

JUL 11 1989

Docket Nos. 50-445
and 50-446

Mr. William J. Cahill, Jr.
Executive Vice President, Nuclear
Texas Utilities Electric Company
400 North Olive Street, L. B. 81
Dallas, Texas 75201

Dear Mr. Cahill:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO
FSAR CHAPTER 17 ISSUES - COMANCHE PEAK OPERATIONS
QUALITY ASSURANCE PROGRAM

The staff's review of Amendment 76 changes to Chapter 17 of the Comanche Peak FSAR has resulted in a number of areas for which additional information and/or clarification is needed as described in the enclosure to this letter.

We propose that a working meeting be held as early as possible between the staff and TU Electric and that this request for additional information serve as the meeting agenda. A formal written response to this request need not be provided prior to the meeting.

Should you have any questions regarding the enclosure or when you have identified a convenient date for the proposed meeting, please contact either our project managers, Melinda Malloy at (301) 492-0738 or Mel Fields at (301) 492-0765.

The reporting requirements contained in this letter affect fewer than ten respondents, therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Nuclear Reactor Regulation

Enclosure:
Request For Additional Information

cc: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Sincerely,

A handwritten signature in cursive script that reads "C. I. Grimes".

Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Nuclear Reactor Regulation

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Request For Additional Information

cc: See next page

Mr. W. J. Cahill, Jr.

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cc:

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REQUEST FOR ADDITIONAL INFORMATION
COMANCHE PEAK QA - FSAR AMENDMENT 76

1. FSAR Amendment 76 added the following exception to the Regulatory Guide 1.38 commitment:

For handling of items during operations phase, the following codes and standards shall apply.

ANSI B30.9-1971
ANSI B30.2-1976 (1967 for Design and Fabrication)
ANSI B30.5-1968

Specify the guidance in Regulatory Guide 1.38 which will not be followed and the provisions in the listed ANSI standards which will provide an equivalent level of quality and quality assurance.

2. The justification for deleting "nonroutinely" from page 17.2-7 indicates that the QA Department reviews procurement documents only when these documents impose QA requirements. How does the QA Department ensure that QA requirements are not omitted from other procurement documents?
3. FSAR Section 17.2.1.3 states that the Quality Assurance Section is responsible for an effective audit and surveillance program at CPSES. Clarify whether this responsibility extends to suppliers and contractors during the operations phase.
4. FSAR Section 17.2.1.4 addresses the Quality Control Section, but it does not address the Brown & Root Site QA Manager which Figure 17.2-1 shows reporting to the Manager, Quality Control. Discuss the authority and responsibility of this position (organization) during the operations phase. Also, Section 17.2.1.4 states that the Quality Control Section is responsible for an effective inspection program, but it also states that personnel performing inspections may be from the same department that performed the work. Clarify to whom personnel that perform inspections report. If these personnel report outside the Quality Control Section, clarify how the Quality Control Section fulfills its responsibility for an effective inspection program.
5. FSAR Amendment 71 (at the middle of page 17.2-11) included a commitment to perform independent management audits of quality assurance activities as necessary to assess the scope, status, implementation, and effectiveness of the QA program. FSAR Amendment 74 (same location) changed this commitment to a commitment to perform an annual independent assessment of the audit program with periodic meetings of the Vice Presidents to assess and report on the status, adequacy, and overall effectiveness of the QA program. Clarify the difference between the independent management audits of quality assurance activities and the independent assessments of the audit program. Provide justification for what appears to be a decrease in commitment in this regard. Meetings do not generally satisfy the NRC perceived need for an annual independent assessment of the scope, status, implementation, and effectiveness of the operations phase QA program by licensee management above or outside the QA organization.

6. FSAR Amendment 76 revised the two-sentence paragraph towards the top of page 17.2-13. This paragraph addresses:

- (a) the QA Manager's review of procedures and
- (b) QA review of procedure implementation.

Regarding (a), clarify the purpose of the QA Manager's review of procedures that require SORC review, clarify that this purpose is documented, and clarify how TU Electric ensures that other procedures (not submitted for SORC review) should not have the same level of review. Regarding (b), the change in Amendment 76 appears to place more responsibility on line management to ensure that procedures having no "quality assurance requirements" are properly implemented. Clarify whether this is the intent. If not, clarify the intent. If so, describe how line management is made aware of this increased responsibility.

7. FSAR Amendment 76 deleted the commitment at the top of page 17.2-14 of Amendment 71 that procedures used to implement the QA program are prepared before the controlled activities begin. Justify this deletion.
8. FSAR Amendment 76 changed page 17.2-21 regarding document review. Describe measures which ensure the independence of document reviewers from document preparers when reviews for QA-related aspects are made by an individual not in the NEO QA Department.
9. The description of the first FSAR Amendment 76 change on page 17.2-26 states that it is to clarify responsibilities/requirements for identifying inspection hold points. Neither the earlier version nor the new version mention inspection hold points. Clarify the description of this change.
10. In FSAR Amendment 76, the last paragraph on page 17.2-27 indicates that inspection hold points are the only controls required in administrative control procedures and instructions. Discuss the pros and cons of adding "and" to the revision such that it reads: "In addition, administrative control procedures and instructions are reviewed by the QA Section to assure that required controls are included and to provide for the necessary reviews for the assignment of inspection hold points."
11. The last sentence on page 17.2-3 of FSAR Amendment 76 states that measuring and test equipment (M&TE) and reference standards are labeled or tagged to indicate the next calibration due date or otherwise controlled in accordance with approved procedures. Describe the method of "otherwise controlling" calibration schedules.
12. Identify (by position title) TU Electric's management authorized to accept calibration accuracy ratios of less than 4 to 1 for reference standards to M&T and not better than "greater than" for other calibrations. Also, identify who accepts the bases for calibration where no nationally recognized standard or natural physical constant exists.

13. Consider substituting "and" for "of" in the middle of the paragraph on page 17.2-31 of FSAR Amendment 76 which states "...determine the validity of all inspection, tests, of measurement results...."
14. FSAR Amendment 76, at the bottom of page 17.2-33, has changed "nonconformance reports" to "nonconformance documents." Clarify whether nonconformance trending and analyses takes into account all nonconformances regardless of where they are documented.
15. The justification given for deleting responsibility for definition of activities related to nonconformance control from the cognizant manager is because this responsibility is "assigned to the executive Vice President, Nuclear Engineering and Operations...." Identify where this responsibility is shown in the FSAR.
16. The controls associated with nonconforming item conditional release in the last paragraph of Section 17.2.15 (pages 17.2-34 and 35) eliminate Engineering Department evaluation and approval. These responsibilities and responsibility for reinstallation, operation, and use of nonconforming items are now shown as Nuclear Operations. Describe quality assurance controls of these actions which assure safe operation. Also, "in violation of Technical Specification requirements" has been added to the commitment that nonconforming materials are not relied upon for safety-related service. Justify this limitation.
17. FSAR Amendment 76 added Regulatory Guides 1.68 and 1.68.2 (among others) to Table 17.2-2. To be consistent with the Standard Review Plan (NUREG-0800), delete these two Regulatory Guides and add Regulatory Guides 1.26 and 1.29.
18. The following items refer to changes made in Table 17A-1 by FSAR Amendment 76.
 - (a) Boron Recycle System (sheets 9 & 10): Justify changing components from Safety Class 3 to NNS; from ASME III to ASME VIII, Mfrs Stds, or ANSI B31.1; from Code Class 3 to no Code Class; and from an Appendix B QA program during the operations phase to no QA program during the operations phase. Clarify whether TU Electric's "specifically structured non-Appendix B quality assurance program," as discussed in the last paragraph of FSAR 17A.1, will be applied to these components during the operations phase.
 - (b) The description of the change to sheet 15 indicates that the Turbine Driven Pump Control Panel "is now seismic and non-IE," and the panel has been deleted from the table. Clarify QA commitments for this panel during the operations phase.
 - (c) Clarify why the quality assurance requirements of Branch Technical Position ETSB 11-1 are not required for the chemical drain tank pump of the liquid waste processing system (sheet 22) and for the handling equipment of the solid waste processing system (sheet 25).

- (d) For the following items, FSAR Amendment 76 shows no quality assurance during the operations phase. Clarify what QA program will be applied to these items during the operations phase.

Spent fuel handling tool	Sheet 34
Burnable poison rod assemblies	Sheet 37
Primary source rods	Sheet 37
Plant vent stack monitors	Sheet 42
High range area monitors	Sheet 42
Low range area monitors	Sheet 42
Steam generator blowdown monitor	Sheet 43
Condenser off-gas monitor	Sheet 43
Ventilation duct monitors	Sheet 43
Turbine building drain monitors	Sheet 43
Failed fuel monitors	Sheet 43
Service water monitors	Sheet 43
Boron recycle monitor	Sheet 43
Auxiliary steam condensate monitor	Sheet 43
Spent fuel pool cooling and sample monitors	Sheet 43
Steam generator blowdown sample monitors	Sheet 43
Rod control equipment	Sheet 46
Rod position indication containment cabinets	Sheet 46
Control board demultiplexer	Sheet 46

- (f) Justify the portion of Note 65 on sheet 56 which states: "Tubing systems previously pressure tested as being satisfactory, which were later repaired or replaced, shall not require an additional pressure test prior to initial plant startup...."
- (g) Note 69 on sheet 57 does not appear to be referenced in Table 17A-1. Specify where this note is referenced in the table or consider its deletion.
19. The following items refer to changes made in responses to earlier QA related questions:
- (a) The response to Q421.4 has been changed in FSAR Amendment 76 to address only the QA Manual. Clarify the involvement of the QA organization in other manuals that include QA requirements. See also Q&R421.28.
- (b) Question 421.12 addresses an annual management assessment of the scope, status, implementation, and effectiveness of the CPSES QA program. The response should be incorporated into Section 17.0 of the FSAR. We note that the activities of the Operations Review Committee and the QA organization do not normally satisfy the NRC guidance for an independent assessment. See also question 5, above, and Q&R421.50.

- (c) R421.54 refers to Figure 13.1-4 which is now an affidavit. Identify the approximate number of technical onsite QA personnel reporting to the Manager, QA.
- (d) R421.79 indicates that "off the shelf" commercial items are "subject to the same procedural control as all safety-related structures, systems, and components." Clarify the response and the FSAR text to address procurement and subsequent inspections/tests of commercial items from suppliers without a 10 CFR 50 Appendix B QA program.
- (e) Five FSAR references are given on page 387 of the Attachment to TXX-89201 regarding the removal of chlorine detectors from sheet 45. Clarify whether there will not be chlorine detectors or whether the chlorine detectors have been determined to be not important to safety.