been accepted by PCHVP inspection due in part to the member length discrepancy noted by the NRC inspector. This condition was documented on NCR 88-11162. Although the specific dimensional discrepancy was not recorded in this NCR, the configuration description provided by the QC inspector sufficiently details the as-built condition for resolution.

Regarding platform AB-206-01, examples 1 and 2, the condition described in these examples is not a required QC inspection attribute for PCHVP inspection of structural steel. NCRs have been initiated to resolve these conditions.

2. Corrective Steps Taken and Results Achieved

Nonconformance reports (NCRs) have been initiated for the discrepant conditions identified in this violation.

3. Corrective Steps Taken to Avoid Further Violations

QC inspectors responsible for structural inspections have received additional training to emphasize their responsibility to accurately verify all dimensional and configuration attributes. Since TU Electric believes that the discrepancies identified by the NRC inspector are isolated, this action is sufficient to assure that QC inspectors perform their inspections properly. However, to further substantiate this conclusion, structural steel dimensional and configuration attributes like those identified in this violation will be reinspected on a sampling basis. Should the need for additional corrective steps be identified by this reinspection, a supplemental response to this violation will be provided which outlines those actions. Records of items reinspected and the reinspection results will be available for review at the CPSES site.

4. Date of Full Compliance

The NCRs referred to under Item 2 and the reinspection described under Item 3 will be completed by July 28, 1989.

NOTICE OF VIOLATION
ITEM C (445/8926-V-03)

- C. Criterion V of Appendix B to 10 CFR 50, as implemented by Section 5.0, Revision 0, of the TU Electric Quality Assurance Manual requires that "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with those instructions, procedures, or drawings."

Contrary to the above, Procedure AQP 11.2, "Fabrication and Installation Inspection of Pipe and Equipment," and Construction Traveler CC-1-RB-003, governing the application of a seal weld to spool piece 8Q3 on isometric drawing BRP-CC-1-RB-003, did not provide a necessary requirement for craft and quality control (QC) to verify that the finished configuration remained in specification with the isometric drawing. This construction activity resulted in the rotation of the stem of valve ICC-692 from the original 13 degree (from vertical) angle depicted on isometric drawing BRP-CC-1-RB-003 to a final configuration of 22 degrees. This 9 degree difference exceeds the maximum tolerance of ± 5 degrees permitted by Specification 2323-MS-100, Revision 9. As a result of the procedural deficiency, neither the installing craft nor the inspecting QC identified the existence of this out-of-specification condition.

RESPONSE TO NOTICE OF VIOLATION
ITEM C (445/8926-V-03)

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

1) Reason for the Violation

The valve angle discrepancy identified by the NRC inspector was the result of an isolated personnel error, which occurred even though adequate instructions and procedures were provided.

Had a specific requirement for valve angle measurement been included in operations traveler CC-1-RB-003, the craft and QC personnel may not have erred in this instance. However, the purpose of the operations traveler is to serve as a fabrication/installation/inspection checklist of operations necessary to achieve a quality end product. Details contained within the traveler vary depending on the complexity of the operation. Procedure AQP 11.2, "Fabrication and Installation Inspection of Pipe and Equipment," states that design drawings shall be used as a basis for QC to verify as-constructed acceptability. The orientation for valve ICC-692 is shown on drawing BRP-CC-1-RB-003, however, the QC inspector erred by failing to include this dimension in the verification of piping configuration.

To assess the effectiveness of instructions and procedures implemented for seal weld installations, similarly reworked configurations were reinspected by Level III ASME Quality Engineers. Valve angles reinspected were found to be in accordance with the design drawings, within the tolerance specified in Specification 2323-MS-100. The operations travelers implemented for similar seal weld installations, which could affect valve angles, were compared to operations traveler CC-1-RB-003. These operations travelers contained essentially identical work and inspection instructions including QC verification for piping configuration. This configuration verification is intended to include valve angle orientation.

Based on the reinspections, operations traveler reviews, discussions with QC inspectors and involved craft personnel, appropriate instructions and procedures are established; however, these documents were not entirely implemented in the instance identified by the NRC inspector.

The conclusion that this personnel error is isolated is based on review of QA surveillance reinspection results for items previously accepted by the subject QC inspector. These reinspection results reflect excellent QC inspector performance. Additionally, the reinspected valve angles were found to be installed satisfactorily.

2) Corrective Steps Taken and Results Achieved

Nonconformance Report (NCR) 89-2564 was initiated to resolve the valve ICC-692 angle discrepancy and has been dispositioned "use-as-is."

3) Corrective Steps Taken to Avoid Further Violations

The QC inspector responsible for acceptance of the discrepant valve angle and appropriate craft supervision have been made aware of this error. Since this error is isolated, no other action directed specifically at valve angle verification is considered necessary. As an enhancement however, QC inspectors have been briefed on the issues that resulted in this violation. In addition, procedure AQP-11.1, "General Fabrication and Installation Inspection," will be revised to describe the QC inspector's responsibility to consider all inspection attributes impacted by rework prior to final acceptance.

4) Date of Full Compliance

Full compliance will be achieved by June 23, 1989.