

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

June 1, 1984
TXX-4187

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dockets: 50-445
50-446

Comanche Peak Steam Electric Station
Units 1 and 2
Allegations Transmitted by Letter
of April 24, 1984
Additional Response
File No.: 10125

Dear Mr. Eisenhut:

This letter provides our additional response to your letters of April 24, 1984 and May 1, 1984 containing a list of allegations about certain practices at the Comanche Peak Steam Electric Station. Our TXX-4180 dated May 25, 1984 provided our response to 16 of the 24 allegations. Responses to the remaining eight allegations are contained herein.

We have responded to these allegations to the fullest extent possible commensurate with the amount of specific information provided to us.

To the best of our management's knowledge, no documentation relating to this evaluation has been discarded or destroyed.

We trust you will find the enclosed information helpful in expediting closure of these issues. Please advise if you require further information.

Very truly yours,

Billy R. Clements

BRC:ln

cc: John Collins
NRC, Region IV

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Allegation No. 1

It has been alleged that document control clerks have issued incomplete "packages" to quality control and craft personnel, at the direction of supervision, in violation of procedures.

Evaluation of Validity

Applicants are unaware of any instance where a supervisor directed document control clerks to violate a procedure by issuing incomplete packages.

Our review indicates that this allegation may stem from a misunderstanding of certain CPSES procedures. Procedure DCP-3, Rev. 17, at Section 3.4 authorizes the issuance of documents into "traveler" packages. This process allows the issuance of only those documents required for the specific work covered by the traveler. These documents are then stamped "This document shall be used only in conjunction with Operation Traveler # _____." This practice precludes the documents from being used in a manner other than that intended by management. This procedure is certainly preferable to burdening the inspectors or craft personnel with documents not related to their assigned task.

Personnel may have been confused with what constitutes a "complete" package. It is our position that the procedure provides for issuance of a package complete for the intended use. QC inspections, verification of design changes and the walkdown programs provide an additional level of assurance that all required documents have been utilized.

Safety Significance

None

Generic Implications on Other Systems or Contractors

Not applicable

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Allegation No. 5

It has been alleged that document control clerks received poor training. These clerks learned how to handle "travelers" and other types of documentation on the job.

Evaluation of Validity

In accordance with Procedure DCP-3, document control clerks are required to receive training commensurate with the complexity of their job function. This training comprises document control orientation (including instruction in handling of travelers) and a passing grade (15 out of 16 questions correct) on a test which is based on a thorough knowledge of DCP-3. Records of training and test results are maintained by DCC. We have reviewed these records and have confirmed that all clerks presently employed and employed within the last six months underwent this training and testing. Obviously, additional training in the broad sense may be received "on the job" as individual clerks are faced with opportunities to learn even more about document control.

Safety Significance

None

Generic Implications on Other Systems or Contractors

Not applicable

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Allegation No. 14

It has been alleged that management has taken away an approved set of procedures for reviewing documents. Therefore, document controllers do not have anything to review by.

Evaluation of Validity

Our investigation of this allegation indicates that on Transmittal #57, dated 4/18/84, Brown & Root QA procedures CP-QAP-18.2 "QA Review of ASME III Documentation," and CP-QAP-18.3 "QA ASME III N-5 Certification," were deleted. This was done in anticipation of incorporation of the contents of these procedures into CP-QAP-12.1. As this was Easter weekend, document reviewers did not work. On Monday, April 23, it was evident that the new revision of CP-QAP-12.1 was not going to be ready for issuance. Transmittal #58 was sent out explaining that CP-QAP-18.2 and 18.3 were deleted in error and reinstated those procedures. They are still in effect as the new revision of CP-QAP-12.1 has yet to be issued. We are not aware of any other instances.

Safety Significance

None

Generic Implications on Other Systems or Contractors

Not Applicable

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Allegation No. 16

It has been alleged that non-conforming material has been used in safety systems. Examples include:

- a) Craft "battered" pipe, material is welded 360° around the pipe to make it thicker, to achieve required wall thickness.
- b) Pipe numbers have been changed in an effort to bypass NCR's.
- c) Out of round pipe was heated up by craft and made round without procedures or analysis.
- d) CMC's would be "lost" so that unauthorized work could not be traced.

Evaluation of Validity

Our investigation of the four cited examples indicates the following:

- a) Piping which was identified as being in violation of minimum wall requirements has been repaired by welding to achieve the required wall thickness. This practice was approved in Construction Procedure CP-CPM-6.9D and is considered a standard repair method for such situations. The repair of minimum wall violations was documented by a repair process sheet or by Welding Engineering adding additional steps on the Weld Data Card for the weld involved.
- b) ASME Section III requires heat traceability for all pressure retaining materials. Heat number verification is documented on the Manufacturer's Record Sheet (MRS) and verified by both QC inspection personnel and QA Document Review personnel. There have been some instances when QC inspections have identified mismatches between numbers on the drawing and on the hardware. Pieces identified on the drawing have been incorrectly identified on the hardware, or in some cases, the fabrication drawing or Component Modification Card (CMC) would incorrectly duplicate piece numbers, i.e., use the same piece number for more than one piece of the

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subassembly. In the first case, QC inspection personnel would have the craft correctly identify the spool. In the latter case, QC would notify the craft that the drawing (or CMC) was in error. If engineering agreed and revised the drawing (or CMC), the craft would correctly identify the piece, at which time QC would perform its inspection.

- c) Our investigation of this allegation on safety related piping did not substantiate that this has occurred. The basis for this statement is interviews with construction supervisors and numerous QC inspectors. Additionally, both TUGCO and Brown & Root NCR logs have been searched, and no evidence of this type of activity was encountered.
- d) The purpose of the CMC is to document a design change which is required because of interference, minor fabrication error, etc. A "lost" CMC would make an as-constructed condition appear nonconforming, rather than making "unauthorized work" untraceable. CMC's are issued to construction through the Document Control Center (DCC) and logged as they are issued. As an additional safeguard, the verification of design changes and the N-5 walkdown verify that the as-installed condition matches the latest design. Hardware which does not match the latest design is identified by QC as nonconforming.

Safety Significance

None

Generic Impact on Other Systems or Contractors

Not applicable

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Allegation No. 17

Describe the utility and contractor programs for changing the class of a material and procedures used to assure the appropriate class of material is used in the construction of systems. It has been alleged that:

- a) Documents were reassigned from "Q list" (safety-related) items to "non-Q" (non-safety related) items to circumvent ANI review. The documentation would be left as non-Q, however, the material was placed in safety system.
- b) A department upgrades the class of a material to fill an order if material requested is not available. An example is that craft will look for material requested on drawings and if it cannot be found, they will substitute a similar looking material. The material will then be stamped with a number that incorrectly identifies the class of the material.

Evaluation of Validity

Material classification may properly be changed either downgrading material or upgrading. Material, on occasion, has been upgraded, i.e., ASME Class 2 upgraded to ASME Class 1. Both the Brown and Root QA Manual and ASME QA/QC procedures define specific provisions for doing so. A higher classification, i.e., Class 1, is always acceptable for use in a Class 2, Class 3, Class 5, or BOP system. Material is not upgraded from non-safety to Class 5 or ASME.

- a) Our interpretation of this allegation is that systems or portions of systems have been changed from ASME to Class V (Non-ASME) or nonsafety. This has happened as a result of Engineering reclassifying systems or portions of systems. These changes were based on design considerations, and were not made in order to preclude or circumvent ANI review.

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b) Construction procedures allow the substitution of alternate materials which have been approved by Engineering. If neither the specified material nor the approved alternate is available, Engineering is contacted to provide additional alternatives or to work with Construction and Procurement to prepare Field Requisitions to procure necessary materials. The quality program requires that this material is checked at receiving by QC to assure compliance with purchase order requirements. QC field inspection personnel verify material type, grade, and heat numbers (where required). This verification is designed to assure that material used meets design requirements. Two safeguards preclude the possibility of changing the classification of material by simply "re-stamping" the material:

- 1) If material reclassification were to occur as alleged, the old classification would have to be ground off prior to stamping the new number and would be readily apparent to QC; and
- 2) For material requiring heat number traceability, the material classification would be caught in Document Review by the mismatch between ASME Class and heat number, i.e., heat number would be for a different Class than indicated.

In summary, our investigation indicates that material reclassification has occurred, but it was done in accordance with approved procedures. Portions of ASME systems have been downgraded to non-Code; however, it was not done in violation of Code or regulatory requirements.

Safety Significance

None

Generic Implications on Other Systems or Contractors

Not applicable

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Allegation No. 18

It has been alleged that there was improper sign off of "hold points" on travelers.

Evaluation of Validity

We have assumed that the term "improper sign off" means the signing of a traveler by someone unauthorized to do so. Our review of this matter indicates that there have been isolated instances of this nature. When an unauthorized signature has been detected, appropriate corrective action has been taken.

Safety Significance

None

Generic Implications on Other Systems or Contractors

Not Applicable

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Allegation No. 19

It has been alleged that craft personnel would satisfy a CMC on an inadequate weld by welding over it instead of following the procedure of cutting it out and then welding.

Evaluation of Validity

The term "inadequate weld" used in this allegation is vague. For example, a weld which was undersize and therefore "inadequate" would require no weld metal removal prior to performance of additional welding. On the other hand, welds may be termed "inadequate" due to relevant indications and rejectable by applicable codes or standards. In these cases, procedures require removal of the defect, verification of defect removal by the same nondestructive examination method which detected the defect, rewelding, and repetition of required NDE. In neither case would "inadequate welds" be welded over in violation of procedure.

Without any specific information to aid in the evaluation, we are unable to address this allegation more specifically.

Safety Significance

None

Impact on Other Systems or Contractors

Not applicable

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Allegation No. 20

It has been alleged that there are undocumented weld repairs. Modifications were made to material, such as a hanger, after QC had approved it.

Evaluation of Validity

This allegation lacks sufficient specificity to allow an evaluation. Our review has determined that construction has, on occasion, performed additional welding after QC acceptance of a pipe support. Unauthorized welding, when identified, has been resolved through approved nonconformance procedures. There are instances, however, where post inspection modifications have been performed. This is, however, controlled procedurally and results in a subsequent QC inspection of the modification.

Safety Significance

Ncne

Generic Imp er Systems or Contractors

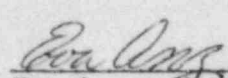
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STATE OF TEXAS)
)
COUNTY OF ~~SOMERVELL~~)
 HOOD BRC

Billy R. Clements being duly sworn deposes and says:
That he is Vice President, Nuclear Operations, Texas
Utilities Generating Company and knows the contents of
the foregoing Applicants' additional response to Darrell
G. Eisenhut's April 24, 1984 letter transmitting allegations;
that the same is true of his own knowledge except as to
matters therein stated on information and belief, and as
to that he believes them to be true.


Billy R. Clements

Subscribed and sworn to before me this 1 day of June 1984.


Eva Anz - Notary Public

EVA ANZ - NOTARY PUBLIC
Term Expires 11-25-85

State: Texas
County: Hood