

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

82 MAY 11 10:30

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES GENERATING	)	Docket Nos. 50-445 and
COMPANY, <u>et al.</u>	)	50-446
	)	
(Comanche Peak Steam Electric	)	(Application for
Station, Units 1 and 2)	)	Operating Licenses)

AFFIDAVIT OF R. J. VURPILLAT  
REGARDING BROWN & ROOT RESPONSE TO  
ASME SURVEY AND RESURVEY

I, R. J. Vurpillat, being first duly sworn, do depose and state: I am employed by Brown & Root, Inc. in the position of Power Group Quality Assurance Manager. As such I was responsible for implementation of corrective action in the Brown & Root Quality Assurance Program for Comanche Peak in response to the findings of the ASME survey team made at the October 12-14, 1981 Survey and the January 18-20, 1982 Resurvey. The purpose of this affidavit is to demonstrate that Brown & Root has taken appropriate corrective actions which assure that work performed under the authority of the ASME Certificates of Authorization issued to Brown & Root for Comanche Peak meets all applicable ASME Code standards. A statement of my educational and professional qualifications is attached as Attachment 1.

I. RESPONSE TO OCTOBER 12-14,  
1981 ASME SURVEY

Brown & Root has taken appropriate actions in response to each of the items identified in the November 23, 1981 letter from the ASME setting forth the findings of the ASME Survey Team of their October 12-14, 1981 survey of the Brown & Root ASME QA Program for Comanche Peak. Attachment 2. In addition, Brown & Root has taken measures to assure that the matters identified by the ASME Survey Team will not recur and that all ASME Code work performed by Brown & Root at Comanche Peak in areas affected by those findings satisfy applicable ASME Code requirements. Each finding by the ASME Survey Team is dealt with separately, below.

A. Brown & Root ASME Quality Assurance  
Manual for Comanche Peak

1. General

The ASME Survey Team found as follows:

The manual was vague, failed to establish required controls, responsibilities, or provide for objective evidence that required activities were satisfactorily performed.

Analysis and Conclusion

The QA Manual which was reviewed by the ASME Survey Team had been revised by Brown & Root several months before the ASME Survey. These revisions were approved by the Authorized Nuclear Inspector for Comanche Peak at the time they were made. However, when making these changes, some of the essential

features that had been described both in the original QA Manual and the implementing procedures were taken out of the QA Manual, although left in the procedures. In response to the Survey Team's Comment that these revisions left the QA Manual too vague, the QA Manual was subsequently revised to include the specific features which had remained in the procedures.

## 2. ASME Code Addenda

The ASME Survey Team found, as follows:

The manual established the Summer 1974 Addenda for piping and the Winter 1974 Addenda for component supports as the Code effectivity. The manual addressed activities only permitted by later Code addenda; such as NX-2610, NA-3867.4(f) and supply of material - NCA-3820(e), without any identification of the applicability of these provisions.

This finding concerns the use by Brown & Root of specific ASME Code provisions from later Code Addenda than the Addenda specified in the Manual for the work being performed. Brown & Root has verified, however, that the required details concerning the use of these later Addenda paragraphs are documented in the appropriate design documents, and ASME has been so advised.

### 3. Manual Control System

The ASME Survey Team found, as follows:

The manual control system did not contain the exhibits displayed in the manual or any manual approval method.

The documents used to control and transmit the QA Manual were, in fact, not included in the QA Manual exhibits. Nevertheless, these control documents were part of the Quality Assurance program in that they were contained in implementing procedures. The QA Manual approval and transmittal was, in fact, performed in accordance with the program as detailed in those procedures. Subsequent to the ASME Survey, the subject transmittal forms were added to the Manual as exhibits.

### 4. Process, Nonconformity and Document Controls

The ASME Survey Team found, as follows:

The program elements of process control, nonconformity control and document control required significant changes.

The elements of control referenced by the ASME Survey Team were, in fact, part of the Brown & Root Quality Assurance system but were detailed in the

QA implementing procedures rather than in the QA Manual. To correct this matter, Brown & Root has added more clarifying detail to the QA Manual.

5. Design Control Element

The ASME Survey Team found, as follows:

The design control element (control of field change design information and feed back of construction information to the Owner) was missing from the Manual.

As in the previous comments, Brown & Root has always had implementing procedures regarding control of field change information from the design stage forward. In response to the ASME Survey Team's comment, Brown & Root added these controls to the QA Manual. The ASME did not require any change in the features of control.

6. Elements of Control - General

All elements required changes to provide definitive information since few auditable controls were included.

The Survey Team requested that the specific details of controlling work, which were in the Brown & Root implementing procedures, also be described in the QA Manual. The QA Manual was revised to accomplish this.

B. Implementation of Brown & Root ASME Quality Assurance Manual for Comanche Peak

1. Document Control

The ASME found, as follows:

The manual requires that the File Custodians in each department maintain a log of design changes received from the Owner. The File Custodian is to mark the involved document to indicate that a design change had been received and then the document user checks the log to find the applicable design change(s).

The log being maintained by the QA Department File Custodian contained numerous mistakes and was missing information. Three of three design packages, checked by the team, contained design changes not properly identified in the log.

The ASME Survey Team was describing a situation encountered with the QA Department File Custodian. This File Custodian was reviewing each completed document package to assure that all the editorial work, required signatures, and other specifics were properly documented prior to placing these document packages in storage files. These documents were not working documents (i.e., not used for field work) but merely documents that were to be reviewed after construction and prior to final storage.

For the three design packages that were reviewed by the Survey Team, the document review had not yet been accomplished although the records were in the File Custodian's hands. The

matter raised by the Survey Team concerns the timeliness in performing the review, not that the records were not being properly reviewed.

In response to this finding Brown & Root directed that all design change logs related to ASME Code work be reviewed by File Custodians to verify and update, if necessary, the current revision status of those documents. This review was performed to assure that the latest revisions and design changes are reflected in the design change logs. The review has been completed and all logs properly updated. To assure that this situation will not recur, the Document Control Center Supervisor has re-indoctrinated File Custodians on the requirements of file maintenance, including the timeliness of reviews.

## 2. Instructions, Procedures & Drawings

The ASME found, as follows:

Brown & Root Construction Procedure 6.9G, reviewed by the Site QA Manager, was in direct conflict with the QA Manual and the Code (NA-5241) in that it stated that the ANI would sign a blank process sheet and then B&R would add the ANI hold points. The AIA representatives stated that this procedure was not honored by them and that they had requested the procedure to be revised. The procedure has not been revised.



The purpose of the Site QA Manager's review is to assure that the procedure complies with the Code and the QA Manual.

The ANI on site used the procedure described above in order to establish "generic" hold points as he felt were necessary. The Survey Team, however, felt that the ANI should not sign blank process sheets to establish hold points. Accordingly, this Procedure has been revised and a new revision has deleted the paragraph which describes the establishment of ANI holdpoints. The ANI continues to use his own method of establishing hold points. In addition, to prevent recurrence of this situation, the Quality Assurance Department has been reorganized and additional Quality Engineers and a Codes & Standards Staff Assistant have been assigned direct responsibility for reviewing the procedures to assure compliance with the Code and the QA Manual.

3. Control Of Purchased Materials,  
Items And Services

a. Vendor Control

The ASME found, as follows:

B&R procured plate material from a vendor that they had surveyed and qualified as a Material Supplier of bolting and plate materials. The material had been formed into a saddle configuration by this vendor. The B&R survey and qualification of the vendor did not address review of any



operation relative to forming and the B&R purchase order did not define a forming process or procedure.

This finding concerned material supplied by AFCO Steel. In response to it, Brown & Root conducted a review of the AFCO Steel procedures for forming, bending and rolling. In addition, Brown & Root conducted an audit on December 2-3, 1981 to verify that AFCO Steel was in compliance with the reviewed procedure. Based on the completion of an acceptable review of the procedure and the audit results, Brown & Root has identified on the Approved Suppliers List ("ASL") for AFCO Steel that the scope of permitted materials/service includes formed plates. To assure that this situation does not recur, the Site QA Manager has directed Quality Engineering to insure, in accordance with current Brown & Root QA Manual and implementing procedures, that requisitioned items or services are within the scope of the applicable supplier prior to purchase order approval.

b. Production Shop

The ASME found, as follows:

The same material addressed in C1 was observed in the production shop with work in process. This material had not been receipt inspected in noncompliance with the QA Manual and the material was not identified as required by the B&R purchase order. B&R had divided the material and transferred the material identification incorrectly. B&R does not verify the transfer of material identification and during the review of the manual stated that this verification was unnecessary.

This material had been properly receipt inspected by QC receiving in accordance with the approved procedure at that time. A misunderstanding arose because the heat code (110) was marked on each piece of cut material immediately next to the shop order number (479) to produce what appeared to be a new number (110479) on one line, rather than two lines as on the original material. In any event, an Nonconformance Report ("NCR") was written to cover all such items and this material has been marked with the entire heat number (803N80110) rather than the abbreviated heat code and verified for correctness.

To prevent recurrence of this matter, the QA Manual and QA Procedures and Construction Procedures have been revised and training on the revised procedures has been conducted and completed. A QC Inspector is now required to verify, prior to cutting a piece or dividing material from a bundle, that the transfer of markings to each piece is correct. This verification is documented in accordance with the revised procedures.

#### 4. Control Of Construction Processes

##### a. Process Sheets

The ASME found that:

Process Sheets were observed in production that had not been reviewed with the ANI for establishment of hold points in noncompliance with the B&R QA Manual and NA-5241 of the Code. The process sheets CC-068-002-S33R and AF-035-S33A are included in this finding although numerous such process sheets are in production. (See B above).

This matter arose because of differences of opinion between two ANIs regarding the review of process sheets to establish hold points. The first ANI on site did not wish to review all process sheets for pipe hangers. He felt that his inspection of the installation of the pipe hangers would satisfy his requirements for inspections. A subsequent ANI felt that it was necessary to establish hold points on the process sheets. Some hold points were bypassed because of the inconsistency between the two ANIs' approaches.

This condition had been documented prior to the ASME survey in a NCR. With the concurrence of the ANI, the following actions were taken: (1) all process sheets, including Code-related Operation Travelers, are being routed through the ANI for preliminary review and establishment of hold points prior to issuance, (2) welding documentation packages and Operation Travelers issued but not yet complete are being submitted to the ANI for review and

establishment of hold points and/or signature, and (3) travelers and welding documentation packages which have been completed are being referenced with the NCR number. These NCR's are and will continue to be reviewed by the ANI, prior to the items being certified. The NCR will remain open until corrective action is complete.

To prevent recurrence of this matter a procedure has been prepared and issued to include the requirement of ANI preliminary review to preclude issuance of the subject documents without such review.

b. Welding Procedure Specification

The ASME found, as follows:

Welding Procedure Specification 11012 for welding with impact test requirements did not specify the travel speed but instead controlled the heat input by Volt/amp range and maximum bend width for a given electrode diameter. The Procedure Qualification Record 010AB1276 for this WPS recorded a bead width greater than that allowed by the WPS.

This concern of the Survey Team was resolved by subsequent additional procedure qualifications which tested all the worst case heat input conditions which might exist during welding. The test results of these new welding procedure qualifications meet the requirements of the Code. In addition, all other similar welding procedures qualification records have been reviewed for adequacy.

Finally, an NCR on this matter has been issued and the welding procedure specification was revised to restrict the bead width to 5/16". Supplementary tests were performed on a test coupon which was welded using a 3/8" bead width, which qualified that welding procedure specification for the greater 3/8" bead width.

#### 5. Nonconformity Control

The ASME found, as follows:

Nonconformity Control Report (NCR) M-2952 reported that a spool piece had been welded into the system backwards. B&R QA determined the disposition to be rework and not repair and thereby the disposition to cut the spool piece out and reweld it in the correct configuration was not reviewed by welding engineering, as would have been required by a repair designation. There appeared to be no consideration of the heat input effects on the material, etc. as would be expected with this type of nonconformance.

Although the welding control procedures were not described in detail in the QA Manual, appropriate procedures were and remain in place to assure that for those materials for which heat input is a consideration, replacement welds for items to be repaired or reworked are evaluated by Brown & Root Welding Engineering in accordance with the design criteria to assure that the properties of the material are not affected. Specifically, all Component Modification Cards ("CMCs") which are written to remove and/or replace

welds are routed to Brown & Root Welding Engineering for review and the issuance of documentation for the replacement welds. Welding Engineering prepares new weld data cards for the replacement welds and performs evaluations of heat input effects at that time. CMCs are reviewed against design specifications and procedural requirements and those which are not in compliance are returned to the originator and documentation for replacement welds is not issued. This documentation system for all ASME welding is described in the Brown & Root QA Manual and assures Welding Engineering involvement in all welding activities.

In any event, welds for the spool referenced in this finding were not stainless steel nor did they require Charpy impact testing. The material was Carbon Steel, 2" Schedule 40, Class 3. Further evaluation concerning heat input for this material was not, therefore, necessary.

6. Identification And Control Of Material And Items

The ASME found, as follows:

Component Supports are procured as stamped items by the Owner. The Code Data Report does not list Code Case N-225. The Component Support is supplied to B&R with only the Code Data Report by the

Owner. B&R then cuts the component support, removing the welds, and uses the material to fabricate other component supports. B&R does not have the Certificate of Compliance (C of C) for the material.

In response to this finding, Brown & Root has issued an NCR to address the deficiency identified. The component supports are supplied for Comanche Peak by ITT-Grinnell, and NPS Industries. ITT-Grinnell has provided required Code Data Reports in addition to Certified Material Test Reports, Certificates of Compliance as applicable or a single certification as appropriate. NPS Industries, however, had provided only the required Code Data Report. NPS Industries has been requested to provide Certificates of Compliance or Material Test Reports, stating the type and grade of material supplied. The need for such documentation arises when revised designs are issued which require the cutting of the component supports, removal of the welds, and use of the material to fabricate or modify other component supports. Prior receipt of the required material certifications from NPS Industries, the use of salvaged material and the fabrication or modification of Code supports was placed on administrative hold. Quality Engineering is reviewing the material certifications to assure acceptability of the documentation and the material supplied.



For new fabrication or modification, salvaged material will be inspected and released in accordance with applicable procedures and documented in appropriate inspection reports. Material which cannot be properly verified will not be used in Code applications. For salvaged material previously installed, the material used will be checked against and be traceable to proper documentation from the vendor. Material which cannot be traced to proper documentation will be identified in a NCR and removed.

F. Authorized Nuclear Inspector Involvement

The ASME found, as follows:

The ANI hold points on process sheets have been bypassed on numerous occasions. The ANI logbook documents these conditions and the volume would indicate a significant breakdown of the program and interface between B&R and the Authorized Inspection Agency personnel (See B and D-1 above).

All missed hold points during the period reviewed by the ASME Survey Team have been documented in NCR's and resolved, including ANI concurrence. In addition, Brown & Root has reviewed all NCR's initiated because of bypassing the hold points established by the ANI and/or Brown & Root QC. As a result of their review, a Corrective Action Request has been issued to construction by the Site QA Manager. A review of the NCR's referenced on the Corrective

Action Request indicates that there has been a significant reduction in the frequency of missed ANI hold points since May of 1980. CAR's written in October, 1978, and April, 1979, apparently have resulted in this improved performance.

To prevent recurrence of this situation, Quality Engineering and the Codes & Standards Staff Assistant have been assigned direct responsibility for coordinating ANI activities and assuring that any concerns identified by the ANI are timely resolved or brought to the attention of management for resolution.

## II. RESPONSE TO ASME NUCLEAR RESURVEY CONDUCTED JANUARY 18-20, 1982

On January 18-20, 1982, the ASME Survey Team conducted a resurvey of the Brown & Root QA program for activities performed under the Brown & Root ASME Certificates of Authorization for Comanche Peak. The Survey Team recommended renewal of the certificates upon completion of responses to three items and certification and approval of those items by the Authorized Nuclear Inspector Supervisor. Brown & Root has taken appropriate corrective actions in response to those findings and the ANI Supervisor has approved and verified these actions. See Letter from Hartford Steam Boiler Inspection and Insurance Company to ASME, February 8, 1982. Attachment 3.

A. Finding Number 1

The ASME Survey Team found that a material supplier (AFCO), which had been surveyed and qualified by Brown & Root, had supplied materials which had been procured from other material suppliers which were not properly qualified. In response to this finding, Brown & Root has restricted the sources from which AFCO may procure ASME materials for use by Brown & Root at Comanche Peak. Until such time as AFCO may obtain an ASME Quality Systems certificate as a Material Supplier, AFCO is limited to procuring materials from:

1. Materials manufacturers qualified by AFCO and holding current ASME Quality System Certificates,
2. Material suppliers who have a current ASME Quality System Certificate, or
3. Suppliers who are on the current Brown & Root approved suppliers list for Comanche Peak.

In addition, all documentation associated with AFCO has been reviewed by QA Engineering. One material supplier, not falling in the above categories, was identified as having provided AFCO with material. All material supplied by this company has been identified as nonconforming and tagged in accordance with the Brown & Root QA Program. The material was evaluated by

Brown & Root Design Engineering and the disposition submitted to the ANI for concurrence. See Attachment 2 at 1-2. That concurrence has been received. See Attachment 2 at 1-2. Subsequently, on February 5, 1982, AFCO also received their Quality Systems Certificate as a Material Supplier from ASME.

B. Finding Number 2

The ASME Survey Team found that a supplier of ASME Code items was not listed on the Brown & Root Approved Suppliers List. In response, Brown & Root has reviewed the current suppliers of ASME Code items to determine whether or not they appear on the Brown & Root Approved Suppliers List. Brown & Root has verified that all suppliers of Code stamped items, including the supplier identified by ASME, hold valid certificates of authorization. Brown & Root has placed those suppliers on the Approved Suppliers List. See Attachment 2 at 2.

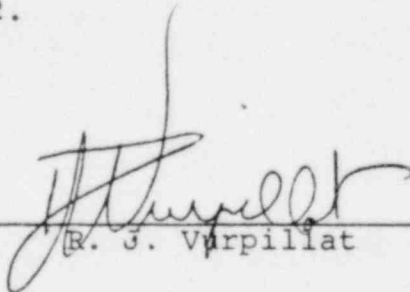
C. Finding Number 3

The ASME Survey Team determined that some welding material which had been receipt inspected and accepted by Brown & Root had not been properly marked as so received. In response, Brown & Root has reviewed all welding material on site to assure proper identification. This review has been documented by Quality Assurance. With respect to the particular material identified by ASME, Brown & Root has segregated and tagged such material in accordance with their

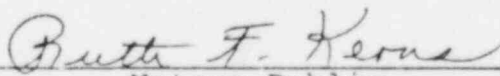
QA Program and the material has been scrapped. In addition, all receiving inspectors have been retrained in the proper use of receiving procedures and material identification requirements. See Attachment 2 at 2.

### III. CONCLUSION

All findings and comments made by the ASME Survey Team as a result of the October 12-14, 1981 Survey and the January 18-20, 1982 Resurvey of the Brown & Root ASME QA Program for Comanche Peak have been responded to by Brown & Root. These responses have demonstrated to the satisfaction of the ASME Subcommittee on Nuclear Accreditation that Brown & Root's ASME QA Program for Comanche Peak warrants issuance of the NA and NPT Certificates of Authorization to Brown & Root for Comanche Peak. These certificates were reissued to Brown & Root on March 15, 1982.

  
R. J. Varpillat

Subscribed to and sworn before me this 7th day of May, 1982.

  
Notary Public

Ruth F. Kerns  
Notary Public, State of Texas  
My Commission Expires 9-2-84

RAY J. VURPILLATSTATEMENT OF EDUCATIONAL  
AND PROFESSIONAL QUALIFICATIONS

POSITION: Power Group QA Manager

FORMAL EDUCATION: B.S. Chemical Engineering, Purdue University

EXPERIENCE:

1980 - Present Power Group QA Manager, Brown & Root, Inc. Manages programs and personnel of Power Group QA Department concerned with various maintenance projects throughout OK, MS, LA, TX, NB, FL and VA.

1968 - 1980 Assistant QA Manager, United Engineers and Constructors. Was involved in the planning, management, and supervision of QA Programs related to design and/or construction of 16 commercial nuclear power plants and more than 10 fossil-fueled power plants.

1967 - 1968 Associate, Gunito Services, Inc. Partner in a construction business involved primarily in concrete construction related to medium-sized private and commercial projects.

1964 - 1967 Warner Co., Director of Quality Control. Responsible for attaining the quality of concrete materials and ready mixed concrete production.

1956 - 1964 Pittsburgh Testing Laboratory, started as a trainee and later became Philadelphia District Manager. Responsible for planning and supervision of all phases of inspection and testing functions related to medium-large construction projects.

PROFESSIONAL: Professional Engineer in Indiana and California  
Member of American Society for Quality Control  
Member of various American Concrete Institute and ASME Committees.



ATTACHMENT 2  
The American Society of Mechanical Engineers

United Engineering Center • 345 E. 47th St., New York, N.Y. 10017 • 212-644-7812 • TWX -710-581-5267

November 23, 1981

RECEIVED  
BROWN & ROOT, INC.

1 - 1981

R. J. VURPILLAT, JR.

CERTIFIED MAIL #P35 7143418

RETURN RECEIPT REQUESTED

BROWN & ROOT, INC.  
R.J. Vurpillat; QA Mgr..  
4100 Clinton Drive  
Houston, TX 77020

Subject: Report of ASME Nuclear Survey Conducted on October 12-14, 1981 for  
New NA & NPT (Replacing current site extension N-2222-2 & N-2223-2)  
at Comanche Peak Electric Station, Units #1 & #2; Glen Rose, TX.

An ASME Nuclear Survey was conducted at your facilities on the date and location  
shown above for the subject requested Authorization.

As a result of the Survey, the Team has recommended that a Resurvey is required.  
The ASME decision on the Teams recommendation will be forwarded to you shortly.

The deficiencies noted in your program include, but are not limited to, the fol-  
lowing items which require corrective action:

I. Quality Assurance Manual

- (A) The manual was vague, failed to establish required controls, responsibilities, or provide for objective evidence that required activities were satisfactorily performed.
- (B) The manual established the Summer addenda 1974 for piping and Winter addenda 1974 for component supports as the Code effectivity. The manual addressed activities only permitted by later Code addenda; such as NX-2610, NA-3867.4(f) and supply of material - NCA-3820(e), without any identification of the applicability of these provisions.
- (C) The manual control system did not include the exhibits displayed in the manual or any manual approval method.
- (D) The program elements of process control, nonconformity control and document control required significant changes.
- (E) The design control element (control) of field change design information and feed back of construction information to the Owner) was missing from the manual.



- (F) All elements required changes to provide definitive information since few auditable controls were included.

## II. Implementation

- (A) Document Control - The manual requires that the File Custodians in each department maintain a log of design changes received from the Owner. The File Custodian is to mark the involved document to indicate that a design change had been received and then the document user checks the log to find the applicable design change(s).

The log being maintained by the QA Department File Custodian contained numerous mistakes and was missing information. Three of three design packages, checked by the team, contained design changes not properly identified in the log.

- (B) Instruction Procedures & Drawings - B & R Construction Procedure 6.9G, reviewed by the Site QA Manager, was in direct conflict with the QA Manual and the Code (NA-5241) in that it stated that the ANI would sign a blank process sheet and then B & R would add the ANI hold points. The AIA representatives stated that this procedure was not honored by them and that they had requested the procedure to be revised. The procedure has not been revised.

The purpose of the Site QA Manager's review is to assure that the procedure complies with the Code and the QA Manual.

- (C) Control of Purchased Materials, Items and Services -

- (1) Vendor Control - B & R procured plate material from a vendor that they had surveyed and qualified as a Material Supplier of bolting and plate materials. The material had been formed into a saddle configuration by this vendor. The B & R survey and qualification of this vendor did not address review of any operation relative to forming and the B & R purchase order did not define a forming process or procedure.
- (2) The same material addressed in C1 was observed in the production shop with work in process. This material had not been receipt inspected in noncompliance with the QA Manual and the material was not identified as required by the B & R purchase order. B & R had divided the material and transferred the material identification incorrectly. B & R does not verify the transfer of material identification and during the review of the manual stated that this verification was unnecessary.

- (D) Control of Construction Processes -

- (1) Process Sheets were observed in production that had not been reviewed with the ANI for establishment of hold points in noncompliance with the B & R QA Manual and NA-5241 of the Code. The process sheets CC-068-002-S33R and AF-035-023-S33A are included in this finding although numerous such process sheets are in production. (See B above)
- (2) Welding Procedure Specification 11012 for welding with impact test requirements did not specify the travel speed but instead controlled the heat input by Volt/amp range and maximum bead width for a given electrode diameter. The Procedure Qualification Record 010AB127 for this WPS recorded a beam width greater than that allowed by the WPS.

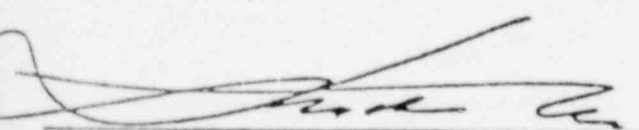
- (E) Nonconformity Control - Nonconformity Control Report (NCR) M-2952 reported that a spool piece had been welded into the system backwards. B & R QA determined the disposition to be rework and not repair and thereby the disposition to cut the spool piece out and reweld it in the correct configuration was not reviewed by welding engineering, as would have been required by a repair designation. There appeared to be no consideration of the heat input effects on the material, etc. as would be expected with this type of nonconformance.
- (F) Identification and Control of Material and Items - Component Supports are procured as stamped items by the Owner. The Code Data Report does not list Code Case N-225. The Component Support is supplied to B & R with only the Code Data Report by the Owner. B & R then cuts the component support, removing the welds, and uses the material to fabricate other component supports. B & R does not have the Certificate of Compliance (C of C) for the material.
- (G) Authorized Nuclear Inspector Involvement - The ANI hold points on process sheets have been bypassed on numerous occasions. The ANI logbook documents these conditions and the volume would indicate a significant breakdown of the program and interface between B & R and the Authorized Inspection Agency personnel (See B and D-1 above).

It is called to your attention that the resurvey will include a review of the entire program & its implementation, and all areas discussed by the Survey Team with your personnel should be given particular consideration.

Please note that arrangements to schedule dates for the resurvey have been made and the exact dates have been or will be sent to you shortly. Note that the resurvey will not be held until we have received payment of our invoice for the subject survey.

If you disagree with the decision above and wish to submit additional information for reconsideration, you must make your intentions known, in writing, to this office, to be received within five (5) working days after receipt of this letter. Your request for reconsideration must include the reasons upon which the reconsideration is to be based.

If you have any questions concerning this survey or the resurvey, please contact this office.



Joseph A. Russo  
Manager, Accreditation - N & SPPE  
(212) 644-8051

/CE

cc: AIA - Hartford Steam Boiler  
Chmn., SC-NA



THE HARTFORD STEAM BOILER  
INSPECTION and INSURANCE COMPANY  
HARTFORD • CONNECTICUT 06102

ATTACHMENT 3

HOUSTON OFFICE — 4151 SOUTHWEST FREEWAY, SUITE 200, HOUSTON, TEXAS 77027 — (713) 623-2220

February 8, 1982

Ms. Arlene Spadafino  
Director of Accreditation  
The American Society of Mechanical Engineers  
United Engineering Center  
345 East 47th Street  
New York, N.Y. 10017

RE: BROWN & ROOT, INC., COMANCHE PEAK UNITS 1 & 2  
GLEN ROSE, TEXAS 76043  
ASME NUCLEAR SURVEY CONDUCTED JANUARY 18, 19 & 20, 1982  
FOR NA & NPT CERTIFICATES OF AUTHORIZATION.

Dear Ms. Spadafino:

The implementation of the corrective action required by the three findings (reports attached) was verified as being completed on February 4, 1982.

The specific corrective action taken is as follows:

## FINDING #1

- A. Letter has been written to AFCO which restricts the sources in which they, AFCO, may procure ASME materials for use by Brown & Root, Inc. at CPSES. AFCO is limited to procuring materials from:
1. Materials manufacturers qualified by AFCO or holding current ASME Quality System Certificates (materials).
  2. Material suppliers who have a current ASME Quality System Certificate (materials).
  3. Suppliers who are on the current Brown & Root approved suppliers list for CPSES.
- B. All documentation associated with AFCO has been reviewed by QA Engineering and one material supplier, not falling in the above categories, was identified as having provided AFCO with material.

RECEIVED  
BROWN & ROOT, INC.

FEB 12 1982

R. J. VURPILLAT, JR.

Brown & Root, Inc.  
Page 2

All the material from this supplier has been identified as non-conforming and tagged in accordance with the B & R QA Program. The nonconformance reports issued against this supplier's material are being evaluated by Design Engineering and Quality Engineering and the proposed disposition will be submitted for ANI concurrence prior to implementation.

FINDING #2

Brown & Root, Inc. Quality Assurance has reviewed current suppliers of ASME Code items to determine whether or not they appear on the B & R approved suppliers list.

B & R has verified the validity of the applicable Certificate(s) of Authorization of all suppliers of code stamped items which includes Southwest Fabrication, Inc. and has placed them on the B & R approved suppliers list.

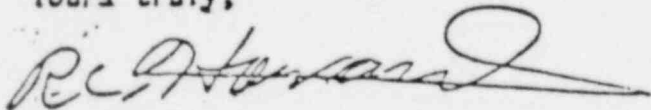
FINDING #3

Brown & Root, Inc. issued a nonconformance report, segregated and tagged the above welding material in accordance with their QA Program, and this material has been scrapped.

All welding material on site has been reviewed to assure proper identification. This review has been documented by Quality Assurance. All receiving Inspectors have been retrained in the proper use of receiving procedures and material identification requirements and this training has been documented by Quality Assurance.

If more information is required or clarification is required, please do not hesitate to contact me.

Yours truly,



R.C. Howard  
Sr. Regional Manager  
Special Inspection Services Division

cc: R.E. Tilton - ASME Team Leader

cc: S.M. Matthews - State of Texas



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Date: JANUARY 20, 1982Page 1 of 1

This form is to be used for the Inspection Specialist's verification of corrective actions taken by the Company to findings identified during a survey. After Sections I and II are completed by the Team Leader and accepted by a Company's representative, the original form is left with the Inspection Specialist and a copy returned to ASME with the team report. The Inspection Specialist is to complete Section III and transmit all finding reports from this survey to ASME with details included in one (1) transmittal.

Company &amp; Survey Location

Inspection Specialist: RONALD HOWARD

BROWN & ROOT, INC.  
COMMERCIAL PEAK STEAM ELECTRIC STATION  
GLEN ROSE, TX

Report Deadline Date: FEBRUARY 20, 1982

## Section I

Finding # 1 (Describe deficiency including Code para.(s) and QA manual ref.(s))

AFCO (MATERIAL SUPPLIER) SURVEYED & QUALIFIED BY BROWN & ROOT (BSR). THE BSR SURVEY DID NOT ADDRESS VENDOR QUALIFICATION. THE RECORDS OF MATERIAL SUPPLIED BY AFCO SHOW THAT THEY PROCURED IT FROM OTHER MATERIAL SUPPLIERS WHICH WAS NOT UNDER CASE N-242-1.

PARA. 5.3(b) ~~ASME Q9000~~  
NA-3700Team Leader: R. E. TILTONSurvey Dates: JANUARY 18-20, 1982

## Section II - Proposed Corrective Action by the Company

- Future procurement from AFCO will be restricted to materials manufacturers certificate holders, until such time as AFCO may obtain a materials supplier certificate; and
- All material supplied by AFCO will be identified, and those items procured by AFCO from material suppliers shall be identified as nonconforming and dispositioned in accordance with Section 16.0 of the BSR QA manual.

Completion Date: 1/22/82Company Rep: Boris G. GurevTitle: Sr QA Manager

## Section III - Summary of Verification by Inspection Specialist Including Actual Corrective Actions Taken

- A Letter has been written to AFCO which restricts the sources in which they may procure ASME materials from by Discontinuity.
- B. All documentation associated with AFCO has been reviewed by QA Engineer. All materials procured by AFCO from improperly qualified suppliers have been identified by QA and have been dispositioned as nonconforming, in accordance with Brown & Root QA Program.

Verification Date: 2-4-82Inspection Specialist: R. C. HowardAgency: Hentford Steam Boiler L & Co





## AND CORRECTIVE ACTIONS

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Date: JANUARY 10, 1982Page 1 of 1

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## Company &amp; Survey Location

Inspection Specialist: RONALD HOWARD

BROWN & ROOT INC.  
COMALCO PEAK STREAM Electric Station  
GLEN ROSE, TX

Report Deadline Date: FEB 20, 1982

## Section I

Finding # 2 (Describe deficiency including Code para.(s) and QA manual ref.(s))

~~P.B.R.~~ PURCHASE ORDER TO SOUTHWEST FABRICATORS INC.  
FOR PIPING SUBASSEMBLIES. RC-2-RB-30.6 & RC-2-RB-63.6.  
SOUTHWEST FABRICATORS, INC. IS NOT A BROWN & ROOT, INC. APPROVED  
SUPPLIER.

(PARA 8.3(C)) ~~NA-3553~~  
NA-3553

Team Leader: R.E. TILLYSurvey Dates: JANUARY 15-26, 1982

## Section II - Proposed Corrective Action by the Company

B&R Quality Assurance shall identify all suppliers of Code items, and initiate action to include those not currently identified on the Approved Suppliers list, on the listing in accordance with Section 8.0 of the B&R QA Manual

Completion Date: 1/27/82Company Rep: Carl R. SundryTitle: Sr QA Manager

## Section III - Summary of Verification by Inspection Specialist Including Actual Corrective Actions Taken

BROWN & ROOT QUALITY ASSURANCE HAS REVIEWED CURRENT SUPPLIERS OF ASME CODE ITEMS TO DETERMINE WHETHER OR NOT THEY APPEAR ON THE B&R APPROVED SUPPLIERS LIST.

B&R HAS VERIFIED THE VALIDITY OF THE APPLICABLE CERTIFICATION OF AUTHORIZATION OF ALL SUPPLIERS OF CODE STAMPED ITEMS WHICH INCLUDES SOUTHWEST FABRICATORS INC AND HAS PLACED THEM ON THE B&R APPROVED SUPPLIERS LIST.

Verification Date: 2-4-82Inspection Specialist: R.E. TILLYAgency: HEATFIELD STEAM BOLLER 1st-1 CO.

## The American Society of Mechanical Engineers

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Page 1 of 1Date: JANUARY 20, 1982

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## Company &amp; Survey Location

BROWN & ROOT INC.  
COMMISSIONER PEAK STEAM ELECTRIC STATION  
GLEN ROSE, TX.

Inspection Specialist: KEITH HOWARDReport Deadline Date: FEBRUARY 20, 1982

## Section I

Finding # 3 (Describe deficiency including Code para.(s) and QA manual ref.(s))

WELDING MATERIAL (HT# 065230 - E 70-52) TO SFA 5.18  
HND BEEN RECEIPT INSPECTED AND ACCEPTED BY BROWN & ROOT INC.  
THE MATERIAL WAS NOT IDENTIFIED AS REC'D BY SFA 5.18, PARA 13.4.  
(PARA 8.4.3). NA 4133.8.

Team Leader: R.E. TILTONSurvey Dates: JANUARY 20, 1982

## Section II - Proposed Corrective Action by the Company

All welding material, on-site, shall be reviewed to assure proper identification. This review shall be documented. Receiving Inspectors shall be re-trained in proper use of receiving inspection procedures and material identification requirements. The training shall be performed and documented as required by QA Manual.

Completion Date: 2/3/82Company Rep: Bob O. PaulTitle: SA QA Manager

## Section III - Summary of Verification by Inspection Specialist Including Actual Corrective Actions Taken

BROWN & ROOT ISSUED HLR, SIGNED AND TAPED  
THE ABOVE WELDING MATERIAL. THIS MATERIAL HAS BEEN SCRAPPED.  
ALL WELDING MATERIAL ON SITE HAS BEEN REVIEWED TO ASSURE  
PROPER IDENTIFICATION. THIS REVIEW HAS BEEN DOCUMENTED BY QA. ALL  
RECEIVING INSPECTORS HAVE BEEN RE-TRAINED IN THE PROPER USE OF  
RECEIVING PROCEDURES AND MATERIAL IDENTIFICATION REQUIREMENTS. THIS  
TRAINING HAS BEEN DOCUMENTED BY QA.

Verification Date: 2-4-82Inspection Specialist: R.C. [Signature]Agency: Houston Steel Fabrication Co.