

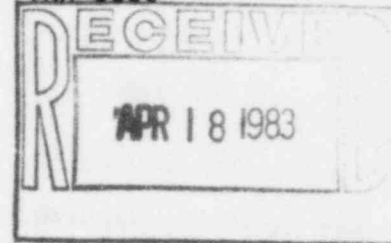
TEXAS UTILITIES GENERATING COMPANY

2001 RYAN TOWER - DALLAS, TEXAS 75201-1050

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

April 15, 1983

TXX-3655



Docket Nos.: 50-445
50-446

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

COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NO. 83-07/04
FILE NO.: 10130

Dear Mr. Madsen:

This will serve to document our telephone conversation with T. F. Westerman on April 12, 1983, wherein we requested an extension of the due date for responding to the Notice of Violation contained in NRC Inspection Report No. 83-07/04. An extension of three working days, until April 18, 1983, was granted.

We have reviewed your letter dated March 14, 1983 on the inspection conducted by Messrs. L. D. Gilbert and C. E. Johnson of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak, Units 1 and 2. We have responded to the finding listed in Appendix A of that letter.

To aid in the understanding of our response, we have repeated the requirement and your finding followed by our corrective action. We feel the enclosed information to be responsive to the Inspector's finding. If you have any questions, please advise.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. J. Gary".

RJG:aq

Enclosures

cc: NRC Region IV - (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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APPENDIX A
NOTICE OF VIOLATION

Texas Utilities Generating Company
Comanche Peak Unit 1

Docket: 50-445/83-07
Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period January 27-28 and February 1-2, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified.

Failure to Follow Procedure

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances, and shall be accomplished in accordance with the procedures.

Brown & Root, Inc., Construction Procedure CP-CPM 9.10, Revision 8, paragraph 3.2.4, specifies that the fit-up gap for "T" fillet joints should not exceed 1/16"; however, if the gap is in excess of 1/16", but not exceeding 5/32", this condition will be considered acceptable provided the leg of the fillet weld is increased by the amount of separation in excess of 1/16".

Contrary to the above, on January 28, 1983, the NRC inspector determined that Pipe Support Mark No. SW-1-102-106-Y33K had been welded with a fit-up gap of 1/4" at one end of the "T" fillet joint which attached piece 7 to piece 4. The 1/4" fit-up gap exceeds the 5/32" maximum allowable fit-up gap requirement of Procedure CP-CMP 9.10.

This is a Severity Level V Violation. (Supplement 11.E) (445/8307-01)

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Corrective actions have included the following:

- 1) Identification of the procedural violation as a nonconforming condition (NCR-51235);
- 2) Removal of the affected portions of the pipe support (for investigative reasons) and replacement with new materials;
- 3) Engineering evaluation of the total weld for purposes of evaluating safety consequences, if any.

As noted above, the pipe support was reworked to comply with design and procedural requirements. Engineering evaluation of the original as-built conditions revealed the following:

- 1) The excessive gap occurred at the toe of the skewed angle, and for a distance of six inches toward the heel on one side and seven inches on the other. No design credit is taken for the weld at the toe of the angle, as it exceeds 135° (157°). Additionally, to account for the corner effect caused by the radius of the tube steel, 2.56 inches of the weld on each side at both the toe and heel is excluded from design consideration. This results in a total weld length (for which design credit is taken) of 10.24 inches on each side.
- 2) Taking no credit for the weld where gap is in excess of $5/32$, and excluding 2.56 inches at both the toe and heel, the remaining weld which is within acceptance criteria is 6.8 inches on one side and 5.8 inches on the other.
- 3) Design calculations based on as-built piping loads indicate a total of 1.6 inches of fillet weld is required on both sides to meet structural design requirements.

In summary, had the gap condition not been detected, there would be no adverse results.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Affected construction personnel will be reinstructed in the necessity for rigid compliance with design and procedural requirements.

DATE OF FULL COMPLIANCE

Corrective actions are complete. Preventive measures are scheduled to be completed by April 22, 1983.