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RELATED CORRESPONDENCE

June 28, 1985 DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'85 JUL -2 A10:41

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
TEXAS UTILITIES ELECTRIC)	Docket Nos. 50-445/2
COMPANY, <u>et al.</u>)	50-446/2
)	
(Comanche Peak Steam Electric)	
Station, Units 1 and 2))	

THIRD SUPPLEMENT TO NRC STAFF RESPONSE
TO CASE'S REQUEST FOR ADMISSIONS

I. INTRODUCTION

On February 4, 1985, Intervenor Citizens Association for Sound Energy (CASE) filed a request for admissions in which it asks the Staff to admit certain facts purportedly found by the Staff's Technical Review Team (TRT) during the course of its review and evaluation of Applicants' construction and quality assurance/quality control activities at Comanche Peak Steam Electric Station (CPSES). In its March 1, 1985 Response the Staff indicated that the TRT's findings and conclusions regarding the matters within its jurisdiction are set forth in applicable Supplemental Safety Evaluation Reports (SSERs). See Staff Response at 2-3. At the time the Staff's March 1 Response to CASE'S Admission requests was filed only the SSER concerning Electrical/Instrumentation and Test Program issues had been published. Subsequently, the Staff issued SSER No. 11, which addresses Quality Assurance/Quality Control issues. Consequently, the Staff is now in a position to respond to CASE admission requests

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34-85, 87-89, 92-115, 117-122, 124-126 which relate to these matters. ^{1/}

The Staff's responses are set forth below.

II. NRC STAFF RESPONSE TO SPECIFIC
ADMISSION REQUESTS

34. The TRT found, based on a review of about 200 fuel pool travelers, that the fuel pool travelers included irregularities such as:

- 1) There was apparently a routine practice during construction of the fuel pool that allowed craft personnel to complete a portion of the inspection report forms prior to the actual inspection. Craft personnel entered the word "SAT", dated the entry, and left blank only the space for the QC inspector's signature. It appeared that the craft personnel were judging the inspection results prior to inspection.
- 2) The date accompanying the signature for visual examination of an inside weld was changed to a date that appeared to precede the examination.
- 3) Entries by the same inspector for two different inspections did not appear to match in that one entry appeared to be written by another person.
- 4) The procedure number for a dye penetrant inspection was changed by an inspector different from the one who conducted the inspection.
- 5) The date for a dye penetrant inspection was changed by an inspector other than the one who performed the inspection.
- 6) Fuel pool travelers were found with missing QC signoffs for fitup and cleanliness. No proof could be found that some of the required weld fitup and cleanliness inspections were ever performed.

^{1/} The Staff's Response to CASE Admission Requests 1-13, 14-17, 18-27, and 28-33 were timely filed on March 1, April 4, and June 7, 1985, respectively. The Staff will respond to CASE Admission requests 86, 90, 91, 116, and 123 on July 1, 1985.

7) The TRT review disclosed the following irregularities with traveler entries in addition to those listed above:

- (a) Date changes after the fact
- (b) Signoffs for functions out of sequence
- (c) Corrections after the fact
- (d) Changes to first party inspector date signoffs
- (e) Missing signatures

STAFF RESPONSE: Admit. See SSER 11 at pp. 0-199 thru 0-206.

35. The TRT found no basis or criteria for paint removal or identification methodology of "worst case" pipe whip restraints which had received inadequate source inspections. This resulted from a TRT review of 12 NCRs issued involving weld defects.

STAFF RESPONSE: Admit only that CASE Admission Request 35 fairly reflects the contents of Part 2(B) of the enclosure of the TRT's January 8, 1985 letter to TUEC. See SSER 11 at 0-196.

36. The TRT found that although pipe support components had been previously inspected and accepted by TUEC QC as meeting the respective construction and installation requirements, of 42 pipe supports inspected, 46 deficiencies were identified.

STAFF RESPONSE: Admit. See SSER 11 at pp. 0-249 and 0-250.

37. The TRT found that TUEC did not report to the NRC, pursuant to 10 C.F.R. 50.55(e)(1), the omission of thread-locking devices in the Unit 1 nuclear safety systems and did not attempt corrective action until May 1984, when TUEC tested previously applied paint for thread-lock capability. That test was inconclusive, since it did not establish that

the paint, an epoxy process, would reliably perform as an effective locking device under all service conditions and throughout the expected lifetime of the plant.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-263.

38. The TRT found that TUEC could not identify to the TRT which paint was the subject of testing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-260.

39. The TRT found that paint was applied to ASME code-controlled, NF hardware per specification 2323-AS-30 (non-Q) which required no inspection. (This issue appears to be generic for Unit 1.)

STAFF RESPONSE: Admit. See SSER 11 at p. 0-259.

40. The TRT found that TUEC did not initiate an NCR, required by procedure, identifying the widespread problem of missing locknuts; only a Request for Information was apparently generated which TUEC could not locate for the TRT.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-259, 263.

41. The TRT found that pipe support RC-1-901-702-C82S had a load bolt at a beam attachment which did not exhibit an approved locking device. (The bolt material type was SA-307 grade A.) The TRT found that pipe support CS-1-085-003-A42K had no approved locking device on the "special clamp" bolts, even though the design drawing for this clamp showed each bolt with a nut and a locknut.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

42. The TRT found that the baseplate for pipe support CC-X-039-006-F43R, located in the component cooling system, Room 249A, Fuel Handling Building, violated minimum edge distance criteria for bolt holes.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

43. The TRT found the horizontal member of Support CC-1-126-010-F33R was 3 inches lower at its centerline relative to the upper bolt-hole centerline than shown on the vendor-certified drawing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

44. The TRT found that an excessive free gap existed between spherical bearing and washers on the sway strut assembly of support CC-1-126-015-F43R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

45. The TRT found that other supports with similar bearing gap anomalies found in TRT's inspections were: RC-1-052-016-C41K, RC-1-052-020-C41K, and MS-1-416-001-S33R.

STAFF RESPONSE: Admit with following clarification: Correct pipe support number is RC-1-052-015-C41K, not RC-1-052-016-C41K. See SSER 11 at p. 0-250.

46. The TRT found that the frequency of this type of procedure violation in the TRT's limited inspection suggests that this problem is generic for Unit 1.

STAFF RESPONSE: Admit that TRT found the frequency of this procedural violation to be "excessive." See SSER 11 at 0-263; see also id. at 0-250.

47. The TRT found paint contamination in the bearings of both snubber assemblies on component support SI-1-909-006-C41K that severely obstructed the bearing cavities and limited their movement.

STAFF RESPONSE: Admit. Correct support number, however, is SI-1-090-006-C41K. See SSER 11 at p. 0-250.

48. The TRT found that a similar condition exists on supports MS-1-416-002-S33R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

49. The TRT found that procedure QI-QAP-11.1-28, Revision 25, Attachment 29 permits less than full thread engagement in threaded plates. This allowance for less than full thread engagement is a potential violation of the ASME Code Section III, NF-7411; no code was invoked to set aside this procedure.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250, 262.

50. The TRT found that snubber (shock arrester) adapter-plate bolt threads were insufficiently engaged in all four threaded holes of component support MS-1-416-002-S33R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

51. The TRT found that a similar lack of full threaded engagement deficiencies on NF supports SI-1-090-006-C41K and CT-1-013-012-S32K.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

52. The TRT found that sight holes were present in the strut body to verify threaded rod engagement. The rod was not visible through the sight hole for support RC-1-901-702-C82S.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

53. The TRT found locking device deficiencies. An example was that sway strut No. AF-1-001-014-S33R had a broken cotter pin.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

54. The TRT found load sides of pipe clamp halves that were not parallel. An example is that clamp halves for pipe supports AF-1-001-S33R and AF-1-001-014-S33R were not parallel.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

55. The TRT found pipe clearance outside of allowable tolerance violations. An example of is that pipe support CC-1-126-013-F33R exhi-

hited no clearance on top or bottom, while the hanger drawing called out 0" on the bottom and 1/16" on top.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

56. The TRT found that a similar problem existed for pipe support AF-1-001-702-S33R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

57. The TRT found that pipe clamp locknuts were loose. An example was that a pipe clamp locknut for pipe support AF-1-035-011-S33R was found loose (less than finger-tight).

STAFF RESPONSE: Admit that the pipe clamp locknut for pipe support AF-1-035-011-S33R was found loose. See SSER 11 at p. 0-250.

58. The TRT found that pipe support CC-1-126-014-F43R exhibited angularity that exceeded requirements.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-250.

59. The TRT found that a similar problem existed with pipe support RC-1-052-020-C41R.

STAFF RESPONSE: Admit. Correct pipe support number, however, is RC-1-052-020-C41K. See SSER 11 at p. 0-250.

60. The TRT found that snubber cold set (AC) dimension did not match the design drawing. An example was that pipe support CS-1-085-

003-A42K deviated by approximately 1" from the cold set dimension shown on the design drawing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

61. The TRT found that support configuration did not match the design drawing. An example was that pipe support snubber CT-1-005-004-S22K was installed end-to-end opposite from the orientation shown on the drawing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

62. The TRT found that a similar problem existed with pipe support CT-1-013-010-S22K, where dimensional discrepancies existed on the support drawing that detailed the orientation of the snubber.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

63. The TRT found that a component type/model number did not match the design drawing. An example was that model numbers of installed snubbers for pipe support SI-1-090-006-C41K did not match the model number on the design drawing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

64. The TRT found that a similar problem existed with pipe support RC-1-052-020-C41R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

65. The TRT found that weld data cards were missing QC initials for welds. An example was that support number CC-1-126-013-F33R had some welds performed with no QC inspector initials or signature on the corresponding blocks of the weld data card for that support inspection package.

STAFF RESPONSE: Admit that the weld data card (singular) was missing QC initials. See SSER 11 Attachment 3, p. 4.A.17.

66. The TRT found deficiencies in identification of materials and parts. An example was that a replacement part (sway strut eyerod) for pipe support CT-1-013-014-S32R had no apparent material identification either on the hardware or in the documentation package for the support. The Material Identification Log (MIL) did not list any identification traceable to the origin of the replace part.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

67. The TRT found that a similar problem existed with pipe supports CI-1-126-012-F33R, CC-X-039-005-F43R, and AF-1-035-011-S33R.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-251.

68. The TRT found a frequently occurring number of strut and snubber load pin spherical bearing clearance with washers that were excessive (Ref. QI-QAP-11.1-28, Sec. 3.7.3.1 Rev. 25). (See Attachment 2, Table 3 Summary of Additional TRT Inspections).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

69. The TRT found a frequently occurring number of strut and snubber load pin locking devices (cotter pins or snap lock rings) which were damaged or missing.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

70. The TRT found a frequently occurring number of pipe clamp halves on load side which were not parallel.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

71. The TRT found a frequently occurring number of bolts threaded into tapped holes of snubber adapter plates that had less than full thread engagement.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

72. The TRT found that a frequently occurring number of "Hilti Kwik" bolts (concrete expansion anchors) as installed did not meet minimum effective embedment criteria.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

73. The TRT frequently found that locking devices for threaded fasteners were missing or of a non-approved type.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-253.

74. The TRT found undersize welds on electrical conduit supports and cable tray hangers. An example of undersize welds was that three or four welds on conduit support C120-21-104-3 (cable spread room) were

undersized. The required weld size was 1/4" at all weld joints, while the measured weld size was 7/32" to 5/32" for the full lengths of three out of the four welds.

STAFF RESPONSE: Admit. Correct pipe support number, however, is C120-21-194-3. See SSER 11 at 0-257.

75. The TRT found that cable hanger CTH 5824 (Containment Building) had 13 undersize welds. The all-around welds on the six horizontal beams should be 1/4" in size, according to details L1 and L2 on Drawing FSE-00159, sheet 5824, 1 of 2. The measured size of these welds was 3/16" to 5/32" at each connection.

STAFF RESPONSE: Admit that the TRT found 12 undersize welds on CTH-5824. See SSER 11 at 0-257 and Attachment 3, p. 4.C.1.

76. The TRT found that support IN-SP-7b exhibited undersize welds measuring 7/32" to 5/32" instead of the required 1/4".

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.1.

77. The TRT found misplaced welds on hangers. An example was on hanger CTH-6742, where the TRT found that two structural welds were made in the wrong direction. The 3/16" shop welds which join MK-10 and MK-11 were made horizontally instead of vertically, as shown on drawing FSE-00159, sheet 6742. QC Inspection Report ME-I-0024909, dated February 16, 1984, accepted all inspectable attributes as satisfactory prior to the TRT inspection.

STAFF RESPONSE: Admit that problems listed in CASE Admission Request 77 was found only on hanger CTH-6742. See SSER 11 at 0-257 and Attachment 3, p. 4.C.2.

78. The TRT found unauthorized configuration changes on cable tray hanger CTH 5824 (Containment Building) which had been fabricated to include 40 more stiffeners and 80 more welds than required or shown on drawing FSI-00159, sheet 5824, 2 of 2, Detail L2. Inspection Report ME-1-0006155 verified final QC inspection and acceptance on January 3, 1984.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.3.

79. The TRT found that cable tray hanger CTH-6742 (Auxiliary Building), Clip, MK-12, should be 6" x 6" x 3/4" angle stock in accordance with FSE-00159, sheet 6742. The actual flange thickness of MK-12 was 3/8".

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.3.

80. The TRT found Hilti anchor bolt installation deficiencies. An example was CTH-6742 (Auxiliary Building) anchor bolt torque which was not verified (paragraph 3.5 of the procedure).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.3.

81. The TRT found that Hilti bolts were not marked in accordance with Attachment 1 of the procedure on CTH-6742.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.4.

82. The TRT found that the length of the Hilti bolts was not verifiable (paragraph 3.2) on CTH-6742.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.4.

83. The TRT found that five base plate bolt holes on CTH-5824 (Containment Building) had violated minimum edge distance -- edge distance cannot be less than 1 7/8" (Attachment 2 of the procedure). Actual distance was 1 5/8" to 1 3/8" from the nearest plate edge.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.4.

84. The TRT found that ONE Hilti bolt ON CTH-5824 was skewed to more than 15 degrees. (Maximum allowable skew was 6 degrees without corrective bevel washers (paragraph 3.1.2).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.4.

85. The TRT found that Hilti torque on hanger CTH-6741 (Auxiliary Building) was not documented as being verified by QC (paragraph 3.5).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-257 and Attachment 3, p. 4.C.4.

87. The TRT found that many problems indicative of inadequate drawing control existed at CPSES from September 1981 to April 1984. These problems had been identified prior to the TRT's evaluation by both TUEC and NRC Region IV audits and reviews.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-047-48 and Attachment 3 at p. 5.B.

88. The TRT found at least that between August 1983 and April 1984:

- 1) Drawings released to the field were not current.
- 2) Drawing and specification changes were not current.
- 3) Design documentation packages were incomplete.
- 4) The document control center did not provide the satellites with up-to-date drawings, component modification cards, design change authorizations and document revisions.
- 5) Drawings hanging from an open rack, which had no checkout control, were available to craft and QC personnel.
- 6) Design change logs were inaccurate.
- 7) Design documents were not always accounted for in the document control center.
- 8) Current and superseded copies of design documents were filed together.
- 9) Satellite distribution lists were inaccurate.
- 10) There were discrepancies between drawings contained in the satellites and those in the document control center.

- 11) Some drawings were missing from the satellite files.
- 12) Telephone requests for design documents resulted in the issuance of documents that bypassed the controlled distribution system.

STAFF RESPONSE: Admit that during its review of safety-related hardware design documents control for the period between August 1981 and July 1984, the TRT found the deficiencies listed in paragraphs 1 through 12 of CASE Admission Request 88 "were of a recurring nature." See SSER 11 at 0-098-091.

89. The TRT found that the effects of document control inadequacies prior to July 1984 have yet to be fully analyzed by TUEC.

STAFF RESPONSE: Admit. See SSER 11 at p. P-28.

92. The TRT found that the document control center issued a controlled copy stamp to the QC department to expedite the flow of hanger packages to the Authorized Nuclear Inspector. Methods for this kind of issuance and control of such stamps were not described in TUEC's procedures.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-83-84.

93. The TRT found that 20 percent of the training records reviewed contained no verification of education or work experience.

STAFF RESPONSE: Admit. See SSEF 11 at p. 0-109.

94. The TRT found that the results of Level I certification tests were used for some Level II certifications rather than the results of a level II test.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-109.

95. The TRT found that after failing a certification test, a candidate could take the identical test again.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-109.

96. The TRT found that certifications were not always signed or dated.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-109.

97. The TRT found that white-out was used on certification tests.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-109.

98. The TRT found that seven inspectors had questionable qualifications.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-109.

99. The TRT found that there was no limit or control on the number of times an examination could be retaken.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

100. The TRT found that no guidelines were provided for the use of waivers for on-the-job training.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

101. The TRT found that in some cases recertification was accomplished by a simple "yes" from a supervisor.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

102. The TRT found that there was no formal orientation training for document control center personnel prior to August 1983.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

103. The TRT found that the responsibility for administration of the non-ASME training program was not clearly assigned to a single individual or group.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

104. The TRT found that non-ASME personnel capabilities were loosely defined by levels (I, II, III).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

105. The TRT found that there were numerous additional problems in non-ASME certification testing, such as: no requirement for additional training between a failed test and the retest; no time limitation between a failed test and a retest; two different scoring methods to grade a test and a retest; no guidelines on how a test question should be disqualified; no program for periodically establishing new tests except when

procedures changed; and no details on how the administration of tests should be monitored.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-108.

106. The TRT found that the exemption provision in ANSI N45.2.6, which allowed substitution of previous experience or demonstrated capability, was the normal method for qualifying inspection personnel rather than the exceptional method.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-107-608.

107. The TRT found that installation of certain butt-welded valves in three systems required removal of the valve bonnets and internals prior to welding to protect temperature-sensitive parts. The three systems involved were the spent fuel cooling and cleaning systems, the boron recycle system, and the chemical and volume control system. This installation process was poorly controlled in that disassembled parts were piled in uncontrolled areas, resulting in lost, damaged, or interchanged parts. This practice created the potential for interchanging valve bonnets and internal parts having different pressure and temperature ratings.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-119.

108. The TRT found that the scrap and salvage pile in the fabrication (fab) shop laydown yard was not identified and did not have restricted access.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-147.

109. The TRT found that material requisitions prepared in the fab shop did not comply with the applicable procedure.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-146, 0-152.

110. The TRT found that the fab shop foremen were not familiar with procedures that controlled the work under their responsibility.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-146.

111. The TRT found that fabrication and installation procedures did not include information to ensure that B&R-fabricated threads conformed to design specifications or to an applicable standard.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-148.

112. The TRT found that indeterminate bulk materials that accumulated as a result of site cleanup operations were mingled with controlled safety and nonsafety material in the fab shop laydown yard.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-147.

113. The TRT found that site surveillance of material storage was not documented.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-147-148.

114. The TRT found that work in the fab shop was performed in response to memos and sketches instead of hanger packages, travelers, and controlled drawings.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-147.

115. The TRT observed that not all snubbers were wrapped with protective covering when welding was being done in close proximity to them. This practice was a violation of B&R procedure CP-CPM-14.1, which required protection of installed equipment during welding.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-158.

117. The TRT found that NCRs were used as a tracking document to record removal of a part from equipment on a permanent equipment transfer rather than for reporting a nonconforming condition; such usage of the NCR was not defined in procedures.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-164.

118. The TRT found that there was an inconsistency between paragraphs 2.1 and 3.2.1 in procedure CP-QP-16.0. Paragraph 2.1 required all site employees to report nonconformances to their supervisor or to the site QA supervisor, while paragraph 3.2.1 required persons other than QA or QC personnel to submit a draft NCR to the Paper Flow Group.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-164.

119. The TRT found that the NCR form had no form number or revision date to indicate that the form was being adequately controlled.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-165.

120. The TRT Found that there were two versions of the TUEC NCR form, one with and one without a space for the Authorized Nuclear Inspection (ANI) review.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-165.

121. The TRT found that the NCR form had no space to identify the cause of the nonconformance and the steps taken to prevent its recurrence.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-165.

122. The TRT found that the NCR form had no provision for quality assurance review.

STAFF RESPONSE: Admit. See SSER 11 at p. 0-165.

124. The TRT found the material traceability was adequate for those 33 pipe supports, with the exception of four material identification discrepancies out of 33 pipe supports checked (as noted in section 4 on as-built inspections).

STAFF RESPONSE: Admit. See SSER 11 at pp. 0-248 and 0-251.

125. The TRT found that TUEC failed to maintain material traceability for safety-related material and numerous hardware components.

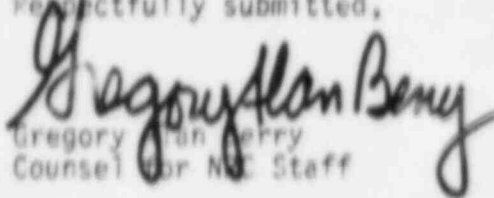
STAFF RESPONSE: Admit as clarified in SSER 11 at 0-176.

126. The TRT found that a QA breakdown in material traceability maintenance for safety-related material and hardware components was reported to TUEC in an ASME Code survey in October 1981 yet was not

reported to the NRC in accordance with the requirements of 10 C.F.R.
50.55(e).

STAFF RESPONSE: Admit. See SSER 11 at p. 0-176.

Respectfully submitted,


Gregory Alan Berry
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 28th day of June, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 JUL -2 AIO:41

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

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

Docket Nos. 50-445/2
50-446/2

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of "THIRD SUPPLEMENT TO NRC STAFF RESPONSE TO CASE'S REQUEST FOR ADMISSIONS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 28th day of June, 1985:

Peter B. Bloch, Esq., Chairman*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
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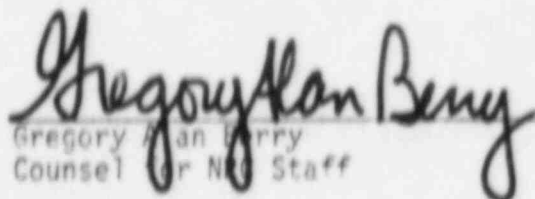
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