

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION

NRC Inspection Report: 50-445/89-11  
50-446/89-11

Permits: CPPR-126  
CPPR-127

Dockets: 50-445  
50-446

Category: A2

Construction Permit  
Expiration Dates:  
Unit 1: August 1, 1991  
Unit 2: August 1, 1992

Applicant: TU Electric  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES),  
Units 1 & 2

Inspection At: Comanche Peak Site, Glen Rose, Texas

Inspection Conducted: February 8 through March 7, 1989

Inspector: MFR Runyan 3/17/89  
M. F. Runyan, Resident Inspector, Date  
Civil Structural  
(paragraphs 3, 4, and 5)

Consultants: W. Richins, Parameter (paragraphs 3, 5, and 6)  
J. Dale - EG&G (paragraphs 2, 5, and 6)

Reviewed by: RF Warnick for 3-17-89  
H. H. Livermore, Lead Senior Inspector Date

Inspection Summary:

Inspection Conducted: February 8 through March 7, 1989 (Report 50-445/88-11; 50-446/88-11)

Areas Inspected: Unannounced, resident safety inspection of applicant's actions on previous inspection findings, follow-up on violations/deviations, action on 10 CFR 50.55(e) deficiencies identified by the applicant, Post-Construction Hardware Validation Program (PCHVP), and plant tours.

Results: Within the areas inspected, no strengths or weaknesses were identified. One violation was identified regarding an undersized weld on an HVAC duct support (paragraph 5.d). One unresolved item was identified questioning methods used by QC inspectors to measure valve stem angles (paragraph 5.a). One open item was identified concerning discrepancies with the administration of weld rod (paragraph 6).

DETAILS1. Persons Contacted

- \*R. W. Ackley, Jr., Director, CECO
- \*M. Alexander, Manager of Materials Management, TU Electric
- \*R. P. Baker, Licensing Support Manager, TU Electric
- \*D. P. Barry, Sr., Manager, Engineering, Stone and Webster Engineering Corporation (SWEC)
- \*H. D. Bruner, Senior Vice President, TU Electric
- \*R. C. Byrd, Manager, Quality Control (QC), TU Electric
- \*W. J. Cahill, Executive Vice President, Nuclear, TU Electric
- M. R. Clem, CAP, Structural, SWEC
- \*J. T. Conly, APE-Licensing, SWEC
- \*W. G. Council, Vice Chairman, Nuclear, TU Electric
- \*J. C. Crnich, Project General Manager, Ebasco
- \*G. G. Davis, Nuclear Operations Inspection Report Item Coordinator, TU Electric
- \*D. E. Deviney, Deputy Director, Quality Assurance (QA), TU Electric
- \*J. C. Finneran, Jr., Acting Manager, Civil Engineering, TU Electric
- \*C. A. Fonseca, Deputy Director, CECO
- \*J. L. French, Senior Review Team
- N. D. Hammett, Engineering Assurance, Brown and Root (B&R)
- \*T. L. Heatherly, Licensing Compliance Engineer, TU Electric
- \*J. C. Hicks, Licensing Compliance Manager, TU Electric
- \*C. B. Hogg, Engineering Manager, TU Electric
- \*S. D. Karpyak, Nuclear Engineering, TU Electric
- \*J. E. Krechting, Director of Technical Interface, TU Electric
- \*O. W. Lowe, Director of Engineering, TU Electric
- \*J. W. Muffett, Manager of Engineering, TU Electric
- D. Noss, Licensing, Daniel
- \*E. F. Ottney, Program Manager, CASE
- \*A. Pereira, Staff, QA, Ebasco
- \*D. M. Reynerson, Director of Construction, TU Electric
- \*C. E. Scott, Manager, Startup, TU Electric
- \*J. C. Smith, Plant Operations Staff, TU Electric
- \*C. L. Terry, Unit 1 Project Manager, TU Electric
- \*R. D. Walker, Manager of Nuclear Licensing, TU Electric
- \*R. G. Withrow, EA Systems Manager, TU Electric
- \*J. E. Wren, Assistant Director QA for Administration, TU Electric

The NRC inspectors also interviewed other applicant employees during this inspection period.

\*Denotes personnel present at the March 7, 1989, exit meeting.

2. Applicant Action on Previous Inspection Findings (92701)

- a. (Closed) Open Item (445/8513-O-14): During an NRC inspection of pipe support package I-S-PS7N-170, the CPRT inspector identified clamp bolts without locking devices and an undersized cotter pin as potential deviations. These items were subsequently identified on Deviation Report (DR) I-S-PS7N-170-DR1 and reworked per Corrective Action Report (CAR)-66X and CAR-65X, respectively. CAR-66X, as utilized in the PCHVP, allows the use of double nutting or upset threads as locking devices. Project Procedure QI-QAP-11.1-28, Revision 23 dated October 24, 1983, states that "Cotter pins . . . only need be large enough to remain in place after opening." The NRC inspector reinspected inspection package I-S-PS7N-170 (support VD-1-060-002-542R) and found that the threads had been upset on the clamp bolts in question and that the cotter pin was adequately sized for the hole in which it was used. This open item is closed.
- b. (Closed) Open Item (445/8516-O-16): During review of inspection package I-S-PS42-41, the CPRT inspector identified the following deviations: (1) paint on the spherical bearing and (2) incorrectly identified material. These items were reported on DR I-S-PS42-41-DR2 and DR1, respectively. These DRs were subsequently transferred to Nonconformance Report (NCR) M-88-23452H and dispositioned "use-as-is" with the following justification: QI-QAP-11.1-28, Revision 34, identifies that ". . . paint on spherical bearings is not to be considered as extraneous material . . . as long as bearing gimbles freely." DCA-58629 states that the installed material is W8X24 instead of the W8X20 that is identified on the drawing. The applicant determined that this condition was acceptable since the W8X24 member has higher section properties than the W8X20 member and its extra weight was determined to be insignificant. The NRC inspector has reviewed the identified procedure, reinspected the support, and determined that the spherical bearing gimbles freely. The NRC inspector reviewed the AISC manual and agrees with DCA-58629. This open item is closed.
- c. (Closed) Open Item (445/8856-O-04): The NRC inspector identified that two seismic duct hanger packages (DH-1-844-1K-1X and DH-1-844-1K-1AP) contained two NCRs (CM-87-3410 and CM-87-3275) that were dispositioned "use-as-is" after some amount of work/rework had been performed on the supports in question. This appeared to be due to a misunderstanding on the part of the engineers. Some of the HVAC NCRs were dispositioned "use-as-is" after the work/rework was completed since the

engineers had subsequently determined that the nonconforming condition no longer existed. As a result, DR C-88-04210 was issued to correct previous CAR-111 "use-as-is" NCRs. Additionally, a supplemental letter of instruction (HV-0648) was issued to engineering to clarify the use of scrap, repair, and rework.

The NRC inspector has reviewed the corrective action with respect to the already issued "use-as-is" NCRs and the specific instruction given in letter HV-0648 and agrees with the applicant that this will alleviate the problem. This open item is closed.

3. Follow-up on Violations/Deviations (92702)

- a. (Closed) Violation (445/8870-V-03): This violation involved the failure of a PCHVP inspection report to identify a base metal gouge in an embedded plate. The gouge was 0.15-inch deep as compared to the 0.07-inch maximum depth permitted by Specification 2323-SS-30. The applicant reviewed the performance history of the QC inspector responsible for this oversight by examining QA surveillance results of attributes he had previously accepted. The applicant concluded that the QC inspector had been performing required inspections accurately and effectively. The QC inspector was made aware of this error but no administrative or disciplinary actions were taken. NCR 88-16179 was issued and dispositioned to rework the embedded plate base metal in accordance with Specification 2323-SS-16B and site approved procedures. The rework was accepted by QC on January 4, 1989.

The NRC inspector reviewed the associated documentation and observed that the rework had been performed. This violation is closed.

- b. (Closed) Violation (EA 86-09, Appendix A, Item I.B.8): This violation addressed the failure to test various coating thicknesses applied to the inside of the containment liner to demonstrate survivability under design basis accident (DBA) conditions. Subsequent to this finding, the NRC staff concurred with the applicant (SSER, Supplement No. 9, page M-9) that the total failure of protective coatings inside the containment building would not adversely affect the performance of post-accident fluid systems. Coatings applied to the inside of the containment liner have, therefore, been reclassified as nonsafety related. The applicant revised all containment building coating procedures to enhance their program and assure compliance with Specification 2323-AS-31, "Protective Coatings." The NRC inspector reviewed the documents referenced above and concluded

that the applicant had satisfactorily addressed the original issue. This item is closed.

- c. (Closed) Violation (EA 86-09, Appendix A, Item I.B.9): This violation addressed the lack of documentation demonstrating that coating systems in areas exposed to radiation had been tested and qualified by Oak Ridge National Laboratories as required by the CPSIS FSAR, Table 17A-1, and Specification 2323-AS-31. Subsequent to this finding, all protective coatings within the containment were reclassified as nonsafety-related and the above stated requirements have been deleted. Specification 2323-AS-31 now requires compliance only to ANSI N101.2 and ANSI N512. Coatings procedures have been revised to require compliance to the above referenced ANSI standards and the manufacturer's written instructions. The applicant stated that the major coating systems used at Comanche Peak had been tested and qualified by the Oak Ridge National Laboratories but acknowledged that site DBA test data files were not complete. The applicant also acknowledged using the manufacturer's DBA test data to adjust film thickness tolerances in lieu of contracting the services of the Oak Ridge National Laboratories, as had been previously required. As corrective action, the dry film thickness tolerances for containment coating materials were reevaluated and modified to assure compliance with ANSI N101.2 and ANSI N512. Test data files were verified complete with respect to the relevant specifications. The NRC inspector concluded that the applicant has satisfactorily addressed the original problem. This item is closed.
- d. (Closed) Violation (445/8864-V-02): This violation addressed welds that were not installed in accordance with applicable drawings on the support structure for pipe whip restraints MS-1-002-911-C67W, MS-1-002-912-C67W, MS-1-002-913-C67W, and MS-1-002-914-C67W. Two welds were undersized at least 1/16-inch for the full length and what appeared to be a single square groove weld was installed in areas where two 1/4-inch fillet welds were specified. The applicant stated in response to the violation (letter TXX-88782 dated December 5, 1988) that the weld discrepancies apparently resulted from the failure of the welders and QC inspectors to properly install and inspect the welds per procedure in 1983. Subsequent to issuance of this violation, NCRs have been initiated for the above conditions and dispositioned "use-as-is" based on calculations that compare the load capacity of the as-built condition with the design loads. The applicant further stated that generic implications and corrective

actions have been adequately addressed in ISAP VII.c Results Report, Appendix 29. In addition, TU Electric letter TXX-88495 dated June 9, 1988, describes numerous corrective actions to assure that construction and QC personnel rigidly adhere to procedures and design drawings.

The NRC inspector reviewed NCRs 88-15616, 88-16450, and 88-17051 that specifically address the welding discrepancies, and discussed the corrective actions with the applicant. This violation is closed.

4. Action on 10 CFR Part 50.55(e) Deficiencies Identified by the Applicant (92700)

- a. (Closed) SDAR-CP-85-03, "Steam Generator Upper Lateral Support Beams": By letter TXX-4415 dated February 14, 1985, the applicant informed the NRC that a deficiency regarding anchor bolts in the steam generator upper lateral supports was a reportable item. Ultrasonic tests indicated that the anchor bolts possessed less than the 2 1/4-inch engagement required by the design drawings. A corrective action plan was formulated and carried out as ISAP V.b, "Improper Shortening of Anchor Bolts in Steam Generator Upper Lateral Supports." By letter TXX-88363 dated May 5, 1988, the applicant informed the NRC that the replacement of the anchor bolts had been completed.

Previous NRC review of this issue is documented in NRC Inspection Reports 50-445/86-01, 50-446/86-01; 50-445/86-03, 50-446/86-02; 50-445/88-21, 50-446/88-18; 50-445/88-28, 50-446/88-24; and 50-445/88-36, 50-446/88-31. As documented in NUREG-0797, Supplement No. 20 (SSER 20), the NRC staff concluded that this issue had been adequately resolved. Consequently, this SDAR is closed.

- b. (Closed) SDAR-CP-86-60, "Polar Crane Girder and Girder Support Shim Gaps": By letter TXX-6544 dated June 29, 1987, the applicant stated that visible gaps existing between the polar crane girder and girder support brackets did not constitute a reportable item. SWEC Calculation 16345-EM(S)-008, CZC-09H, Revision 1, presented a bounding analysis which confirmed the adequacy of the support and attachment design, regardless of the magnitude and location of visible gaps. The applicant concluded that no further action or rework was necessary at the girder seat connections.

Previous NRC review of this issue is documented in NRC Inspection Reports 50-445/86-01, 50-446/86-01; 50-445/88-37, 50-446/88-35; and 50-445/88-51,

50-446/88-47, as part of the review of ISAP VI.b, Polar Crane Shimming. The NRC staff review, summarized in NUREG-0797, Supplement No. 20 (SSER 20), concluded that the applicant had satisfactorily resolved this issue. On the basis of the documented NRC review, this SDAR is closed.

- c. (Closed) SDAR-CP-86-61, "Polar Crane Restraints": By letter TXX-6092 dated November 17, 1986, the applicant stated that several discrepancies involving the restraints for the polar crane rail did not constitute a reportable item. Movement had occurred in the Unit 1 polar crane rail assembly as evidenced by three broken rail-to-rail ground wires, two broken cad welds connecting the ground wire to the rail, and two dislocated shims under the rail. The applicant developed a measurement program to determine the extent of rail movement. Based on information from this program, rail-to-rail splice bars were installed to dampen movement of the crane rail and thus lessen the likelihood of further damage. The applicant stated that had the deficiency remained unidentified, some additional minor repairs would eventually have been required, but that those aspects of polar crane performance, safety, and reliability required for its intended safety function would not have been affected.

Previous NRC review of this issue is documented in NRC Inspection Reports 50-445/86-01, 50-446/86-01; 50-445/88-37, 50-446/88-35, and 50-445/88-51, 50-446/88-47, as part of the review of ISAP VI.b, "Polar Crane Shimming." The NRC staff review, summarized in NUREG-0797, Supplement No. 20 (SSER 20), concluded that the applicant had satisfactorily resolved this issue. The NRC inspector concurred with the applicant's reportability determination. This SDAR is closed.

- d. (Closed) SDAR-CP-87-65, "LOCA Effects on HVAC Duct Inside Containment." By letter TXX-88082 dated January 13, 1988, the applicant informed the NRC that the failure to analyze the effect of a postulated loss of coolant accident (LOCA) on HVAC ducts inside the containment building is not a reportable item. Specifically, the original design analysis for HVAC ductwork did not consider the differential pressure transient resulting from a LOCA. Although HVAC ductwork inside containment is not required to perform safety-related functions following a LOCA, there is a possibility that falling ductwork may damage safety-related components. The applicant performed an extensive engineering analysis which concluded that the ductwork will not fall down nor

cause a failure of the duct supports in the event of a design-basis LOCA.

The NRC inspector reviewed the SDAR file: Ebasco Calculation 3-E-24-016, Revision 1; Calculation 3-E-24-017, Revision 0; and 3-E-24-18, Revision 1; and discussed the issue with applicant engineers. Based on this review, the NRC inspector determined that the applicant had satisfactorily resolved the original issue. This SDAR is closed.

5. Post-Construction Hardware Validation Program (PCHVP) (46053, 46055, 46071, 48053, 48055, 50100, 55150)

a. Piping and In-line Components (CPE-SWEC-FVM-EE/ME/IC/CS-090 and CPE-SWEC-FVM-PS-081)

- (1) BRP-CS-1-RB-001, seal water injection line to No. 3 reactor coolant pump, Unit 1. This applicant inspection entailed approximately 35 feet of predominantly 2-inch piping and all in-line components including drains and blind flanges, but excluding pipe supports. The QC inspector verified sequence, dimensions, and configuration from isometric drawing BRP-CS-1-RB-001, Revision CP-1, as well as other safety-related attributes. The inspection included ultrasonic testing (UT) of pipe wall thickness on two 10-inch radius 90 degree pipe bends. The QC inspector documented that all attributes related to this segment of piping were satisfactory.

The NRC inspector examined in detail the entire length of pipe, reviewed the accompanying UT reports, and concurred with the documented inspection results. However, as an out-of-scope finding, the NRC inspector identified two cotter pin discrepancies. A broken cotter pin was found on support CS-1-106-717-C-42R and a cotter pin was missing from support CS-1-106-723-C-42R. These examples were combined with cotter pin discrepancies identified by other NRC inspectors and are addressed collectively in NRC Inspection Report 50-445/89-12, 50-446/89-12.

- (2) BRP-CC-1-RB-003, component cooling water return from No. 2 reactor coolant pump thermal barrier heat exchanger, Unit 1. This applicant inspection entailed approximately 60 feet of predominantly 2-inch piping and all in-line components including drains but excluding pipe supports. The QC inspector verified sequence, dimensions, and

configuration from isometric drawing BRP-CC-1-RB-003, Revision CP-1, as well as other safety-related attributes. The inspection included ultrasonic testing of one 10-inch radius 61 degree pipe bend. The QC inspector documented on NCR 88-18065 two discrepancies, as follows: (1) incorrect dimensions, commodities, and configuration in the vicinity of items 22 to 34 due to some items not being installed, and (2) abandoned lugs observed which were not depicted on drawing CC-1-RB-003.

The NRC inspector examined in detail the entire 60-foot length of pipe, and reviewed the inspection report, ultrasonic test report, and NCR 88-18065, Revision 0. The NRC inspector observed that a valve stem angle was significantly different from the angle specified in view C-C of isometric drawing BRP-CC-1-RB-003 for valve No. ICC-692. As measured by the NRC inspector and confirmed by a lead QC inspector, the valve stem was cocked 22 degrees from vertical, which is not within the required  $\pm 5$  degree tolerance of the 13 degree angle specified on the isometric. The applicant issued NCR 89-2564 to address this NRC identified discrepancy. The NRC inspector observed a QC inspector measure the valve stem angle referenced above. The QC inspector first measured the angle as 12.5 degrees, but later concurred that the angle was 22 degrees. The use of a protractor via "eyeballing" as was demonstrated does not appear to be accurate to within  $\pm 5$  degrees. The QC inspectors have been instructed to request a survey "shot" for any angle they feel they cannot measure accurately. Within this package, some angles were shot but not the subject valve stem angle. This issue will be tracked as an unresolved item (445/8811-U-01) pending further NRC review of the accuracy of QC valve stem angle measurements.

The NRC inspector verified the dimension/commodity/configuration problem found by the QC inspector in the approximately 15 feet of piping exiting the reactor coolant pump (described in [1] above). In this area, a drain line was not installed, a partially installed flange was not depicted, dimensions were incorrect, and piping configuration varied significantly from the isometric drawing. Regarding this problem and the abandoned lugs (described in [2] above), the QC inspection report (IR) referenced NCR 88-18065, Revision 0. The NRC inspector observed that this NCR addressed only the

abandoned lugs, making no mention of the dimension/commodity/ configuration problem referenced in the IR. This matter was resolved in a meeting with the lead QC inspector wherein reference to DCA 62123, Revision 15, showed that the entire area in question was temporary piping only. Following testing activities, new piping will be installed and inspected to current specifications. Therefore, the NRC inspector concurred that this situation can be justifiably excluded from the referenced NCR.

b. Structural and Miscellaneous Steel (CPE-SWEC-FVM-EE/ME/IC/CS-086 and CPE-SWEC-FVM-ME/EE/IC/CS-090)

AB-113-01, platform, Auxiliary building, Unit 1: The NRC inspector reviewed the PCHVP package and inspected the platform. The QC inspector had previously identified unsatisfactory conditions related to: (1) reentrant corners not per design drawings and (2) weld size. These conditions were identified on NCR 88-05235, Revision 0, and dispositioned use-as-is based on the applied loading. The NRC inspector concurred with the disposition of NCR 88-05235 and the identification of the above unsatisfactory conditions.

The NRC inspector identified two concerns:

- (1) Page 5 of DCA 1508, Revision 7, shows a typical brace connection with 1 1/2-inch ( + 1/4-inch) spacing between the center line of a 3/4-inch A-325 bolt and the end of a 4X4X1/4 angle. On the east face of the southwest column, the spacing is 2 1/16-inch.
- (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.

These concerns will be addressed as part of the continuing review of unresolved item (445/8905-U-02) which identified problems of a similar nature.

c. Concrete Attachments (CPE-SWEC-FVM-CS-075)

- (1) 1-CB-808-0033-C-02, column, Reactor building, Unit 1: The NRC inspector performed a field inspection of the completed as-built drawings generated from a field walkdown per FVM-075 for package 1-CB-808-0033-C-02, a concrete column package file under calculation 16345-CS(S)-482.

The drawings in the package contained details and locations of all concrete attachments to the column. No discrepancies were identified.

The NRC inspector reviewed calculation 16345-CS(S)-482, Revision 0, which identifies and evaluates concrete attachment spacing violations for the column. The NRC inspector reviewed the methodology, load combinations, assumptions, and conclusions identified in the calculation. Numerical values were spot checked for arithmetic accuracy. The NRC inspector concurs with the applicant's conclusion that all spacing violations had been identified and the concrete attachments are adequate.

- (2) C-AB-790-017A-C-10, column, Auxiliary building, Unit 1: The NRC inspector performed a field inspection of the completed as-built drawings generated from a field walkdown per FVM-075 for package C-AB-790-017A-C-10, a concrete column package filed under calculation 16345-CS(S)-503. The drawings in the package contained details and locations of all concrete attachments to the column. The NRC inspector checked approximately 30 percent of the details and locations noted on the drawings. No discrepancies were identified.

The NRC inspector also reviewed calculation 16345-CS(S)-503, Revision 0, which identifies and evaluates concrete attachment spacing violations for the column. No discrepancies were identified. The NRC inspector concurs with the applicant's conclusion that all spacing violations had been identified and the concrete attachments are adequate.

d. Heating, Ventilation, and Air-Conditioning (CPE-EB-FVM-CS-029)

The NRC inspector performed field inspections and document reviews of the following documentation packages generated as a result of construction, engineering, and inspection activities related to PCHVP:

<u>Seismic Duct Hangers</u>	<u>Unit</u>	<u>Room</u>
DH-1-830-2N-1U	1	135
DH-1-830-2N-1Q	1	135
DH-1-830-2N-1R	1	135
DH-1-830-2N-1Y	1	135
DH-1-830-2N-1T	1	135
DH-1-830-2N-1Z	1	135

  

<u>Duct Pieces</u>	<u>Unit</u>	<u>Room</u>
B-1-756-221F-PC IJL	1	135
B-1-756-221F-PC1014FH	1	135
B-1-756-221F-PC1022X	1	135
B-1-756-221F-PC1016BC	1	135
B-1-756-221F-PC1017U	1	135
B-1-756-221F-PC1019MN	1	135

During the inspection of seismic duct hanger DH-1-830-2N-1U, the following area of concern was noted: field weld 17 identifies a 5/16-inch weld; however, due to a very deep valley between the two horizontal weld beads, the actual throat size of the weld in question was 1/4-inch maximum for the full length of the weld making the weld 1/16-inch undersize.

This package had been statused as inspection complete and acceptable under the PCHVP.

TU Electric initiated NCR 89-02193 which documented the identified discrepancy and authorized the repair of same. During further discussions with TU Electric representatives, it was learned that a training session had been held with the inspector in question regarding the effectiveness of the preceding weld inspection. The NRC inspector has reviewed the NCR, reinspected the weld, interviewed TU Electric personnel, and feels that this discrepancy has been adequately addressed.

Although this is a clear violation of administrative procedures, the NRC inspector has determined that a Notice of Violation will not be issued. This is in accordance with the revised statement of policy effective October 13, 1988, based on the following:

- . The violation is of minor safety significance.
- . It appears that this is an isolated case, because no other instances have been identified to date.

- . The applicant took immediate corrective actions to rectify the identified problem and prevent similar occurrences.
- . The violation was not willful in nature.

The following inspection report item number will be considered opened and closed by the above documentation (445/8811-V-02).

6. Plant Tours (46053, 48053, 42051C, 50100, 55150)

The NRC inspectors made frequent tours of Unit 1, Unit 2, and common areas of the facility to observe items such as housekeeping, equipment protection, in-process work activities, and weld filler material control. The NRC inspectors observed work in-process related to the closure of a temporary access opening used for cleaning and removal of debris from the seismic air gap. The closure work was being performed under traveler CCE-88-1239-8404A, package 02C-8904A-1855-?. The work included installation of water stops (a water seal), installation of concrete forms, and cad welding.

NRC inspectors also performed an inspection of TU Electric Operations weld filler material "Controlled Issue Point" (CIP) with the following results:

TU Electric Filler Material Control Procedure WLD-105 required that "Weld filler material for use on 'non-safety related' equipment may be purchased as 'non-safety related' if the following requirements are met.

- . "The weld filler material is purchased for a specific weld or series of welds.
- . "The storage area and container(s) shall be clearly and prominently marked "Non-Safety Related Welding Filler Material.
- . "The storage of 'Safety related and non-safety related weld filler material in the same ovens or STORAGE AREA [emphasis added] is strictly prohibited'."

The same procedure also requires that "Bare Welding Wire 36" in length shall be tagged or identified on both ends with the filler material type. Tagging on one end is acceptable for bare wire that is cut in half for storage or welding." However, during the NRC inspection of TU operations CIP, the NRC inspector identified non-Q welding rod (nonsafety-related rod) being stored in the same area (tool room) without being under separate lock and key. Further, bare wire of 18-inch

length was identified in storage issue containers without tags identifying the filler material type. The lack of locked storage for nonsafety related rod and unidentified bare filler material are an open item pending further clarification (445/8911-O-03; 446/8911-O-01).

No violations or deviations were identified and no additional items of significance were observed.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. One unresolved item disclosed during the inspection is discussed in paragraph 5.a.

8. Open Items

Open items are matters which have been discussed with the applicant, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or applicant or both. One open item disclosed during the inspection is discussed in paragraph 6.

9. Exit Meeting (30703)

An exit meeting was conducted March 7, 1989, with the applicant's representatives identified in paragraph 1 of this report. No written material was provided to the applicant by the inspector during this reporting period. The applicant did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection. During the exit meeting, the NRC inspector summarized the scope and findings of the inspection.