

ORIGINAL

NRC/TUGCO MEETING

VOLUME I  
MORNING SESSION

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June 13, 1985

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NRC/TUGCO MEETING

APPEARANCES:

NRC:

Vince Noonan  
Robert Martin  
Darrell Eisenhut  
Don Landers  
Robert Bosnak  
Larry Shao  
Jose Calvo  
Angelos Marinos  
R. Keimig  
Jim Milhoan  
J. Youngblood  
S. Black  
Jane Axelrod  
J. Treby  
Charlie Trammell  
Herb Livermore  
Jim Gagliardo  
P. Check  
R. Denise  
Ed Jordan  
Richard Vollmer  
Larry Chandler  
Al Patterson

TUGCO:

William Counsil  
John W. Beck  
John Marshal  
Spot Burwell

TENERA CORPORATION:

John Guilbert

STONE AND WEBSTER:

John Hansel  
Vick Hoffman  
John Christianson

TELADYNE:

Jim Mollonson

MEETING HELD before Jayne Ames, a CSR, and Notary Public, in  
Tarrant County for the State of Texas, on the 13th of June, 1985,  
beginning at 8:45 a.m., at the Sheraton Hotel, 1500 Stadium Drive  
East, Arlington, Texas.

## P R O C E E D I N G S

MR. EISENHUT: Why don't we go ahead and get started? Maybe I ought to stand here to start. I don't like the logistics already.

Let me go ahead and get started. Let me talk here for a second so everyone can hear me. I'm Darrell Eisenhut, the Deputy Director for the Nuclear Reactor Regulations at the NRC. And this is a meeting between the NRC and Texas Utilities concerning the Comanche Peak project.

The meeting today was requested by the NRC as a vehicle for bringing together all of the relevant information on the Comanche Peak project, so to speak. What are all the issues that need to be addressed, how are they going to be put together by TUGCO into an overall game plan for the resolution permitted decision, into what was called by a lot of people something like an action plan.

We asked Texas Utilities to get together at this point in time to go through an overview of that. We asked for it to be as much as we could today and tomorrow aimed towards a management overview, recognizing there are many, many details that, obviously, we're not going to be able to discuss here today.

1           The -- recognizing it's a management meeting from  
2 the standpoint of trying to have an overview, there's  
3 quite a number of NRC participants here. I'll introduce  
4 just a couple, since we are keeping a transcript.

5           As we go through the meeting, I would ask everyone  
6 to identify themselves.

7           Vince Noonan is the director of the NRC's overall  
8 project in Comanche Peak. He is assigned to integrate  
9 all the pieces together and come up with an overall plan  
10 of action leading to a decision by the NRC.

11          Bob Martin, who you all know, I'm sure, is the  
12 Regional Administrator here for this area. Some other  
13 key participants who are here today: Dick Vollmer is  
14 the Deputy Director of the Office of Inspection and  
15 Enforcement; Jane Axelrad, Director of Enforcement, if I  
16 did these right. Ed Jordan, one of the Division  
17 Directors in the office of IE. Quite a bit of  
18 management here today from throughout and across the NRC  
19 to hear this presentation.

20          Over the last few weeks, the NRC issued its last  
21 SER that was contemplated, originally at least, as a  
22 result of the technical review team, went out. That is  
23 the QA SER, SSER number 11, I believe it was, which  
24 identified a lot of the QA/QC deficiencies, and various  
25 items.

1           The question that is now, we put to the utility is,  
2 as I said earlier, "What does all this mean? How do you  
3 put it together?" There has been some good things  
4 found. There's been some bad things found. We looked a  
5 lot harder at this plan, a lot greater depth in some  
6 areas than we have, typically.

7           How do you factor all these together, leading you  
8 to developing an overall feeling about the construction,  
9 the design, the operational adequacy, all the relevant  
10 aspects on the project.

11           What we asked TUGCO to do, really, was put together  
12 in one place, in a program, all of the issues, all of  
13 the decisions, all of the items that have to be decided  
14 on the project. We asked TUGCO to do that. We -- and  
15 this meeting is to some degree, perhaps a status  
16 meeting, because it's recognized all of the answers  
17 don't exist at this time. It's also recognized the  
18 action plan, the overall game plan, has not been  
19 submitted to the NRC.

20           Basically, it's an interacting meeting between the  
21 staff and the Texas Utility. It is not a decision  
22 making meeting. Make that right up front.

23           At the end of some appropriate time, I'll ask any  
24 other interested parties if they have any comments to be  
25 made in the meeting.

1           We're going to try to run it, and then, Mr.  
2       Council, I may be stealing your thunder, we're going to  
3       try it, starting off with -- start with a higher plan  
4       management overview, working over a lower plan, working  
5       through, eventually, over the coming weeks, I'm sure, a  
6       rather intense effort for working out a lot of details.

7           From a general philosophical standpoint, it would  
8       be our intention that Texas Utilities would develop a  
9       detailed program plan on how they're going to proceed  
10      to resolve all of the deficiencies that have been  
11      identified in the past, how they all integrate  
12      together. The NRC will review that plan, and try to  
13      pass judgment on -- if the plan is implemented. It  
14      could lead to a -- an adequate decision down the road.

15           So our thrust will be to -- be looking at the  
16      program plan on its adequacy. We will try to give a  
17      decision, something on the order of 30 days from receipt  
18      of the final program plan. We're going to try to give  
19      you an opinion. That is, an opinion can vary from --  
20      it's a great program plan on one extreme, with no  
21      comments, to the other extreme, it's a totally  
22      inadequate program plan, and it's so bad we can't given  
23      you any specifics.

24           Those are the two easiest. I doubt it's going to  
25      be either one of those. It will probably fall somewhere

1 in between. But we are going to try to reach that  
2 judgment on a time frame.

3 With that as a general introduction, I'm going to  
4 ask Vince Noonan and Bob Martin if you have any  
5 introductory comments. If not, I'm going to turn it  
6 over to the Texas Utility to go ahead and start the  
7 meeting. I apologize for the logistics. I don't like a  
8 podium. I prefer tables. But we can proceed through  
9 there. Vince, do you have any comments?

10 MR. NOONAN: I don't really have any comments at  
11 all. Go ahead.

12 MR. EISENHUT: Bill, I assume you are going to be  
13 sharing the meeting with Texas Utilities. We're going  
14 to turn it over. I ask all the NRC, feel free to  
15 interrupt and ask any questions you need to. This is  
16 really a meeting for anyone to understand any concern,  
17 any question that you have. I want to make sure that,  
18 even though Bill is going to probably say, "I'd like to  
19 finish and reserve your questions," I'd like to make  
20 sure we can answer any question that you have. Thank  
21 you.

22 MR. COUNCIL: Thank you, Darrell. Good morning  
23 ladies and gentlemen. My name is Bill Council. This  
24 morning, my portion of this program, what I hope to  
25 accomplish, I want to state once and for all my

1 qualifications on the record, since I haven't had an  
2 opportunity to do that yet. I also want to give you an  
3 overview of how I view safety, and that will be very  
4 short.

5 I'm going to cover this morning what we hope to  
6 accomplish in the next two days. And then as the NRC  
7 has requested, I'm going to show you what my  
8 organization is to accomplish it.

9 Now as to a quick summary of my background. I'm  
10 a graduate of the U.S. Naval Academy in 1960, with a  
11 B.S. in engineering. After graduation, I served seven  
12 years as a commissioned officer in the navy, five of  
13 which was in nuclear power.

14 I resigned, joined Northeast Utilities in May of  
15 1967 as a shift supervisor on their then most known one  
16 project. I quickly became the operations supervisor  
17 responsible for the startup testing, preoperational  
18 testing, all training of that unit, and its inservice  
19 operations.

20 I am or have been SRO licensed, both on a boiling  
21 water reactor, two pressurized navy reactors. I have  
22 completed all training, and have been senior certified  
23 on a combustion engineering reactor.

24 And I have also been senior certified by  
25 Westinghouse on a 4 loop pressurized water reactor of

1 design benich.

2 My management experience stands from operation  
3 supervisor to assistant plant superindendent, as of both  
4 a BWR and a PWR units under construction, and all the  
5 way to station superintendent, nine years of operations  
6 experience.

7 Then moving into the corporate management chain,  
8 first, as a project manager of the Millstone 3 Project,  
9 followed by the vice president of a complete nuclear  
10 organization. That's engineering and operations, to a  
11 senior vice president of Northeast Utilities, where I  
12 had 2250 people reporting to me, approximately half  
13 professionals, and the other half operations type.

14 As far as industry type experience, I'll only  
15 highlight just a couple things of recent vintage. I am  
16 a member of the AIF policy committee. I was chairman of  
17 a group called the Nuclear Utility Group, on  
18 enforcement, one of my favorite subjects.

19 I'm co-chairman presently of the Nuclear Utility  
20 Fire Protection Group. I'm also chairman of the Nuclear  
21 Utility back pit and regulatory reform group. And I'm a  
22 past chairman on -- of impulse and analysis engineering  
23 division industry review group for three years while  
24 input was being formulated.

25 I think all of you presently know I'm TUGCO's

1 executive vice president in charge of nuclear  
2 activities.

3 This represents approximately 25 years, 23 of which  
4 are involved in strictly nuclear power, and 18 of which  
5 are commercial nuclear power, at many levels of  
6 management, and also in many disciplines.

7 As the person in charge of TUGCO's nuclear  
8 organization, I am responsible for all nuclear  
9 activities of this company. My management style, so you  
10 can get used to me, is one of total involvement, in  
11 these activities where I hope I may apply my experience  
12 and judgment to implement a safety first attitude.

13 More specifically, let me give you my management  
14 overview of safety. Now for those of you who are NRC in  
15 the room, I'm not trying to lecture. I'm going to give  
16 you a little brief summary only. And then give you my  
17 view.

18 Obviously one can say is a plant or an  
19 organization, is safe if they meet the 10 CFR codes. If  
20 they have an understanding and implement all applicable  
21 codes and criteria.

22 Number one talks about ASME or any other of the  
23 applicable codes in reference to 10 CFR or any NRC  
24 documents. And also if the organization has procedures  
25 to implement those above.

1 Obviously, to also have a safe organization and  
2 safe operation, you must have training in those  
3 procedures which you have developed. You must have  
4 construction in operation, strictly follow those  
5 procedures. And finally you must have inspection  
6 processes to insure that they have been properly  
7 implemented.

8 But I would submit, ladies and gentlemen, it goes  
9 far beyond that. Those are minimum requirements, as I  
10 think the NRC is well aware.

11 To have a good organization, well respected, and  
12 also one that goes beyond those minimum requirements,  
13 requires a safety ethic. What do I mean by a safety  
14 ethic? Well, when you get right down to it, a safety  
15 ethic is really a management state of mind. It goes  
16 well beyond codes and criteria. It attempts to instill  
17 that same safety ethic in all of its employees. And it  
18 is conservative, extremely conservative. It always asks  
19 the question, what will happen if. And that is not a 10  
20 CFR 5059 question. It goes beyond that. It always  
21 questions what your actions are, what you are doing. If  
22 you're an operator, what will happen if you don't start  
23 the pump, or you incorrectly stop a pump.

24 It also encompasses, especially in construction,  
25 doing it right the first time. It encompasses a strict

1 adherence to all codes, criteria, and procedures which  
2 have been developed. It encourages among its employees  
3 an attitude to adopt strictly safety first.

4 And it also requires management to be totally  
5 involved. And what do I mean by that? Why should  
6 management be totally involved? Well, management must  
7 lead; management must train; and management must develop  
8 this organizational safety ethic. When safety  
9 significant deficiencies are found, it requires that  
10 they are correctly -- that we correctly engineer the  
11 fix.

12 It also requires follow-up to ensure that the  
13 proper implementation and corrective actions remove the  
14 root cause of the problem, and ensure that that problem  
15 or similar problems will never reoccur.

16 Now that is a short brief on my attitude towards  
17 safety. I'd like to turn now to our management meeting,  
18 this June 13th and 14th, and the program plans and what  
19 we hope to accomplish.

20 I believe our program plans are a comprehensive  
21 overview. We will deal with the implementation plans,  
22 which are going to be available to you on site.

23 Is that better?

24 And I believe that we are going to deal with all  
25 concerns regardless of their origin. I believe our

1 program goes well beyond those concerns that have been  
2 expressed to date. It's designed to provide TUGCO  
3 management with assurance that the plant is properly  
4 constructed and can be operated safely.

5 I will assure you that TUGCO management will not  
6 ask the NRC for an operating license until we are  
7 satisfied that those objectives have been met.

8 And in all steps of the way, as we implement this  
9 program, I would like to see the NRC closely involved  
10 with our technical staff.

11 The program overall is designed to provide  
12 reasonable assurance that the health and safety of the  
13 public will be protected.

14 And now, if I may, I will turn to the organization  
15 that I have in place. Darrell, do you want to ask a  
16 question?

17 MR. EISENHUT: Let me ask a generic question before  
18 you pass by the front end safety ethic, do it right the  
19 first time philosophy, which I certainly agree with much  
20 of it. I think that's certainly the way to go.

21 Can you characterize -- let's see. You have been  
22 with TUGCO now a month and a half roughly.

23 MR. COUNSIL: Roughly.

24 MR. EISENHUT: Can you characterize how you see  
25 it? You see -- you obviously felt the need to go

1 through that safety ethic to make sure that that's where  
2 you're going. You also said on the last slide that  
3 you're not going to ask for an NRC license until you get  
4 there.

5 Would you care to characterize where you think you  
6 have been as an organization? Where do you think you --  
7 obviously -- I mean it doesn't take a genius sitting  
8 here to figure out in some areas it wasn't done right  
9 the first time.

10 But can you characterize where you think you have  
11 been, and where you think you're going, and give me a  
12 feeling for a number of the areas you talked about as --  
13 how big a step you think it's going to be. Is it a  
14 major change? Can you characterize it?

15 MR. COUNCIL: I will attempt to do so. In my six  
16 weeks that I -- since I have come here, and the various  
17 levels of management that I have talked to, I have been  
18 in meetings with, the personnel that I have met in the  
19 field, including the operations personnel, the attitude  
20 is one of trying to do it right the first time.

21 What I found is, on occasion, some personnel don't  
22 know exactly how to do it the first time, and do it  
23 correctly. And that's in retrospective now.

24 Where we are today is putting together an  
25 organization where, if I don't have the technical

1 expertise, I have drawn in that technical expertise from  
2 outside to help me to accomplish what I hope to  
3 accomplish. And you will meet some of those people over  
4 the next couple of days.

5 The intent is, over the next few years, is to find  
6 the personnel that I need from within the industry, such  
7 that I don't have to have technical consultants. And  
8 that I can become self contained. That's the way I like  
9 to be.

10 So we're not fully there yet with staff,  
11 obviously. The attitude is there, and it has been  
12 there.

13 MR. EISENHUT: But to some degree, don't you really  
14 have to have the qualified staff, at least managers, in  
15 place, and ensure they have the right attitude or  
16 approach or philosophy, then develop the plan for  
17 implementing that philosophy, and then going forth and  
18 doing it? Really, how are you going to address the  
19 chicken and the egg argument? Which one do you have  
20 first?

21 MR. COUNCIL: Well, right now, Darrell, in answer  
22 to your question, I have most of what I need with me  
23 today. You're going to see some blanks on my chart when  
24 I put it up. That was my next step. What you're going  
25 to find where I have a blank, either I or some other

1 manager or vice president within my organization are  
2 filling that blank on a temporary basis.

3 I have the framework of an organization to carry  
4 out exactly what I said. There are certain activities  
5 that we're doing today that will not be required in the  
6 future. Consequently, those activities are being filled  
7 by outside consultants working directly for TUGCO  
8 management.

9 There are some activities that I would like to, in  
10 the future, in an operating mode, not in the mode we're  
11 in today, expand that organization. And that's one of  
12 my goals. And I will in fact to do that.

13 But I don't want you to get the idea that I am not  
14 prepared to go forth with what I have presently today  
15 and what I have before me. I can easy accomplish that.

16 MR. EISENHUT: And recognizing, to following up on  
17 what you said, some places when you go through the  
18 organization, you will be showing then yourself filling  
19 in a function until you make those transitions.

20 MR. COUNCIL: That's correct.

21 MR. EISENHUT: And could you also when you go  
22 through, make it clear again, who is really a TUGCO  
23 employee full-time, and who is an outside consultant or  
24 temporary assignment or whatever, so we can get a  
25 feeling of where you really stand from a TUGCO

1 organization? I'd appreciate it.

2 MR. COUNCIL: I will. But I took my organization  
3 only down to one level. So generally you won't find  
4 outsiders filling in any positions inside the  
5 organization at that level.

6 MR. EISENHUT: Okay.

7 MR. COUNCIL: Now John, when I turn it over to John  
8 Beck, his organization will go a little deeper than  
9 that. And also his explanation of some things that will  
10 follow me. And he in fact will show you who is outside,  
11 and the qualifications of people who appear on his  
12 chart. Am I ready to go on now to the chart?

13 (Indicating)

14 Obviously I report to Mike Spence, president of  
15 TUGCO. Reporting to me are Mr. Warner, who is the  
16 manager of SAFE team. The senior review team, who I  
17 will go into a little more detail in a moment, first  
18 slot that I'm now filling, that you see my name twice on  
19 that chart, is I'm acting as the vice president of  
20 nuclear operations at this point.

21 Mr. George is the vice president of Comanche Peak  
22 Steam Electric Project, general manager. And obviously  
23 at the table with me is John Beck, who is vice  
24 president. And I think you know that he has planned  
25 licensing, fuels, and quality assurance at this point.

1 In the nuclear operations area, direct reports to  
2 me are Mr. Kahler, supervisor, engineering and  
3 administrative services. And he's located in Dallas.  
4 Mr. Kuykendall, who is the manager of nuclear  
5 operations. And he's located at the plant site. And  
6 Mr. Edwards, also in Dallas, is the supervisor of health  
7 physics.

8 Mr. George's organization, he has Mr. Merritt, who  
9 is the assistant project manager for unit number 2  
10 construction. He has Mr. Camp, who is outside our  
11 organization. He has been on our project now for  
12 several years. And he's the assistant project general  
13 manager on unit number 1, who is doing much of the  
14 implementation of the Comanche Peak action plans.

15 And obviously now this is a newly created position,  
16 the next one on the right, and that's Mr. George, is  
17 filling as manager of engineering.

18 In Mr. Beck's organization, again on the far left  
19 of the chart, he is filling in as manager of nuclear  
20 licensing. He has Mr. Janne, manager of nuclear full  
21 and safety analysis. And Mr. Wells, who is director of  
22 quality assurance. And I think most of you know that  
23 Mr. Wells is a DUKE employee.

24 When you go to the senior review team, other than  
25 the chairman of the senior review team, John Beck, all

1 are outside our organization. The members are Tony Buhl  
2 of Energyx; John French of Delian; John Guibert of  
3 Tenera; and we have Terry Tyler of Energyx, who is the  
4 CPRT program director. Mr. Shao?

5 MR. SHAO: Is there any member in the senior review  
6 team, expert in the mechanic or design and structure,  
7 where most of the problems are?

8 MR. COUNCIL: No, as you will learn tomorrow, we  
9 have Stone and Webster Engineering Corporation carrying  
10 on that effort for us. And they are reporting on the  
11 project, as opposed to in the senior review team.

12 There is -- senior review team has an overview.  
13 Now on the CPRT however, which is reporting to the  
14 senior review team, there is Howard Levin. And John  
15 will get into that organization chart. I just wanted to  
16 show the senior review team members themselves.

17 MR. EISENHUT: Okay. I think the question Larry  
18 had, John, and you can be thinking about it, is how can  
19 the senior review team exercise its function of  
20 oversight of the CPRT if there is no one on the  
21 CPRT with the expertise in the principal area that is --  
22 or a major area that is being evaluated. And I think  
23 that's a question we want to come back to.

24 MR. BECK: Sure.

25 MR. COUNCIL: That concludes my portion of it,

1 unless you have additional questions.

2 MR. EISENHUT: Are you going to go through the next  
3 slide on SAFE team?

4 MR. COUNCIL: No, I was not.

5 MR. EISENHUT: Is John going to?

6 MR. COUNCIL: No.

7 MR. EISENHUT: Then I would like you to go through  
8 that.

9 MR. COUNCIL: Fine.

10 MR. EISENHUT: Can you characterize the SAFE team?  
11 How long you have had it in effect? And really, can you  
12 describe it a little bit better?

13 MR. COUNCIL: Fine. The SAFE team has been in  
14 effect since about the beginning of this year, as a  
15 fully qualified type organization on site. The manager  
16 of the SAFE team has been involved on the Comanche Peak  
17 project for a number of years in the licensing arena.

18 The SAFE team has two arms. One is an interview  
19 arm, as it shows on the chart. And the second is an  
20 investigation arm. Those two arms do not meet, except  
21 the interview arm turns over, quote, any allegations  
22 that it in fact receives, and protects the -- the  
23 confidentiality of the individuals.

24 The investigators then take that, and they do the,  
25 quote, interviews and investigation in the field as to

1 the allegation. The investigators also draft the final  
2 report back to the individual who made the charge. That  
3 is reviewed by several layers of management prior to  
4 forwarding the letters directly back to the personnel  
5 who made, quote, the allegations.

6 If there is any follow-up required, it so indicates  
7 gnat letter that they have the option of coming back  
8 through the SAFE team once again, if they feel that they  
9 did not get the answers to all the questions they had  
10 put forth.

11 MR. EISENHUT: All right. Can you -- let me ask a  
12 couple of basic questions about it. You have one arm  
13 that is an investigative arm. Is that a technical  
14 investigative, or does it include people qualified in  
15 what I'll loosely call the wrongdoing investigative arm?

16 MR. COUNCIL: It's both.

17 MR. EISENHUT: And they have personnel in the group  
18 then, or at their access, knowledge, capability,  
19 qualifications in, doing investigative, into the  
20 wrongdoing type aspects.

21 MR. COUNCIL: They have people who are qualified,  
22 knowledgeable, to look into the wrongdoings. For  
23 instance, many of the -- if there is an allegation of  
24 wrongdoing, typically it's an allegation to management,  
25 or a management, quote, wrongdoing. And fully about

1 one-third of things brought to SAFE team to date are in  
2 that category.

3 If in fact they do not have the technical  
4 expertise, but -- get off the wrongdoing portion of it  
5 for a minute, to investigate a technical allegation,  
6 they do go to the Comanche Peak project team, and draw  
7 in that technical expertise to help in that  
8 investigation and in the final report.

9 MR. EISENHUT: Let's see. May be mixing apples and  
10 oranges here. Let me take that wrongdoing first.

11 If a third of the issues generally fall or include  
12 wrongdoing aspects, does this group, the investigative  
13 group itself, do the investigation, or do they farm it  
14 out to another group? Do they ship it to the general  
15 counsel's office? Do they ship it? How do they do it?

16 MR. COUNCIL: Well, basically, if it's a management  
17 allegation, let's put it that way, that flows to the  
18 vice president on site. They in turn work with that  
19 vice president to not only investigate, but draft that  
20 final report.

21 If in fact it involves a technical concern, it  
22 could be pulling in quality control management. It  
23 could be pulling in weld engineers. Whatever, in order  
24 to assist them in completing the investigation and  
25 developing a technical response.

1 MR. EISENHUT: Okay. Let me make sure I  
2 understand. I don't want to belabor the point, except  
3 the way you said it, I want to make sure we don't  
4 mislead the record here.

5 Does the reviewer -- let me back it off.

6 If you have an allegation about wrongdoing, does  
7 the evaluation get performed by the same people that the  
8 wrongdoing charge is about? Or does it go to a third  
9 party or someone else?

10 MR. COUNCIL: No, it does not go to the same person  
11 that the allegation is about. No. It might go to,  
12 quote, a same discipline in a different area. But  
13 certainly not about the same -- or by the same group.

14 MR. EISENHUT: Okay.

15 MR. COUNCIL: Now there are disciplines. For  
16 instance, if you talk about weld engineering, the  
17 capability exists in the ABASCO organization on site;  
18 Brown & Root, Comanche organization, so forth. I mean  
19 allegations against one of those organizations, it would  
20 be drawn -- the technical review would be drawn from  
21 another.

22 MR. EISENHUT: Can I ask then a couple of quick  
23 questions? How many files do you have open today in the  
24 SAFE team concept in terms of how many allegations the  
25 SAFE team is reviewing? How many? Tens, hundreds?

1 MR. COUNSIL: Darrell, I can find for the record  
2 how many there are. But I can give you just a rough --

3 MR. EISENHUT: Rough numbers is all I'm looking  
4 for.

5 MR. COUNSIL: Rough numbers, I believe we have had  
6 on the order, just under 600 brought, of which  
7 approximately 100 have been responded to. There are  
8 approximately 350 in review and/or investigation at this  
9 time.

10 MR. EISENHUT: Now I can appreciate, just to make  
11 sure I ask the number, now that I ask for the number, to  
12 make sure that to keep it in prospective. I'm sure they  
13 vary all up the map, in terms of the very insignificant  
14 to potentially more significant.

15 What do you do, and how do you feel -- or what do  
16 you feel TUGCO's responsibility is, to reporting an item  
17 to the NRC that comes up under the SAFE team concept?  
18 Do you feel you have any obligation to report any of  
19 those matters to the NRC?

20 MR. COUNSIL: If in fact it's a technical concern  
21 that has been brought to SAFE team, and we confirm that  
22 the allegation is in fact correct, generally that type  
23 of item would fall under 5055-E, and definitely would be  
24 reported to the NRC.

25 Most items, however, would not be, primarily

1 because we are attempting to protect the confidentiality  
2 of the people who made the report in the first place.

3 Now in general terms, I believe your people on site  
4 from Region4 have talked to Mr. Warner. They know what  
5 the allegations are. The lists are there available for  
6 review. And in addition to that, our response is there,  
7 with the persons' names stricken.

8 MR. EISENHUT: I appreciate that, and we have  
9 looked at it, and we'll continue to look at it. The  
10 question I was really looking to, was what your  
11 philosophy, so to speak, and approach to the problem  
12 was. Also the individuals of course can always come to  
13 the NRC independently, if they feel the SAFE team isn't  
14 satisfied.

15 MR. COUNSIL: Absolutely.

16 MR. EISENHUT: So I feel quite confident in that  
17 sense. I was really looking --

18 MR. COUNSIL: In fact, we encourage them, if they  
19 feel they didn't get an answer from the SAFE team to  
20 talk to the NRC if they don't feel we're going to follow  
21 up. Question?

22 MR. GAGLIARDO: Yes. My name is Jim Gagliardo.  
23 You indicated that about 600 issues had been brought to  
24 the SAFE team since its inception. To what extent does  
25 that 600 include prior issues that management was aware

1 of, or had been brought to management, before the SAFE  
2 team was formed at the end of this year? Or are all of  
3 these 600 issues, been issues that have been brought to  
4 the SAFE team since their inception in January?

5 MR. COUNSIL: That's a difficult question for me to  
6 answer. I can't honestly answer that question, because  
7 of my short history on the project. I do know in the  
8 management area, though, that some of these have  
9 brought -- been brought up to management in the past.

10 For instance, they -- one of the recurring  
11 complaints is that we have not had a pay increase on  
12 site, or Brown & Root has not, in approximately three  
13 years. No general increase.

14 Now that one, although the answer was in fact  
15 given, we are still working on hopefully resolving the  
16 issue. Now management has known about that one. But I  
17 can't honestly go back and off my memory of 600, either  
18 in the safety category, concern category, or management  
19 category, so forth, tell you how many we knew about  
20 before or how many are new.

21 John?

22 MR. BECK: Thank you, Bill. I should probably  
23 start this morning, although I have been with the  
24 organization a slight bit time longer than Mr. Council,  
25 with reminding some of you, perhaps who don't know me

1 and don't know what my background is, and where I come  
2 from, and what I have done in the nuclear business over  
3 the last 20 years.

4 I come from Oklahoma originally, and went to school  
5 at the University of Tulsa, and moved to New England  
6 after graduation. Council migrated from the Midwest in  
7 the upper part, what I call Yankee country, I guess.

8 At any rate, my experience was there was initiated  
9 at Betastomic Power Laboratory, Westinghouse  
10 Corporation, and reactor physics area.

11 I went from there to Yankee Atomic in Boston.  
12 Right at the inception, actually, of a significant  
13 expansion of nuclear power in New England in 1967; an  
14 adequate Yankee, one of Bill's old plants, was just  
15 coming on line. I participated in the early phases of  
16 that facility, particularly in the physics,  
17 thermohydraulics, and safety analysis area, for about  
18 five years. And also with Yankee Row in western  
19 Massachusetts.

20 The same time the Yankee organization was providing  
21 the engineering support for the utility sponsors in New  
22 England for Vermont Yankee and Maine Yankee, which were  
23 under construction.

24 I served as licensing engineer in Maine Yankee's  
25 case for approximately a year. That facility was

1 licensed in 1972. And shortly thereafter, Vermont  
2 Yankee also received a license. And I was more involved  
3 there with that BWR on the technical side of it, and in  
4 the licensing proceeding as well.

5 I proceeded over the next five years with the  
6 Yankee organization on the engineering side of the  
7 fence, and left that company in 1976 as director of  
8 engineering, where I had responsibility for not only the  
9 more esoteric technical disciplines, physics,  
10 thermohydraulics, loga analyses.

11 In that process, by the way, we developed -- I  
12 think we were the first utility to provide and have  
13 benchmarked and accepted by the NRC an analytical  
14 methods for doing relo analyses for those plants.

15 We started with Yankee row and did Connecticut  
16 Yankee, prior to the transition of responsibility for  
17 that plant to Northeast Utilities. And proceeded with  
18 Maine Yankee and Vermont Yankee later on, to a lesser  
19 extent, in the case of the BWR.

20 At any rate, after the ten years I spent with  
21 Yankee Atomic in those various technical and managerial  
22 positions, I went to Vermont Yankee as vice president,  
23 and was subsequently elected six months after my arrival  
24 as executive vice president and chief operating officer  
25 for that corporation.

1 I had responsibility in that capacity for all the  
2 corporate activities reporting directly to the chairman  
3 of the board and the CEO for that single unit generating  
4 company. And in that position, I dealt extensively in  
5 all respects with that unit, and its interrelationship  
6 with not only the state and local officials.

7 But practicing safety first, as Bill said, I'd like  
8 to go back to his comment. I endorse that 110 percent.  
9 I have known Bill Council personally for about 15  
10 years. And his philosophy is 110 percent endorsed by  
11 me, as I said.

12 We practiced very similarly in doing it, albeit  
13 different parts of that state over the course of the  
14 last 15 years or so. John, if you could give me the  
15 first slide.

16 The principal areas I'm going to cover this morning  
17 have to do with the TUGCO organization for which I'm  
18 responsible, what our activities are, and the  
19 non-CPRT licensing issues, if I may. And by that I mean  
20 those issues that are not covered directly by the  
21 Comanche Peak response team activities, but which are  
22 vitally important to the licensing of the facility.

23 I'll go into some detail and give you a status of  
24 where we are with regard to the obligations we have to  
25 the regulatory, and where the regulators are with regard

1 to some obligations they have to us, with regard to  
2 responding to pieces that we have submitted.

3 I hope that will be a comprehensive picture. It's  
4 not the complete picture. We have provided to staff a  
5 comprehensive action list, which is a book about yeah  
6 thick that covers in detail all of these areas. But  
7 I'll get into substantive issues.

8 I'm going to turn, then, to the CPRT organization  
9 as a whole, and give an overview of the issues as we see  
10 it in the Comanche Peak response team. And then I'll  
11 address overall schedule and the resource loading that  
12 we anticipate will be required to execute the program.

13 As Bill indicated, and this is a repeat slide, the  
14 organization within TUGCO for which I'm directly  
15 responsible includes these areas of licensing where I'm  
16 continuing to serve as manager of licensing.

17 Reporting to me is Dr. Randy Janne, who is manager  
18 of fuel and safety analysis. And Jim Wells from DUKE  
19 Power, as Bill indicated, serving in the capacity of  
20 director of our quality assurance and quality control  
21 organization.

22 I might add that reporting directly to Mr. Wells is  
23 Phillip Halstead, a Daniels contract employee, who is on  
24 site in charge of the quality control organization. And  
25 Mr. Dave McAfee, who is also a Daniels employee on

1 contract to us, who is in the Dallas office, and in  
2 charge of the Dallas QA organization, reporting directly  
3 to Mr. Wells.

4 MR. NOONAN: John, I want to interrupt you for a  
5 second.

6 MR. BECK: Sure. Any time.

7 MR. NOONAN: Mr. Wells, is he located in the  
8 corporate office, or is he at the site?

9 MR. BECK: He's officed in Dallas. He spends  
10 probably three days out of five at the site. But his  
11 office is in -- he's got one in both places, like the  
12 rest of us do.

13 MR. NOONAN: Okay.

14 MR. BECK: I should have added, please interrupt if  
15 anybody has a question.

16 MR. NOONAN: One other thing. Maybe, too, when you  
17 talk about these gentlemen, Mr. Wells particularly, his  
18 qualifications.

19 MR. BECK: Jim has been in quality assurance longer  
20 that I have been alive, I think. He was a principal in  
21 the DUKE Power organization and the quality assurance  
22 area. Specifically the sequence I don't recall exactly,  
23 but many years, 15 or 20 in that regard, and had  
24 principal responsibility with the DUKE organization. So  
25 he comes with unparallel qualifications to join us in

1 the capacity he's filling right now.

2 MR. NOONAN: And the other two gentlemen that you  
3 mentioned from the Daniel Construction Company, their --  
4 is it my understanding they were off the Callaway  
5 project?

6 MR. BECK: Mr. Halstead did. Right off I don't  
7 recall where Dave McAfee came -- was last.

8 MR. NOONAN: Their backgrounds?

9 MR. BECK: Similarly, they're very highly  
10 qualified, with many years of experience.

11 MR. COUNSIL: We can get them a resume.

12 MR. BECK: Yeah. We can provide that to you. In  
13 fact, I suspect we already have.

14 Jack Redding I don't want to miss. Jack is our  
15 resident, if you will, in best these days serving as a  
16 primary contact. All of you know him. He is of great  
17 help to me, and we communicate multiple times daily,  
18 making sure that we keep on top of any issues.

19 Next slide, please. This is a further breakdown in  
20 the licensing organization. It shows John Marshall, who  
21 is helping me with the slides this morning, in the  
22 generic licensing area and special considerations.

23 That's a recent move to give John a more defined  
24 role within the licensing organization. He continues to  
25 serve, however, in those areas where he has had specific

1 cognizance over issues having to do with the operating  
2 plants.

3 But we want to begin to focus more on a longer  
4 range look. In particular, to consider how and  
5 specifically when we're going to begin to incorporate  
6 PRA techniques internally to assist us in a decision  
7 making process, particularly with regard to back fit  
8 activities. John is going to be a principal in that  
9 organization.

10 Don Woodlan, who is not here today, is going to  
11 focus primarily on the operating plant licensing  
12 considerations in the future.

13 I'd like to turn now more to specifics on the  
14 non-CPRT licensing issue area. I'm going to cover --  
15 please interrupt if you have got questions. There is a  
16 lot of data here, but I think it's important to  
17 recognize that, from my view, we have got our arms  
18 around all the issues. We have got them documented. We  
19 understand what they are. We know what we need to do,  
20 and we think we have got a good feel for when we're  
21 going to do it.

22 So I have got a lot of dates in here. These are  
23 commitments that we're taking very seriously, and we  
24 intend to satisfy them.

25 The first chart indicates what I will be covering.

1 SER outstanding issues that have been previously  
2 published. Confirmatory issues; licensing conditions;  
3 open correspondence; significant engineering and  
4 construction items; deficiency analysis reports; NRC  
5 inspection reports; the pre-op tests category; our  
6 technical specifications; and a few miscellaneous  
7 items.

8 They will not be briefed as part of the Comanche  
9 Peak responsibility team effort. We're purposefully  
10 keeping that in, if I may characterize it, a licensing  
11 usual bin. And we'll treat it as such.

12 MR. EISENHUT: Let me test you on that first item  
13 there.

14 MR. BECK: Sure.

15 MR. EISENHUT: About SER open issues. You really  
16 mean SER issues that really don't interact with the  
17 CPRT, because there are a number of items under the  
18 SER's, or open issues or follow-up items, which could  
19 have an impact or an effect back on CPRT as sort of a  
20 secondary matter.

21 MR. BECK: That's right.

22 MR. EISENHUT: Leak before break. Those kinds of  
23 items.

24 MR. BECK: There are some items, for example, that  
25 have come out of Region 4 inspection reports that we

1 have chosen to treat within the CPRT program because of  
2 the close relationship activities that are already  
3 ongoing, and we have so indicated our responses to  
4 Region 4. And there may be a few others as we get  
5 through here, but basically most of this is  
6 non-CPRT activity.

7 MR. EISENHUT: Okay. I'm really looking for the  
8 interface. Any item that could potentially interact at  
9 CPRT goes with the CPRT .

10 MR. BECK: Yes, sir. That's the preferential  
11 treatment, to keep this one cleanly separate. Under the  
12 SER outstanding issues, where we feel that we have done  
13 what is required, and I would put into the category of  
14 its NRC action next, are those principal five issues.  
15 An inspection program for pumps and valves. We have  
16 submitted -- provided our submittal a number of years  
17 ago. There is no emergency requirement for response  
18 from the NRC, but I included it for completeness. That  
19 documentation has been provided, and we anticipate that  
20 the NRC will be covering it in their next SSER .

21 Remote safe shutdown, we provided a submittal in  
22 July of 1984, last year. We expect closures of that  
23 issue in the next SSER . All of these cases we have had  
24 continuing dialogue with reviewers, and we feel that the  
25 issues are well in hand. They're included here for

1 completeness.

2 MR. EISENHUT: Let me just ask the detail on one.  
3 The remote safe shutdown, is that the fire protection  
4 shutdown, or is that just the remote -- the other remote  
5 panel from the controller?

6 MR. BECK: It's the safe shutdown, not fire  
7 protection aspect. And in particular in this case,  
8 we're talking about TECO and source range indication  
9 being provided on a back pit basis within that category.

10 MR. EISENHUT: Let me make sure. Are you saying  
11 that you think putting TECO on the panel at the back  
12 pit, or is that a correction? I think you used a  
13 management word to trip me off. Is it correcting -- the  
14 requirement is for instruments to be able to go to TECO  
15 in the remote shutdown panel, and you're saying you just  
16 have to put the instruments on the panel.

17 MR. BECK: That's correct. It is back pit. It's  
18 not part of the original plan design. How can I say  
19 that?

20 MR. COUNCIL: You said it right.

21 MR. BECK: Mr. Council tells me I said it right.  
22 The integrated leak rate test, we submitted a proposed  
23 change -- this touches on a CPRT issue, as a matter of  
24 fact, or TRT rather. It was one of those items that was  
25 identified as a deficiency with respect to the fact that

1 we had changed our requirements. We had not -- or  
2 changed the test requirements. We had not modified the  
3 FSAR .

4 This indicates that was done. And we're waiting  
5 approval and acceptance by the staff formally. And the  
6 safety parameter display package submitted last month.

7 Next slide, please. These are SER outstanding  
8 issues where TUGCO action is required, and we have not  
9 satisfied it yet. Containment isolation dependability,  
10 we're going to be submitting the end of September this  
11 year. What that is principally directed toward, is a  
12 requirement that we provide more complete documentation  
13 with respect to the ability of the containment purge  
14 isolation valve to close in five seconds against the  
15 required pressure differential of 50 PSI. That is  
16 likely going to require a modification to that  
17 particular valve.

18 A containment, some performance. As you know, as  
19 you certainly know, you issued the SSER, we must now  
20 modify our FSAR to reflect our commitments and  
21 requirements with regard -- or in accordance with  
22 SSER number 9. That documentation is being prepared,  
23 and will be submitted along with other FSAR amendments  
24 August 1 of this year.

25 On the control room design review, we have some

1 final noise measurements to make. Those noise  
2 measurements cannot be taken until all construction  
3 activity associated with modifications to the control  
4 room have been completed. We have reached  
5 agreementttha deferral of those measurements prior to  
6 five percent power is an acceptable resolution.

7 MR. LANDERS: John, all you're deferring is the  
8 noise level lest?

9 MR. BECK: There are some other tests having to do  
10 with HBAC that will also -- have yet to be  
11 accomplished. But in particular that's all I'm talking  
12 about here.

13 MR. BECK: Mr. Landers, all of these are -- if you  
14 haven't seen the comprehensive action list, are included  
15 with a lot more detail as to precisely what the issues  
16 are in that document.

17 Preservice and inservice inspection program, I'm  
18 including it here because it's an item that we must  
19 satisfy. The satisfaction date must be six months prior  
20 to the first refueling outage when inservice inspection  
21 activities take place.

22 Next slide, please. On confirmatory issues, where  
23 we have submitted materials and we're awaiting NRC  
24 action. On the turbin driven auxiliary feed pump, those  
25 are hot tests under hot conditions with clean steam.

1 They were performed in '83 and again in '84. We're  
2 awaiting verification of those tests. Essentially an  
3 examination by the resident inspector of the  
4 documentation, which accompanied them. We expect  
5 closure on that issue in the next SSER. It's basically  
6 a records check.

7 Relief and safety valve testing provided a  
8 submittal in '83. There will be a additional -- this  
9 basically was -- rather was additional information on  
10 industry safety and relief valve test programs. It was  
11 supplied. Then we anticipate closure in the next SSER .

12 Environmental qualification, primarily directed in  
13 this instance to the mechanical equipment program, which  
14 we have completed. We provided our last submittal on  
15 that February 15th, and anticipate closure once again in  
16 the next SSER . Natural circ testing, we provided a  
17 commitment in January, and expect closure in the next  
18 SSER on that issue.

19 Next slide. SER license conditions. For  
20 completeness, the ultrasonic testing of the LP turbin,  
21 we will be providing to staff in -- July 1, in a couple  
22 of weeks. That is additional information in the way of  
23 clarification to prior meetings that we have had to  
24 discuss this particular issue.

25 Environmental qualification appears again, and

1 primarily on this issue because action is required by  
2 us. And this is directed in the electrical area. It's  
3 a generic program that Westinghouse is performing, and  
4 primarily involves pressure transmitters, the  
5 pressurizer safety valve, and position indication. That  
6 program will be completed in November, and we'll meet  
7 our commitment on supplying the information to staff.

8 Pre-op testing. We will be providing to staff  
9 prior to fuel load adequate documentation for any pre-op  
10 test for which we will either seek waivers or deferrals  
11 to after fuel load. I don't know precisely what that  
12 list will consist of now.

13 The security plan, an item obviously of  
14 importance. We have implemented it, and have in fact  
15 modified it recently to provide more easy access for  
16 construction activity in unit 1 as opposed to having the  
17 full fledged implementation, and have been in  
18 communication with Region 4 on that issue.

19 The next one.

20 MR. VOLLMER: John, before you leave that. Dick  
21 Vollmer, NRC. In the environmental qualifications,  
22 since your category 1 plan, I assume these are tests  
23 which will demonstrate a higher qualification for this  
24 particular set of instruments, and some of the operating  
25 plans. Do you foresee any difficulty in this area or

1 any other area in meeting environmental qualification  
2 requirements for Comanche Peak?

3 MR. BECK: I'm not aware of any. I'd like John  
4 Marshall to say no also, which he just did.

5 MR. MARSHALL: No, we don't anticipate any problems  
6 in this qualification program. The date shown there is  
7 obviously the rule date. We expect to have the last  
8 program finished mid-month, November. That's the last  
9 Westinghouse last testing program issue. And so the  
10 outcome would depend on the results of those tests.

11 MR. MARSHALL: Yes. By the way, it's the '74  
12 program that we're qualifying these to, so it's --

13 MR. EISENHUT: Yeah, in fact it's the higher level  
14 standard here on their post operative plant. Just my  
15 reaction would be -- well, having the test completion 15  
16 days before the date to be in conformance is a pretty  
17 tight squeeze, particularly.

18 MR. MARSHALL: It's approved by us.

19 MR. EISENHUT: Particularly if the test results are  
20 not -- don't turn out as good as you would expect one.  
21 When are the tests in itself going to be finished?

22 MR. MARSHALL: I don't know precisely.

23 MR. EISENHUT: Thank you.

24 MR. SHAO: You have what are the -- no open issue  
25 on that? It's all done?

1 MR. MARSHALL: Yes. The team has been on site and  
2 done the review.

3 MR. BECK: (To the Reporter) Did you catch that?

4 SER license conditions. With regard to the diesel  
5 generators, as you well know, we have been participants,  
6 and in fact a leader, in the diesel generator owners  
7 group. I believe in fact there is a meeting taking  
8 place in Bethesda today in that regard. We will  
9 continue to follow all recommendations of that owner's  
10 group, and we're to the schedules that have been  
11 provided by the owners group to NRC.

12 Reg guide 1.97, we provided a submittal January  
13 28th of this year, with commitments for a back pit of  
14 several post accident monitoring instruments before the  
15 start of the second cycle. We're awaiting NRC action in  
16 that respect. Next slide.

17 There are three areas where TUGCO action is  
18 required, and I include these for completeness. The  
19 first, the licensed operator requirements at Comanche  
20 Peak. As you know, we have committed to proceeding  
21 experienced SRO 's in the control room for the first  
22 cycle of operation. For the first year, excuse me, past  
23 operations. That commitment is included here for  
24 completeness.

25 Mineral exploration control, there are some gas and

1 oil well activities. We have specific requirements with  
2 regard to control of those insofar as the site is  
3 concerned, and their site and instrumentation for  
4 inadequate or cooling is a licensed condition. We will  
5 be satisfying that during the first refueling outage.

6 SER open correspondence issues, TUGCO action  
7 required on purge and vent valve operability for  
8 containment. That submittal will be coming September  
9 30th. It is the same issue that has been classified as  
10 an SER outstanding issue on containment purge valve, as  
11 we indicated earlier.

12 Breaker news coordination study. We're due to  
13 provide you a report July 1 as part of the safe shutdown  
14 issue. This will be more detailed documentation of the  
15 electrical protection scheme in Comanche Peak.

16 Next slide.

17 MR. VOLLMER: This is a fire protection issue,  
18 however, as opposed to the other, isn't it? Section --

19 MR. BECK: Yes, it is.

20 MR. NOONAN: John, you still have a number of fire  
21 protection issues, don't you, besides this one?

22 MR. BECK: I think right now our list is probably  
23 shorter than yours, but we're in continue am --  
24 continued dialogue on a couple of issues that I don't  
25 anticipate we'll have extreme difficulty satisfying.

1 One of them has to do with NFPA-13 and sprinkler  
2 placement in strict compliance or adherence, as opposed  
3 to the provision for alternate complete meeting. The  
4 intent of and the discussion is the debate, is really  
5 around that particular question.

6 We feel that we have installed the sprinkler heads  
7 in the area in question as an alternate to a strict  
8 prescription of where they should be located with  
9 respect to the ceiling, and used Btu content or  
10 potential Btu generation as a guiding factor in where  
11 these sprinkler heads are located. And there is some  
12 more reiteration required with a review in that respect  
13 to satisfy it. I anticipate it will be satisfactorily  
14 resolved. But the discussion is continuing.

15 Open correspondence issues. The SDPS optical  
16 isolation. We have provided a submittal in January.  
17 We're still discussing the contents of that, and it  
18 falls under the same SER outstanding issues that I  
19 indicated earlier.

20 Safe and alternate shutdown, May 21. We provided  
21 additional requested information, and are looking for  
22 resolution in a future SSER. Do not think there is an  
23 issue outstanding. Simply a matter of completion.

24 The Salem/Atwas event, we provided a committal  
25 only last week in that case. Once again, it's

1 clarification of previous discussions.

2 Turn now to engineering and construction items.  
3 This is really a condensation, and I have used the last  
4 commitment date on our part to cover a number of items  
5 which may in fact be submitted earlier. You mentioned  
6 appendix R. And in that particular case we have got  
7 nine specific items. The latest date for any back pit  
8 aspects are providing information to the staff by the  
9 end of September.

10 In the EQ, area 7 items. Last submittal date is  
11 one I alluded to earlier, November 15th, having to do  
12 with the Westinghouse program. Ventilation system  
13 completion looking at October. That includes the  
14 modification and retest, or retest of some modifications  
15 in the plant ventilation system.

16 We're providing further modification to the diesel  
17 generator excitation system that will be provided to  
18 you later this month. We're modifying the MSIV bypass  
19 valves, and that submittal will be provided to you. It  
20 says on Saturday. I doubt it. But tomorrow or Monday.

21 Hot shutdown can go on. All of these are covered,  
22 as I said, in the CAL. If you see anything of specific  
23 interest, please ask.

24 MR. VOLLMER: That's hot shutdown panel bolts and  
25 -- about the 386 fire protection panels. What are the

1        extents of those?.

2            MR. MARSHALL:    John Marshall, Texas Utilities.    Hot  
3        shutdown panel bolts are interpanel connections that  
4        have apparently some missing bolts.    Whether they're  
5        missing by design or missing because they weren't  
6        installed by the vendor, we need to check that out and  
7        determine the fact whether we need a modification or an  
8        analysis.    So it's a structural issue rather than  
9        anything else.

10           MR. BECK:    Yes.    In the case of fire protection  
11        panels, this is an agreed upon date with staff to  
12        provide factory mutual label for those panels.    That  
13        certification process, if you will, by factory mutual,  
14        is in progress.    It will simply take that time to get  
15        the stakers.

16           Significant deficiency analysis reports that we  
17        have yet to submit are included on this next slide.  
18        These have been identified as SDAR's to the NRC.    Some  
19        are part 21 and some are 5055-E's.    These dates reflect  
20        when we will be providing our response to staff.

21           MR. SHAO:    Can you tell me something about the  
22        active valves?    What are the active valves?

23           MR. BECK:    There are some valves where there's a  
24        question in our -- there's a question on the table with  
25        regard to the stress limits for those valves exceeding

1 normal limits in emergency conditions. It's a question  
2 about specification and actual conditions. John, you  
3 want to amplify it all?

4 MR. EISENHUT: I was going to ask the question --  
5 really is the question about the specification at this  
6 point in time? I mean there's disconnect, as I  
7 understand it.

8 MR. BECK: Yes, there is a disconnect between what  
9 was specified and what was provided by the vendor.

10 MR. EISENHUT: No question about the specification  
11 being correct?

12 MR. BECK: That question is also on the table.  
13 Both.

14 MR. EISENHUT: So it's a two step process.

15 MR. SHAO: What does FSAR say? What does the --

16 MR. BECK: The commitment in the FSAR -- the  
17 disconnect occurs between the specification and the  
18 FSAR commitment, in one or two cases. And there's also  
19 a disconnect between what was provided by the vendor and  
20 what was in the specification, in another case. Am I  
21 correct there, John?

22 MR. MARSHALL: The specification and the FSAR are  
23 essentially the same with respect to this particular  
24 question. Disconnect appears to be between  
25 specification and what was in fact delivered. The valve

1 -- in all cases are code valves, to meet those  
2 requirements.

3 MR. EISENHUT: How many valves are we talking? Can  
4 you give me an index?

5 MR. MARSHALL: This is very new. I can't tell you  
6 how many valves.

7 MR. SHAO: How many vendors involved?

8 MR. BOSNAK: John, this is Bob Bosnak, NRC. Our  
9 bottom line here is operability, not necessarily stress  
10 limit. So keep that in mind when you go through this.

11 MR. BECK: Yes, sir.

12 MR. EISENHUT: Yeah. Why is this not tied to a  
13 CPRT issue? And as a matter of fact, this happened to  
14 be one of the issues I had in mind when I asked the  
15 question a little earlier. I had two issues, I haven't  
16 seen the other one come up, but this is one of them.  
17 And if you don't know whether the question was a  
18 disconnect between the FSAR commitment and the  
19 specification delivery that was provided to a vendor, or  
20 a problem between the specification and whether or not  
21 the vendor provided it. And the extent or duration of  
22 the problem, I really don't see how you can address the  
23 issue without potentially tying it to CPRT.

24 MR. BECK: This is a case, Darrell, where I think  
25 clearly, as John said, it's relatively new, clearly this

1 is going have to be included in the bend for  
2 consideration of generic implications by CPRT.

3 MR. SHAO: Do you know how many vendors involved in  
4 this area?

5 MR. MARSHALL: No, I don't.

6 MR. SHAO: But so far --

7 MR. MARSHALL: It's more than one.

8 MR. SHAO: More than one?

9 MR. MARSHALL: Yes, sir.

10 MR. BECK: More than one and less than five, I  
11 believe Larry, but that's preliminary. Fewer than  
12 five. Your point's well taken, Darrell, and that -- one  
13 of the advantages I have got sitting in both chairs, is  
14 that I can make darn certain that happens and the  
15 attention is given.

16 MR. EISENHUT: Okay. Yeah, I think that's an area  
17 we would want to be discussing very early as you develop  
18 the information on how many valves are involved, how  
19 many vendors are involved, et cetera, because it has a  
20 potential generic implication even beyond Comanche  
21 Peak. If in fact you delivered a specification to the  
22 vendor and the vendor delivers a product that is  
23 different than specification. So we would like to look  
24 into that one very promptly.

25 MR. BECK: At the same time I want to keep Mr.

1 Bosnak's thought in mind too, as far as operability,  
2 there's no question in that respect.

3 John, the next slide on inspection reports. This  
4 provides a -- touched on, on those issues where we need  
5 to provide information back. There are some procedural  
6 deficiencies that are being cleaned up and we will have  
7 that done by August 1. Fire protection items that  
8 resulted from region -- resulting from the Region 4  
9 walkdown will be provided by October first.

10 A security communications system, we have upgraded  
11 that system. One of the items required was an FCC  
12 license for a more powerful transmitter that we  
13 anticipate receiving the end of July.

14 Permanent security locks, we'll have in place prior  
15 to fuel load. Solid rad waste system, we're going to  
16 have skid mounted systems at the site. They will be  
17 arriving after fuel load. The system we have installed  
18 right now is inadequate or judged to be such, by us.  
19 Fire alarm panels first refueling.

20 Pre-op tests on the next slide. Touches on  
21 ventilation system tests, I believe that Mr. Landers  
22 referred to. We're looking to have those completed by  
23 October 1 this year.

24 Diesel generator load test is yet to be scheduled,  
25 and I'm talking about a load test at the higher output

1 rating for which we have a request in front of the  
2 staff. The other items are self explanatory, if you  
3 have no questions.

4 MR. EISENHUT: The question that is before the  
5 staff is to go to a higher load rating on the diesel?

6 MR. BECK: From 5800 approximately to 7,000 which  
7 is the rated capacity of the units.

8 MR. EISENHUT: All right.

9 MR. BECK: Yes.

10 MR. MARINOS: Angelos Marinos, NRC. Do you 10 to a  
11 7 test load level on the diesel?

12 MR. BECK: No. And it's not a requirement as I  
13 understand it of the program.

14 MR. EISENHUT: Angelos, you know a lot about this  
15 TDR unit than I do, however this type or class of  
16 diesel, this model had been tested to the 10 to the 7,  
17 already?

18 MR. BECK: I can't speak directly to that, Darrell.  
19 The first one is the vintage.

20 MR. MARINOS: I am not certain if the load capacity  
21 is the same. That's why I have to checked that out.

22 MR. BECK: We can clarify that.

23 MR. EISENHUT: I think the requirement, the first  
24 of a kind model had a spec rating, back multiple  
25 rating. I think was the test.

1 MR. MARINOS: 16 cylinder diesels?

2 MR. BECK: Yes.

3 MR. MARINOS: Okay. I think the model had them.

4 MR. EISENHUT: Good.

5 MR. BECK: Technical specifications, we provided  
6 our final draft response to staff in November. The  
7 staff has issued the final draft specs. There are some  
8 questions that have been asked by the reactor systems  
9 branch, some additional questions, we responded as  
10 indicated in April, and we'll propose some additional  
11 changes in the near future. Obviously, we'll have to  
12 certify those tech specs as a final step required by  
13 staff, our responsibility.

14 Miscellaneous activities on the next slide, I have  
15 got environmental protection plan, which the NRC is to  
16 issue. I'm not aware of any outstanding issues in that  
17 regard. The draft plan has been agreed on. Our  
18 emergency plan implementation has been approved. We  
19 have exercised it twice. It can be implemented  
20 immediately, when necessary.

21 If there are no questions further in the --

22 MR. EISENHUT: There's one. On the last item, do  
23 you have a full FEMA signoff.

24 MR. BECK: Yes.

25 MR. EISENHUT: Okay.

1 MR. BECK: I'd like to go now to the CPRT  
2 organization. This first slide is -- I'm putting up for  
3 historical prospective, and I'd like to speak to the  
4 evolution of our response, which as you know was  
5 originally structured to respond to TRT issues in  
6 accordance with the initial letter in September of  
7 1984. This is really a second set.

8 Our initial response included, as review team  
9 leaders, and I'll go into more detail as to who these  
10 gentlemen are and what we're expecting of them, but the  
11 initial response included, as review team leaders those  
12 people in our organization who are most familiar with  
13 the issues involved.

14 We fell short, quite frankly, in retrospect of an  
15 objectivity goal in that regard. And that's why we made  
16 the change we did and went to outside, previously  
17 uninvolved, third party people to serve as the review  
18 team leaders. And we also modified at that time the  
19 SRT membership to include outside, previously  
20 uninvolved, experts.

21 And, Larry, right now, I'd like to touch on your  
22 previous question about the absence in that august body  
23 of someone with experience in mechanical systems area.

24 We have not tried to populate the SRT with experts  
25 in all the disciplines that are involved in a nuclear

1 power facility. It would end up being a rather large  
2 body of people, should we do so.

3 At the same time I'm sensitive to the concentration  
4 that we have, as far as issues and concerns, in the  
5 mechanical systems area. And there are two ways we have  
6 dealt with that.

7 The first is to have consultants to the SRT who  
8 have expertise specifically in the area you're talking  
9 about. And Mr. Rodevall, for example. And the  
10 second, is to have actively involved in the process,  
11 other people with expertise in that regard.

12 And then, specifically, I'm talking about Dr. Bob  
13 Cloud, right now. Doctor Cloud is working, if I may, on  
14 the project side of the house, but within our concept of  
15 CPRT, he's available to us any time we need to consult  
16 with him, or talk to him, or any time he wants to come  
17 to the SRT.

18 So the fact that he's not included as a previously  
19 uninvolved third party, although he essentially is, his  
20 efforts are focused more on the project side, but in no  
21 way, is he's isolated or unavailable, or his advice  
22 stifled, or whatever.

23 So we have got that input. And as you will be  
24 hearing a lot more tomorrow, we have also, recently,  
25 contracted with Stone and Webster Engineering

1 Corporation, once again on the projects side. But  
2 there's an eminent working relationship between the  
3 SRT as far as the Comanche Peak response team effort and  
4 these experts that are available to us.

5 So I don't think we're missing the input or the  
6 judgmental factors, or the ability to do an overview  
7 because of the fact that there isn't somebody actually  
8 on the body as an expert in that particular area.

9 MR. SHAO: This is just a comment. If you have a  
10 lot of problem in that area, and you have a special team  
11 to oversite all the problems, always a good idea to  
12 expert team in that particular area, otherwise, might be  
13 oversight, other people's work.

14 MR. EISENHUT: Yeah, I think Larry's question was  
15 not aimed towards the group that we thought ought to be  
16 populated with people from all the disciplines. It was  
17 really though, the senior review team, will make the  
18 management review calls, so to speak.

19 At least, perhaps the principal area of issues  
20 probably should be represented on the SRT. And granted,  
21 it's in retrospect, because we have all evolved. You  
22 did structure the SRT to respond to the September, 1974  
23 letter, and I think things have evolved since then.

24 So I think this is a comment we're giving you as we  
25 see things evolving. That's certainly an area which

1 will want to continue to explore with you.

2       Granted you have Mr. Rodevall, Mr. Cloud, both have  
3 do a very high capability and credentials, and we have  
4 no other reservations other than they are are a  
5 consultant available on call to the SRT. They're not  
6 the principal, responsible person, who is going to have  
7 to make that decision later on down the road.

8       MR. BECK: I think another -- I appreciate the  
9 comment and input. Another consideration from a  
10 practical viewpoint. SRT, while we're recommending and  
11 providing guidance to review team leaders, serving in  
12 that capacity, developing the programs, all of which  
13 you're going to hear much more about this afternoon, the  
14 QA/QC area and design adequacy tomorrow, serves as an  
15 advisor in the end to Mr. Council. Mr. Council's  
16 receptivity to that counsel and advice has been  
17 uniform. In fact he has had a few suggestions of his  
18 own, surprisingly enough as time has gone by. But I'm  
19 sensitive to it. I understand your concern. We'll keep  
20 visiting that issue.

21       MR. NOONAN: John, I'm not going to try to belabor  
22 it. But I do want to point out to you that as the  
23 program plan is being developed here, the details will  
24 be developed, we will probably be talking to these  
25 people from the CPRT .

1           At that time, for example, if I was going to be  
2 talking to Mr. Jones, I'm going to ask you provide  
3 somebody from the SRT to be involved in those particular  
4 meetings. And I think that's what Larry is looking at.

5           In the civil structural area, we don't see anybody  
6 up there to call in, so to speak, to sit with Howard  
7 when we're talking to him.

8           MR. BECK: I'm sure when we get to civil structural  
9 area in that regard, I'll be there, number one. I would  
10 like to participate in a lot of those meetings. Bill  
11 Council I'm sure would be looking forward to sitting in  
12 as well, specifically in that area.

13           Back to the historical evolution, if I may, for a  
14 few minutes. As our responses evolved over the last few  
15 months, we found a number of shifts in direction as we  
16 have learned more, as the SSER 's have come out, as we  
17 have continued to dialogue on occasion with NRC staff  
18 reviewers, it has obviously caused us to exhibit the  
19 living nature of this process.

20           It is not a static one. There are not -- there's  
21 no one on this -- on the face of this earth who can sit  
22 and look with a pressient clear vision down the  
23 stream, and identify all the issues that need to be  
24 addressed clearly.

25           We have in place, however, an organization that has

1 the capacity technically, and has the objectivity to  
2 deal with those issues. And they are doing so.

3 There are two aspects to our response, however, I  
4 want to emphasize. One, are the issues specific plans  
5 that have been covered in subsequent -- previous detail,  
6 in detail in previous meetings.

7 Those issues are not, however, the principal source  
8 of what we want to talk about this afternoon and  
9 tomorrow. May I have the next slide?

10 The issues that are of prime importance that we  
11 want to cover today and tomorrow are in what I would  
12 call the self-initiated category. And by  
13 self-initiated, I mean it's a response in our part in an  
14 overview context to what we might characterize as  
15 preliminary root cause evaluations. What we might  
16 characterize as an extension of generic implications.

17 And it clearly has led us to two areas. The first  
18 is design adequacy. Is the design at Comanche Peak  
19 adequate? And the second is quality of construction and  
20 the QA/QC adequacy question. I'll be introducing Mr.  
21 John Hansel a little later, and he will be covering  
22 today the quality of construction and QA/QC adequacy  
23 self-initiated action plan. Mr. Levin and some of his  
24 colleagues tomorrow will cover design adequacy.

25 Next slide. With regard to specific CPRT issues,

1 I'd like to go to the next slide on the charter. Our  
2 charter is to develop and implement a comprehensive  
3 review program which will address potential safety  
4 concerns related to the design and construction of  
5 Comanche Peak units 1 and 2. It's straightforward. And  
6 I emphasize the comprehensive aspect.

7 There are a number of issues and there are a number  
8 of sources. I'd like to cover some of those right now.  
9 The NRC technical review team obviously was the initial  
10 driving force to develop this response. But it  
11 certainly was not the only one that is serving as a  
12 source of issues for consideration.

13 The CYGNA Independent assessment program has turned  
14 up a number of questions that fall within the  
15 CPRT category. The atomic safety and licensing board  
16 proceedings, and issues that have been raised by the  
17 intervenors will be covered in entirety with a  
18 CPRT effort.

19 Other NRC activities are serving as sources of  
20 input such as SIT, CAT, Region 4 reports, and last and  
21 certainly not least, the self-initiated actions that you  
22 will be hearing more about today, providing that  
23 comprehensive overview.

24 MR. EISENHUT: Let me ask you a question, if I  
25 could. I'm not sure I can make it an intelligent

1 question, but let me try. These are sources of issues  
2 in that the TRT and CYGNA, et cetera down the line,  
3 right through fourth bullet, concluding with Region 4,  
4 found some good things and some bad things. They found  
5 some places there were not problems. They found places  
6 there were problems. And from that you can develop a  
7 spectrum of goodness or feeling of confidence or lack of  
8 confidence.

9 The overall program you develop must be able to  
10 say that we have confidence in the construction. We  
11 have confidence in the design, et cetera.

12 To what degree are you therefore taking credit or  
13 consideration for previous work where the NRC found a  
14 good thing or a bad thing? To what degree are you  
15 factoring that in? That is, are you looking at the  
16 profile from these documents which are by and large not  
17 really, as you said, TUGCO originated documents? They  
18 came from an external source, external stimulus, so to  
19 speak.

20 To what degree are you relying upon those to index  
21 your program and develop what kind of program you're  
22 going to develop, versus saying that those are clearly  
23 indicators of spot checks and spot areas? And that what  
24 you're going to do is take a broad look and say, "I must  
25 develop a program that gives me overall confidence.

1 And, oh, by the way, while I'm going along, it also must  
2 include those kinds of issues."

3 Which philosophical approach are you going to try  
4 to address it?

5 MR. BECK: Our philosophical approach is very  
6 clear. And that is to get our arms around Comanche  
7 Peak, from a design and construction standpoint. Any  
8 one of these sources is insufficient. All of these  
9 sources by themselves, in our view, are insufficient to  
10 that task.

11 And that's why we have taken the next step, to go  
12 must have further than that, and to -- to make sure that  
13 the conclusions that we're going to draw, namely that  
14 reasonable assurance with regard to Comanche Peak, are  
15 indeed conclusions that we can extrapolate to the entire  
16 facility.

17 You're going to hear a lot more today and tomorrow  
18 about why we feel as confident as we do that that  
19 program is all encompassing. And that we in fact do  
20 have our arms around the issues and the problems. We  
21 cannot ignore the good or the bad that's included in any  
22 of these sources, and we're not. We're going to be  
23 relying on both sides of the fence in that respect.

24 MR. EISENHUT: Yeah. My question wasn't so much  
25 ignoring as much as how you factor it in. And let me

1 give you a specific. Let me give you a hypothetical.  
2 Suppose the TRT found -- reviewed an area, did an audit  
3 review, and found generally no problems.

4 Similarly, Region 4 could have done an inspection  
5 in an area and found no problems, or the CAT team. How  
6 would you approach an area where we, based on our  
7 limited audit, found no problems?

8 MR. BECK: Let me pick one that pops into my mind.  
9 And you will be hearing more about it tomorrow. And I  
10 think it will be illustrated in more detail than I'm  
11 able to give you right now.

12 And that's electrical area. It's one where there's  
13 been what I characterize as perhaps a light touch by a  
14 number of people. I'm not aware, other than some  
15 initial TRT findings in butt splice area, for example.  
16 And in some termination questions of any serious design  
17 questions, as far as electrical is concerned. But  
18 there's enough there, for example, to raise an issue.

19 Number two, there has not been an intensive look  
20 that I'm aware of.

21 So, number three, we're going to cover that  
22 comprehensively so that there's not any question  
23 outstanding with regard to that particular design  
24 discipline.

25 So that's a case where there's not an awful lot of

1 smoke. But we want to be darned certain there are no  
2 remaining issues. And tomorrow we'll hear a lot more.

3 MR. CARVO: Jose Carvo, for the NRC. You're  
4 right. Our focus was more in trying to embrace the  
5 allegation, the concerns about the allegation.

6 But keep in mind that the QA/QC SER also raised  
7 some questions that is touching all the disciplines,  
8 including the electrical.

9 So whatever limited look we had at the time, now  
10 the QA/QC is covering, you have to take another look,  
11 because they have got some problems that are in here  
12 that not only affect the electrical, mechanical, and so  
13 forth.

14 So that kind of a look, you have got to be  
15 factoring to your program, so, again, you can put your  
16 arms around it. Otherwise it will do no fair to the  
17 electrical -- in terms of the mechanical.

18 MR. EISENHUT: Yeah. Let me follow that. The  
19 electrical happens to be an area where we have some  
20 concern, because we did only perform a limited look. So  
21 within the limited look, we did find some problems. We  
22 want to be sure that when you develop this program, you  
23 don't go off principally addressing the narrow specific  
24 issue that we found in that review.

25 MR. MARINOS: Which are mainly constructed related,

1 if I may add.

2 MR. BECK: That's correct.

3 MR. EISENHUT: That's correct. Which were  
4 principally construction related. And we want to be  
5 sure that you put enough qualified people, enough heart  
6 to heart power, with a broad enough program,  
7 programmatic look, to be able to say that,  
8 notwithstanding the fact that the NRC didn't turn up big  
9 problems, or CYGNA didn't turn up big problems, or that  
10 other activities didn't turn up big problems, I don't  
11 want to take too much confidence in that. Because we  
12 didn't really look that hard in those areas.

13 We want to make sure, at least not as hard, but  
14 there weren't as many concerns that we followed up on in  
15 some degree. We want to make sure that you develop a  
16 broad enough program to come back and say that you have  
17 high confidence. Things are all right in the area,  
18 electrical and construction and design. So that when we  
19 audit you, I want to put these guys out of work. I want  
20 to make it a low likelihood of finding any significant  
21 issues.

22 MR. BECK: Point very well taken. And I hope at  
23 the end of this two days, you will agree with me that we  
24 have anticipated that question in developing our  
25 program. We have -- that's the crux of the issue, as a

1 matter of fact, Darrell.

2 MR. EISENHUT: Two other thoughts that I had.  
3 Number one, when you started, you have -- you had an  
4 or organizational chart. You said you laid out the  
5 organization and the program principally around the  
6 September '84 letter.

7 MR. BECK: Yes.

8 MR. EISENHUT: Do you see any major changes that  
9 you're going along now, looking at the detailed SER 's,  
10 which, as Jose Calvo pointed out, the QA/QC SSER in fact  
11 includes quite a number of electrical areas or  
12 complications or concerns? Are you going back and  
13 relooking at your program, factoring those in?

14 MR. BECK: There are two parts, Darrell. We're  
15 going to respond to every single issues that was raised  
16 by TRT. That's one set.

17 The other set, and quite frankly, the bigger  
18 program clearly is going to be the self-initiated  
19 activities in construction adequacy, QA/QC, and the  
20 design adequacy question.

21 And we're not ignoring the specific questions. All  
22 of those have to be addressed and put to bed. We're  
23 going to do that. But that's far from enough to satisfy  
24 us that we have answered that question, and be able to  
25 have that reasonable assurance required in our minds, as

1 well as yours.

2 MR. EISENHUT: Is this the time for you to also say  
3 something about how you're going to factor the CYGNA  
4 effort into your program? Or are you -- are you going  
5 to factor it in? Or how you're going to consider it?

6 MR. BECK: Yes. Howard will be talking further to  
7 that tomorrow. I can say right now that the CYGNA  
8 effort is serving on the one hand as a source of input  
9 for issues.

10 On the other hand, in that context, our program is  
11 going to be responsive to every issue that's been raised  
12 by CYGNA. I anticipate when we have issued our program  
13 plan, and the issues specific actions plans, that we're  
14 also going to be providing -- I don't anticipate it.  
15 We're going to do it. Provide CYGNA with a road map  
16 that shows them where within this overall program the  
17 combination of issues specific action plans, all the  
18 issues that they have raised have been covered.

19 I anticipate meetings with CYGNA to discuss our  
20 review of where we think it's covered to make sure that  
21 there's resolution.

22 MR. EISENHUT: Let me --

23 MR. BECK: Staff, I'm sure, will be present at that  
24 session.

25 MR. EISENHUT: Let me ask one other question. And

1 I'm trying to explore how you see the CYGNA effort  
2 continuing. CYGNA presently has phases one through  
3 four. Do you see it then, from a conceptual standpoint,  
4 that at the end of the phase four, the work trunkates?  
5 And that any generic implication, any follow-up, any  
6 issues, are already addressed in your overall program?  
7 So that at the end of phase 4, it's in essence drawing  
8 to a close?

9 MR. BECK: That's our anticipation, that we will  
10 cover any outstanding issues that CYGNA has on the  
11 table, at the end of their fourth phase, within the  
12 CPRT umbrella. And that they will agree with us if that  
13 happens.

14 MR. EISENHUT: And plus any generic expansion  
15 follow up activities will have already been included in  
16 your broader program.

17 MR. BECK: That's correct.

18 MR. SHAO: Is CYGNA going to give you all the root  
19 causes of these problems, and you can follow later?

20 MR. BECK: Their phase four report I'm sure will  
21 include some observations in that regard. Specifically  
22 whether or not they will within the scope that's  
23 assigned to them, be able to make a comprehensive  
24 resolution, I frankly doubt.

25 CPRT will certainly do that. These -- any of the

1 issues that they have raised with our root cause  
2 evaluation and generic implication program, which you're  
3 going to hear a lot more about today and tomorrow. So  
4 the issue clearly is going to be covered.

5 MR. NOONAN: Are you going to discuss that  
6 tomorrow? The CYGNA work tomorrow.

7 MR. BECK: Yes. Not in detail, Vince. But we will  
8 be covering that particular aspects, that input, that  
9 source. And how we're going to handle it.

10 MR. NOONAN: For example, like CYGNA found a number  
11 of problems in the piping support area. You're going to  
12 say how you plan to treat that in -- to overall  
13 piping -- piping and pipe supports at the plant?

14 MR. BECK: We'll tell you tomorrow the  
15 methodologies the details of how we treated our subject  
16 for detailed meters later on.

17 MR. SHAO: What I would like to hear is, normally  
18 how do you fix a piping problem, how do you fix the  
19 bolt? How do you implement the whole plan?

20 MR. BECK: What does it mean in totality?

21 I have been told that there are those anxious --

22 THE REPORTER: Excuse me.

23 MR. BECK: This is a good time. We'll take a  
24 break.

25 (Whereupon there was a recess.)

1 MR. BECK: I'd like to get restarted again, and  
2 focus on CPRT objectives. This is a summary slide that  
3 really covers the essence of what appeared in the draft  
4 program plan, and what will be covered in more detail in  
5 our submittal later this month, of the entire program  
6 plan, complete with all the issues, specific action  
7 plans.

8 But I think this is the essence of the effort. And  
9 that's first to identify the root cause, and evaluate  
10 any generic implication of confirmed deficiencies.

11 MR. LANDERS: Excuse me, John. Don Landers. Could  
12 I go back to sources of issues, and the point that  
13 Darrell brought up earlier, that I'm still concerned  
14 about, and still having difficulty seeing the interface,  
15 and that is the comprehensive action list and some  
16 issues on that some people feel may be CPRT issues. And  
17 wondering how your organization has a control interface  
18 there, to make sure that comprehensive action list items  
19 are in fact moved over to CPRT if they demonstrate they  
20 have the some kind of root cause or generic concerns.

21 MR. BECK: Don, that primary responsibility lies  
22 with me as manager of licensing and as chairman of the  
23 SRT. And that's been the exercise, or the way it's been  
24 accomplished. I'm aware of all the issues on both sides  
25 of the fence.

1           Formerly, as I indicated, we have had some Region 4  
2 inspection reports that have been responded to partially  
3 by indicating that CPRT would be covering those issues.  
4 So that has really come through the licensing arm, but  
5 has been transferred over partially to CPRT, and that is  
6 documented.

7           In other cases, it's been simply a fact that we  
8 have periodically discussed issues that have gone on in  
9 the non-CPRT area in SRT meetings to make sure that we  
10 have got a cross tie. And that it's a well lubricated  
11 one. And that we're not missing anything, and nothing's  
12 dropping through the crack.

13           It's particularly important, I'm sure you recognize  
14 in those areas, where we're doing root cause evaluation,  
15 and the generic implication of all activities that we're  
16 coming to focus on, that it be done.

17           The heavy load in that regard, if I can use the  
18 term, is going to occur later in the program, when we  
19 have finished a lot of these issues specific action  
20 plans, and actually get to the generic implications of  
21 these.

22           MR. LANDERS: But your program plan will show that  
23 link?

24           MR. BECK: It certainly will.

25           MS. BLACK: John, I have a question regarding these

1 issues also. It seems to me that want to take into  
2 consideration of your findings to SAFE team to review  
allegations into your program. And I don't see that one  
4 of the sources of issues in here.

5 MR. BECK: As an issue, specific item, it isn't  
6 there. But I assure you that anything that comes out of  
7 the SAFE team activitiy in the way of findings will be  
8 looked at by CPRT, as far as its applicability is  
9 concerned. It's a good point. I didn't include it as a  
10 source, but it is. That was an oversight.

11 MR. COUNCIL: That is an oversight. Because the  
12 corporate general council does in fact review.

13 MR. BECK: Yes. Right.

14 MR. COUNCIL: For the record.

15 MR. BECK: I appreciate that. We'll clarify that  
16 in any future pieces.

17 MR. BECK: Back to the objectives list. The second  
18 bullet is to define actions to preclude similar  
19 occurrences in the future. We're interested just as  
20 much in the future as we are in a careful and thorough  
21 examination of the past. In fact, even more so. Those  
22 past efforts must form part of the basis for our future  
23 activities.

24 We want to evaluate collective significance of  
25 confirmed deficiencies, and the corrective actions to

1 assure that they have -- these concerns have been  
2 sufficiently addressed.

3 Collective significance is a very carefully chosen  
4 word, because there may well be in many instances  
5 interactions between findings. And the significance of  
6 individual issues could be in fact dwarfed by the  
7 collective aspect of that. And we want to be sure we  
8 don't miss the boat in that regard.

9 And finally we want to provide reasonable  
10 assurance that Comanche Peak can be operated without  
11 undue rest to the public health and safety. That's the  
12 bottom line of the entire program.

13 MR. MILHOAN: Jim Milhoan, NRC staff. Your first  
14 three bullets seem to -- they all previously -- on  
15 previously identified issues, is receive CPRT objectives  
16 also concerning additional reviews. For example, in the  
17 design adequacy area?

18 MR. BECK: That is part and parcel of the entire  
19 process. Collective significance, for example, cannot  
20 be evaluated until the entire program has been  
21 exercised. And I didn't mean in any way to isolate past  
22 occurrences with our future activities, and what those  
23 findings may be. It's part and parcel of the whole.  
24 All of it will be considered.

25 MR. MILHOAN: Later in the day and tomorrow we'll

1 hear about the design adequacy program?

2 MR. BECK: You will hear a lot more. And you will  
3 hear specifically about methodology and how we're going  
4 to assure that those things happen, not only design  
5 adequacy, but in the quality assurance and in the  
6 construction adequacy areas with Mr. Hansel later  
7 today.

8 I think it's important to touch briefly on the  
9 objectives of our effort. When we set up the  
10 CPRT program, consisting of the senior review team and  
11 the review team leaders, we set some very high standards  
12 with regard to the knowledge and experience of the  
13 personnel who were going to be involved.

14 And I think we have met those standards in every  
15 respect with regard to not only personnel, but the  
16 organizational integrity of various groups that are  
17 associated with the effort. And one of the key  
18 touchstones in that regard was a requirement that there  
19 be no previous involvement in Comanche Peak activities  
20 in question by those who are in the process of -- or in  
21 the review process.

22 We have in fact required people involved in the  
23 program to sign and go through an objectivity analysis,  
24 if you will, to make sure that that's the case. And we  
25 have accomplished that. There's more in the program

1 plan in that regard. Jose?

2 MR. CALVO: I'm still having trouble with the  
3 senior review team and the -- it looks to me like if you  
4 see a review team doesn't have that expertise and  
5 knowledge of what is going down at the team level, I  
6 think it -- we're going to be doing a lot of work.

7 And the NRC is going to become the senior review  
8 team, kind of finding out where that -- whether that  
9 kind of logic goes back to the senior review team. It  
10 looks to me like you need somebody there that has an  
11 understanding of what is going on in those disciplines  
12 to appreciate how those -- and specifically as plans are  
13 set down, and also how the work is being accomplished.

14 I'm having that kind of a trouble. I don't see  
15 that kind of -- that kind of direction coming down. I  
16 can see from a standpoint of preparation and guidance.  
17 But I want to get the specific plans of trying to  
18 resolve these issues. I don't see how the senior review  
19 team can in any way look like you're doing a good job,  
20 or look like you're on the wrong kind of direction.

21 So I'm having some kind of a problem in the  
22 structure that you have today to portray that kind of  
23 device to the team leaders.

24 MR. BECK: Let me characterize. This really is  
25 kind of a philosophical question. I think there is a

1 specific content in your question that is very  
2 important.

3 And that is, do we have the expertise directed  
4 toward the problem in the program? Clearly we're  
5 looking at the review team leader for that first level  
6 of experience and expertise in that discipline they're  
7 responsible for.

8 In some cases, we have got that reflected on SRT  
9 by review of specific individuals' experience or  
10 combination of experiences at the Board of Directors, if  
11 I will. But not in all cases, as I said earlier.

12 We're sensitive to that fact, and we have drawn  
13 people in from the outside in a consulting role where we  
14 feel that we're missing, in fact at the senior review  
15 team level, a required degree of specific disciplinary  
16 expertise and experience.

17 Our entire program -- let me finish, is a living  
18 program. One that has purposefully been structured in a  
19 flexible fashion, because we don't know for sure whether  
20 we're going to have to have further emphasis in the  
21 future.

22 MR. BOSNAK: John, if I can interrupt for a  
23 minute. When you saw you're going to draw in your  
24 consultants, and I heard you mention Bob Cloud and  
25 others in the area that we're most concerned about. And

1 that's the pipe and pipe support area.

2 How are they going to function? Since they are not  
3 in the line, how are you going to accept their advice or  
4 reject their advice, and how will we in the NRC know  
5 what's going on?

6 MR. BECK: What's going on with regard to what the  
7 SRT discussed or considered?

8 MR. BOSNAK: The interaction between your  
9 consultants and your SRT , just how deeply involved they  
10 get. They are, if you will, they're letters of  
11 authorization, what they can do and what they can't do.

12 MR. BECK: Sure. Okay. Two things. One, all of  
13 our records are open for audit and inspection. All the  
14 minutes of meetings that we have held, all contractual  
15 relationships, it's available for staff to look at. So  
16 the working relationship is defined in those documents.  
17 And they're available, too.

18 Secondly, I think most importantly, the specific  
19 action plans that reflect what people's responsibilities  
20 are or going to be -- will be and are, that you haven't  
21 seen yet, very clear who has what responsibility.

22 And let me illustrate what's going on in the piping  
23 system and pipe support area. I'll steal a little bit  
24 of the thunder from tomorrow to do this, but I think  
25 it's important to illustrate or focus on your concern.

1           We have made a decision to bring Stone and Webster  
2           Engineering Corporation in to do a substantial  
3           reanalysis in the piping system and support area.

4           They're going to have this responsibility in  
5           conjunction with our architect engineer of record, Gibbs  
6           & Hill. They will be redoing 100 percent of all large  
7           bore piping and supports. That reanalysis effort is  
8           going to be done with the constant attention and focus  
9           of Doctor Cloud and his organization, as a double check.

10          The SRT will be hearing directly and frequently as  
11          to how that program, one, is going to be fully flushed  
12          out. And Mr. Siskin from Stone and Webster will speak  
13          tomorrow as to the details of that, or some of that, an  
14          overview.

15          Mr. Council, for example, will be briefed on a  
16          bi-weekly basis as to how that program is proceeding,  
17          and what the results are.

18          MR. EISENHUT: Let me ask you a question.

19          MR. BECK: Mr. Siskin in that capacity with Stone  
20          and Webster will report directly to Mr. Council.

21          MR. EISENHUT: That's the question I was going to  
22          ask. Because I didn't understand -- when you laid out  
23          that organization, you got a Comanche Peak response  
24          team. You got a program laid out with the different  
25          disciplines and areas.

1 And now, somewhat external of the senior review  
2 team, external of this program that's looking at this  
3 response, you have got another entity, reanalyzing all  
4 lower bores piping supports.

5 How does it interact? And I guess we just -- it's  
6 a piece we just haven't seen how it interacts with  
7 what's being done on the response team, and how do you  
8 insure that not just the findings, so to speak, but the  
9 real feelings, understanding, knowledge, that would be  
10 done by this Stone and Webster review team, gets  
11 factored together in this team coming up with its  
12 overall conclusions, root causes, follow-up, et cetera.

13 MR. BECK: Mr. Levin will cover in detail that  
14 specific relationship tomorrow. I'll touch on it for a  
15 brief minute here. But you will hear a lot more from  
16 him on that subject.

17 He is charged with the responsibility on the third  
18 party side of the fence, to be intimately involved and  
19 satisfied that, A , all concerns that have been raised,  
20 whatever their source, whether they will SALB or TRT or  
21 whatever, in this specific area, are resolved and put to  
22 bed, number one.

23 Number two, and perhaps more importantly from the  
24 CPRT side of the fence, he is going to be looking at all  
25 generic implications to assure ourselves that once we

1 resolve all issues in that specific disciplinary area,  
2 that there isn't any transfer beyond that specific  
3 discipline.

4 Or if there is, we understand it, we recognize it,  
5 and we pursue it to whatever end conclusion it has to be  
6 pursued. Now that's a general explanation of how that  
7 interface is going to work. But it's a very important  
8 one that I agree we need to understand. And we'll spend  
9 hours tomorrow, I'm sure, making sure that we do.

10 MR. EISENHUT: Let me ask a question then on a  
11 little bit more conceptual level. When you approach  
12 this kind of problem, and in effect you're saying that,  
13 as a management decision, you have decided that the  
14 senior review team and its arms underneath it, really,  
15 when a problem gets as big as -- look at it that way.

16 MR. BECK: Reanalyzing.

17 MR. EISENHUT: Or maybe not a problem gets so big,  
18 as much as the solution to bound the problem, or the  
19 response to the problem, or the approach taken by  
20 management, gets so big that it becomes a very large  
21 effort, let's say.

22 You have, from a management standpoint, two  
23 choices. You could put that entire effort under the  
24 arms of the SRT or the -- under the Levins of the world,  
25 or whoever they would be in the various areas, and make

1     them a -- the line function, so to speak, carrying out  
2     the redesign or re-evaluation, or whatever it is.

3             Or you could put them, when it's a large separate  
4     major entity on the side, and put the SRT and its arms  
5     in a mode of overseeing to insure that all of those  
6     pieces get factored and integrated together, so they  
7     sort of have a dotted line, so to speak, on an  
8     organizational chart of monitoring all the pieces. And  
9     if it's -- what I understand you're saying, you have  
10    chosen this kind of option?

11            MR. BECK: In this specific case, yes.

12            MR. EISENHUT: Good. Because now my next case was  
13    going to be, suppose, for example, as you go through the  
14    electrical area, we -- issues start coming up bigger and  
15    bigger in the electrical area. I would take it then  
16    that if you decided on a major effort, had to be  
17    undertaken to oversee audit reject, a lot of electrical  
18    work splices, loadings, a number of different things.

19            And you set up an over the -- a large effort, let's  
20    say. The same kind of logic would say that you want to  
21    keep the SRT in on overseeing role than a line functions  
22    role.

23            MR. BECK: Exactly.

24            MR. EISENHUT: I think I understand the logic.

25            MR. BECK: In that specific case, it hasn't come to

1 the point where a decision has been made to how large  
2 the magnitude of the effort has been made. You will  
3 hear more from Martin Jones tomorrow what we're  
4 proposing to do, and what we think at this stage is  
5 going to be satisfactory if we come to the conclusion in  
6 midstream in that particular regard, that an effort of  
7 the magnitude associated with the pipe reanalysis was in  
8 order, clearly, in my mind, that would be the  
9 responsibility of a much larger organization than we  
10 have focused on them right now.

11 So it's flexible in that sense, Darrell. And we  
12 intend to keep it that way. The key is make darn  
13 certain that we have got the resources necessary to the  
14 task directed toward it. And we'll do whatever's  
15 necessary to see that that happens.

16 MR. EISENHUT: Right. So let's see if you -- the  
17 obvious extension, if I followed up on Bob Bosnak's  
18 extent, that a large area of concern is, to him, is if  
19 you made a decision to look at pipe supports on a  
20 broader scale. Or if you made a decision to look at  
21 valve design on a broader scale, you could go to a Stone  
22 and Webster type entity, or some other entity, and  
23 follow in the same regard.

24 MR. BECK: Yes, sir.

25 MR. EISENHUT: I should say, Bob made the comment.

1 A principal area of concern, or the biggest area, is  
2 what he actually said, concern to us, is piping, pipe  
3 supports, things like that.

4 At least in my mind, I'm not sure I agree with  
5 that. That one of the biggest areas that we know about,  
6 is piping and pipe supports. And knowing about it in  
7 fact gives me some comfort, because I don't mind saying,  
8 I'm very pleased to hear that you are responding to  
9 those kinds of issues by putting together a large  
10 compliment of people with lots of experience to go  
11 review and resolve them.

12 My concern actually goes larger in the other  
13 direction, what don't I know yet. And that's why I was  
14 asking questions about, how are you designing up the  
15 entire umbrella, rather than the known issue, so that  
16 will be the focus, I think, of where I'm headed.

17 MR. BECK: Good. And I assure you that by the end  
18 of the day tomorrow, you will have a much, much stronger  
19 feeling of satisfaction. I hope that the effort I do,  
20 certainly that we're undertaking, is one that will  
21 answer that question.

22 MR. SHAO: I have a question here. You have  
23 different groups doing different things, like you have  
24 Stone and Webster doing pipe supports and piping, and  
25 another group doing other things.

1           What happened to interface? How do you make sure  
2 the interface is transferred from one group to the other  
3 group, is done right? Who has that responsibility?

4           MR. BECK: In the specific case that you have  
5 cited, Larry, the only interface is Stone and Webster  
6 within their own organization.

7           MR. SHAO: Yeah. But if you get someone off to the  
8 wrong load, the final rules -- someone has to give him  
9 the right loads. So the structure people, the  
10 different -- and support the low --

11          MR. BECK: That's also within the Stone and Webster  
12 scope.

13          MR. CHANDLER: How can Stone and Webster know that  
14 the structure work is right?

15          MR. BECK: They're going to look at it. Siskin  
16 will talk to you about this tomorrow. I don't want to  
17 get into his business. I'm not qualified to  
18 specifically. But that interface is one that we have  
19 discussed, and he'll illustrate it tomorrow. I'll make  
20 sure he gets that message.

21          MR. SHAO: Yeah. But interface can be in many  
22 areas. Specifications, the loads.

23          MR. BECK: Sure. I think it will be more  
24 appropriate to have him follow up on that question, than  
25 me try to do it.

1 MR. BOSNAK: John, are there any other areas that  
2 you have already decided are large enough to bring in  
3 separate groups? Or is this the only area at this  
4 point?

5 MR. BECK: There is another area. It has to do  
6 cable tray supports and conduit supports, and we have  
7 Abasco involved in that respect.

8 MR. CALVO: That's what bothers me, John.

9 MR. BECK: Clearly a separate discipline.

10 MR. CALVO: Everything up to now has been triggered  
11 by issues. We got an issue. We set up a team. We set  
12 up a task force to do it. You're still -- you said the  
13 overall objective is determine the reasonable  
14 assurance.

15 So therefore you must look at each discipline, and  
16 do whatever you have to do to ascertain the reasonable  
17 assurance. So that means whatever effort that needs to  
18 be done in the electrical instrumentation or mechanical  
19 systems.

20 So what you have today set up with the senior  
21 review team is totally inadequate to come up with that  
22 reasonable assurance. You see, the emphasis is  
23 different now. Those are little data points. How you  
24 must embrace all the data points to come up with  
25 reasonable assurance.

1           So whatever method you selected, you have got to be  
2           comprehensive enough so you can properly correlate it,  
3           and say, based on what I'm seeing, the rest is okay.

4           So you need this kind of expertise at all levels of  
5           the senior review team. So you understand that the team  
6           leaders are doing what be they're supposed to be doing.  
7           That's the part that bothers me..

8           MR. BECK: I appreciate your input, Jose. And I  
9           can assure you that the collective significance  
10          evaluation process is one that we're looking to very  
11          strongly to resolve an answer to that question in our  
12          own mind.

13          But we're having a disconnect as to whether or not  
14          there's enough expertise at the senior review team level  
15          to make that evaluation today. I assure you, by the  
16          time that's made, that won't be a disconnect. That's a  
17          commitment.

18          MR. CALVO: Okay.

19          MR. BECK: No further questions? I'll go on to the  
20          next slide on principles we're using to exercise the  
21          CPRT program. The first one is a very clear one. The  
22          CPRT has full and completes access to any records, any  
23          persons, any history, anyone. There is no restriction  
24          whatsoever on this activity.

25          The review team leaders, subject to SRT guidance,

1 and I emphasize the guidance aspect. We are relying,  
2 and have to this point, on the expertise of these  
3 individuals in their specific areas, have responsibility  
4 for it, for developing and implementing the action plans  
5 as they may be appropriate.

6 Any analyses and calculations, and, Darrell, this  
7 touches on a point you raised earlier, are either to be  
8 performed by those previously uninvolved, or reviewed by  
9 a third party, or both.

10 And in the case of the -- clearly, in the case of  
11 the piping system analyses that's the case. It will be  
12 done by someone previously uninvolved, and reviewed by  
13 third parties. Namely the CPRT .

14 MR. BOSNAK: John, does the charter of the third  
15 party permit them just to recommend, or does it give  
16 them the authority that they can reject something if  
17 they believe that's the proper course of action?

18 MR. BECK: Clearly it can be rejected. Their  
19 charge is to be completely satisfied in their  
20 independence, in their objectivity, that what is being  
21 done resolves the issue, number one, and that the  
22 resolution is properly incorporated into the entire --  
23 the generic collective significance issue.

24 And the calls are hard sometimes. We have had  
25 some pretty stiff discussions as to the course events

1 we should take in order to be able to satisfy ourselves  
2 that we're headed down the complete path. So they're --  
3 it's a call, and it's a governing call.

4 MR. NOONAN: John, you're using the word sampling  
5 basis on here. I guess sometime between today and  
6 tomorrow we're going to understand what that means?

7 MR. BECK: Yes. I'll touch on it in more detail  
8 here in a second. And John Hansel will touch on it a  
9 lot more this afternoon, as well as to remember in the  
10 case of Howard.

11 Any inspections that are done in the course of  
12 executing these programs will be done by previously  
13 uninvolved or third party validation on a sampling  
14 basis. And this specific case, if we're talking about  
15 an inspection performed in the QA/QC area, for example,  
16 Mr. Hansel has been involved in validating, on a  
17 sampling basis, some inspection activities that has  
18 taken place through the part of the project. And he can  
19 speak to that in detail, if you would like, a little  
20 later.

21 Record reviews will be done by a third party or  
22 validated once again on a sampling basis by third  
23 party. John has had some experience in this effort, or  
24 in that specific regard.

25 Testing and NDE activities, other than the pre-op

1 program itself, will be conducted and certified by a  
2 third party. Case in point is the concrete sampling  
3 effort fits into that category of testing. Mostly  
4 non-destructive.

5 The CPRT itself will not perform any inspections,  
6 calculations, or designs or record. That's a typo. It  
7 should say of record. Where appropriate, however, the  
8 third party will overview inspections calculations or  
9 redesigns of record.

10 This is an excerpt from the program plan, and it's  
11 more definitive and complete with regard to these  
12 particular issues. And I encourage you to review that.  
13 And we can touch on it later.

14 Next slide. An issue --

15 MR. MARTIN: John, Bob Martin. All records of  
16 inspections performed under the CPRT , will they be  
17 retained through more than your normal recordkeeping  
18 systems? Not project overall, segregated and kept  
19 separate, or in a CPRT record system, as opposed to the  
20 project record system for the time being?

21 MR. BECK: All CPRT activities and records that  
22 result therefrom are kept in the CPRT project files, and  
23 they're separate.

24 There may be cases where some investigative efforts  
25 are done by the project and overviewed by CPRT . In

1 that case, those records will be in the project file.

2 MR. MARTIN: Okay. And all --

3 MR. BECK: Where they belong.

4 MR. MARTIN: And all corrective actions that are  
5 triggered as a consequence of these reviews and third  
6 party inspections, are fed back into your normal --  
7 turned back into the project corrective action system?

8 MR. BECK: Yes, sir.

9 MR. MARTIN: It is not a separate corrective action  
10 system?

11 MR. BECK: There may be. Let me be clear. And  
12 John will be talking further to this, and you will hear  
13 more tomorrow.

14 If in the course of reinspection effort, for  
15 example, a deficiency is noted, that deficiency goes to  
16 TUGCO for resolution. It doesn't have anything to do  
17 with CPRT as far as resolving a deficiency on a TUGCO  
18 side of the -- project side of the house, if you will.

19 It also goes to the CPRT for an evaluation with  
20 regard to safety significance. Two different  
21 processes. And that -- in fact at the safety  
22 significance slide is coming up next. I think I will  
23 use to illustrate further that particular point.

24 MR. MARTIN: Okay.

25 MR. BECK: All confirmed deviations will be

1 evaluated for reportability on the project side of the  
2 house, safety significance on -- and safety significance  
3 on the project side. But in particular, CPRT, we're  
4 interested in safety significant findings.

5 These evaluations will be performed in accordance  
6 with our guidelines. Our being CPRT in this case. And  
7 those are clearly defined.

8 MR. LANDERS: John, Don Landers. Throughout  
9 CPRT review effort, you do continually note safety  
10 significance? Is the CPRT going to be at all concerned  
11 with licensing compliance?

12 MR. BECK: The CPRT does not have any functional  
13 responsibility for licensing compliance. That's TUGCO's  
14 responsibility. CPRT will, however, in the course of  
15 executing their -- our responsibilities, note in every  
16 instance, and look as part of our charter, if you will,  
17 at compliance with licensing commitments clearly. And  
18 that will be noted and identified and dealt with  
19 appropriately, either --

20 MR. LANDERS: Let me take it a step further. If in  
21 reviewing an item, the CPRT determines it does not have  
22 safety significance, would they then hesitate to chase  
23 the generic root or the root cause and generic  
24 significance?

25 MR. BECK: Absolutely no hesitation in pursuing

1 that. And that's a very fundamentally important part of  
2 the program to trend any non-safety significant findings  
3 to be certain that there's nothing, even though it, in  
4 and of itself, may not have safety significance, needs  
5 to be pursued further. And that will be done.

6 That's going to be the subject of more conversation  
7 this afternoon and tomorrow. It's an integral part of  
8 the effort. And on the --

9 MR. ORGLEN: George Orglen participating. What  
10 may be going on, in addition, is that any particular  
11 definition of safety significance you're using?

12 MR. BECK: Those criteria will be very carefully  
13 and defined, and available for discussion, I'm sure, at  
14 a -- at the next series of meetings.

15 MR. EISENHUT: Yeah. Let me follow-up on that if I  
16 could. Larry sort of came to the same place I did.  
17 While clearly the most important thing is the safety  
18 significance of the evaluation, and you want to make  
19 sure the plant is SAFE in all aspects.

20 On the other hand, is the general approach going to  
21 be that you're going through reviewing all the issues,  
22 trying to make sure that the plant now conforms with the  
23 overall licensing envelope.

24 Or have you -- to what degree are you now going  
25 back and relooking at what was previously in the FSAR,

1 with the thought that you might want to amend licensing  
2 requirements, et cetera? How are -- have you got a goal  
3 as you're going in?

4 MR. BECK: That evaluation, Darrell, is part and  
5 parcel of the whole effort. We will clearly identify  
6 any areas where we're not in compliance with  
7 FSAR commitments or other commitments that we have made,  
8 and either get in compliance or justify a deviation from  
9 that commitment, one or the other. And that's true for  
10 any findings that we make.

11 MR. EISENHUT: Let me ask the question a little  
12 different. Do you have a goal going in of saying that  
13 your goal is to show that the plant is in conformance  
14 with the FSAR previously reviewed, and approved  
15 licensing commitment approved through at least SSE,  
16 and that as you do the review, any time you find a  
17 deviation, you obviously flag that by whatever vehicle  
18 you need to.

19 MR. BECK: NCR 's.

20 MR. EISENHUT: Is that really the objective of  
21 trying to stay within the previously approved  
22 FSAR designed envelope?

23 MR. BECK: It's a mechanism. We're almost back to  
24 a chicken and egg argument. I think in a way a  
25 deviation, for example, is defined by the fact that we

1 have violated an FSAR commitment. We have violated a  
2 criteria or a specification or whatever, that's what.

3 MR. EISENHUT: I don't really mean it in that  
4 sense. Let me be specific. Let me give you an  
5 example. We have gone through some projects at great  
6 length where the utilities approach was that rather than  
7 argue about the FSAR commitments again, since you laid  
8 out a design envelope, you will just, whatever it  
9 takes. Re-evaluate, redesign, rework to meet that  
10 FSAR requirement.

11 We have had other situations where utility comes  
12 back and argues that, well, let me modify my  
13 FSAR commitments and modify FSAR my commitments, which  
14 may be acceptable. Come back within a new chapter of a  
15 FSAR or portion of a FSAR, and reopen the review process  
16 on that.

17 And I was wondering if you had some going in,  
18 goal. And I give you, for example, the one on response  
19 spectrum. You could start from relooking at response  
20 spectra, and reopen a major issue that's already been  
21 reviewed once.

22 And I'm trying to get a feeling for it from a  
23 management prospective of, do you have an objective  
24 going in, or goal. And what might I expect in terms of  
25 anything else. What kind of work load am I going to be

1 foreseeing from the NRC standpoint? Am I going to go  
2 back and re-evaluate, starting from literally ground up,  
3 which is certainly an option.

4 MR. BECK: No. I certainly don't want to do that.

5 MR. EISENHUT: I don't want to do that either.

6 MR. BECK: I think I understand the drift of your  
7 question. There is one area, and you raised it, a  
8 response spectra where we are -- would be going to --  
9 coming to the staff with a suggested revision, and how  
10 we treat that particular issue, and in fact a -- to  
11 petition the staff for a changed basis.

12 And we will be meeting with staff next week on that  
13 subject. My goal is to meet commitments that we have  
14 got on the table insofar as it's physically and  
15 reasonably feasible to do so. That's going to be the  
16 test, basically.

17 Now I'm not committing that there may not be other  
18 areas where we won't seek a change. But in general, we  
19 want to meet the commitments that are on the table right  
20 now. And I think in most instances we have and will  
21 continue to do so.

22 MR. EISENHUT: The one you talked about. Can you  
23 just summarize, you know, a couple more sentences worth,  
24 how widespread or how, to what extent, you would be  
25 foreseeing making that kind of a request to the staff,

1 to go back and look at some aspects, and how widespread  
2 you would at this point?

3 MR. BECK: At this point, the only one I'm aware of  
4 is the response spectra question.

5 MR. EISENHUT: Is it complete rework of the  
6 response spectra?

7 MR. BECK: Yes, it is. We have got a very  
8 conservative, old, if I may. Old in the context of  
9 time, and we'll be talking to you.

10 MR. EISENHUT: I thought you were going to apply  
11 for a amendment on sample values and response.

12 MR. BECK: That has been done. That's to use  
13 criteria or values that have been accepted at other  
14 facilities by staff. And I don't see any other reason  
15 why it's a significant issue here. I understand there  
16 are conditions associated with our request, and we have  
17 those under consideration.

18 MR. SHAO: I hope these should be minimized.

19 MR. BECK: I do, too. It will make the process  
20 much simple for both of us. Yes, sir?

21 MR. BURWELL: Spot Burwell, NRC.

22 THE REPORTER: I can't hear you.

23 MR. BECK: Spot Burwell.

24 MR. BURWELL: My name's Spot Burwell, NRC. Along  
25 the similar lines that are they were referring with you

1 a moment ago, I noted that in a recent letter, you have  
2 asked for some changes to the technical specifications  
3 that was delayed through a design change on a isolation  
4 valve bypass.

5 MR. BECK: Yes, sir.

6 MR. BURWELL: Basically, to my view, that falls  
7 into a design change. Do other design changes which  
8 staff review, will need to be conformed? Do you  
9 anticipate others that come to your mind?

10 MR. BECK: Right now I don't, Spot. But I don't  
11 know of a nuclear plant in the United States that  
12 doesn't have design changes from time to time. So I'm  
13 sure I can commit that we're going to have more for  
14 you.

15 Offhand, I can't think of any, that you haven't  
16 seen or you're not aware of.

17 MR. BURWELL: I recognize that.

18 MR. TRAMMELL: Charlie Trammell, NRC. I just have  
19 a question on this design -- floor response spectra,  
20 that what we're going to be discussing, I want to make  
21 sure that I can sort of understand when the process is  
22 going to end.

23 We were going to meet on floor response spectra,  
24 and we have, as already mentioned, a request to use the  
25 TOW Case 411, which we're approving today. And also

1 Code Case 397, I believe it is. And using the latest  
2 1984 edition of Section NF of the Section 3. And this  
3 all seems to be part of a package that -- is that the  
4 end of it or --

5 MR. BECK: In our discussion, we're scheduled for  
6 the 18th. You will have it.

7 MR. TRAMMELL: We will have the whole thing?

8 MR. SHAO: The 397 is on dampening area, and 411  
9 is on the PF response shifting.

10 MR. BECK: Yes. The 18th.

11 MR. SHAO: Are you going to talk about the  
12 dampening values, too? 18th is just the response  
13 spectra, or --

14 MR. BECK: The other has already been submitted.  
15 Yes.

16 MR. VOLLMER: The applicability of these changes to  
17 a somewhat more fundamental design input would be  
18 applied to piping, piping systems, supports, cable  
19 trays. The whole gamut? Is that including structures?  
20 How far does this thing go?

21 MR. BECK: The answer is yes, and Bill I think  
22 would like to add to that.

23 MR. COUNSIL: I think some of the discussion we're  
24 hearing right now is a little more premature, because  
25 we're going to discuss this with you on the 18th, in

1 another public noticed meeting.

2       However, in answer to your question directly, Dick,  
3 in the Stone and Webster effort, we are starting now on  
4 making initial runs, so forth, using the response  
5 spectra today as in the FSAR, and enveloping, quote,  
6 that design.

7       And Ed Siskin can get into more details with you  
8 tomorrow on that subject. And if possible, I'd like to  
9 get off response spectra, because I think we're off the  
10 purpose of this meeting. And that is the purpose of the  
11 meeting on Tuesday. And be happy at that time to answer  
12 any of your questions on response spectra. We're not  
13 prepared to do that today.

14       MR. VOLLMER: Yeah. I think the drift of it is  
15 really not off line for this meeting, because I think  
16 what we're looking for is the principals under which  
17 this process is to be guided in taking place.

18       And, you know, broadly you can look at it, as I  
19 think we have already discussed, as meeting regulatory  
20 requirements one by one, as you come to it. Or making a  
21 fundamental change to design criteria, may put the plant  
22 in its -- pertinences into a completely new design  
23 light. And that is a rather fundamental management  
24 approach.

25       MR. COUNCIL: I see. Dick, if in fact we convince

1 you that today's response spectra and codes, so forth,  
2 are the better way because they are far more  
3 sophisticated techniques today than existed in 1972 and  
4 1974, as you're well aware, that what that will impact  
5 is quite clearly the civil structural, which quite  
6 clearly impacts piping.

7 And it also, when you get into the small bore pipe  
8 and in cable tray and in conduit supports, will clearly  
9 impact that as part of our effort.

10 Today, however, right now we are going forth with  
11 the existing response spectra in all of our redesign  
12 views. We are not going away from that program.

13 MR. EISENHUT: Okay. I understand that. Follow-up  
14 on Dick's comment a little bit. I think what we're  
15 really looking for, and the reason we brought it up here  
16 is, we're looking for areas that might interact with  
17 what you're doing here, because in essence it's sort of  
18 a computerized "do loop". You go back, if in fact you  
19 change things at some point, you go back and re-analyze  
20 what you have been doing.

21 Certainly some of the things we're talking about by  
22 new modeling and new approaches today, I agree with you,  
23 are much more sophisticated than they were ten years  
24 ago. And in many cases there may actually be better  
25 ways to model things.

1 But this whole area we look at as a package. I  
2 think that's a key. We try not to look at damping,  
3 trunkation and spectra, modifying spectra. So when we  
4 look at it, the reason you see our questions, we look at  
5 it as a package to make sure the whole thing fits  
6 together in the response spectra.

7 And certainly, if the base of the plant starts --  
8 responses differently to an earthquake motion,  
9 everything that sits on the base of the plant is open to  
10 questions. It goes without saying.

11 So I think we're just trying to explore today. And  
12 the reason for the questions is, to what degree other  
13 ongoing efforts could interact with CPRT work. And  
14 that's the thrust of where we're headed.

15 MR. COUNCIL: I think as John has answered, that I  
16 personally know of no other area, than trying to look at  
17 at the more sophisticated techniques of response spectra  
18 today. Any of the ongoing work, however, is not being  
19 done to, quote, a new response spectra.

20 MR. EISENHUT: At this time.

21 MR. COUNCIL: It is not. At this time. And it  
22 will not proceed until we have convinced staff that it  
23 should.

24 MR. EISENHUT: Okay. Let me -- there's one other  
25 one. My earlier question, I had two things in mind.

1 One was for response spectra, and the other was the  
2 plastic versus elastic modes on valves. So there was a  
3 message behind my question.

4 Do you foresee, to be perfectly straightforward and  
5 tell you that those are the two areas I was much earlier  
6 in the meeting exploring, do you see the valve design  
7 criteria, elastic versus plastic, as another area where  
8 it might interact at this time, or is this too early to  
9 tell?

10 MR. COUNCIL: Well, it's too early for me to tell.  
11 Let's put it that way.

12 MR. EISENHUT: I'll reserve usual a --

13 MR. COUNCIL: If you would like to hold that  
14 question tomorrow, and Ed Siskin's standing up here, I  
15 sure he will be happy to answer it for you.

16 MR. SHAO: One comment I would like to make, is you  
17 made a comment that you're going to start your piping  
18 analysis right now, okay.

19 But usually, if you want to look at a whole plant,  
20 usually the sequence is, you look at the structures  
21 first, and then you look at the piping. You don't want  
22 to do a piping now, and do the structure later. And you  
23 find out something is wrong with the structure, you have  
24 to redo the piping again.

25 MR. COUNCIL: You're entirely correct. We are

1 looking at the structures first. I don't know where you  
2 got the idea we weren't.

3 MR. EISENHUT: I think it was because earlier it  
4 was said in the meeting, that you established a Stone  
5 and Webster to look at large bore piping and supports.

6 You didn't say a group to look at structures and  
7 the associated piping and supports. And so we came  
8 across, at least I did, too, with the same feeling that  
9 was said in the meeting here, that the Stone and Webster  
10 group was largely looking at reanalyzing piping and  
11 supports.

12 I think, if in fact it's expanded to say it's  
13 looking at the overall area, the interaction and the  
14 overall subject as it would naturally extend to, I think  
15 that --

16 MR. COUNCIL: Well, that's entirely correct. Your  
17 concern in the first case was directed to piping and  
18 piping supports.

19 MR. EISENHUT: Right.

20 MR. COUNCIL: I did not -- I would steal Ed  
21 Siskin's thunder of tomorrow, but his first charge was  
22 not only to learn what has been done what was the basic  
23 modeling, so forth was, to go back and look at the stick  
24 models on a structure, so forth. Get a full  
25 understanding of that, looking at the enveloping of the

1 loads on, quote, the structure, before he ever got  
2 started on reanalysis.

3 MR. EISENHUT: Okay. Is he tied in, or is he doing  
4 the floor response spectra issue then, or --

5 MR. SHAO: Who is the structure group? Who is  
6 doing the source structure acting analysis?

7 MR. COUNCIL: Right now, if in fact we go forward  
8 with a new response spectra, sole interactions and floor  
9 response, that is being doing by Gibbs & Hill with the  
10 assistance of Doctor Rizzo and several others. Mr.  
11 Siskin is also involved with that review.

12 MR. SHAO: Okay. I have one question on this. I  
13 thought, why don't you kill two birds with one stone?  
14 If you want to look at a structure in the problem, you  
15 want an independent group, are you using the same  
16 group? You answered no before. Or will you use a new  
17 independent group?

18 MR. COUNCIL: If I understand your question  
19 correctly, Larry, it is the Gibbs & Hill group that is  
20 looking at, quote, today's techniques along with the  
21 systems from Doctor Rizzo, and I believe about three  
22 others, involving Stone and Webster. Looking at what is  
23 there today, today's spectrum, so forth, that is  
24 Siskin's group in New York.

25 MR. EISENHUT: Okay. Good.

1 MR. SHAO: If I understand you, you are not really  
2 changing the standard of your plant. Mainly it's just  
3 using a different technology to do the structure  
4 analysis?

5 MR. COUNCIL: That's my understanding.

6 MR. EISENHUT: Later acceptable models and later  
7 accepted approaches.

8 MR. SHAO: They don't have to change --

9 MR. EISENHUT: Right. In fact it depends -- you  
10 have to take a hard look at it. Bill, I might suggest  
11 that this is an area the staff has a lot of interest  
12 in. And one way to certainly hear Ed Siskin tomorrow,  
13 and I might suggest that there is the meeting on the  
14 floor response spectra next week.

15 And I might suggest, and already even before the  
16 meeting, asked Larry and Vince to look into this, we  
17 might have a meeting on the interaction between the  
18 action between your technical staff and your technical  
19 staff, as soon as you would be ready to say, this is how  
20 you might go about insuring those details work. I think  
21 I agree, we don't want to go too much depth here. But  
22 at the same time, we think this is potentially -- is a  
23 significant issue.

24 MR. COUNCIL: We'll be happy to talk at any time.  
25 But if my calendar is correct, we have only got Monday.

1 MR. EISENHUT: Only got Monday before --

2 MR. COUNCIL: The Tuesday meeting.

3 MR. EISENHUT: No. I didn't mean Tuesday meeting  
4 as a response to floor spectra. Mine was more, unless  
5 you were planning to include in that the interaction of  
6 how Ed Siskin's work is going to proceed, and I didn't  
7 think you were.

8 MR. COUNCIL: No, we are not.

9 MR. EISENHUT: And I was really more looking at it  
10 as the overall question of the interaction of floor  
11 response spectra, the piping and pipe support, whether  
12 or not this would be done under -- without an  
13 FSAR amendment. Those kinds of questions at a later  
14 meeting.

15 MR. COUNCIL: That's fine with me. We can set that  
16 up with Vince after the Tuesday meeting at any time at  
17 your convenience.

18 MR. BECK: Let's go to the next one.

19 You're going to be hearing a lot more and more  
20 detail by people more expert than I in the area of  
21 sampling. But I did want to touch on the issue, because  
22 it's one that's important to our program.

23 And we have look at very, very carefully, and touch  
24 on in the sense that we are going to use sampling  
25 techniques, and many of the CPRT issue specific action

1 plans, and in the overall design and construction  
2 adequacy aspect.

3 We have established guidelines with regard to the  
4 CPRT activities, as far as sampling goes. And they will  
5 be included as Appendix D to our program plan, which you  
6 will have within a couple of weeks.

7 These guidelines require that any issued specific  
8 action plan sampling programs adhere in general and  
9 there will be more, as I said, in the program document,  
10 to these criteria, that we utilize random selection  
11 methods for samples of defying populations, and I mean  
12 that in the rigorous sense.

13 That these sample sizes meet a 9595 statistical  
14 standard. That we utilize predefined accept and reject  
15 criteria, which touches really on the issue that came up  
16 with regard to safety significance, for example, that we  
17 define these criteria ahead of time, and that we adhere  
18 to them. That we identify decision criteria for sample  
19 results, acceptance, or sample expansion. And this will  
20 be very clear in every instance as to how we plan to  
21 proceed. As I said, we will have more discussion on  
22 that point.

23 MR. MARTIN: John, you said you -- when you said in  
24 the rigorous sense with regard to random selection for  
25 defined populations. In your appendix, you will define

1 the bounding or the manner in which you approach a  
2 definition of a defined population?

3 MR. BECK: Yes.

4 MR. MARTIN: What I concern myself is that will we  
5 be able to elicit from Appendix D to the program plan,  
6 that if you're going to go out and sample pipe hangers  
7 that how you define populations of pipe hangers in some  
8 fashion, that at least we can understand when we go out  
9 and see what you're doing.

10 MR. BECK: There will be two pieces. One, the  
11 methodology will be described in appendix D.

12 Two, in every specification where we use sampling  
13 as part of that issue, specific sampling plan, and the  
14 back up documentation, it will be very clear to anyone  
15 who wants to look at it how we arrived at populations,  
16 how we describe them, and how the sampling will proceed,  
17 and what the criteria are.

18 So appendix D methodology to be applied in general  
19 issues specific actions plans, if sampling is used as  
20 part of them, will describe precisely how it was done in  
21 that case, in accordance with a previous -- the  
22 established methodology.

23 MR. MARTIN: And your predefined reject criteria  
24 will define what constitutes a failure within that  
25 population?

1 MR. BECK: Yes, sir.

2 MR. MARTIN: Whether the sampling plan or the  
3 inspection plan, which goes out to do these things,  
4 particularly if you want to approach the pattern of  
5 9595.

6 MR. BECK: Yes. It will be specific in each case.

7 MR. MARTIN: Size of samples, numbers required,  
8 and then presumably the response to if a reject rate  
9 exceeds a certain number, the size of a population  
10 growth that's required for that class within the  
11 population.

12 MR. BECK: Exactly.

13 MR. MARTIN: One of the things that has gone on for  
14 about the last six months or so is, because of the  
15 formulation of the CPRT , we have, in terms of  
16 inspection findings and enforcement, offered the option  
17 of the company to either respond directly to the  
18 particular issue, or to sweep it into the Comanche Peak  
19 response team.

20 Do you perceive a point at which the -- I think of  
21 that more as a planning document and an overall response  
22 document. At some point you will then be much further  
23 into implementation, and no longer developing the  
24 program plan for responding, than at that particular  
25 point? Are you anticipating you will then deal with

1 enforcement issues as they arise?

2 MR. BECK: We're still going to use all information  
3 available to CPRT , including project response to  
4 enforcement actions or Region 4 inspection reports, for  
5 example. That process will continue until we have  
6 reached the end of the CPRT program.

7 MR. MARTIN: Okay. In terms of another continuing  
8 input into their activity?

9 MR. BECK: Yes, sir. Whether or not CPRT has  
10 specified responsibilities in response to an inspection  
11 report, we still are looking at those results.

12 MR. MARTIN: Okay.

13 MR. DENISE: John, Dick Denise, NRC. Regarding  
14 your sampling, I don't see any mention of what previous  
15 samples have to do with this sampling. Is there a clean  
16 slate approach or --

17 MR. BECK: I don't understand your question.

18 MR. DENISE: Well, there have been lot of  
19 inspections you have done. And some have been a hundred  
20 percent, and some have been samples, and they have had  
21 certain results. Do they have anything to do with the  
22 selected sampling protocol of the CPRT ?

23 MR. BECK: If it's a CPRT activity, in day 1, if we  
24 have used sampling in that respect, we have done it in  
25 accordance with, I -- what appendix D will say.

1 We have had Fred Webster, Dr. Fred Webster on our  
2 team, from the very beginning, to serve in that  
3 capacity. He is the author of Appendix D. And any  
4 sampling that's been done to date, has been done in  
5 accordance with those principles.

6 MR. DENISE: Perhaps you didn't understand my  
7 question, and I didn't understand your answer.

8 MR. BECK: Maybe I didn't.

9 MR. DENISE: What I'm asking you is, does the  
10 previous inspection program --

11 MR. BECK: CPRT?

12 MR. DENISE: No. The program conducted over a  
13 period of years, inspecting the construction of the  
14 plant, some of which involved overcheck and sampling  
15 when there were NCR 's and corrective actions written.  
16 Do any of those results, in any of those samplings  
17 results, have anything to do with the selection of the  
18 samples by CPRT ?

19 MR. BECK: No.

20 MR. DENISE: It's a clean slate, is what you're  
21 saying?

22 MR. BECK: Yes.

23 MR. DENISE: I want to understand.

24 MR. BECK: I understand your question, and I hope  
25 my answer was clear.

1 MR. DENISE: Let me say it was concise.

2 MR. BECK: No, there is no connection whatsoever.

3 MR. MARTIN: Okay.

4 MR. MILHOAN: Excuse me. Jim Milhoan. As the  
5 design area, are you saying that you're going to do a  
6 random sampling of pumps of components for the design  
7 adequacy review? Are you saying you're going to go to a  
8 sample system basis?

9 MR. BECK: I think you should wait to tomorrow and  
10 ask your question when Mr. Levin is here, and it will be  
11 very clear what that design adequacy review is going to  
12 entail.

13 MR. CALVO: I think everybody is under the  
14 impression that we're doing it separately of different  
15 areas the plant, is whatever it needs you to supplement,  
16 like you said before, you had done before. So whatever  
17 areas you --

18 MR. BECK: No. He said that.

19 MR. CALVO: But I think the impression that this is  
20 creating is that, starting from scratch, and you're  
21 going to sample all these areas to give the reasonable  
22 assurance, I think what it's in your mind, if I  
23 understand you correctly today, whatever you have done  
24 before, you assess with it. You need to do anything in  
25 that area. But the area that you decide to look for,

1 that's the one you're going to apply the sampling, if  
2 you decide to.

3 MR. BECK: If -- I think the confusion, Jose, at  
4 least in my mind, is coming with non-CPRT activities  
5 that may have taken place before it was even a twinkle  
6 in somebody's eye. And that I can't speak to.

7 I can speak to any experiences that we might have  
8 had in that regard, are not going to serve as the basis  
9 or a precedent, or anything else. We're blind to that.

10 But to your specific point, we have used sampling  
11 on issued specific actions plans within CPRT. And those  
12 sampling efforts has been done in accordance with the  
13 methodology.

14 MR. CALVO: For instance, the CYGNA phase 1, 2, 3,  
15 4, did some sampling on your own, and you want to take  
16 credit for that effort, if you want to take credit, you  
17 have got to go back now, and the CPRT is going to sample  
18 those things in there, after they have been fixed and  
19 everything corrected.

20 MR. BECK: No. We're not going to take credit for  
21 anything CYGNA did.

22 MR. CALVO: But you have to concentrate your effort  
23 in those areas, because everything has been done and  
24 corrected. Because you're not going to find anything  
25 wrong with them. That's what I'm saying.

1 MR. BECK: I'm not going to make any judgment.  
2 We're not going to use it.

3 MR. CALVO: That's what I'm saying. So therefore,  
4 this is whatever you elected to, this -- the area of  
5 planning and fueling, you want to concentrate on, then  
6 you sample that area. All right.

7 MR. BECK: That's correct. When I say we're not  
8 going to use. We are using CYGNA. Output as input. So  
9 we're not going to use it. So we're not going to use  
10 what they did as part and parcel of our program.

11 MR. CALVO: So you're -- to the bounds that you  
12 have specified?

13 MR. BECK: Yes, sir.

14 MR. SHAO: In the design area, you mentioned Stone  
15 and Webster were going to pipe support. Gibbs & Hill  
16 working on the spectra. And Abasco working on the cable  
17 tray support. Any other groups? You already mentioned  
18 three groups.

19 MR. COUNCIL: They're all together.

20 MR. BECK: There are other groups involved, but not  
21 in the kind of analytical revision that you're talking  
22 about.

23 MR. EISENHUT: Here's what I think, and Larry's  
24 question is very pointed in civil structure, mechanical  
25 and piping. He's biased over there where he's looking

1 at.

2 MR. BECK: I can appreciate that.

3 MR. EISENHUT: You have got these three other  
4 groups. And I guess what the staff's real question is,  
5 how they interact. Because they obviously are  
6 interacting as more of an unknown to us of how well  
7 they're glued together, and how that interaction is  
8 going to be taking place.

9 MR. BECK: I think it's obviously a question of  
10 real interest. And that's going to be very crystal  
11 clear in the issued specific actions plans that are  
12 going to be coming in, and in the meetings we're going  
13 to have. And I suggest that that's prime subject for  
14 subsequent get-togethers.

15 MR. VOLLMER: John, one area that's peripheral to  
16 that, a question of Darrell's, is, again, a management  
17 issue. Do you have responsibility for QA/QC broadly  
18 under you, and the TUGCO organization, not SRT , with  
19 the consultants that you have, the number of groups you  
20 have, some of which I'm aware have QA topic reports in  
21 the NRC, and have approved QA programs, some of which  
22 you don't how are you going to broadly handle the  
23 quality aspects of all of these activities?

24 The organizational viewpoint from the viewpoint of  
25 auditing and demonstration. And perhaps in some cases

1 where vendors are part of the program. We may wish to  
2 get vendor inspection involved. Can you -- could you  
3 give me an overview of that?

4 MR. BECK: Sure. This was a subject of a very  
5 careful look in the CPRT program, of how precisely we  
6 were going to deal with QA with regard to our  
7 CPRT effort. Let me characterize CPRT for purposes of  
8 this brief discussion as a consulting activity, per se.

9 It's not for design of record. We on the project  
10 side of the house are not relying on anything. And this  
11 is one of the reasons, by the way, for having Stone and  
12 Webster placed where they are, reporting to Bill Council  
13 on the project side of the house, if in fact the results  
14 of some of their analyses are used for the record, or to  
15 verify the record as it exists.

16 If that's the case, they will obviously be subject  
17 to their QA program, which they are, and that program  
18 will obviously be subject to our audit, if it's set up  
19 that way.

20 But back to CPRT as a whole. We are not  
21 considering CPRT activity in that consulting capacity as  
22 subject to our QA program. They're providing advice.  
23 They're providing direction for programs.

24 If any parts of those programs, however, fall into  
25 the category of being subject to the QA program, it will

1 be executed that way and rigorously adhered to. But  
2 it's a rather clean definition, I think, that these  
3 consulting activities are not part of the design of  
4 record. They do not have a direct impact in that  
5 capacity on the plant as it physically exists.

6 MR. TRAMMELL: John? Charlie Trammell again. The  
7 nature of some of the questions I'm hearing, together  
8 with parts of this program, which we don't know where  
9 it's going to lead yet, going to go out. And some of  
10 these self-initiated things we'll learn about later.

11 And you're going to find things and you're going to  
12 maybe hire special groups to look into this and that.  
13 An important element at least from a regulator's  
14 standpoint, is reporting on what is happening, and where  
15 is it leading you. And maybe a look ahead at what  
16 you're going to do, and maybe your sampling results; 1  
17 out of 83, you decide you're going to look at all of  
18 them, and this type of thing.

19 And I think NRC would be interested in knowing what  
20 your reporting methods will be. And perhaps we would  
21 like to look closely at certain areas, and maybe we  
22 would like to not look closely at other activities,  
23 depending on circumstances.

24 So I would like at some point to hear some  
25 discussion on what your thoughts are on reporting, so

1 that we could comment on that.

2 MR. BECK: Okay. Let me respond in a couple of  
3 different ways. You will hear today and tomorrow about  
4 what role wrap-up reports play in the program itself.  
5 Number one, just internal to CPRT in Mr. Hansel and Mr.  
6 Levin.

7 We also, aside from the self-initiated actions,  
8 have all of our TRT response activities underway. Some  
9 of them are nearing completion. A couple of them  
10 physically, the physical work associated with them, has  
11 been completed. There will be a results reports as a  
12 result of all these activities. These results reports  
13 will be made available, provided to staff and all  
14 interested parties.

15 Staff is, I hope I'm viewed as being responsive,  
16 when Mr. Noonan rings my chime and wants to have a  
17 meeting on any subject. So that door is always open as  
18 staff need -- have the contact. And it will continue to  
19 be.

20 At what stage staff chooses to be involved at a  
21 detailed sense in any area where there may be interim  
22 results made available, that's obviously a subject for  
23 discussion and meeting.

24 So we're here to cooperate. We encourage staff  
25 involvement. We encourage that for the singular reason

1 that it's going to lead to a better understanding of  
2 what we're doing, and why we're doing it, and what that  
3 end result is going to mean.

4 MR. TRAMMELL: I wouldn't want to have to  
5 orchestrate something like this every month to find out  
6 what's going on.

7 MR. BECK: Neither would I.

8 MR. TRAMMELL: I had in mind a monthly report,  
9 bi-weekly report, how it's going, what's your finding,  
10 what new groups. Stone and Webster is down at the site  
11 now, and I just learned that by telephone and this  
12 morning really. And I learned about Abasco doing  
13 something for you. And this is all unknown. This is  
14 all news to me. And maybe a periodic report would be  
15 maybe not so hard to put together.

16 MR. BECK: I'd like to think about the best way for  
17 us to be responsive to the need you have just expressed,  
18 and get back to Vince on that one, or to you. There are  
19 a number of ways we can approach it. Let's talk about  
20 it.

21 MR. EISENHUT: Yeah. I'm not hooked into, you  
22 know, a very frequent report, because you end up  
23 spending all your time writing reports. But at the same  
24 time there is a need to have communication, something we  
25 we need to talk about.

1 MR. BECK: Yes. Can I have the next one?

2 This slide is intended to address the issue of  
3 where we have been responsive to specific issues. And  
4 what that process will do is lead to a conclusion that  
5 there is reasonable assurance that no safety significant  
6 issues, be they design or construction that are related  
7 to issues that have been raised by others, exist at  
8 CPSES .

9 That's not the whole story, however. And the next  
10 slide talks about our self-initiated efforts. And what  
11 those efforts will do is permit the conclusion with  
12 regard to the issue responsive efforts to be extended to  
13 the balance of a safety significant plant.

14 That is the key in my mind to the entire program,  
15 to simply address those issues, whatever the source, is  
16 not enough. And that's why we're going to this  
17 substantial additional effort. It will provide the  
18 necessary enhancement of confidence and the conclusions  
19 we're going to reach at the end of the program.

20 MR. LANDERS: John, I want to make sure I'm reading  
21 this wrong, and what you said is really right. The  
22 self-initiated efforts again address issues or issue  
23 responsive efforts.

24 And that's the same terminology that is used in the  
25 previous slide, and would lead one to believe that the

1 self-initiated efforts are going to take the issues that  
2 are currently on the table, and extend them throughout  
3 the plant. And that is not what I heard you say  
4 earlier.

5 MR. BECK: I apologize for the language. The  
6 self-initiated will allow us to take the issue,  
7 responsive results, supplement them in a fashion such  
8 that the totality can be extended to the entire plant.

9 MR. LANDERS: Thank you.

10 MR. BECK: And --

11 MR. SHAO: Can you tell me which of the  
12 organization are going to address that issue? Which  
13 group is going to work on this issue?

14 MR. BECK: The final conclusion?

15 MR. SHAO: No. Which group? Like you have Stone  
16 and Webster working on this part, and Gibbs & Hill  
17 working on this. And Abasco working on that. Who is  
18 working on self-initiated effort?

19 MR. BECK: Yes, Mr. Hansel will talk about the  
20 QA/QC today. And Mr. Levin tomorrow will tell you the  
21 number of different entities that are in the --

22 MR. SHAO: So that therefore would be under the  
23 Howard Levin, and --

24 MR. BECK: He will speak to the issue. He's  
25 certainly not doing it by his lonesome. But, yes,

1 tomorrow you will understand precisely who is involved  
2 at this stage.

3 MR. SHAO: But you do have an organization working  
4 on the issue?

5 MR. BECK: Yes, absolutely.

6 MR. CALVO: It goes back what I said before. You  
7 have got Stone and Webster; you have Gibbs & Hill. You  
8 have got Abasco. And now you have got somebody else.  
9 We want to know how many somebody else before all that  
10 things is --

11 MR. BECK: Yes.

12 MR. CALVO: -- all the things are --

13 MR. BECK: The -- if you're talking about getting  
14 our arms around the whole thing, I'm going to be  
15 involved. The SRT is going to be involved. Mr. Council  
16 has never been bashful about being involved in  
17 anything.

18 So it's going to be the totality of the project and  
19 the CPRT efforts. The focus is going to be with the  
20 SRT, if that answers your question.

21 MR. NOONAN: John, the comments I'm hearing from  
22 the staff. You may have talked to Bill. The  
23 organization chart is complex. People involved, who  
24 they report to, is a very complex system. It depends on  
25 the one and other. And they don't see how it all comes

1 together.

2 MR. EISENHUT: I don't think it seems so much that  
3 it seems to be confusing. We don't know. We're trying  
4 to understand what it is. And assume, when you settle  
5 down in your final program plan, that you submit -- you  
6 have heard the questions today, and you can factor those  
7 in and try to expand and explain the interworkings and  
8 the mechanisms of how this is going to function.

9 I appreciate that it's complex. It's been  
10 expanding. It's been evolving. Different people have  
11 been coming into different play. But I think this is an  
12 area that the staff does really want to look at, is the  
13 organizations and how they're going to interact.

14 So I think at this point it probably suffices to  
15 say -- well, in fact not only that question, but all the  
16 other questions we discuss, are for your benefit, to  
17 feed back into your plan. So when it comes in, a lot of  
18 them will be addressed. But clearly, there is the key.

19 MR. BECK: I appreciate that, Darrell.

20 MR. MARTIN: John, in the CPRT objectives, two of  
21 the objectives include evaluation of generic  
22 implications, and then evaluation of collective  
23 significance. I presume in nonissue areas, areas for  
24 which issues have not been identified, the thing that  
25 the -- it is this generic implications and collective

1 significance that would lead the CPRT to go into areas,  
2 potentially go into areas, which -- for which there are  
3 no specific issues on the table relative to the Comanche  
4 Peak project.

5 MR. BECK: It could. The generic implication is  
6 set up specifically to address that concern and --

7 MR. MARTIN: So there are. It might lead you in.  
8 It would not necessarily.

9 MR. BECK: That's correct.

10 MR. MARTIN: I guess conceptually, just as a  
11 concept, do you either believe it is possible that there  
12 could be hardware or activity areas relative to Comanche  
13 Peak, for which an additional overview would not be  
14 conducted?

15 Because either, A, there have been no issues  
16 identified. Or, B, the collective significance --  
17 collective -- yeah, collective significance or generic  
18 implications could potentially not lead you into an  
19 area.

20 And have you made any overt decisions that, should  
21 that be the case, that area will be looked at anyway?  
22 So that you can still come to that bottom line that  
23 everything has been looked at at some level to your  
24 current status of confidence in the plant.

25 MR. BECK: Bob, I think when Mr. Hansel's finished

1 this afternoon, you will have a better appreciation for  
2 the totality of our construction adequacy program. That  
3 there is not going to be any area of the plant, from a  
4 construction end point prospective, that won't be  
5 touched upon in our sampling effort, number one.

6 In the design area that Howard will be talking to  
7 tomorrow, and others, I think it will also be clear that  
8 there, if it's not covered specifically and directly by  
9 CPRT , it clearly has been by others, number one.

10 Or if there is any generic implication, for  
11 example, a picking area, large bore pipes analysis,  
12 there will be findings in that area.

13 We already know of areas where there are  
14 deficiencies that are going to be corrected. What's the  
15 generic implication of the design process, for example  
16 there, that would lead you to look somewhere else?  
17 That's the question on the table.

18 I don't know for sure today where it is going to  
19 lead, but it's certainly on the table. It could go into  
20 an area that, I can't think of where right now, but we  
21 haven't drawn any conclusions yet, that would touch on  
22 something. Doesn't have anything to do with pipe  
23 supports or piping system analysis.

24 I think the answer to your question is best, the  
25 bottom line, as we get through to the end of these two

1 days, and if there's still a question on the table, we  
2 need to revisit it.

3 MR. MARTIN: Okay.

4 MR. VOLLMER: I would like to get back again to a  
5 question that I asked before, because I gave you  
6 thinking time to think about your answer.

7 And that is, we have talked about, for example, I  
8 think an instance Howard is doing on civil, structural,  
9 mechanical, and so on. What you're suggesting, I guess,  
10 from your previous answer, is that all of his activities  
11 will not come under any sort of a quality assurance  
12 program because they don't become a part of a design of  
13 record.

14 MR. BECK: Some do, Dick. The concrete  
15 inspection -- reinspection efforts for hardness clearly  
16 falls under our QA/QC program, and has been executed  
17 that way. Southwest Research did the NDE testing, but  
18 they did it under our QA/QC program for project.

19 MR. VOLLMER: So some parts of the CPRT --  
20 CPRT work will come under what? The --

21 MR. BECK: Under the project QA/QC program.

22 MR. VOLLMER: Normal project QA QC program. And  
23 how is this going to be defined? Is this going to be  
24 structured in the next couple days?

25 MR. BECK: Yes. You will understand better how

1 that falls out. I don't want to go into the -- I'm not  
2 sure I can go into all the detail that would lead you to  
3 that understanding you're seeking, I think,  
4 specifically, where it does and didn't apply.

5 MR. VOLLMER: Okay. So some of this work will  
6 clearly become part of design decisions and perhaps be  
7 input designs. So it should be, although it won't be  
8 design of record in the sense that they will be  
9 necessary final calculations, final design drawings,  
10 they will have some principal ingredients, perhaps  
11 criteria direction and so on.

12 In other words, I'm wondering how anybody will ever  
13 be able to look back and decide in retrospect to how  
14 some of the decisions are made.

15 MR. BECK: Okay. The track record will be very  
16 clear. And, Bill, I think you wanted to add something.

17 MS. GARDE: One thing that perhaps, Dick, isn't  
18 very clear to you yet, because Mr. Hansel hasn't been up  
19 or Mr. Levin.

20 Any deviations they find, design and/or  
21 construction, are going to result in a nonconformance  
22 report. That nonconformance report then flows to the  
23 project. We are then under the QA program of TUGCO. We  
24 will resolve, and that record will be available to you  
25 on how we dispositioned a nonconformance.

1           It could be, as you're well aware, use as is. We  
2           may change it. Change out the thing, whatever. That  
3           will be available.

4           When you get into Mr. Levin's area, where he is a  
5           third party. We are not applying our program to the  
6           third party because it would give undue influence to the  
7           third party.

8           They will in fact come up with recommendations to  
9           us, and that will be documented such that if in fact we  
10          do fully go with the recommendations, whatever we come  
11          up with as a program to change it, will be fully  
12          documented in accordance with the QA program of TUGCO.

13          I think some of the questions you have got, are we  
14          applying their QA program to what they are doing in the  
15          areas in which it has to be applied.

16          For instance, if Mr. Levin doesn't do design  
17          calculation or check a design calc in accordance with  
18          their program, one part of it would require a second  
19          engineer to determine the calcs. But that's as far as  
20          it would go.

21          And then it would come to us as a recommendation to  
22          take action. And under our QA program, I hope that  
23          gives you just a little bit overview.

24          MR. VOLLMER: To the extent they use the  
25          terminology independent design review as part of this

1 program, there should be some control lights of that, of  
2 that process, same degree of confidence and final design  
3 process.

4 MR. COUNSIL: It's part of -- that is totally part  
5 of the CPRT procedures, the review of those procedures,  
6 and the approval of the procedures, and how this work  
7 would be conducted.

8 MR. BECK: But it's not -- appreciate the  
9 difference with me. It is not subject to project coming  
10 in and looking over the reviewers shoulder as far as  
11 QA/QC is concerned. That just gets untenable.

12 MR. MILHOAN: Jim Milhoan. Without reliance on  
13 other work and in the third party, I think the term was  
14 used, third party design review program, design adequacy  
15 program.

16 Do you expect that program, without reliance on  
17 other work, to reach conclusions with respect to the  
18 adequacy of the control of the design process in each,  
19 let's say the five major design discipline areas?  
20 Mechanical systems, mechanical components, civil,  
21 structural, electrical, and instrumentation and  
22 controls?

23 MR. BECK: That program will rely very heavily on  
24 work that other people have done. Much of it is a  
25 review of work that other people have done, and the

1 methodology they have used to output the results.

2 So in that context, it does rely on what other  
3 people have done. I'm not sure I follow the gist of  
4 your question.

5 MR. MILHOAN: Well, you mentioned you have the  
6 CYGNA work.

7 MR. BECK: In that specific case, CYGNA has done an  
8 independent capital-I protocol controlled effort. CYGNA  
9 will have results from that effort. Those results will  
10 in some instances be, in their mind, unresolved issues.  
11 That will serve as an input to the design adequacy  
12 program, and will have responses to them. We will make  
13 sure they understand what our response is and how we got  
14 here.

15 But we are not going to look at the CYGNA  
16 independent assessment program, other than the results  
17 that come out of it.

18 MR. MILHOAN: Let me ask another question. With  
19 respect to the scope of the third party design review,  
20 does the previous design review efforts affect the scope  
21 of what you're going to look at with respect to the  
22 breadth and depth of review?

23 MR. BECK: No.

24 MR. MILHOAN: And each of the five design  
25 discipline areas, are we going to hear about that later?

1 MR. BECK: You will hear about it tomorrow at  
2 length. But the answer is no, the previous design  
3 reviews are not impacting our scope. In many instances,  
4 CPRT has not looked at what was done in previous design  
5 reviews. We couldn't even know, or don't know yet.

6 I'm not sure whether there's another question  
7 brewing back there.

8 MR. MILHOAN: It was an internal discussion between  
9 Dick and I.

10 MR. BECK: The last subject I'd like to touch on is  
11 overall schedule and resource leading. You will be  
12 hearing later today from John Hansel, and tomorrow from  
13 Howard Levin regarding their schedules specifically for  
14 the construction adequacy, QA/QC program adequacy, and  
15 the design adequacy tomorrow, self-initiated efforts.  
16 Absent significant scope expansion, you understand.  
17 It's a living program with an expansion potential built  
18 in, or hardware modifications.

19 These and all other CPRT efforts should be complied  
20 by this coming winter. Implementation completed.

21 With regard to resources that are dedicated to the  
22 CPRT effort on behalf of TUGCO and all other parties  
23 involved, the manpower estimates to date, and projected  
24 into the completion of the program, is an effort  
25 approximately 15 to 20 times the size of the TRT effort,

1 for example. We're looking at somewhere between 750 ar  
2 a 1000 man years for this CPRT effort.

3 If there are no other questions, we'll resume at  
4 1:45.

5 MR. EISENHUT: There are, yes, sir.

6 MR. BECK: I'm sure there will be.

7 MR. EISENHUT: I'm -- I was going to -- there  
8 questions that I was wanting to -- I want to explor  
9 this schedule thing and the resource thing, obviou  
10 a later time. I don't think I need to here.

11 But when we do, I would like to talk about  
12 resources in terms of, how much do you envision  
13 mainline program? And how much do you envision in  
14 overseeing program of your independent groups, et  
15 cetera? I would like to have the feeling of how much,  
16 what the breakdown of that is.

17 As I said, I don't think I need to now. And as far  
18 as the schedule is concerned, I appreciate it's  
19 sufficiently flexible, that we're all going to have to  
20 evolve and develop before it's going to pin down any  
21 more.

22 MR. BECK: Yes. That's why I can't be any more  
23 specific than I was, but the program as structured falls  
24 into that time frame.

25 MR. EISENHUT: I'm surprised you were as specific

1 as you were.

2 MR. NOONAN: John, maybe I have just one  
3 question.

4 MS. AXELRAD: I have a suggestion. The schedule, I  
5 assume you were talking about licensing sometime after  
6 the program is complete. I think one thing you should  
7 keep in mind --

8 MR. BECK: I didn't hear your assumption.

9 MS. AXELRAD: Licensing of the plant would probably  
10 occur sometime after this winter, after the program is  
11 completed, and everything goes as such.

12 But I think one thing you should keep in mind is  
13 that certain things were approved by instrumentation for  
14 fueling your justification, for not putting the  
15 instrumentation into the first refueling, might have  
16 been an assumption that the staff approved back in  
17 1983. When they assumed your first refueling, would be  
18 in 1985.

19 And so you ought to consider whether we would need  
20 a license condition, or whether you should get that kind  
21 of instrumentation installed prior to licensing.

22 MR. YOUNGBLOOD: You have several items that are  
23 that way in here, John.

24 MR. BECK: I understand.

25 MR. YOUNGBLOOD: And you should give us a date

1 specific, if not prior to five percent, prior to five  
2 percent if we're going to be licensed next month --  
3 prior to five percent.

4 MR. BECK: I understand.

5 MR. NOONAN: John, just a little on the program  
6 plan. When do you visualize we'll start seeing this  
7 thing in some detail?

8 MR. BECK: Before July.

9 MR. NOONAN: Do you see a need for us to sit and  
10 talk about these details?

11 MR. BECK: I think the advantage we're getting from  
12 the input here today and in previous meetings and  
13 discussions is going to be sufficient for us to publish  
14 a document that's going to be very close to the mark. I  
15 don't anticipate that it's going to be perfect.

16 And as I said, it's an open program. But we want  
17 to get it out, complete, and on the street. And we're  
18 shooting for the 28th of June, as a matter of fact.

19 MR. NOONAN: Okay.

20 MR. BECK: All of it. Any other questions,  
21 please? Mr. Hansel, enjoy your lunch. You're on at  
22 1:45.

23 (Whereupon there was a recess.)  
24  
25