

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

December 27, 1982

Mr. G. L. Madsen, Chief
Reactor Projects Branch 1
U.S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Dear Mr. Madsen:

SUBJECT: Response to SALP Report

This will provide our response to the observations made in the NRC's Systematic Assessment of Licensee Performance (SALP) Board Report of Comanche Peak SteamElectric Station (CPSES) and the subsequent meeting held on December 8, 1982 regarding that report.

Although Section A is titled Plant Operations - Preoperational Testing, NRC inspection activities were directed primarily toward the review of preoperational test procedures and the witnessing of several of these tests. The performance analysis does not refer to activities of the Plant Operations organization.

Of the seventy-nine (79) engineers who are directly involved in preoperational testing, fifty-four (54) of them had nuclear power plant startup experience prior to their assignment to CPSES. A large majority of the remainder had either fossil plant startup experience or military nuclear experience prior to their assignment. All personnel assigned to the startup group who are responsible for directing testing activities meet the education and/or experience requirements specified by the NRC.

The primary basis for all test schedules issued to date have been sequence of test activities required to support other tests. Those systems not having a required sequence were fixed early in the scheduled time frame to place emphasis on construction completion and early identification of engineering and construction problems. All schedules have been reviewed by personnel having actual nuclear plant startup experience on several plants. Prior to issuance, all startup schedules have been coordinated and agreed to with engineering and construction management and scheduling personnel as well as the individuals responsible for performing the necessary engineering and construction activities.

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While the lack of timely production of preoperational test procedures has hampered the test schedule to a minor degree, there is no indication this was caused by lack of actual nuclear plant startup experience.

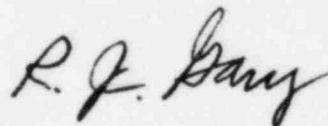
We consider our overall Vendor Compliance (VC) program to be an effective, useful part of the Texas Utilities Generating Company (TUGCO) Quality Assurance (QA) effort. The VC program includes vendor source inspections performed by qualified TUGCO personnel at the vendors' facilities. In performing these inspections TUGCO personnel use checklists which are developed by extracting requirements (weld, dimensional, documentation, etc.) from the specification which have been imposed upon the vendor. During the inspection the TUGCO source inspector verifies the vendor has satisfied the requirements by completing the checklist. He will then release the equipment for shipment as all requirements are met. This program was developed to assure equipment meets specification requirements prior to shipment to CPSES.

While we consider this program to be effective, TUGCO QA management is committed to improvement. One area in which we have recognized a need for improvement is performing inspections of vendor supplied welds. As a result we have retained the services of Reedy, Herbert, Gibbons, & Associates (RHG&A) to assist in an on-the-job retraining program for our source inspectors specifically in this area. RHG&A is a consulting firm consisting of highly qualified individuals considered throughout the industry to be experts in the field of ASME and AWS welding requirements.

As a part of the program RHG&A is accompanying our source inspectors on selected trips when weld inspections are required. These consultants observe the source inspectors as they perform their work for the purpose of determining their overall effectiveness, thoroughness and knowledge of welding code requirements and strengthening those areas that might need improvement. When completed this retraining program will have included all persons who perform source inspections for TUGCO. Final results will be included in a report to the Manager, QA from RHG&A.

This program was first implemented on November 30, 1982 at Reliance Electric with more than satisfactory results. It will continue until the Manager, QA is completely satisfied that all VC personnel are capable of performing weld inspections to the applicable ASME or AWS requirements.

Very truly yours,



RJG:cp