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Subj: Texas Utilities Electric Company, et al.
(Comanche Peak Steam Electric Station,
Units 1 and 2); Docket Nos. 50-445 and 50-446

Gentlemen:

The Board Chairman has requested that Applicants comment on the validity of a conclusion made in I&E Report 83-52 (February 21, 1984) regarding the relevance of an allegation by a craftworker (that he was not allowed to obtain materials for his work) to matters within the jurisdiction of the NRC. In particular, the Board questioned whether this allegation was related to the provisions of 10 C.F.R. Part 50, Appendix B, Criteria II, regarding the conduct of activities affecting quality under suitably controlled conditions. For the reasons discussed below, Applicants believe the conclusion of the NRC investigator was correct and the allegation is unrelated to the provisions of 10 C.F.R. Part 50, Appendix B.

The essence of the allegation addressed in I&E Report 83-52 is that a worker was required to perform work on tasks he was assigned so long as materials were available to perform those tasks, but that when materials were not available for a particular task he moved to another task for which he had materials. The worker apparently believed he should have been permitted to leave his work to obtain materials himself whenever he believed they were needed, regardless of whether other tasks might be performed pending receipt of additional materials. This allegation simply involves a question as to the most efficient means for workers to complete their tasks.

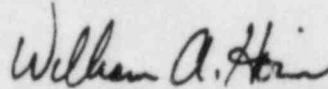
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Thus, the NRC investigator was clearly correct in concluding that this matter involved a disagreement over matters within the prerogative of the supervisor.

As for the Board's question regarding the relationship of this matter to Criterion II of Appendix B, it is apparent that there is none. The portion of that criterion which the Board Chairman suggested may be relevant concerns the need to perform certain activities under controlled conditions (e.g. suitable environmental conditions) or with special tools or equipment. The allegation here does not involve a situation inconsistent with those provisions. Even assuming the tasks the worker was performing required either appropriate tools or equipment or were to be conducted under controlled conditions, he was never asked to perform those tasks without such tools or equipment or when not under such conditions. He was required only to perform tasks for which he had the necessary materials. He was simply required to remain working when materials for a particular task were not immediately available by commencing tasks for which materials were presently available. In sum, no request was ever made that the worker perform tasks in a manner inconsistent with the provisions of Appendix B.

Sincerely,

A handwritten signature in dark ink, appearing to read "William A. Horin". The signature is written in a cursive, slightly slanted style.

William A. Horin
Counsel for Applicants