

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of

TEXAS UTILITIES GENERATING  
COMPANY, et al.

(Comanche Peak Steam Electric Station  
Station, Units 1 and 2)

Docket Nos. 50-445-1  
and 50-446-1

'84 OCT 22 A11:08

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CASE'S PARTIAL ANSWER TO APPLICANTS' STATEMENT OF MATERIAL FACTS  
AS TO WHICH THERE IS NO GENUINE ISSUE REGARDING APPLICANTS'  
QUALITY ASSURANCE PROGRAM FOR DESIGN OF PIPING AND PIPE SUPPORTS  
FOR COMANCHE PEAK STEAM ELECTRIC STATION

in the form of

AFFIDAVIT OF CASE WITNESS MARK WALSH

- Q: Have you completed your review of the documents being supplied by Applicants which CASE has requested on discovery regarding Applicants' Motion (for Summary Disposition Regarding Applicants' Quality Assurance Program for Design of Piping and Pipe Supports for Comanche Peak Steam Electric Station)?
- A: No, I haven't. I am still in the process of reviewing the procedures, specifications, and other documents which Applicants have supplied and which they will be supplying.
- Q: Is there anything you would like to call to the Board's attention at this time regarding the implementation of Applicants' quality assurance program for design?
- A: Yes. Applicants' Statement 4 states:

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"Each design organization has implemented design control measures which include verification and/or checking of the adequacy of each design, including the initial design of the piping or support prior to release of the design for construction. These measures include documentation of the design reviewer's findings and correction of the deficiencies by the original designer. Each design organization also requires that the person performing design review may not be the same person who performed the original design, although he may be part of the same organization as the original designer. (Affidavit at 20-22 (G&H), 30 (W), 35-37 (NPSS), 40-41 (ITTG), and 46-48 (PSE).)"

And Applicants' Statement 5 states:

"During the course of construction of the piping and support system changes in design of supports are virtually unavoidable. Implementation of the changes are governed by established procedures and instructions. The most commonly employed method to implement such changes is through Component Modification Cards ("CMCs"). These changes are subject to design review, verification and approval in accordance with procedures commensurate with the design review process employed in the original design. With respect to design changes not initiated by field modifications, each organization also conducts design reviews of the change in a manner commensurate with the procedures for new designs. The design change control process for each organization provides that the organization which performed the original design to also perform the design review of the design changes. (Affidavit at 50-56.)"

I will not discuss this in detail at this time, but I want to call the Board's attention to our previously-filed Answers to Applicants' various Motions for Summary Disposition. Just as a couple of examples:

The problem regarding bending in the bolt for the Richmond inserts was called to Applicants' attention by CASE Witness Jack Doyle. But even after it was called to their attention, Applicants did nothing about it until their Motion for Summary Disposition, when they finally admitted that Mr. Doyle was correct. (See discussion at page 39 of CASE's Answer to Applicants' Statement of Material Facts Relating to Richmond Inserts As to Which There Are No Material Issues, in the form of Affidavit of CASE Witness Mark Walsh.)

The problem of instability is one which clearly documents a complete breakdown of Applicants' QA/QC program for design. I discussed this in detail in our recent Answer to Applicants' Motion for Summary Disposition on stability (see CASE's Answer to Applicants' Statement of Material Facts As To Which There Is No Genuine Issue Regarding Stability of Pipe Supports, in the form of Affidavit of CASE Witnesses Mark Walsh and Jack Doyle, entire Answer).

Throughout our Answers to Applicants' Motions for Summary Disposition, as well as CASE's First Motion for Summary Disposition, there are clear patterns of numerous continuing breakdowns in Applicants' QA/QC program which are repeated time and again.

Q: Do you have any further comments?

A: Not at this time. However, as I stated earlier, I am still in the process of reviewing the procedures, specifications, and other documents which Applicants have supplied and which they will be supplying. And I will be discussing Applicants' Statements further in a supplement to this partial answer.

The preceding CASE's Answer to Applicants' Statement of Material Facts As To Which There Is No Genuine Issue was prepared jointly under the personal direction of the undersigned, CASE Witnesses Jack Doyle and Mark Walsh. We can be contacted through CASE President, Mrs. Juanita Ellis, 1426 S. Polk, Dallas, Texas 75224, 214/946-9446.

Our qualifications and background are already a part of the record in these proceedings. (See CASE Exhibit 842, Revision to Resume of Jack Doyle, accepted into evidence at Tr. 7042, and CASE Exhibit 841, Revision to Resume of Mark Walsh, accepted into evidence at Tr. 7278; see also Board's 12/28/83 Memorandum and Order (Quality Assurance for Design), pages 14-16.)

We have read the statements therein, and they are true and correct to the best of our knowledge and belief. We do not consider that Applicants have, in their Motion for Summary Disposition, adequately responded to the issues raised by us; however, we have attempted to comply with the Licensing Board's directive to answer only the specific statements made by Applicants.

*Mark Walsh*

(Signed) Mark Walsh

STATE OF TEXAS

On this, the 17 day of Oct, 1984, personally appeared Mark Walsh, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes therein expressed.

Subscribed and sworn before me on the 17 day of Oct, 1984.

*Samuel W. Nestor*

Notary Public in and for the  
State of Texas

SAMUEL W. NESTOR

My Commission Expires: 1-31-85

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
Docket Nos. 50-445-1 BRANCH  
and 50-446-1

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of  
CASE's Partial Answer to Applicants' Motion for Summary Disposition Regarding Applicants'  
Motion for Summary Disposition REGARDING Applicants' Quality Assurance Program for Design  
of Piping and Pipe Supports for Comanche Peak Steam Electric Station -- and -- CASE's 10/18/84  
letter to Applicants re: Documents Request by CASE on Discovery Re: Applicants' Motion for  
Summary Disposition Re: Allegations Concerning QA for Design

have been sent to the names listed below this 18th day of October, 1984,  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

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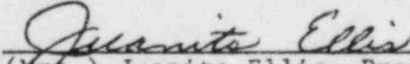
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