

906

CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

April 25, 1984

RELATED CORRESPONDENCE

1426 S. Polk
Dallas, Texas 75224

214/946-9446

DOCKETED
USNRC

'84 APR 30 P12:24

Administrative Judge Peter B. Bloch
U. S. Nuclear Regulatory Commission
4350 East/West Highway, 4th Floor
Bethesda, Maryland 20014

Dr. Walter H. Jordan
881 W. Outer Drive
Oak Ridge, Tennessee 37830

Dr. Kenneth A. McCollom, Dean
Division of Engineering, Architecture
and Technology
Oklahoma State University
Stillwater, Oklahoma 74074

Gentlemen:

SUBJECT: In the Matter of
Application of Texas Utilities
Generating Company, et al. for
An Operating License for
Comanche Peak Steam Electric Station
Units #1 and #2 (CPSES)
Docket Nos. 50-445 and 50-446-1

ASME Code of Record

As the Board is aware, Applicants have repeatedly made a big point in these proceedings about the ASME Code of record.

Information has just come into CASE's hands, as part of the Applicants' updating of past discovery requests, which indicates that Applicants have been playing games with the Board and other parties in these proceedings in this regard.

As indicated in the attached pages from CPSES Quarterly Reports on QA Department and QA Program Activities for several quarters, Applicants have been constantly and continually changing selected portions of the Code to suit their own purposes. Further, as is clearly indicated that (in some instances at least) the thrust of these changes is to allow Applicants to use less restrictive portions of the Code (see, for instance, the third page of CASE Exhibit 1,005 attached, which states, in part: "NCA-8230 of Summer 1982 Addenda eliminates the requirement for showing the location of the component support location on the drawing."). CASE is unable to evaluate the effect of the additional changes which Applicants have made (even if we were able to obtain the many different codes involved, we simply don't have time due to the tremendous amount of documents we currently have to deal with regarding Cygna). However, this is of great concern to us, and appears to CASE to be contrary to ASME Code provisions, specifically NA-1140 (g).* As far as CASE knows, the NRC has not given such assurance.

Respectfully submitted,

CASE (Citizens Association for Sound Energy)

8405010167 840425
PDR ADOCK 05000445
G PDR

cc: Service List

(Hand delivered to Board and parties at hearings)
*See CASE Exhibit 1,003 attached, from 1974 ASME Code.

Juanita Ellis
(Mrs.) Juanita Ellis, President

DSOM

NA-1140 NA-1220

SECTION III, DIVISION 1 SUBSECTION NA

NA-1140 EFFECTIVE DATES OF CODE EDITIONS, ADDENDA, AND CASES

(a) Code Editions become mandatory on July 1 of the publication year printed on the cover. Addenda may be used on and after the date of issue and become mandatory six months after the date of issue.

(b) Code Cases may be used beginning with the date of approval by the ASME Council and, being permissive, do not become mandatory. Only Code Cases that are specifically identified as being applicable to Section III may be used for construction in accordance with this Section.

(c) The Code Edition, including Addenda, which is mandatory on the contract date for a component shall determine the mandatory rules for the manufacture and installation of that component, including its materials, parts, and appurtenances. Earlier editions shall not be used.

(d) The Code Edition, including Addenda, which is mandatory on the contract date for core support structures and component supports shall determine the mandatory rules for manufacture and installation of core support structures and component supports including their materials. Earlier editions shall not be used.

(e) The contract date for an entire nuclear power system does not govern the Code Edition, Addenda, and Cases applicable to the components, core support structures, and component supports.

(f) Code Editions, Addenda, and Cases which have not become mandatory on the contract date for a component may be used by mutual consent of the Owner¹ or his agent and Manufacturer² or Installer³ on or after the dates permitted by (a) through (d) above. It is permitted to use specific provisions within an Edition or Addenda provided that all related requirements are met.

(g) Caution is advised when using Addenda or Cases that are less restrictive than former requirements without having assurance that they are acceptable to the enforcement authorities having jurisdiction at the nuclear plant site.

(h) The Owner or his agent shall obtain a Certificate of Authorization (NA-3230 and NA-8243) prior to the field installation (NA-1250) of any item of

the nuclear power plant to be constructed in accordance with this Section.

NA-1200 GENERAL REQUIREMENTS FOR AND DEFINITIONS OF ITEMS AND INSTALLATION**NA-1210 COMPONENTS**

The components of a nuclear power plant include items such as, vessels, piping systems, pumps, valves, and storage tanks. Each component shall bear the required Code N-type Symbol⁴ and Manufacturer's Data Reports shall be prepared for them (NA-3370 and NA-8400). The Installer of such components or any associated appurtenances shall complete Data Report Form N-5 which serves to indicate that each component or appurtenance assembled into the nuclear power plant and the installation meet the requirements of this Section.

NA-1220 MATERIALS

Materials are manufactured to an SA, SB, or SFA Specification⁵ or any other material specification permitted by this Section. Such material shall be manufactured and certified in accordance with the requirements of this Section. Materials produced under an ASTM designation may be accepted as complying with the corresponding ASME specification provided the ASME specification is designated as being identical with the ASTM specification for the grade, class, or type produced and provided that the material is confirmed as complying with the ASTM specification by a Certified Materials Test Report or Certification from the Material Manufacturer. Welding material produced under an AWS designation may be accepted as complying with the corresponding ASME specification provided the latter specification is indicated to be identical with the AWS specification and provided the welding material is confirmed as complying with the AWS specification by a Certified Material Test Report or Certification from the Materials Manufacturer.

⁴The term *N-type symbol* means any one of the symbols shown in Figure NA-8220-1.

⁵SA or SB Specifications listed under the heading *Bars, Rods, Shapes, Forgings* may be used as material for any of these product forms even though not all product forms are listed in the SA or SB Specification.

¹See NA-3210 for definition of Owner.

²See NA-3310 for definition of Manufacturer.

³See NA-3410 for definition of Installer.

QA PROGRAM ACTIVITIESA. QA MANUAL MAINTENANCE

During this report period a general rewrite of the Brown and Root CPSES QA Manual was completed in preparation for the scheduled January 1982 ASME resurvey. Prior to the resurvey, one minor revision was issued to the QA Manual to "clean-up" editorial errors. The QA Manual was reissued on January 19, 1982 following incorporation of the ASME Resurvey Team's comments.

Subsequent to the ASME resurvey, 2 revisions have been issued to the Brown and Root CPSES QA Manual. Of the changes included in these revisions only the following activities constitute action other than routine QA Manual maintenance:

1. The manual was revised to permit vendors to be placed on an ASI (Approved Suppliers List) on the basis of NPT Certificate of Authorization or QA Manual and program review, provided the item being furnished is within the scope described in the Certificate of Authorization or QA Manual.
2. Control of Special Process now allows the Power Group or Site QA Manager to review welding procedure specifications and the Materials Engineering Manager or Project Welding Engineer to approve Welding procedure specifications.

B. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or in progress as of March 31, 1982:

1. New QA Procedures or Instructions Issued

NUMBER	TITLE
CP-QAP-8.4	Supplier Audits
CP-QAP-9.1	Permanent Equipment Transfer Verification
QI-QAP-11.1-36	Insp. Verification of Salvages Hanger and Parts
QI-QAP-11.1-37	Inst. for QA/QC Review, Approval of Travlers
CP-QAP-14.1	Insp. Of Storage and Maintenance of Mech. Equipment
CP-QAP-2.3	QA Manual Control
CP-QAF-6.1	Preparation, Approval and Control of Procedures
CP-QAP-8.5	Material Reclassification
CP-QAP-10.3	QC Surveillance of Welder Performance Qualification
CP-QAP-18.2	QA Review of ASME III Documentation

QA PROGRAM ACTIVITIESA. QA MANUAL MAINTENANCE

NCA-8200 1980 thru Summer 1981 addenda was approved and included in the Code editions and addenda applicable at this site. This paragraph eliminates the need for reattachment of Code name plates, when they are lost or removed from installed components, provided traceability of the component to the Data Report has been maintained.

It was approved that material produced and certified to later edition and addenda of Section II than 1974 Edition thru Winter 1974 is acceptable for use, provided the material meets the additional requirements of applicable edition and addenda of Section III.

Manual was revised to allow preoperational test by the Owner prior to Brown & Root Code stamping the system.

The procedure for nonconforming items was revised to allow repairs to arc strikes in accordance with inprocess repair procedures instead of by means of an NCR. This permits repairs and documentation of arc strike in an expeditious manner.

Also the NCR procedure now requires removal of hold tags following the approval of disposition, instead of removal after the implementation of disposition.

The organization chart has been revised to indicate Materials Engineering reporting to Power Group QA, and indicates the Site QA with three groups, i.e. QE, QC and PSG.

A provision for upgrading the stock material, procured from vendors not qualified to meet NCA-3800/NA-3700, was included in the manual.

B. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or in progress as of June 30, 1982:

1. New QA Procedures or Instructions Issued:

<u>NUMBER</u>	<u>TITLE</u>
QI-QAP-7.1-3	Issuance and Control of Quality Control Inspection Procedures and Instructions

2. QA Procedures or Instructions Revised:

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
CP-QAP-2.1	Personnel Training and Qualification	6
QI-QAP-2.1-5	Training and Certification of Inspection Personnel	1
CP-QAP-2.3	QA Manual Revision and Control	1

QA PROGRAM ACTIVITIES

A. QA MANUAL MAINTENANCE

There were three revisions to the QA Manual during this quarter.

NX-5342 and NX-5352 of 1977 Edition eliminates the discrepancy subsection NC had with other subsection in regards to the definition of relevant indication. Subsection NB and ND had defined the relevant indication as an indication with major dimension greater than $1/16"$, where as this definition was missing from subsection NC.

NCA-8230 of Summer 1982 Addenda eliminates the requirement for showing the location of the component support location on the drawing.

NX-6125 of 1980 Edition Summer 1981 Addenda eliminates the requirement for hydro testing of flanged joints at which blinds are inserted to blank off other equipment during the hydro test.

NX-4433 of 1980 Edition Summer 1981 Addenda permits the use of fillet or partial penetration continuous or intermittent welds other than as shown in figure NC-4433-1.

NC-4436 of Winter 1981 Addenda revised the size of welds which are allowed to be used for attachments to piping system after pressure testing. Now code permits a weld not exceeding total length of 24 inches for fillets and 12 inches for full penetration. Earlier a maximum of 6 sq. inch cross sectional area material was permitted to be attached.

Code Case N-32 was adopted to permit hydro testing of embedded class 2 and class 3 piping.

Code Case N-272 will permit alternate method to the requirement of NCA-8430 for compiling N-5 Data Reports.

Code Case N-310 provided alternate rules for metallic bolting material, which have been procured without meeting NCA-3800 requirements.

The procedure for evaluating and reporting of defects, non-compliances and deficiencies was issued as a part of QA Manual.

QA Manual was revised to reflect the organization changes at the Corporate level.

QA PROGRAM ACTIVITIES

A. QA MANUAL MAINTENANCE

Revision 12 of QA Manual was issued on February 28, 1983. The following paragraphs of Section III ASME Code were adopted:

NCA 1140(a)	1980 Edition, No Addenda
NF-4424(c)	1980 Edition through Winter 82 Addenda
NF-4711	1980 Edition through Winter 82 Addenda
NX-4123	1980 Edition through Winter 82 Addenda
NX-4427	1980 Edition through Winter 82 Addenda
NX-4453.4	1980 Edition through Summer 81 Addenda
NX-6114.2	1980 Edition through Summer 81 Addenda

Code Cases N-237-1
N-274

Adoption of these later code paragraphs permits us the following:

- a. Fillet welds undersize than specified as long as undersize does not exceed certain parameters.
- b. Weld repairs to welds and base material after hydro testing provided the depth of repair does not exceed, so that the repair requires radiographic examination.

Code Case N-237-1 exempts hydro testing requirements for Class 2 or Class 3 piping terminating in spargers or spray devices provided the piping welds have been examined to the requirements of Class 2.

Code Case N-274 describes the alternate rules for examination of weld repairs.

B. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or in the process as of March 31, 1983:

1. New QA Procedures or Instructions Issued:

<u>NUMBER</u>	<u>TITLE</u>
QI-QAP-11.1-39	Mechanical Equipment Installation Inspection
QI-QAP-18.3	QA ASME III N-5 Certification

2. QA Procedures or Instructions Revised:

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
QI-QAP-2.1-1	Nondestructive Examination Personnel Certification	5

QA PROGRAM ACTIVITIES

A. QA MANUAL MAINTENANCE

1. Rev. 13 of QA Manual was issued on June 20, 1983. The following paragraphs of Section III ASME Code were adopted:
 - a. NF-1131.6 1980 Edition
 - b. NF-1133 1980 Edition
 - c. NX-5521 1980 Edition
2. Adoption of these later code paragraphs permits us the following:
 - a. NF-1131.6 and NF-1133 was adopted to allow ASME pipe supports to be attached to an intervening element.
 - b. NX-5521 was adopted to allow Level 1 individual to independently accept the results of Nondestructive Examination when the specific acceptance criteria are defined in written instruction.
3. Section III ASME Code Table was also adopted:
 - a. NF-3324.5(a)-1 1980 Edition through Winter 1982 Addenda
4. Adoption of this later code permits us the following:
 - a. To allow welds to be proportioned to meet the stress requirements given in Table NF-3324.5(a)-1 for Class 1, 2, 3 and MC Linear type supports.

B. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or were in the process as of June 30, 1983:

1. New QA Procedures or Instructions issued:

<u>NUMBER</u>	<u>TITLE</u>
QI-QAP-11.1-39A	Valve Disassembly/Reassembly

2. QA Procedures or Instruction revised:

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
QI-QAP-2.1-5	Training and Certification of Mechanical Inspection Personnel	3
CP-QAP-2.4	Program for Repair or Alteration of ASME N-Stamped Components	2
QI-QAP-10.2-4A	Ultrasonic Digital Thickness Measurements	3
QI-QAP-10.2-4B	Ultrasonic Examination of Hilti Bolts	3

QA PROGRAM ACTIVITIES

A. QA MANUAL MAINTENANCE

Revisions to the QA Manual were issued on June 20, 1983 and August 3, 1983. ASME Section III paragraphs were adopted as follows:

Code Editions:

NF-1131.6	1980 Edition
NF-1133	1980 Edition
NX-5521	1980 Edition

Table:

NF-3324.5 (a)-1 1980 Edition through Winter 1982 Addenda

Revision August 3, 1983 - No Code paragraphs or code case adopted with the issue of this revision.

3. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or were in process as of September 30, 1983.

1. New QA Procedures or Instructions Issued:

<u>NUMBER</u>	<u>TITLE</u>
QI-QAP-10.2-4E	Ultrasonic Examination of ASME Section III Class 1 plate
QI-QAP-11.1-40	Insulation Installation Inspection

2. QA Procedures or Instructions Revised:

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
CP-QAP-2.1	Personnel Training and Qualification	9
CP-QAP-2.3	QA Manual Revision and Control	2
CP-QAP-2.4	Program for repair or alterations of ASME N-Stamped Components	3
CP-QAP-5.1	QA Review of Procurement Documents	4
CP-QAP-6.1	Preparation of QA Procedures & Instructions	5
CP-QAP-8.1	Receiving Inspections	6
CP-QAP-8.2	Evaluation and Selection of Supplies	4
CP-QAP-8.3	Source Surveillance	4
CP-QAP-8.4	Supplier Audits	2
CP-QAP-11.1	Fabrication and Installation of Components	
	Component Supports and Piping	3
CP-QAP-12.1	Inspection Criteria and Documentation	
	Requirements prior to N-5 Certifications	9

QA PROGRAM ACTIVITIES

A. QA MANUAL MAINTENANCE

A revision to the QA Manual was issued on October 11, 1983, adopting the following ASME Section III

Code Editions and Addenda

NC-2300	1977 Edition through Summer 1977 Addenda
NC-4335.2	1974 Edition through Winter 1974 Addenda
NCA-8200	1980 Edition through Winter 1981 Addenda
NF-2610	1977 Edition through Summer 1977 Addenda
NF-4453.1	1983 Edition - No Addenda
NX-2610	1980 Edition - No Addenda
NX-4430	1980 Edition through Winter 1981 Addenda
NX-6000	1980 Edition through Summer 1981 Addenda
NB/C/O 2420(d)	1980 Edition through Summer 1980 Addenda
NF-4622.3.1	1974 Edition through Summer 1976

Code Cases

N-274
N-275
N-310
1751

B. QA PROCEDURES AND INSTRUCTIONS

The following activities were completed or were in process as of December 31, 1983:

1. New QA Procedures or Instructions Issued

<u>NUMBER</u>	<u>TITLE</u>
CP-QAP-12.4	Identification, Traceability and Retention of ASME Code Nameplates

2. QA Procedures or Instructions Revised

<u>NUMBER</u>	<u>TITLE</u>	<u>REVISION</u>
CP-QAP-2.1	Personnel Training and Qualification	10 .
QI-QAP-2.1-5	Training and Certification of Mechanical Inspection Personnel	4
CP-QAP-3.1	Site ASME QA Organization	5
CP-QAP-7.1	Control of QA Procedures and Instruction	5
CP-QAP-8.2	Evaluation and Selection of Suppliers	3
CP-QAP-8.4	Supplier Audits	2
CP-QAP-9.1	Permanent Equipment Transfer Verification	
QI-QAP-11.1-28	Fabrication, Installation Inspections of ASME Component Supports, Class 1, 2 & 3	2 & 3
QI-QAP-11.1-28A	Installation Inspections of ASME Class 1, 2 & 3 Snubbers	5