

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

March 15, 1984

RELATED CORRESPONDENCE

1426 S. Polk  
Dallas, Texas 75224

214/946-9446 DOCKETED  
USNRC

'84 MAR 19 A10:30

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 50-44

Differences between handwritten documents  
and typewritten documents

In going through CASE's interrogatories and requests to produce in order to supply Applicants with a list of those items CASE believes should be updated, we came across an item which (although not as significant at the time) appears to have increased significance at this point in time regarding nonconformances, especially regarding Mrs. Stiner's recollection and documentation that she had written an NCR which is not shown on Applicants' documents (the NCR log).

We refer the Board to CASE's 4/5/82 letter to the Board, to which was attached CASE's 4/5/82 Answer to Applicants' Motion for Protective Order, and CASE's Motion to Compel Discovery regarding CASE's Eighth Set of Interrogatories and Requests to Produce to Applicants. (For the Board's convenience, we are attaching pertinent portions of our pleading. /1/)

Briefly, part of our Motion had to do with our desire to look at original documents at the plant site, rather than accepting certified copies. This was necessary because of several reasons, including the fact that on the copy of the handwritten NCR log which had been obtained by CASE on discovery previously, NCR M2447 was identified as "Bolt has shear load imposed on threads", etc., whereas when we were given a copy of the updated typewritten NCR log,

1 The remainder of CASE's 4/5/82 pleading (which we are not attaching hereto) gives further details regarding Applicants' *modus operandi* on discovery which was discussed in CASE's 3/15/84 letter to the Board under Subject of Supplementation of Interrogatories and Requests to Produce to Applicants from CASE.

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PDR ADOCK 05000445  
PDR

DS03

NCR M2447 was identified as a totally different item with a totally different identifying number, a different Nonconformance Trend Category number, etc., "Lost traceability on base plate." (See attachments, CASE Attachment E, pages 1 and 2.)

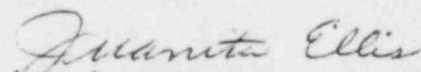
When we went to the plant site to review the original documentation, we were told that the only documents retained were the typed NCR log, that the original handwritten NCR log had been destroyed (which was Applicants' usual practice), and that the only NCR available was the one which was shown on the typewritten list. So, in effect, we did not know much more after we reviewed the original documents at the plant than we did before we made the trip.

We believe that this is especially important at this time, however, because we believe it tends to show that there has been on at least one occasion an NCR which was assigned a number, then apparently voided and the number assigned to another NCR. If this happened once, it raises the possibility that it could have happened again -- perhaps in the case of Darlene Stiner.

We request that the Board advise if they would entertain a motion for the admission of the attached two pages into evidence at this time.

Respectfully submitted,

CASE (Citizens Association for Sound Energy)

  
(Mrs.) Juanita Ellis  
President

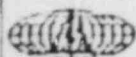
cc: Service List, with attachments

Brown Root Inc.

QUALITY ASSURANCE DEPARTMENT  
NONCONFORMANCE LOG

REQ. NO.	DESCRIPTION OF CONDITION	NO. CONFORM "AS-BUILT"	CAN REQ. YES/NO	TWR	ISSUED	DISPOSITION ASSIGNMENT	DISPOSITION DUE	DISPOSITION SUBMITTAL	DISPOSITION APPROVAL CONCURRENCE	VERIFICATION CLOSURE
I 2445	FS-1-319-01-193 new steel on wall. Park disapproved.	G-8	NO	—	7-18-80	Meritt	—	—	—	—
M 2446	Brucel in I.D. canister. 10" m.e.v. RC-1-319-01-193	M-4	—	43	7-19-80	Meritt	—	—	—	—
M 2447	Bolt has shear loading in end of T RC-1-319-01-193	M-13	—	—	—	—	—	—	—	—
M 2448	Filler material. 1-5-8-016 RC-1-319-01-193	M-15	NO	—	7-18-80	Franklin	—	7-27-80	7-30-80	8-5-8
M 2449	Sway steel. 1-5-8-016 RC-1-319-01-193	M-14	NO	—	7-27-80	Franklin	—	—	—	—
M 2450	Union steel. 1-5-8-016 RC-1-319-01-193	M-12	NO	—	7-27-80	Franklin	—	—	—	—
M 2451	General sway steel. 1-5-8-016 RC-1-319-01-193	M-14	NO	—	7-27-80	Meritt	—	—	—	—
M 2452	By passed OR. Hold points RC-1-319-01-193	M-20	NO	—	7-27-80	Franklin	—	—	—	—
M 2453	By passed OR. Hold points RC-1-319-01-193	M-20	NO	—	7-27-80	Franklin	—	—	—	—
M 2454	Rust on main. 1-5-8-016 RC-1-319-01-193	G-11	NO	—	7-27-80	Franklin	—	—	—	—
M 2455	Item #3 on B. Hangers. 1-5-8-016 RC-1-319-01-193	M-14	NO	—	7-27-80	Franklin	—	—	—	—
M 2456	Pipe does not have 2" clearance. 1-5-8-016	G-3	—	—	—	—	—	—	—	—
M 2457	Material tag. 1-5-8-016 RC-1-319-01-193	M-13	NO	—	7-27-80	Franklin	—	—	—	—
M 2458	Thermal port. 1-5-8-016 RC-1-319-01-193	M-15	NO	—	8-5-80	Franklin	—	—	—	—
M 2459	Hold points. 1-5-8-016 RC-1-319-01-193	M-20	NO	—	7-31-80	Franklin	—	—	—	—
M 2460	Flange has 3. 1-5-8-016 RC-1-319-01-193	G-4	NO	—	7-30-80	Franklin	—	—	—	—
M 2461	Sway steel. 1-5-8-016 RC-1-319-01-193	M-19	NO	—	8-1-80	Franklin	—	—	—	—
M 2462	Weld filler. 1-5-8-016 RC-1-319-01-193	M-22	NO	—	7-31-80	Franklin	—	—	—	—
M 2463	NAME PLATE. 1-5-8-016 RC-1-319-01-193	M-14	—	—	—	—	—	—	—	—





## Brown &amp; Root, Inc.

CASE ATTACHMENT E - Page 2

QUALITY ASSURANCE DEPARTMENT  
NONCONFORMANCE LOG

PROJECT: COMANCHE PEAK STEAM ELECTRIC STATION

JOB NO.

35-1195

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NCR NO.	DESCRIPTION OF CONDITION	NON-CONFORM TRENDCAT	CAN REQ'D YES/NO	TWR	ISSUED	DISPOSITION ASSIGNMENT	DISPOSITION DUE	DISPOSITION SUBMITTAL	DISPOSITION APPROVAL/ CONCURRENCE	VERIFICATION/ CLOSURE
2445	Nozzle on West. tank damaged FSI-2107-07 1Q3	G-8	No	--	7-18-80	Merritt	--	8-8-80	8-15-80	8-18-80
2446R	2 Bevel on I.D. counter bore 10° max. RE-2-520-001	M-4	No	43	7-17-80	Merritt	--	9-9-80	9-9-80	9-9-80
2447	Lost traceability on base plate CC-1-057-012-A33R	M-19	No	--	8-18-80	Frankum	--	8-22-80	8-27-80	10-27-80
2448	Filler material traceability AF-1-SB-016 803	M-15	No	--	7-18-80	Frankum	--	7-29-80	7-30-80	8-5-80
2449	Sway strut bearing dislodged (generic) 13 hangers	M-14	No	--	7-21-80	Frankum	--	9-29-80	9-30-80	1-27-81
2450R	1 Violation of QC holdpoints FW-4B CC-1-RB-56B	M-12	No	--	7-24-80	Frankum	--	8-15-80	8-15-80	9-15-80
2451R	1 Grinnell Sway struts unacceptable SW-1-132-041-A43R (thread portion)	M-19	No	--	7-21-80	Merritt	--	3-18-81	3-19-81	3-20-81
2452	By-passed QC holdpoints CC-1-116-029-A43R	M-20	No	--	7-24-80	Frankum	--	8-29-80	9-2-80	10-1-80
2453R	1 By-passed QC holdpoints CC-1-028-004-A33R	M-20	No	--	7-24-80	Frankum	--	9-29-80	9-30-80	11-20-80
2454	Rust on main coolant primary oop piping RC-1-520-01	G-11	No	--	7-24-80	Frankum	--	8-12-80	8-12-80	9-3-80
2455	(2) hanger parts interchanged SW-1-129-711-Y33R SW-1-102-711-Y33R	M-14	No	--	7-24-80	Frankum	--	8-5-80	8-5-80	9-5-80
2456R	3 Pipe doesn't have 2" clearance (generic)	M-4	No	--	8-11-80	Frankum	--	9-1-81	9-3-81	9-3-81
2457	Material traceability WP-1-RB-05 spool 1	M-13	No	--	7-28-80	Frankum	--	8-4-80	8-5-80	8-11-80
2458	Threaded portion of bolt supporting load CC-1-030-006-S33S	M-15	No	--	8-5-80	Frankum	--	8-25-80	8-26-80	9-8-80
2459	Hold points by-passed CS-1-037-007-A53R	M-20	No	--	7-31-80	Frankum	--	8-6-80	8-6-80	9-2-80
2460	Flange has 3 damaged areas CH-1-EC-001 CPI-CACICE-06	G-4	No	--	7-30-80	Frankum	--	9-3-80	9-4-80	9-9-80
2461	Sway strut is misaligned CS-2-358-012-A53R	M-15	No	--	8-1-80	Frankum	--	8-6-80	8-6-80	10-30-80
2462	Weld filler material not entered on WFML CC-1-RB-033-006-3	M-22	No	--	7-31-80	Frankum	--	8-5-80	8-6-80	8-6-80
2463	Name plate is absent from hanger CC-1-194-002-C42R	M-14	No	--	8-11-80	Frankum	--	8-13-80	8-15-80	2-10-81
2464	By-passed hold points CC-1-011-036-A63R	M-20	No	--	8-11-80	Frankum	--	8-22-80	8-25-80	9-24-80
2465	Material traceability W-1&16 SI-2-SB-70A	M-5	No	--	8-11-80	Frankum	--	8-22-80	8-22-80	8-22-80
2466	By passed hold points CS-2-333-019-A53R	M-20	No	--	8-11-80	Frankum	--	9-2-80	9-3-80	9-3-80
2467	No traceability on filler material CH-1-205-700-A23R	M-15	No	--	8-11-80	Frankum	--	8-20-80	8-20-80	11-20-80
2468	Fit-up not per drawing CH-1-239-708-E23R	M-21	No	--	8-18-80	Frankum	--	8-22-80	8-26-80	8-26-80
2469	Filler material traceability CC-2-137-701-E63R	M-19	No	--	8-18-80	Frankum	--	8-22-80	8-23-80	9-22-80
2470	Pipe steel stamped CS-1-AB-217 FW-1&4	M-10	No	--	8-15-80	Frankum	--	9-22-80	9-22-80	12-23-80
2471	Spherical bearing cracked AF-1-L100-015-S33R	M-15	No	--	8-18-80	Frankum	--	10-16-80	10-16-80	10-28-80

QA-15.1-1/1-0