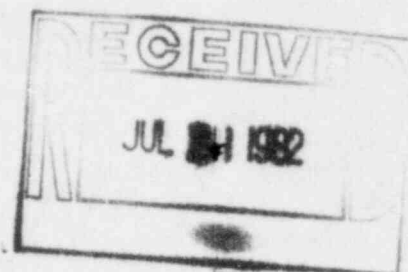


# TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER • DALLAS, TEXAS 75201

R. J. GARY  
EXECUTIVE VICE PRESIDENT  
AND GENERAL MANAGER

July 19, 1982  
TXX-3544



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

Docket Nos. 50-445  
50-446

COMANCHE PEAK STEAM ELECTRIC STATION  
RESPONSE TO NRC  
UNRESOLVED ITEM  
INSPECTION REPORT NO. 82-10/82-05  
FILE NO: 10130

Dear Mr. Madsen:

As agreed in a telephone conversation on June 28, 1982, between the TUGCO QA Manager and Mr. E. H. Johnson of your staff, we submit this letter which describes our corrective actions with respect to welding inspections at the Chicago Bridge & Iron Company (CB & I). Although the matter in question (as identified in NRC I & E Report 50-445/82-10 50-446/82-05) involves recent allegations regarding pipe whip restraints, this discussion also covers prior corrective action taken with regard to piping moment limiting restraints manufactured at the same facility.

As early as July, 1980, the CPSES QA Program had identified an apparent violation of NDE procedures at Chicago Bridge & Iron Company. The matter was discovered during a routine audit/source inspection by Brown & Root QA at the CB & I Salt Lake City facility and involved moment limiting restraints. The auditor identified some welds on the restraints to have surface conditions unsuitable for proper interpretation of magnetic particle test (MT) results. The NRC investigated the matter (see NRC I & E Report 80-20) and issued a citation for violation of NDE procedures.

All moment limiting restraints received at the jobsite up to the date of I & E Report 80-20 were reinspected, and relevant indications were reworked to achieve full compliance. In addition, our source inspection program at that time began placing more emphasis on detecting weld surface conditions of the type identified by the Brown & Root auditor.

From that time until early 1982, our source inspections at the CB & I Salt Lake City facility continued to identify relevant welding indications on moment limiting restraints and pipe whip restraints. During this time TUGCO management became increasingly concerned that TUGCO inspectors were having to do basic, first-line inspection work that CB & I should have been doing.

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In March, 1982, upon the recommendation of the TUGCO Vendor Compliance Supervisor, the TUGCO QA Manager authorized a trip to the CB & I facility in Salt Lake City to observe a source inspection and meet with their management. TUGCO was represented by the TUGCO QA Vendor Compliance Supervisor, who met with their plant management. CB & I was told by the TUGCO Supervisor that unless their inspections were made more effective, we would no longer identify individual weld indications to them so that they could be reworked and released at that time. Instead, we would simply reject all welding on an individual restraint upon identifying a relevant indication and thus force their inspectors to thoroughly reinspect the entire assembly until finding the indication themselves.

Further corrective action with regard to CB & I was initiated as a result of discovering some relevant indications on four pipe whip restraints which had been sandblasted after arriving on site. We then directed a reinspection of 52 other restraint assemblies, which had been received on site prior to or subsequent to the four initially inspected. These inspections revealed conditions similar to those on the four restraints, but to a lesser degree. The specific corrective actions were as follows:

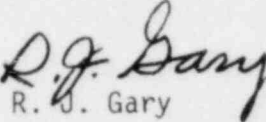
1. On May 5, 1982, the TUGCO QA Manager telephoned the president of CB & I and requested his personal involvement in the matter.
2. As a result of that conversation, a meeting was called at the jobsite on May 7, 1982, with CB & I and CPSES management. At this meeting the following commitments were made:
  - A. A Brown & Root welding specialist would be assigned full-time to the CB & I shop for at least six weeks to monitor welding and NDE. He arrived there on May 10, 1982. He will remain there full-time at least until August 1, 1982, at which time we will determine whether his full-time status can change.
  - B. CB & I committed to sandblast all welds prior to inspection even though this is not required by ASME Section III, Subsection NF, or by the specification.
  - C. CB & I agreed to perform MT on weld areas randomly selected by TUGCO QA inspectors, over and above the 100% MT already done prior to the arrival of the TUGCO personnel.
  - D. CB & I agreed to perform a post-sandblast visual inspection of 100% of the welds prior to TUGCO QA's 100% visual inspection.

The above listed corrective actions have brought about a significant improvement in CB & I's inspection performance. Please note that we have evaluated the welding indications which are a matter of record and have

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determined that the matter would have had no significance, assuming they had gone uncorrected. We will continue to monitor this facility. Should you require additional information, please advise.

Very truly yours,

  
R. J. Gary

RJG:pko