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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
TEXAS UTILITIES ELECTRIC ) Docket Nos. 50-445  
COMPANY, et al. ) 50-446  
 )  
(Comanche Peak Steam Electric ) (Application for  
Station, Units 1 and 2) ) Operating License)

APPLICANTS' MOTION FOR SUMMARY  
DISPOSITION OF MAXIMUM ROUGHNESS  
SURFACE PREPARATION ISSUE

Pursuant to 10 C.F.R. § 2.749, Texas Utilities Electric Company, et al. ("Applicants") submit this motion for summary disposition of the maximum roughness surface preparation issue. There is no genuine issue as to any material fact as to this point, and Applicants are entitled to a decision in their favor as a matter of law.

I. BACKGROUND

Robert Hamilton testified (CASE Ex. 653 at 16):

The specification calls for a near-white blast, which is defined in the Steel Structure Painting Council specifications as being from a one to three mill profile. The maximum as far as how rough the surface is allowed to be has been removed from the specifications entirely. The rougher the surface is, the earlier the paint will break down.

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Applicants submitted an affidavit on this issue, acknowledging that the procedures do not specify a maximum profile height, but explaining that the question is addressed by the procedural requirement that appropriate coatings thicknesses be ascertained by measurement after painting. The Board, however, rejected Applicants' submittal because the NRC "once found that dry film thickness tests were not indicated on Applicants' checklists." The issue thus remained open.<sup>1</sup>

II. THE BOARD SHOULD GRANT APPLICANTS'  
MOTION FOR SUMMARY DISPOSITION  
ON THIS ISSUE

Mr. Hamilton's testimony regarding maximum roughness consists of two separate allegations: first, that SSPC specifications call for a maximum surface profile of three mils; and second, that if a three-mil profile is exceeded, the coatings may "break down." Mr. Hamilton is mistaken as to both points. As to the latter, his observation is not relevant.

1. Steel Structure Painting Council (SSPC) specifications do not prescribe a maximum surface profile, as Mr. Hamilton claims. Attached is the affidavit of C. Thomas Brandt, who identifies and discusses the surface profile

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<sup>1</sup> Applicants have indicated to the Board that this issue could be addressed in the context of Applicants' coatings reinspection program. On review, however, Applicants conclude that the issue may be resolved on the independent basis presented in this motion.

provision of SSPC Surface Preparation Specifications No. 10 (SP-10). As Mr. Brandt states (affidavit at 6, and see Attachment A at 2), rather than to prescribe, in mils, a maximum profile, SP-10 provides that "[t]he height of profile of the anchor pattern produced on the surface shall be limited to a maximum height that will not be detrimental to the life of the paint film."

Applicants' specification AS-31, as identified and described by Mr. Brandt, also does not prescribe a maximum profile height, but refers to the coatings manufacturer's instructions. Applicants have advised the Carboline Company, which manufactures the primer coatings in question here, that their procedures do not specify a maximum surface profile. Carboline has advised Applicants that no maximum profile need be specified so long as the blast media used by Applicants will limit the actual profile achieved.<sup>2</sup> As we next show, the surface preparation methods employed by Applicants do not produce a surface profile that exceeds three mils.

2. Mr. Brandt's affidavit addresses the maximum surface profile produced by Applicants for each of the surface preparation methods in use at Comanche Peak. Applicants originally prepared all steel substrate surfaces

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<sup>2</sup> As Mr. Brandt explains (affidavit at 7), Applicants' original source of a 3-mil maximum profile height was not SP-10 or Applicants' specifications, but a product data sheet prepared by the Carboline Company (Attachment E).

inside containment by sandblasting (Brandt affidavit at 3). According to SSPC-SP-10, Applicants should achieve a maximum profile of 2.8 mils with the blasting medium in use at Comanche Peak (Brandt affidavit at 3 and Attachment A, Appendix A-4). As Mr. Brandt further explains, even if sandblasting were to produce a surface profile in excess of 2.8 mils, "there would be no loss in the integrity of the primer coating" (affidavit at 3-4). The Carboline Company, which manufactures the relevant primer coatings for use at Comanche Peak, has independently confirmed Mr. Brandt's statement (affidavit at 4-5). According to the manufacturer, if the blast medium limits achievable surface profile and steel surfaces are completely covered, Applicants need not specify a maximum allowable surface profile (Attachment B to affidavit).

For repair work, Applicants utilize a variety of power tools to prepare steel surfaces, including flapper wheels, a 3-M product, belt sanders, and needle guns. Applicants have also established, by test, a maximum surface profile achievable for each of these devices (Brandt affidavit at 4-5 and Attachment B). In no case did testing show that the prepared steel surface exceeded three mils; indeed, in most cases the profile did not even approach three mils. The same result obtained with Applicants' only other method of

surface preparation, hand sanding, for which test results yielded a maximum profile height of 1.75 mils (Brandt affidavit at 5 and Attachment B).

In sum, none of the steel surface preparation methods in use at Comanche Peak produces a surface profile height in excess of three mils. In fact, the maximum produced by the principal method, sandblasting, is 2.8 mils. Robert Hamilton's allegation that surface profiles in excess of three mils will cause problems is therefore, essentially irrelevant, and the issue that he apparently seeks to raise is a non-issue.

### III. LEGAL STANDARDS GOVERNING SUMMARY DISPOSITION

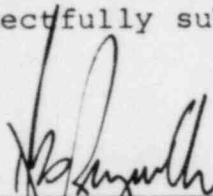
Applicants discuss the legal requirements applicable to motions for summary disposition in their "Motion for Summary Disposition of Certain CASE Allegations Regarding AWS and ASME Code Provisions Related to Welding," filed April 15, 1984 (at 5-8). We incorporate that discussion herein by reference.



IV. CONCLUSION

The Board should grant Applicants' motion for summary disposition on this issue.

Respectfully submitted,



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