

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

*E. HANCOCK*

DFC 5 1984

TO: Darrell G. Eisenhut, Director  
Division of Licensing

Vincent S. Noonan, Project Director  
Comanche Peak Technical Review Team

SUBJECT: COMANCHE PEAK ACTION ITEMS - SCHEDULE UPDATE

Enclosed is the second update to the tabulation of Comanche Peak Action Items. This updates the tabulation of November 9, 1984, and provides scheduled actions in the areas of Technical Review Team, Licensing, Inspections, and Legal.

Significant changes are noted below:

- Civil/Electrical/Test Programs SSER completion is rescheduled to 12/21/84. Mechanical/Miscellaneous SSER completion is rescheduled to 1/11/85. These delays are due to additional work resulting from allegor feedback interviews and to assure coordination of QA aspects of these technical areas with the QA/QC Group.
- The Coatings SSER will incorporate TRT findings and the NRR technical review of the effects on containment emergency sump performance of paint and insulation debris. Completion of the NRR technical review will delay issuance of this SSER until 1/14/85.
- Presentation of the QA/QC findings to the applicant is tentatively planned for 12/19/84. Completion of the QA/QC SSER is rescheduled to 1/11/85. Delays are attributed primarily to the allegor feedback effort and coordination with other TRT Groups.
- Completion of the efforts by the Contention 5 Panel and Intimidation Panel are scheduled for 1/31/85. We expect the staff to be ready to resume hearings in mid-February.

Contact: R. Wessman  
Ext. 28432

FOIA-35-59

*D/405*

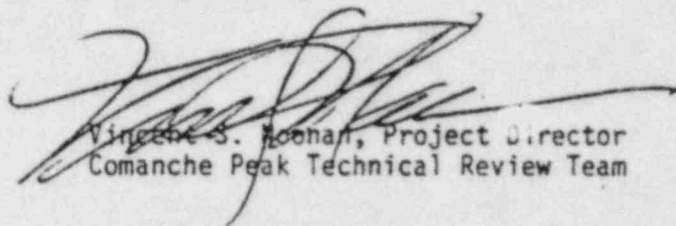
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Darrell G. Eisenhut

- 2 -

- Completion of various inspection activities, mostly dependent on completion of applicant actions, has slipped to mid-January 1985. Noteworthy are the large number of fire protection items to be completed by the applicant.

I will be pleased to discuss this with you at your request.

  
Vincent S. Noonan, Project Director  
Comanche Peak Technical Review Team

Enclosure: As stated

cc: R. Martin, Region IV  
H. Livermore, Region III (TRT)  
D. Hunter, Region IV

~~\_\_\_\_\_~~ Phillips - 1023  
L. Shao, TRT  
R. Keimig, TRT  
P. Matthews, TRT  
C. McCracken, TRT  
B. Hayes, OI  
R. Herr, OI  
E. Christenbury, OELD  
J. Scinto, OELD  
E. Case, NRR  
R. Vollmer, DE  
R. Bernero, DSI  
H. Thompson, DHFS  
T. Speis, DST  
B. J. Youngblood, DL  
T. Novak, DL  
R. Wessman, DL  
A. Vietti, DL  
R. C. Tang, DL  
W. Olliu, TIDC  
R. DeYoung, IE  
N. Grace, IE  
E. Jordan, IE  
J. Axelrad, IE  
T. Ippolito, AEOD  
J. Gagliardo



PROJECT DIRECTOR ACTION ITEMS

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
Establish alleged feedback procedure and tentative contacts schedule	Tang/Hofmayer	-draft- Complete 12/7/84
Respond to GAP letters	Wessman	-final- 12/14/84
SSER Completion:		
Integrate 68 group inputs into Mech/Misc. allegations SSER	Tang/Saffell	12/28/84
Management Review of SSER	Noonan	1/4/85
Publish SSER	LB#1	1/11/85
Obtain rest of [REDACTED]	Zudans	12/14/84
Allegations (evaluation will be incorporated in Mechanical Group reviews)		
Complete Review of Several Vendor Allegations:		
Diesel Generators	Bangart	12/14/84
(applicants vendor inspection program)		
Grinnell Pipe Hangers	Shao/Hou	12/14/84
Include vendor reviews in Misc. section of SSER	Tang/Saffell	12/14/84
Develop Program for Handling future allegations at CPSES	Vietti/Zudans	12/14/84
Provide Potential Enforcement Actions resulting from TRT effort to Region IV for action	Gagliardo	1/18/85
Publish SSER addressing remaining TRT issues and results of alleged feedback contacts		1/31/85
Assess Applicant actions in response to NRC "Requests for Information" resulting from TRT effort. Prepare SSER	Group Leaders	2/28/85
Intimidation Panel	Gagliardo	1/31/85
Contention 5 Panel	Vollmer	1/31/85
EGG Records Review Effort	Poslusny	1/18/85
Actions resulting from records review effort	McCracken	2/1/85

# TRT ACTION ITEMS

## Areas: Civil/Electrical/Test Programs Allegations

Note: Issues in these areas provided to applicant 09/18/84

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
Civil Executive Summary for SSER (Electrical/Test Program summaries complete)	Shao	Complete
Finalize 33 SSER sections	Group Leaders	12/7
Complete major allegor feedback interviews	Jeng/Calvo/Zudans	12/14
Integrate 33 SSER sections into SSER	Tang/Hofmayer	12/14
Draft SSER to management	Tang	12/14
Issue SSER	LB#1	12/21
Complete evaluation of witness "F" allegations and allegor feedback results	Calvo/Keimig/Jeng	12/28
Integrate final results of witness "F" allegations and allegor feedback contacts into supplemental SSER	Tang	1/11
Response to ASLB memo of 10/01/84 on "Concerns on Startup QA"	Keimig	12/7

## Area: Coatings Allegations

Note: Coatings SSER will integrate results of TRT evaluation and NRR Technical review of effects on containment emergency sump performance of paint and insulation debris.

Draft 7 SSER Sections on Allegations	McCracken	12/7
Complete allegor feedback interviews	Matthews	12/14
Integrate TRT Findings with results of NRR coatings safety analysis	Matthews (CSB, RSB, CPB to assist)	12/21
Finalize draft of SSER	McCracken	12/28
Coatings Draft SSER to management	McCracken	12/28
Issue SSER/Meet with Applicant	LB #1	1/14/85

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
<u>Area: Mechanical Allegations</u>		
Note: Issues in this area provided to applicant 11/29/84		
Identify applicant actions	Shao/Hou	Complete
Draft 47 SSER sections	Shao/Hou	12/7
Complete alleged feedback interviews	Shao/Hou/Zudans	12/14
Mechanical allegations executive summary for SSER	Shao/Hou	12/7
Evaluate results of alleged feedback	Shao	12/21
Finalize 47 SSER mechanical sections	Shao/Hou	12/21
Integrate Mechanical SSER section with Misc. Section	Tang/Saffell	12/29
<u>Area: Miscellaneous Allegations</u>		
Note: Issues in this area provided to applicant 11/29/84		
Identify applicant actions	Bangart	Complete
Draft 21 SSER sections	Bangart	Complete
Complete alleged feedback interviews	Bangart/Zudans	12/14
Evaluate results of alleged feedback	Bangart	12/21
Finalize 21 SSER Misc. sections	Bangart	12/21
Miscellaneous allegations executive summary for SSER	Bangart	12/7
Integrate Misc. section of SSER with Misc. Section	Tang/Saffell	12/29
<u>Area: QA/QC Allegations</u>		
Draft 69 SSER sections	Livermore	12/7
Identify applicant actions	Livermore	12/14
Complete alleged feedback interviews	Livermore/Zudans	12/14
Review tentative QA Assessments with DL management & Contention 5 Panel	Noonan/Livermore	12/17
Letter/Meet with applicant	Noonan	12/19
Evaluate results of alleged feedback	Livermore	12/21
QA Allegation Executive Summary for SSER	Livermore	12/14
Finalize 69 SSER sections	Livermore	12/28
Draft QA SSER to management	Tang	12/28
Issue SSER	LB #1	1/11/85

LICENSING ACTION ITEMS

A. SER and SSER Unresolved Review Items

<u>Open Items</u>	<u>Assigned</u>	<u>NRR Staff Scheduled Completion</u>
(1) Preservice and inservice inspection and testing program for pumps and valves (not required for licensing as interim relief granted)	MEB/C. Hammer	----
(2) Safe shutdown system; associated circuits (await applicant response)	ASB/P. Hearn	12/31/84
(3) Fire protection per Appendix R	CHEB/J. Stang	12/31/84
(4) Impact of paint debris on containment sump and long term core cooling (Must consider results of Coatings TRT Group)	CSB/C. Li GIB/A. Serkiz RSB/B. Mann	12/21/84
(5) Cygna Independent Assessment Program (Phase 1 and 2)	D. Terao	12/14/84

Confirmatory Items

(1) TMI II.D.1 Performance testing of relief and safety valves (awaiting applicant response)	MEB/G. Hammer	-----
(2) TMI II.E.1.1 Test of turbine driven AFW pump to operate without ac power	ASB/P. Hearn	12/21/84
(3) TMI II.E.4.2 Capability of containment purge valves to close in accident conditions (EQB evaluation of 10/24 has open items - need Applic. action)	EQB/R. Wright	12/31/84
(4) Environmental qualification of N-16 detector and N-16 junction box	EQB/H. Garg	12/31/84



<u>Confirmatory Items</u>	<u>Assigned</u>	<u>NRR Staff Scheduled Completion</u>
(5) Response to Generic Letter 83-28, Salem ATWS Events	ICSB/T. Dunning	12/14/84
(6) Response to Generic Letter 83-35, Small Break LOCA Analysis (II.K.3.30) (license condition established in SER #6)	RSB/J. Guttman	3/85
<u>License Conditions</u>		
(1) Conformance with R.G. 1.97, Revision 2, Generic Letter 82-33	LCSB/J. Joyce	12/14/84 (interim report complete)
		6/85 (final report)
(2) SPDS, Generic Letter 82-33	HFEB/Lipinski	12/14/84
(3) Procedures Generation Package (license condition established prior to OL)	PSRB/J.Clifford	3/85
<u>B. Technical Specifications</u>		
(1) Reactor System Branch questions regarding relationship between stated and measured process variables. (awaiting applicant response)	RSB/S. Diab, B. Mann, C. Moon	12/31/84
(2) Accuracy of transient time flow meter (N-16) (awaiting applicant response)	CPB/L. Lois	12/31/84
<u>C. Board Notifications</u>		
(1) Cross index of Board Notifications to SER and SSER sections.	LB#1/unassigned	3-man wks.
(a) Pump Seal integrity	LB#1/Burwell	12/31/84
(2) Issue forthcoming Board Notifications (8 estimated)	LB#1/S. Burwell	2-man wks.

D. Hearing Items - NRR Staff Support

(1) Motions for Summary Disposition  
on Piping and Pipe Supports

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
a. QA for pipe support design process	Teledyne/D. Landers	1/7/85
b. Pipe support stability (Applicant's response incomplete)	MEB/D. Terao	12/7/84
c. Cinched U-bolts	ETEC/H. Fleck, P. Chen	12/14/84
d. ASME/AWS Welding Codes	MEB/D. Terao	11/2/84-C
e. Upper lateral restraint (Applicant's response raised new issue)	SGEB/F. Rinaldi and Brookhaven	12/14/84
f. Use of generic stiffness in piping analysis. (Applicant's response incomplete)	EGCB/J. Fair	11/15/84-C
g. Richmond inserts (Applicant's response incomplete)	EGCB/J. Fair	12/1/84-C
h. Wall-to-wall and floor-to-ceiling piping supports	ETEC/H. Fleck, P. Chen	12/14/84
i. U-bolts as 2-way restraints	EGCB/J. Fair	12/1/84-C
j. Force distribution in axial restraints	ETEC/H. Fleck, P. Chen	12/14/84
k. Damping factors (Waiting on applicant's response)	EGCB/J. Fair	11/13/84-C
l. Safety factors	EGCB/J. Fair	11/15/84-C
m. Friction due to small thermal movements	EGCB/J. Fair	11/15/84-C

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
n. Local displacements and stresses (applicant's response incomplete)	ETEC/J. Brammer, P. Chen	12/14/84
o. Section property values	EGCB/J. Fair	11/15/84-C
p. Effects of gaps on seismic response of pipe support	EGCB/J. Fair	11/15/84-C
(2) Hearings on above Motions Summary Disposition	Staff reviewers and consultants listed above	Estimated for 8 man-wks.
(3) Staff affidavits on Cynga IAP (Phase 1 and 2)	MEB/D. Terao SGEB/F. Rinaldi RIV/D. Hunnicutt	11/15/84-C
(4) Review of Cynga IAP (Phase 3)	Terao EG&G review - Staff Review -	12/14/84 12/21/84
(5) Review of Cynga IAP (Phase 4) (awaiting CYGNA submittal)	Terao Contractor - Tech Reviewers -	Estimated 6 man-weeks 18 man-weeks
(6) Support OELD in preparation staff testimony, re-responding to ASLB Memorandum and Orders, and in preparation of Proposed Partial Initial Findings	Unassigned Leader	Estimated of 18 man-weeks
<u>E. Project Management Tasks</u>		
(1) Correspondence, filing and information retrieval		
(2) Status tracking and reports		
(3) Meetings		
(4) SSER preparation		
(5) Technical Specifications		
(6) License preparation and concurrence		
(7) Regional Readiness		
(8) Briefing Book		
(9) Review for conformance with regulation and exemption requirements		
(10) FOIA actions		

F. Miscellaneous

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
Obtain affidavits from Vendor Inspection Branch and Region IV regarding QA applicable to TDI Diesels (Awaiting Region 4 input)	Zech/IE Bangart/RIV	IE Complete 12/14/84



REGION IV ACTION NECESSARY FOR COMPLETION PRIOR TO FUEL LOAD

Description	Responsibility	Oct.      Nov.      Dec.      Jan 1985
1. Complete Evaluation of Preop. Test Results	Res. Insp. (Ops)	Licensee Dependent
2. Witness "Mini" Hot Functional (Thermal Expansion)	Res. Insp. (Ops)	Licensee Dependent
3. Complete Operating Staff Inspection	Res. Insp. (Ops)	
4. Complete Inspection of Maintenance and Operating Procedures	Res. Insp. (Ops)	Licensee Dependent
5. Fire Protection/Prevention Assessment Team Inspection	RIV (Murphy) and BNL, IE, NRR:Staff	
6. Complete Open Inspection Items on Preop. Testing QA	Res. Insp. (Ops)	
7. Close Out of Open Inspection Findings	Res. Insp. (Ops/Con) Region Based Insp.	Ongoing Function - Performed as Required
8. Complete Pre OL Issuance Requirements of 2514 Program (Test Procedure Review)	Res. Insp. (Ops)	Licensee Dependent
9. Close Out of Remaining HEDs (Human Factors)	Res. Insp. (Ops)	Licensee Dependent
10. Emergency Preparedness Exercise and Evaluation*	RIV (Baird) and FEMA	
11. Emergency Preparedness Appraisal Significant Deficiency Items (9) Close Out	RIV (Baird)	Licensee Dependent
12. Radiation Protection and Radwaste Open Items (6) Close Out	RIV (Murray)	Licensee Dependent
13. Issue IE Procedure 94300 Letter	Res. Insp. (Ops)	

\*Emergency Preparedness Exercise Scheduled for 11/14/84

DECEMBER 3,  
~~NOVEMBER 7~~, 1984

COMANCHE PEAK HEARING ISSUES

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
<u>A. PIPE SUPPORT DESIGN/QA</u>					
1) Letter to Applicants Requesting Information Relating to A500 Steel	Letter drafted and sent in May 1984 to Region IV. Letter was not sent to Applicants			12/7/84	
2) Applicants' Summary Dispo- sition Motion on AWS/ASME Codes for Weld Design	D. Terao. Staff completed	5/17/84	11/2/84	10/31/84	
3) CASE's Answer to Motion on AWS/ASME Codes for Weld Design	D. Terao Staff completed	8/6/84	11/2/84	10/31/84	
4) Applicants' Summary Dispo- sition Motion on OBE/SSE Damping Factors	J. Fair Technical draft complete. Attor- neys preparing affi- davit for filing by 12/7/84	8/6/84	12/7/84	11/15/84	
CASE's Answer to Motion on OBE/SSE Damping Factors		5/17/84	12/7/84	11/15/84	
5) Applicants' Summary Dispo- sition Motion on Safety Factors	Included in part (4)	5/21/84	12/7/84	11/15/84	

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	CASE's Partial Answer to Motion on Safety Factors	8/28/84	12/7/84	11/15/84	
6X)	Applicants' Summary Disposition Motion on Friction due to Small Thermal Movements	J. Fair. Included in (4)	5/21/84	12/7/84	11/15/84
	CASE's Answer to Motion on Friction	8/6/84	12/7/84	11/15/84	
	Applicants' Reply to CASE Answer	9/19/84	12/7/84	11/15/84	
	CASE Reply to Applicants' Reply	10/1/84	12/7/84	11/15/84	
7.8)	Applicants' Summary Disposition Motion on Section Property Values	J. Fair. Included in (4)	5/21/84	12/7/84	11/15/84
	CASE's Answer to Motion on Section Property Values	8/13/84	12/7/84	11/15/84	
8.8)	Applicants' Summary Disposition Motion on Effect of Gaps on Seismic Response	J. Fair. Technical draft in progress. Pass copy to TRI to coord. Attorney preparing affidavit.	5/21/84	1/7/85	11/30/84
	CASE's Answer to Motion on Effect of Gaps	8/13/84	1/7/85	11/30/84	
9.10)	Applicants' Summary Disposition Motion on Upper Lateral Restraint	Brookhaven/SGEB need added coord. with TET findings, discussion with G&H.	5/21/84	1/7/85	12/15/84

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	CASE's Partial Answer to Motion on Upper Lateral Restraint	8/28/84			
<sup>10</sup> 11)	Applicants' Summary Disposition Motion on Generic Stiffness	J. Fair. Technical position complete. Attorney preparing affidavit.	5/22/84	12/7/84	11/15/84
	CASE's Partial Answer to Motion on Generic Stiffness	8/28/84			
<sup>11</sup> 12)	Applicants' Summary Disposition Motion on Richmond Inserts	J. Fair. Technical Portion complete. Attorney preparing affidavit. Coord. with TRT.	6/2/84	12/7/84	12/1/84
	CASE's Answer to Motion on Richmond Inserts	9/10/84			
<sup>12</sup> 13)	Applicants' Summary Disposition Motion on Stability	D. Terao. Draft in progress	6/18/84	12/15/84	12/1/84
	CASE's Motions and Answer to Motion on Stability	Answer to Motion sent on October 19, 1984	10/15/84		
<sup>13</sup> 14)	Applicants' Summary Disposition Motion on Wall to Wall Supports	P. Chen	6/26/84	12/15/84	12/1/84
	CASE's Partial Answer to Motion on Wall to Wall Supports	8/28/84			



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	Applicants' Reply to CASE's Answer	10/1/84			
<sup>14</sup> 15)	Applicants' Summary Disposition Motion on Torsional Resistance of Axial Restraints	P. Chen	7/11/84	12/15/84	12/1/84
	CASE's Answer to Motion on Axial Restraints	8/28/84			
<sup>15</sup> 16)	Applicants' Summary Disposition Motion on Local Displacements/Stresses	P. Chen	6/19/84	12/15/84	12/1/84
	CASE's Answer to Motion on Local Stresses	8/28/84			
	Applicants' Reply to CASE's Answer	10/8/84			
<sup>16</sup> 17)	Applicants' Summary Disposition Motion on U-Bolts (2-Way Restraints)	J. Fair. Technical Draft compl. Attorney preparing affidavit.	5/24/84	12/15/84	12/1/84
	CASE's Answer to Motion on U-Bolts (2-Way Restraints)	8/20/84			
<sup>17</sup> 18)	Applicants' Summary Disposition Motion on U-Bolts (Cinching)	P. Chen. Still need info. from applic. Preparing draft, based on existing material	6/30/84	12/15/84	12/1/84
	CASE's Answer to Motion on U-Bolt Cinching	9/28/84			

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
19) 29) Applicants' Summary Disposition Motion on Pipe Support Design QA/Weld Audit of Vendor	D. Landers Draft by 1/1/85. Depends on getting copies of parts (1)-(18) drafts in week of 12/3.	7/10/84	1/15/84	1/7/85	
CASE's Partial Answer to Summary Disposition Motion on Pipe Support Design QA		10/19/84	1/15/85	1/7/85	
CASE Summary Disposition Motion on Pipe Support Design QA		10/11/84	1/15/85	1/7/85	

B. WELDING

1) Close-out of welding fabrication items from hearing:					
a. preheat	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20/84	
b. temp. indicating crayon use during interpass	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20	
c. adequacy of support with alleged downhill weld	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20	

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
d. plug welds in cable spreading room; assurance that this is not generic	Letter sent to Applicants, and reply received. Staff assessment necessary.				
e. contact [REDACTED] and [REDACTED] regarding weave welding allegation by [REDACTED]					
f. Reverification of welder symbols on Class 5 hangers (CASE Exhibit 919, p.20)					
2) Response to p.5 of CASE's finding regarding hold-points for weave weld repairs	10/11/84 Telephone conference call				
<u>C. PROTECTIVE COATINGS</u>					
1) Applicants' Summary Disposition Motion on Near White Blast	Completed: Resolved in Applicants' favor				
2) Applicants' Protective Coatings Reinspection Program	May be affected by Applicants' Application to change Safety classification of Protective Coatings		1/15/85	12/28/84	

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
3) Applicants' Motion for Summary Disposition on [REDACTED] Report	Awaiting resulting of this phase of TRT	10/5/84	1/15/85 Deferred by October 10, 1984 Board Order	12/28/84	
4) Applicants' Summary Disposition Motion on Maximum Roughness Surface Preparation	[REDACTED] - consultant (per [REDACTED]) See 3 above	6/26/84	1/15/85	12/28/84	
5) Applicants' Summary Disposition Motion on Westinghouse Components Coatings	[REDACTED] (per [REDACTED]) See 3 above	9/16/84	1/15/85	12/28/84	
6) Board Notification 84-015, regarding adhesion testing of protective coating		See March 15, 1984 Order, pp. 7-8			
Brookhaven Interim Report	TRT evaluation is scheduled for completion by 12/28/84. Brookhaven Interim Report will be considered by TRT			12/28/84	
<u>D. OTHER CONSTRUCTION ADEQUACY ISSUES</u>					
1) Results of Staff Walkdown Inspections	Inspection reports issued re: Fuel Building Cable Spreading Room Portions of Containment Room inspection com-			12/28/84	



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	pleted, awaiting report re: Safeguard Building Auxiliary Building				
2) Results of TRT Report					
3) CAT Report	Testimony concluded; proposed findings of fact currently being drafted. Awaiting findings of TRT				
4) Polar Crane shim reinspec- tion	Applicants filed response on 4/9/84 See Inspection Report 84-08				
5) Undocumented removal of cable trays	See 3/15/84 Order, p.9				
6) Reactor Vessel Mirror Shield	Staff Affidavit filed on June 4, 1984. Awaiting Board Response. TRT SSER being prepared			12/28/84	

E. INTIMIDATION

1) Board's September 17, 1984 Memorandum Direct- ing Release of OI Reports	OI responded on 10/25/84. Board requests the Staff to advise it which reports are poten-	9/17/84			
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	tially relevant to licensing proceeding, See Memorandum Request for Staff Analysis) dated 11/2/84				
2) Reopening of Inspection Report 79-15 (7/2/79) Involving Welding of Stainless Steel Fuel Pool Liners	Board request, See Tr. 16,744. Memo to Reg. IV sent on October 5, 1984			11/30/84	
3) Allegation re: Voiding of NCR by Applicants regarding incorrect dates of inspection on a weld data card.	TRT reviewing (QA group)			12/28/84	
4) Intimidation of Protective Coatings QCI				TRT Completed 12/28/84	
a. [REDACTED]	Closed by Board. Applicants submitted offer of proof. Board rejected offer.				
b. [REDACTED]	DOL transcript is record.				
c. [REDACTED]	Testimony of [REDACTED] received at Septem- ber 18-19, 1984 hear- ing session. Rebut- tal testimony filed by Applicants. TRT SSERs should address his concerns.				

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
d. [REDACTED] memorandum	Testimony of [REDACTED] [REDACTED] received at October 1-2, 1984 hearing session. Further testimony from [REDACTED] and [REDACTED] scheduled for October 29-31, 1984 hearing session.				Nov. 19-21, 1984
5) [REDACTED] (Should also be referred under OVERALL QA/QC PROGRAMMATIC ISSUES Category)				TRT Completed 12/28/84	
a. [REDACTED] ordered to incorrectly approve traveller for valve where valve disc number did not match disc number on the data report.					
b. ISO reviewers pressured to approve 40 ISO packages per week.					
c. QC Supervisor [REDACTED] [REDACTED] ordered a reviewer to improperly approve a QES sheet.					

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
6) Witness F	TRT raised to OI				
a. ES-100/RG 1.75/IEEE-384 conflict; criteria involving separation between conduit and cable trays				TRT (electrical) 12/28/84	
b. Whether failure of Westinghouse Invertions was timely reported in accordance with NRC regulations, including Part 21, and § 50.55(e)				TRT (test) 12/28/84	
c. Adequacy of XCP-EEB Procedure for energized functional testing					
d. Adequacy of prerequisite and preoperational test procedures	Set forth in October 1, 1984 Order.				
e. 3 incidents of intimidation (See findings of fact)					
f. Whether [REDACTED] approval required for STEs to write-up NCRs (Witness F, Tr. 14,629)					
g. Correctness of Witness F's prerequisite tests on Westinghouse inverters.					

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
h.	Whether Applicants' procedures specify "jump points" for testing of annunciators (Witness F, Tr. 14,538)				
i.	Whether SWA procedure, or other document, directs STEs to collect SWAs on the same system				
j.	Applicants' procedures (if any) for generating Start-up memoranda				
7)	Termination of [REDACTED]	[REDACTED] testified by deposition of 7/3/84 that he was improperly terminated for reporting pipe gouge. [REDACTED] also claims that Staff was not responseive to his allegation in a meeting following his termination.			
8)	[REDACTED]				
a.	Hole on Polar crane rail				
b.	Rejectable Welding on doors				

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
c. Inadequate welding on diesel generator skids - Programmatic QA/QC aspects					
9) EG&G Report on Climate of Intimidation at CPSES	Offered as Staff Testimony at September 21, 1984 hearing session				
10) T-Shirt Incident				TRT (electrical) 12/14/84	
a. Whether "destructive testing" (deliberately improper testing) of electrical components/ systems occurred in Safeguards building, both before and after T-shirt incident					
b. Follow-up on statements made to NRC by utility officials regarding "destructive testing."					
c. Adequacy of Procedures for conducting QC electrical inspections, and adequacy of implementation					



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
11) [REDACTED]					
a. Interview [REDACTED] and other members of his crew, to determine if a QC inspector was - intimidated	[REDACTED] Deposition,				
b. Adequacy of procedures for placing hold tags on cable tray supports, and adequacy of implementation					
12) [REDACTED]					
a. Whether stainless steel welding was improperly done while "arc gouging" was occurring in North Valve Room	[REDACTED] Deposition,				
b. Whether QC inspector who saw the improper welding was improperly prevented from stopping the arc gouging from continuing at the same time as the welding					

F. OVERALL QA/QC PROGRAMMATIC ISSUES

- 1) Results of TRT Report

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
2) Management commitment to an effective QA/QC program	See July 29, 1983 Order, pp. 21-22; September 23, 1983 Order, p.42, n.100				
3) Applicants new QA/QC program	Identified as an issue in March 15, 1984 Order, p.19. Evidence presented during July 1984 evidentiary depositions and September 10-21 hearing session.				
4) Trending of Non-Conforming Conditions	Open, See March 15, 1984 Order, p.20				
5) Implications of Applicants' failure to develop QA procedures for excavation activities	Open, See March 15, 1984 Order, p.6				
6) Reverse classification of non-safety related structures	Open, See March 15, 1984 Order, p.11				
7) Unqualified QA/QC Personnel	Open, See March 15, 1984 Order, p.12				
8) Adequate Number of QA/QC Personnel	Open, See March 15, 1984 Order, p.16				

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
9) QC oversight of CB&I, as raised in Inspection Report 82-25/82-13	Open, See March 15, 1984 Order, p.12				
10) QC oversight of NPSI, as raised in Inspection Reports 82-22 and 82-14	Open, See March 15, 1984 Order, p.13				
11) Incorporation of CMC's at DCC	Open, See March 15, 1984 Order, p.15				
12) Computerization of Non-conformances	Open, See January 30, 1984 Order; March 15, 1984 Order, pp. 17-18. Applicants filed several filings. Latest is "Applicants' Response Concerning Record Retrieval" (June 29, 1984)				
13) Stainless steel fuel pool/refueling canal liner travellers, and procedures for conducting the QA/QC activities associated with welds for those structures (Originated with [REDACTED] allegations of HHTs).	[REDACTED] testimony received at September 10-21, 1984 hearing session. CASE filed brief ("CASE's Evidence of a Quality Control Breakdown") listing all problems with travellers on September 27, 1984. Further testimony				

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	from [REDACTED] expected for November 1-2, 1984 hearing session. Staff will need to respond to CASE's and Applicants' evidence on these issues.				
14)	Document Control problems as brought out by [REDACTED]				
15)	No response to [REDACTED] allegation that backfit program for CB&I pipe whip restraints was not taken seriously	Open, See September 23, 1984 Board Order, p.32, n.81			
16)	Unstated management directive not to report problems (concern raised by [REDACTED])	Open, See 25, October 25, 1983 Board Order, p.11; September 23, 1983 Board Order, pp. 34-35; July 24, 1983 Board Order, p. 42			
17)	[REDACTED] pressured to approve Tennessee wall, Tube and Metal Audit	Open, See September 23, 1983 Board Order, p. 42			

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
18) Adequacy of Applicants' Vendor QA Program with regard to TDI diesel generators	Applicants filed Response to Board's June 15, 1984 clarification on this subject.		11/30/84	11/20/84	
19) Board's October 1, 1984 Memorandum (Concerns About Startup QA)		10/1/84	11/15/84	11/1/84	
G. CYGNA					
1) Cygna IAP Report (Phases I and III)	Applicants' and Intervenor's testimony concluded in April/May. Staff SSER and testimony required	Nov. 1983			
2) Cygna Phase III Report	No Staff review initiated	July 1984			
3) Cygna Phase IV Report	To be litigated only if Applicants fail to prevail on <span style="background-color: black; color: black;">[REDACTED]</span> Summary Disposition issues				
4) Applicants' Motion to Set Schedule on Cygna Phase III Report		10/5/84	10/25/84		



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
H. <u>MISCELLANEOUS</u>					
1) Whether IDI for CPSES will be conducted; whether SSER on pump seal integrity will be issued.	Board questions in telephone call to Staff counsel. Memo sent to NRR.		8/22/84		



Document Name:

STATUS REPORT ON MOTIONS

Requestor's ID:

EDNAD

Author's Name:

Mizuno/Lucas

Document Comments:

(when received and due date also)



# Brown & Root, Inc.

P.O. BOX 1001 GLEN ROSE, TEXAS 76043

MESSAGE

REPLY

DATE

7c

3-1-84

Room #59

Post on raceway completed  
5 items found 15 items  
corrected Post on Equipment  
not done due to need of  
WA Equipment still unsat  
separation completed  
14-84 three items found  
three items corrected no  
other items found today  
Rj Jones

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SIGNED

INSTRUCTIONS TO RECEIVER

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FOIA-85-59

D/520



# Brown & Root, Inc.

P.O. BOX 1001 GLEN ROSE, TEXAS 76043

MESSAGE -

REPLY -

DATE

03-02-84

THE FOLLOWING LIST IS  
FOR P.C.V. & SEP-OPEN ITEMS  
Rm # 51, SG #1 EL. 773'

1. P.C.V. - 16 ITEMS OPEN

~ SEP. - 0 ITEMS OPEN

*Jack Pitts*

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FOIA-85-59

D/521

D/522





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

OCT 11 1984

70



Enclosed please find the papers which we have borrowed from you during our interview with you on [REDACTED]

70

On September 19, 1984, a blank copy of confidentiality agreement was mailed to you. Please call either Ms. R. C. Tang on (301) 492-8986 or Mr. R. H. Wessman on (301) 492-8432 (both collect) to discuss the terms contained in this agreement. Please note that your request for confidentiality cannot be honored and guaranteed unless this agreement is signed and properly executed.

Sincerely,

Thomas A. Ippolito, Project Director  
Comanche Peak Technical Review Team

Enclosure:  
As stated

FOIA-85-59

D/523

DO NOT DISCLOSE



**Brown & Root, Inc.**

P.O. BOX 1001 GLEN ROSE, TEXAS 76043

**MESSAGE**

**REPLY**

To

[REDACTED]

7c

DATE

DATE

Items 1+3 on ID #CPI-VAAUSE-01  
were transferred to PCU-1-0023091 Punch list.  
This list is not included in package

BY

SIGNED

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**FOIA-85-59**

D/524



FOIA-85-59

[Appendix D (Denials)]

Records Released in Entirety

| Originals — To DCS |



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FEB 28 1985

*Calder*

MEMORANDUM FOR: Those on Attached List

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: PANEL TO PREPARE NRC STAFF POSITION ON COMANCHE PEAK  
HEARING CONTENTION NO. 5

On December 24, 1984, I established the subject panel and provided initial guidance regarding its charter. Since that time, the charter and the panel composition have been clarified to reflect a broader range of expertise and to accommodate agency priorities. This memorandum reflects the panel's charter and changes.

To properly assist the Director, Comanche Peak Project in evaluating Contention 5 and to assist him in the preparation of a comprehensive staff position on Contention 5, a panel composed of senior managers has been formed. The panel is composed of the following individuals:

Edward Jordan, IE (Chairperson)  
Richard Vollmer, IE  
Alan Herdt, R-II  
Robert Warnick, R-III  
James Snizek, DEDROGR  
Ashok Thadani, NRR

This contention concerns the applicant's adherence to QA/QC requirements and is provided as Enclosure 1. The issue of construction QA/QC at Comanche Peak is multifaceted and is addressed, in part, by many records, documents and in testimony from various sources including the staff, applicant, intervenor, and allegers. The background of this contention and associated records span several years. Various NRC offices have been involved, including Region IV, OI, NRR, OELD and IE. Because of their involvement with Comanche Peak regulatory activities, I am appointing the following personnel as resource support to the panel in their areas of expertise:

Joe Scinto, OELD  
Vince Noonan, NRR  
Thomas Ippolito, AEOD  
James Gagliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Chet Poslusny, NRR\*  
Ted Sullivan, NRR\*

FOIA-85-597  
D/280

\*Administrative and technical support as requested by Panel Chairman

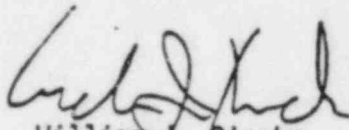
~~85-313-514 PDR~~  
7PP

These individuals may be asked to assist in this effort when issues involving their specific area of expertise are being considered, and I request your support in making them available on an "as-needed" basis.

The product of this effort will be the assistance to the Director, Comanche Peak Project, in preparing a position that integrates the staff findings and conclusions regarding this Contention. In addition this effort may require panel members, or the panel as a whole, to be prepared to testify concerning panel recommendations in support of the staff position on Contention 5 as identified by the Director, Comanche Peak Project. Enclosure 2 provides the charter for the panel.

The work schedule of the panel as developed by the Director, Comanche Peak Project, is to be consistent with the hearing schedule and shall be closely coordinated with ELD.

The panel will work under the direction of Vincent S. Noonan, Director, Comanche Peak Project, and should provide periodic status briefings to the Deputy Director, NRR.



William D. Dircks  
Executive Director for Operations

Enclosures: As stated

cc: Panel Members  
Panel Resource Personnel  
T. Murley  
J. Martin

ADDRESSEES FOR MEMORANDUM DATED FEB 28 1985

Victor Stello, Jr, DEDROGR  
Harold R. Denton, NRR  
James Taylor, IE  
Guy H. Cunningham, III, ELD  
Clemens J. Heltemes, AEOD  
Nelson Grace, RII  
James Keppler, RIII  
Robert Martin, RIV  
Ben Hayes, OI

ENCLOSURE 1

COMANCHE PEAK CONTENTION 5\*

Contention 5. The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC) and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak.  
(CFUR 4A-ACORN 14-CASE 19 JOINT Contention)

\*Reproduced from Board Order Subsequent to the Prehearing Conference of April 30, 1980 (dated June 16, 1980)



## ENCLOSURE 2

### COMANCHE PEAK CONTENTION 5 PANEL CHARTER

#### I. PURPOSE

The purpose of this panel is to assist the Director, Comanche Peak Project, to evaluate in an integrated manner the information developed by the staff which bears upon QA/QC and overall plant quality. The objectives are:

- A. To assist the Director, Comanche Peak Project to make the staff determination regarding the findings required by 10 CFR 50.57(a) as related to Contention 5.
- B. To provide an integrated review and feedback to the Director, Comanche Peak Project, on information bearing on Contention 5 along with the identification of problem areas and appropriate recommendations for NRC actions or proposed solutions.
- C. To be prepared to testify as needed individually or as a panel, concerning panel recommendations in support of the staff position on Contention 5 as identified by the Director.

#### II. MEMBERSHIP

Edward Jordan, IE (Chairperson)  
Richard Vollmer, IE  
Alan Herdt, P-II  
Robert Warnick, R-III  
James Sniezek, DEDROGR  
Ashok Thadani, NRR

#### III. PANEL SCOPE

- A. Under the guidance of the Director, Comanche Peak Project the panel shall become familiar with and consider findings of past and current NRC staff activities and applicant actions in response to NRC findings as they relate to the matters addressed in Contention 5. Specifically, the panel shall consider the results of:
  - 1) Region IV inspections
  - 2) CAT inspections



- 3) OI investigations
- 4) Technical Review Team inspections
- 5) Enforcement actions
- 6) Special Review Team inspection
- 7) SALP reports
- 8) Staff analysis of CYGNA Report
- 9) Staff summary of the Hearing Record

Additionally, the panel may examine the result of other staff activities which may bear on their findings related to Contention 5 if directed to do so.

- B. The Director, Comanche Peak Project will arrange for staff members to brief the panel on findings related to Contention 5. The Director will also set up meetings with the intervenor and the applicant to discuss matters which they respectively believe are most significant as related to Contention 5. Any such meetings will be open to the public. The panel should properly characterize the collective concerns raised by the staff, intervenor and applicant and review/comment on the applicants plan to address these concerns. The panel should then advise the Director, Comanche Peak Project on its recommendations.
- C. During conduct of panel activities, the panel should advise the Director, Comanche Peak Project of areas where it appears additional NRC activity may be warranted in order to address the issues raised in Contention 5.

#### IV. PANEL OPERATING PROCEDURES

- A. Panel meetings will be held as established by the Chairperson. The Director, Comanche Peak Project will arrange all meetings with the applicant, intervenor or allegers. Meetings with NRC staff and staff consultants shall be considered predecisional.
- B. A quorum for conduct of panel business will consist of four members. In the temporary absence of the Chairperson, the Chairperson may designate an acting Chairperson.
- C. Briefings by the principal NRC reviewers in each of the areas identified in Section III.A will be obtained. Reviewers will summarize the scope of their reviews, deficiencies noted, root causes of such deficiencies and applicant corrective actions. Likewise, the reviewers are to discuss those areas where no deficiencies were found.
- D. The panel should analyze the information presented by NRC reviewers contained in source documents which the panel reviews, obtained by discussions with the applicant, intervenor and staff and observed during site reviews in arriving at its recommendations regarding Contention 5 and should continually provide feedback to the Director, Comanche Peak Project.

- E. The panel should keep apprised of the ongoing agency activities related to Contention 5 and promptly identify conflicts or problems to the Director, Comanche Peak Project.

V. RECORD AND REPORTING

- A. The panel will work under the direction of Vincent S. Noonan, Director of the Comanche Peak Project, and should provide periodic status briefings to the Deputy Director, NRR.
- B. The panel shall keep such records of activities to assist it in arriving at recommendations regarding Contention 5, as requested by the Director. Such records shall be considered predecisional until staff testimony regarding Contention 5 is provided to the Hearing Board.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 12 1984

MEMORANDUM FOR: John T. Collins, Regional Administrator  
Region IV

Harold R. Denton, Director ~~Office of Nuclear Reactor Regulation~~

Richard C. DeYoung, Director  
Office of Inspection & Enforcement

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: COMPLETION OF OUTSTANDING REGULATORY ACTIONS ON  
COMANCHE PEAK AND WATERFORD

Construction of the Comanche Peak and Waterford facilities is nearing completion. There remain a number of issues that need to be resolved before the staff can make its licensing decisions. The issues remaining for these plants are quite complex and span more than one Office. In order to assure the overall coordination/integration of these issues and to assure issues are resolved on a schedule to satisfy hearing and licensing decision needs, I am directing NRR to manage all necessary NRC actions leading to prompt licensing decisions. Darrell Eisenhut, Director, Division of Licensing, NRR is being assigned the lead responsibility for this activity. He will coordinate the efforts of NRR, IE, and Region IV, and will coordinate this activity with OI and OELD. Prior to any of the affected Offices undertaking major activities (e.g., inspections) or making decisions on these plants, that activity should be concurred in by NRR.

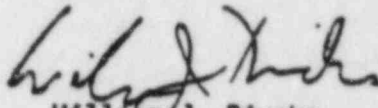
We are presently in the process of assigning a dedicated senior manager to assist Mr. Eisenhut in the management of these activities.

The first phase of this program will be the identification of issues needed to be resolved for each plant prior to hearing and licensing decisions. Once the issues have been identified a Program Plan for resolution of each item should be developed and implemented. The Program Plan should address the scope of the work needed, the identification of the responsible line organization, and the schedule for completion. In principle, this effort will therefore be similar to the effort undertaken regarding the allegation review on Diablo Canyon except that this effort should encompass all licensing, inspection, hearing, and allegation issues.

~~84-329-367~~ XA FOR  
9 PP

Each affected Office will assign a full time senior manager to work with NRR to define, schedule and complete the issues. I expect these managers to be identified by each of you within a few days. All affected offices should provide dedicated resources and give their full support to this effort, to assure that all existing issues are expeditiously handled and all new issues are promptly provided to NRR so as not to delay the licensing decisions. In addition, copies of all information, documents, depositions, etc. should be promptly provided to NRR to ensure a coordinated approach.

I anticipate that the approach utilized here will be necessary for a number of upcoming OL projects, and am directing NRR to take the lead for carrying out this activity.



William J. Dircks  
Executive Director for Operations

cc: G. Cunningham, ELD  
B. Hayes, OI

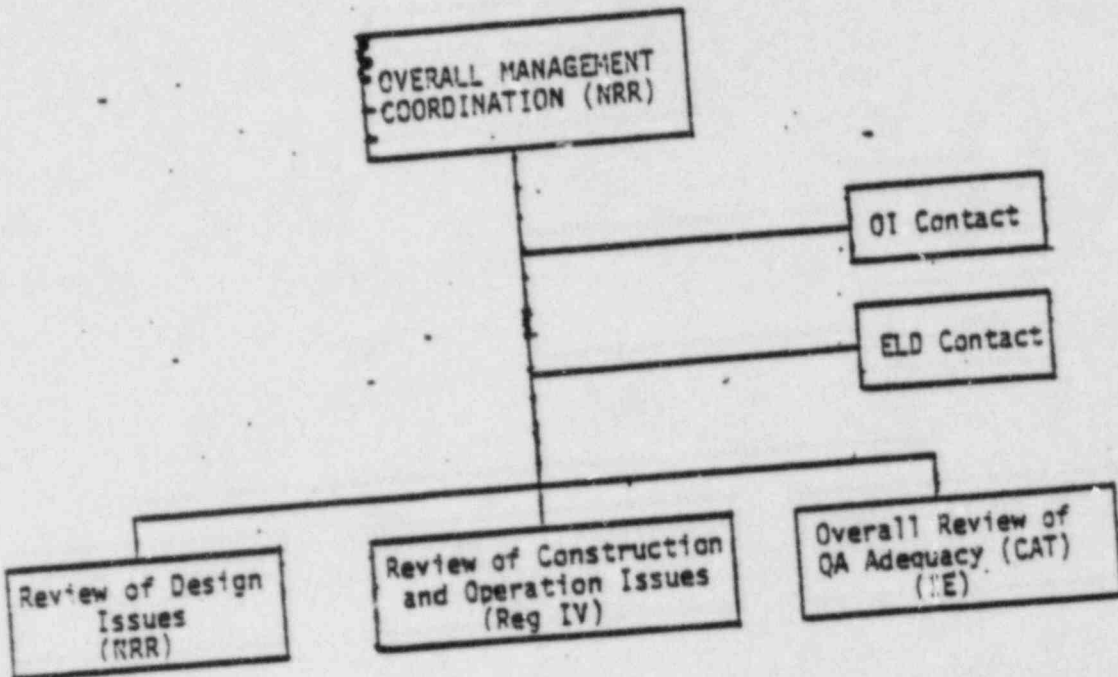




FIGURE 1

COMANCHE PEAK

Major Regulatory Actions Schedule

REGULATORY ACTIONS	May	June	July	August	September	October
<u>Licensing (SERs)</u>	X-----X					
<u>Hearing Testimony Submittals to ASLB</u>	X-----X					
<u>Inspections</u>	X-----X					
<u>Allegations</u>	X-----X					

FIGURE 1

COMANCHE PEAK

Major Regulatory Actions Schedule

REGULATORY ACTIONS	May	June	July	August	September	October
<u>Licensing (SERs)</u>	X-----X					
<u>Hearing Testimony Submittals to ASLB</u>	X-----X					
<u>Inspections</u>	X-----X					
<u>Allegations</u>	X-----X					

FIGURE 2

COMANCHE PEAK

LICENSING REVIEW SCHEDULE

Regulatory Action		Responsible Organization	May	June	July	August	September	October
1.	FSAR Open Issues 4 Issues Remain (TMI issue; 3 sub-items)	NRR/DE, DSI DHFS, IE	X					X
2.	Confirmatory Issues Required For Unit 1 License; 10 Issues Remain (TMI Issue; 12 sub-items)	NRR/DE, DSI	X					X
3.	License Conds. 2 Issues Remain	NRR/DE	X			X		
4.	Technical Specif. 5 Issues Remain	NRR/DE, DSI	X					X
5.	New Issues Raised by NRC; 7 Issues Remain. (including Financial Qualifications)	NRR/DSI, NMSS	X					X
6.	New Issues Raised by Applicant 6 Issues Remain	NRR/DHFS, DE DL, DSI	X			X		
7.	Outstanding Gen. Ltrs; 3 Remain	NRR/DSI, IE	X					X

**FIGURE 3**  
**COMANCHE PEAK**

\*OI Limiting

\*\*Technical Review Team (TRT)

HEARING TESTIMONY PREPARATION AND SUBMITTAL SCHEDULE

Regulatory Action	Responsible Organization	May	June	July	August	September	October
1. Independent Assessment							
a. IAP-Cygnus	NRR/DE, DL, IE	X-----X					
b. Applicant's Plan (W/D concerns)	NRR/DE, DSI, IE		X-----X				
2. *Intimidation/Harassment Issues	NRR/DL, OELD		X-----X				
3. **QA/QC Program Issues	TRT	X-----X					
4. **Pipe Support Issues	TRT	X-----X					
5. Welding Issues (Followup)	NRR/DE, RIV, IE	X-----X					
6. **Coating Issues	RIV (LANL), NRR/DE	X-----X					
7. Vendor Generic							
a. Transamerica Delaval Diesel Generators	TDI Task Force		X-----X				
8. Miscellaneous							
a. **Staff Walkdown (includes Cable Tray)	TRT			X-----X			
b. Polar Crane Reinspection	RIV	X-----X					
c. Mirror Shield	RIV	X-----X					

FIGURE 4

COMANCHE PEAK SCHEDULE

INSPECTION AND REGIONAL RESPONSIBILITIES

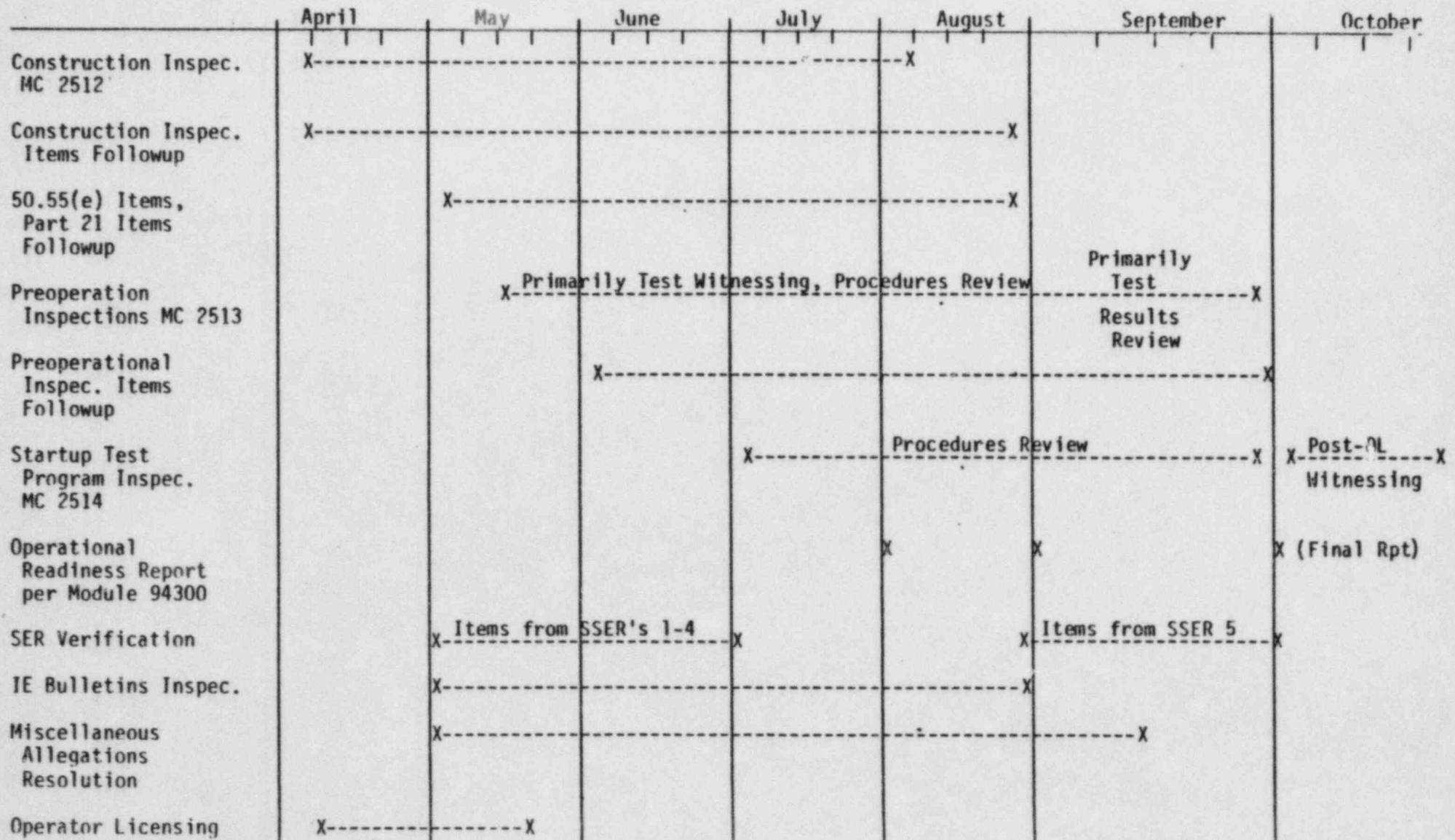
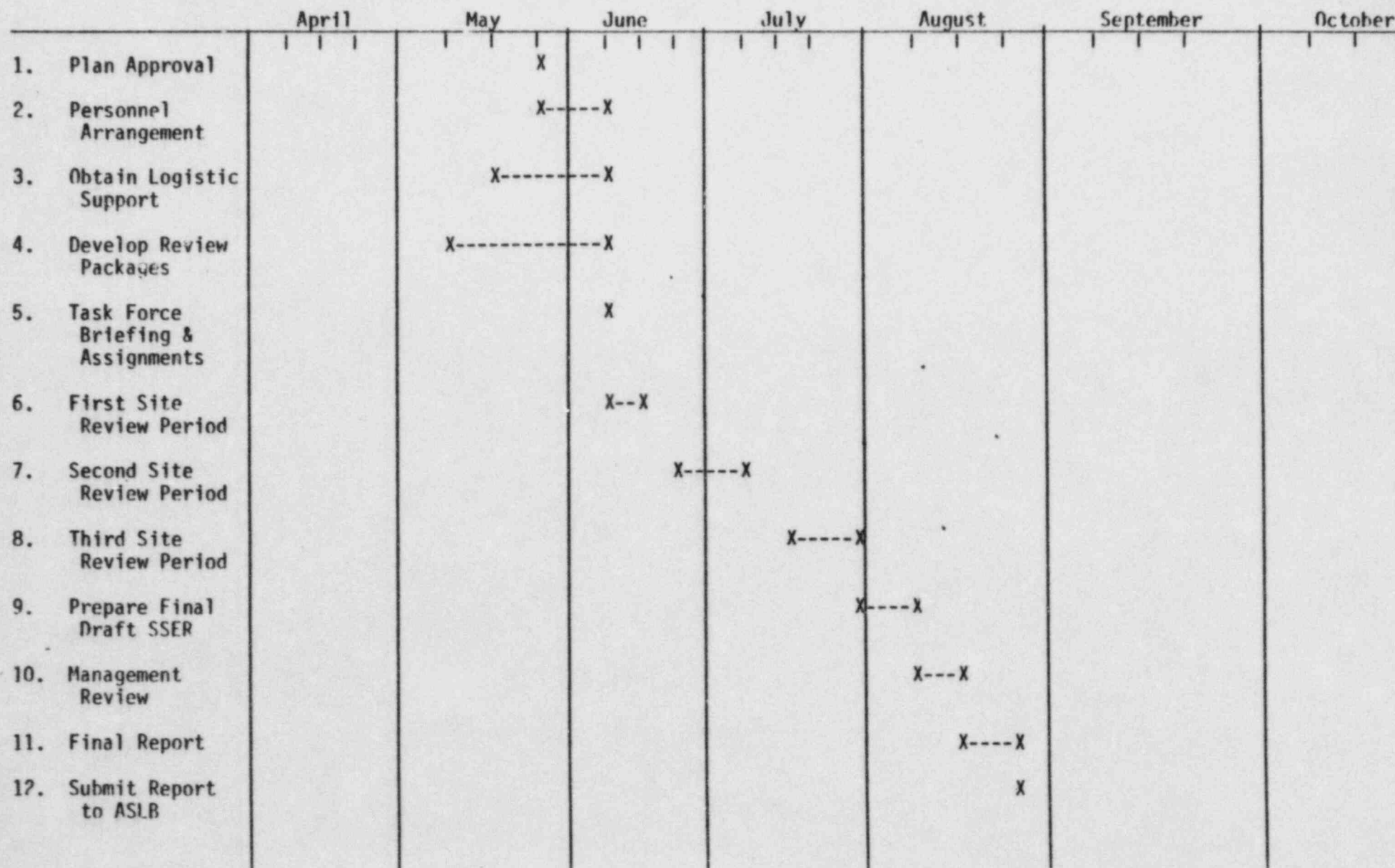




FIGURE 5

## COMANCHE PEAK

Allegations Resolution Schedule



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 24 1984

MEMORANDUM FOR: Those on Attached List

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: FORMATION OF PANEL TO PREPARE NRC STAFF POSITION  
ON COMANCHE PEAK HEARING CONTENTION NO. 5

The staff's formal positions on the Comanche Peak facility are nearing completion. The ASLB Hearings, which have been in progress for three years and are expected to resume in February 1985, have resolved all contentions except Contention No. 5. This contention concerns the Applicants' adherence to QA/QC requirements and is provided as Enclosure 1. The issue of construction QA/QC at Comanche Peak is multi-faceted and is addressed, in part, by many records, documents and in testimony from various sources including the Staff, Applicants, Intervenor, and Aliengers. The background of this contention and associated records span several years. Various NRC offices have been involved, including Region IV, OI, NRR, OELD and IE.

To properly evaluate this contention and to prepare a comprehensive staff position, I am directing the formation of a panel composed of senior managers drawn from your offices. This panel is to be composed of the following individuals:

Edward Jordan, IE (Chairperson)  
Richard Vollmer, NRR  
Alan Herdt, R-II  
Robert Warnick, R-III  
Roger Fortuna, OI

Because of their previous association with Comanche Peak regulatory activities, I am appointing the following advisors to the panel:

Joe Scinto, OELD  
Vince Noonan, NRR ←  
Thomas Ippolito, AEOD  
James Gagliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Bruce Kaplan, EG&G

The advisors may occasionally be asked to assist the panel when issues involving their specific area of expertise are being considered, and I request your support in making them available on an "as-needed basis."

FOIA-85-59

~~85-107-352-XA~~

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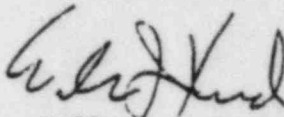
Those on Attached List

-2-

The product of the Panel's effort will be a report similar to a SSER, that states clear staff conclusions regarding this Contention. Enclosure 2 provides the outline of a Charter for this Panel. As the first order of business, the Panel will develop a working Charter which shall be submitted for my approval.

The scheduled completion of the Panel's action is January 31, 1985. I expect the Panel to establish its own schedule, consistent with the resumption of the hearing process. Enclosure 3 provides a proposed milestone summary.

The Panel will work under the direction of Vincent S. Noonan, Director of Comanche Peak Project, and should provide periodic status briefings to the Director of Licensing.



William J. Dircks  
Executive Director  
for Operations

Enclosures: As stated

cc: B. Hayes, OI  
Panel Members  
Panel Advisors

Addressees List:

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Guy H. Cunningham, III  
Executive Legal Director

Jack Heltemes, Director  
Office of the Analysis and  
Evaluation of Operational Data

James P. O'Reilly, Regional Administrator  
Region II

James Keppler, Regional Administrator  
Region III

Robert Martin, Regional Administrator  
Region IV

ENCLOSURE 1

COMANCHE PEAK CONTENTION 5\*

Contention 5. The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC, and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak. (CFUR 4A-ACORN 14-CASE 19 JOINT Contention)

\*Reproduced from Board Order Subsequent to the Pre-hearing Conference of April 30, 1980 (dated June 16, 1980)



## ENCLOSURE 2

### COMANCHE PEAK CONTENTION 5 PANEL CHARTER

#### OBJECTIVES

- 1) To make the staff determination regarding the Applicants' adherence to the QA/QC requirements described in Contention 5.
- 2) Provide a report to management reflecting the panel's determination.
- 3) Provide panel testimony before the Comanche Peak ASLB.

#### PURPOSE

The purpose of this Panel is to integrate the views and experience of senior NRC managers to yield a staff determination regarding Contention 5.

#### MEMBERSHIP

Nelson Grace, IE (Chairperson)  
Richard Vollmer, NRR  
Edward Jordan, IE  
Robert Warnick, R-III  
Alan Herdt, R-II  
Roger Fortuna, OI

#### Advisors

Joe Scinto, OELD  
Vince Nconan, NRR  
Thomas Ippolito, AEOD  
James Gagliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Bruce Kaplan, EG&G

ACTION ITEMS

- 1) Define criteria for judging the adequacy of the Applicants' adherence to the QA/QC requirements described in Contention 5.
- 2) Conduct a records review. The Panel members should examine and analyze the following records.
  - a. CAT Report
  - b. CYGNA Reports
  - c. Hearing Records/Summary Depositions
  - d. OI Reports
  - e. Enforcement Actions
  - f. SALP Reports
  - g. Reg. IV Inspection Reports
  - h. TRT Reports
  - i. Special Review Team Report

To make the workload manageable, summaries of records or briefings to the panel by key individuals associated and familiar with the records may be requested.

- 3) Routinely interface with the Comanche Peak Intimidation Panel and consider input provided by that Panel.
- 4) For each type of records (a.-i.) the team members will prepare a summary of findings highlighting problem areas and root causes, as related to Contention #5.
- 5) The panel, as a body, will consider the finding summaries, briefings provided by key NRC personnel, and other relevant information to develop the staff position on Contention #5 in the format of an SSER.
- 6) The panel will be required as necessary to provide both written and oral testimony before the ASLB.

ENCLOSURE 3

CONTENTION 5 PANEL SCHEDULE

December

January

---

Initial Panel Meeting

Obtain relevant documents

Document Reviews

Consolidate Individual  
views, Develop Panel  
consensus

(Developed by Panel, consistent  
with resumption of hearings at  
the end of January 1985)

Prepare Panel Report

Report Staff Position  
to Management

Prepare Testimony  
for ASLB



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 8 1985

Docket Nos.: 50-445/446

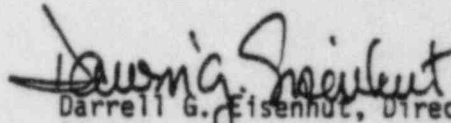
Mr. M. D. Spence, President  
Texas Utilities Generating Company  
400 N. Olive Street  
Lock Box 81  
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Formation of Two Panels Consisting of NRC Senior  
Staff Management to Address Comanche Peak Hearing Issues

On December 24, 1984, the Executive Director for Operations directed the formation of two panels consisting of NRC senior staff management. One panel will prepare the NRC staff position on the Comanche Peak Hearing Contention No. 5. The second panel will prepare the NRC staff position on whether intimidation occurred and make a determination on the effects of any such intimidation on the overall QA/QC Program at Comanche Peak.

A copy of the two memoranda directing the formation of each panel is provided for your information. The Atomic Safety and Licensing Board and operating license proceeding are being notified by a Board Notification. If the Panels wish information from TUEC, arrangements will be made through Mr. Noonan's office.

  
Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosures: As stated

cc: Service List

FOIA-85-59

~~6501140444~~ D / 407  
PDR 3pp

COMANCHE PEAK

Mr. M. D. Spence  
President  
Texas Utilities Generating Company  
400 N. Olive St., L.B. 81  
Dallas, Texas 75201

cc: Nicholas S. Reynolds, Esq.  
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Purcell & Reynolds  
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Wooldridge  
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Dallas, Texas 75201

Mr. Homer C. Schmidt  
Manager - Nuclear Services  
Texas Utilities Generating Company  
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400 North Olive Street  
L. B. 81  
Dallas, Texas 75201

Mr. H. R. Rock  
Gibbs and Hill, Inc.  
393 Seventh Avenue  
New York, New York 10001

Mr. A. T. Parker  
Westinghouse Electric Corporation  
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Renea Hicks, Esq.  
Assistant Attorney General  
Environmental Protection Division  
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Mrs. Juanita Ellis, President  
Citizens Association for Sound  
Energy  
1426 South Polk  
Dallas, Texas 75224

Ms. Nancy H. Williams  
CYGNA  
101 California Street  
San Francisco, California 94111

Mr. James E. Cummins  
Resident Inspector/Comanche Peak  
Nuclear Power Station  
c/o U. S. Nuclear Regulatory  
Commission  
P. O. Box 38  
Glen Rose, Texas 76043

Mr. Robert D. Martin  
U. S. NRC, Region IV  
611 Ryan Plaza Drive  
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Mr. Lanny Alan Sinkin  
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Vice President Nuclear  
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Washington, D. C. 20036

Ms. Billie Pirner Garde  
Citizens Clinic Director  
Government Accountability Project  
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David R. Pigott, Esq.  
Orrick, Herrington & Sutcliffe  
600 Montgomery Street  
San Francisco, California 94111

Anthony Z. Roisman, Esq.  
Trial Lawyers for Public Justice  
2000 P. Street, N. W.  
Suite 611  
Washington, D. C. 20036



cc: Mr. Dennis Kelley  
Resident Inspector - Comanche Peak  
c/o U. S. NRC  
P. O. Box 1029  
Granbury, Texas 76048

Mr. John W. Beck  
Manager - Licensing  
Texas Utilities Electric Company  
Skyway Tower  
400 N. Olive Street  
L. B. 81  
Dallas, Texas 75201

Mr. Jack Redding  
Licensing  
Texas Utilities Generating Company  
4901 Fairmont Avenue  
Bethesda, Maryland 20014



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 24 1984

MEMORANDUM FOR: Those on Attached List

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: FORMATION OF PANEL TO PREPARE NRC STAFF POSITION  
ON COMANCHE PEAK HEARING CONTENTION NO. 5

The staff's formal positions on the Comanche Peak facility are nearing completion. The ASLB Hearings, which have been in progress for three years and are expected to resume in February 1985, have resolved all contentions except Contention No. 5. This contention concerns the Applicants' adherence to QA/QC requirements and is provided as Enclosure 1. The issue of construction QA/QC at Comanche Peak is multi-faceted and is addressed, in part, by many records, documents and in testimony from various sources including the Staff, Applicants, Intervenor, and Allegers. The background of this contention and associated records span several years. Various NRC offices have been involved, including Region IV, OI, NRR, OELD and IE.

To properly evaluate this contention and to prepare a comprehensive staff position, I am directing the formation of a panel composed of senior managers drawn from your offices. This panel is to be composed of the following individuals:

Edward Jordan, IE (Chairperson)  
Richard Vollmer, NRR  
Alan Herdt, R-II  
Robert Warnick, R-III  
Roger Fortuna, OI

Because of their previous association with Comanche Peak regulatory activities, I am appointing the following advisors to the panel:

Joe Scinto, OELD  
Vince Noonan, NRR  
Thomas Ippolito, AEOD  
James Gayliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Bruce Kaplan, EG&G

The advisors may occasionally be asked to assist the panel when issues involving their specific area of expertise are being considered, and I request your support in making them available on an "as-needed basis."

~~85-1494352 KA~~  
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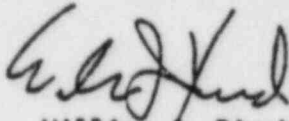
Those on Attached List

-2-

The product of the Panel's effort will be a report similar to a SSER, that states clear staff conclusions regarding this Contention. Enclosure 2 provides the outline of a Charter for this Panel. As the first order of business, the Panel will develop a working Charter which shall be submitted for my approval.

The scheduled completion of the Panel's action is January 31, 1985. I expect the Panel to establish its own schedule, consistent with the resumption of the hearing process. Enclosure 3 provides a proposed milestone summary.

The Panel will work under the direction of Vincent S. Noonan, Director of Comanche Peak Project, and should provide periodic status briefings to the Director of Licensing.



William J. Dircks  
Executive Director  
for Operations

Enclosures: As stated

cc: B. Hayes, OI  
Panel Members  
Panel Advisors

Addressees List:

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Guy H. Cunningham, III  
Executive Legal Director

Jack Heltemes, Director  
Office of the Analysis and  
Evaluation of Operational Data

James P. O'Reilly, Regional Administrator  
Region II

James Keppler, Regional Administrator  
Region III

Robert Martin, Regional Administrator  
Region IV

ENCLOSURE 1

COMANCHE PEAK CONTENTION 5\*

Contention 5. The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC, and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak. (CFUR 4A-ACORN 14-CASE 19 JOINT Contention)

\*Reproduced from Board Order Subsequent to the Pre-hearing Conference of April 30, 1980 (dated June 16, 1980)



ACTION ITEMS :-

- 1) Define criteria for judging the adequacy of the Applicants' adherence to the QA/QC requirements described in Contention 5.
- 2) Conduct a records review. The Panel members should examine and analyze the following records.
  - a. CAT Report
  - b. CYGNA Reports
  - c. Hearing Records/Summary Depositions
  - d. OI Reports
  - e. Enforcement Actions
  - f. SALP Reports
  - g. Reg. IV Inspection Reports
  - h. TRT Reports
  - i. Special Review Team Report

To make the workload manageable, summaries of records or briefings to the panel by key individuals associated and familiar with the records may be requested.

- 3) Routinely interface with the Comanche Peak Intimidation Panel and consider input provided by that Panel.
- 4) For each type of records (a.-i.) the team members will prepare a summary of findings highlighting problem areas and root causes, as related to Contention #5.
- 5) The panel, as a body, will consider the finding summaries, briefings provided by key NRC personnel, and other relevant information to develop the staff position on Contention #5 in the format of an SSER.
- 6) The panel will be required as necessary to provide both written and oral testimony before the ASLB.

## ENCLOSURE 2

### COMANCHE PEAK CONTENTION 5 PANEL CHARTER

#### OBJECTIVES

- 1) To make the staff determination regarding the Applicants' adherence to the QA/QC requirements described in Contention 5.
- 2) Provide a report to management reflecting the panel's determination.
- 3) Provide panel testimony before the Comanche Peak ASLB.

#### PURPOSE

The purpose of this Panel is to integrate the views and experience of senior NRC managers to yield a staff determination regarding Contention 5.

#### MEMBERSHIP

Richard Vollmer, NRR  
Edward Jordan, IE (Chairperson)  
Robert Warnick, R-III  
Alan Herdt, R-II  
Roger Fortuna, OI

#### Advisors

Joe Scinto, OELD  
Vince Noonan, NRR  
Thomas Ippolito, AEOD  
James Gagliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Bruce Kaplan, EG&G

ENCLOSURE 3

CONTENTION 5 PANEL SCHEDULE

December

January

---

Initial Panel Meeting

Obtain relevant documents

Document Reviews

Consolidate Individual  
views, Develop Panel  
consensus

(Developed by Panel, consistent  
with resumption of hearings at  
the end of January 1985)

Prepare Panel Report

Report Staff Position  
to Management

Prepare Testimony  
for ASLB



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 24 1984

MEMORANDUM FOR: Those on Attached List

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: FORMATION OF PANEL TO PREPARE NRC STAFF  
POSITION ON INTIMIDATION AT COMANCHE PEAK

As the work of the Comanche Peak Technical Review Team (TRT) is nearing completion, the staff must evaluate all issues involving intimidation and harassment at Comanche Peak. The ASLB hearings, which have been in progress for three years and are expected to resume in February 1985, have resolved all contentions except Contention No. 5. This contention concerns the Applicant's adherence to QA/QC requirements. As part of developing the staff position on this Contention, the staff must evaluate whether intimidation or harassment against employees or contractors occurred in the past or is now occurring, and make a determination concerning the effects of any such intimidation on the overall QA/QC Program at Comanche Peak.

To properly evaluate the intimidation issue and to prepare a comprehensive staff position, I am directing the formation of a panel, composed of senior managers drawn from your offices. This panel is to be composed of the following individuals:

James Gagliardo, IE (Chairperson)  
Jane Axelrad, IE  
James Lieberman, OELD  
Dorwin Hunter, Region IV

Because of their previous association with Comanche Peak regulatory activities, I am appointing the following individuals as advisors to the panel:

Brooks Griffin, OI  
Thomas Ippolito, AEDD  
Joseph Scinto, OELD  
Vincent Noonan, NRR  
Bruce Kaplan, EG&G

The advisors may be asked to assist the panel when issues involving their specific area of expertise are being considered, and I request your support in making them available on an "as-needed" basis.

The product of the Panel's effort will be a report similar to a SSER, that states clear staff conclusions regarding the occurrence of intimidation and harassment at Comanche Peak. The Charter for this Panel is provided as Enclosure 1. The Charter provides the scope and objectives of the Panel but allows sufficient flexibility to enable the Panel to expand its scope, if necessary.


~~8501400381~~ DR  
6PP

Those on Attached List

-2-

The scheduled completion of the Panel's action is January 31, 1985. I expect the Panel to meet at least once per week and more frequently, if necessary. Enclosure 2 provides a proposed milestone schedule.

The Panel will work under the direction of Vincent S. Noonan, Director of Comanche Peak Project, and should provide periodic status briefings to the Director of Licensing.



William J. Dircks  
Executive Director for Operations

Enclosures: As stated

cc: B. Hayes, OI  
Panel Members  
Panel Advisors



Addressees List:

Harold R. Denfon, Director  
Office of Nuclear Reactor Regulation

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Guy H. Cunningham, III,  
Executive Legal Director

— Jack Heltemes, Director  
Office of the Analysis and  
Evaluation of Operational Data

James Keppler, Regional Administrator  
Region III

Robert Martin, Regional Administrator  
Region IV

ENCLOSURE 1

Comanche Peak Intimidation Panel Charter

OBJECTIVES:

The objectives of the panel are:

- 1) To determine whether intimidation or harassment against employees or contractors occurred in the past or is now occurring at Comanche Peak;
- 2) To determine the extent of the above conditions if they exist(ed) and to identify the circumstances surrounding the events including the personnel involved, the duration, the reasons for its occurrence and the applicant's management corrective actions or recommendations for corrective actions.
- 3) To evaluate any other indicators of poor management practices or attitude toward the identification and correction of quality problems.

PURPOSE:

The panel will provide as products:

- 1) A position on the intimidation question to NRC upper management;
- 2) Input to the Comanche Peak Contention 5 Panel. The Contention 5 Panel will determine the effects of any intimidation on the overall QA/QC Program at Comanche Peak.

MEMBERSHIP:

James Gagliardo, IE (Chairperson)  
Jane Axelrad, IE  
James Lieberman, OELD  
Dorwin Hunter, Region IV  
Bruce Kaplan, EG&G (Advisor)  
Brooks Griffin, OI (Advisor)  
Thomas Ippolito, AEOD (Advisor)  
Joseph Scinto, OELD (Advisor)  
Vincent Noonan, NRR (Advisor)

ACTION ITEMS :-

- 2 -

1. Define criteria for determining whether intimidation or harassment occurred.
2. Conduct as appropriate a review of relevant data bases:
  - a. EG&G report on intimidation (9/84)
  - b. Transcript of EG&G Intimidation Study Team briefing of NRC, applicant's, and intervenor's lawyers
  - c. Enforcement packages related to intimidation.
  - d. Depositions related to intimidation and harassment. (A summary will be sought or prepared as required)
  - e. Proposed Findings on intimidation (staff, applicants and intervenors).
  - f. Transcripts of current ASLB hearings related to intimidation.
  - g. Office of Investigations reports on intimidation and status of outstanding allegations. (B. Griffin should provide briefing on the above)
  - h. Information on Department of Labor Hearings related to the subjects of concern.
3. Interface with CP Contention 5 Panel routinely.
4. Based on the above data and any other relevant data reviewed by the panel, develop a position which meets the stated objectives.
5. Prepare an SSER on intimidation, and provide testimony as required at ASLB hearings.

ENCLOSURE 2.

Intimidation Panel Schedule

December

January

---

—Initial Panel Meeting

Obtain relevant documents

Document Reviews

Consolidate Individual  
views, Develop Panel  
consensus

(Developed by Panel, consistent  
with resumption of hearings at  
the end of January 1985)

Prepare Panel Input to  
QA/QC Panel

Prepare Panel Report  
on Staff's Position



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FEB 28 1985

MEMORANDUM FOR: Those on Attached List

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: PANEL TO PREPARE NRC STAFF POSITION ON COMANCHE PEAK  
HEARING CONTENTION NO. 5

On December 24, 1984, I established the subject panel and provided initial guidance regarding its charter. Since that time, the charter and the panel composition have been clarified to reflect a broader range of expertise and to accommodate agency priorities. This memorandum reflects the panel's charter and changes.

To properly assist the Director, Comanche Peak Project in evaluating Contention 5 and to assist him in the preparation of a comprehensive staff position on Contention 5, a panel composed of senior managers has been formed. The panel is composed of the following individuals:

Edward Jordan, IE (Chairperson)  
Richard Vollmer, IE  
Alan Herdt, R-II  
Robert Warnick, R-III  
James Snizek, DEDROGR  
Ashok Thadani, NRR

This contention concerns the applicant's adherence to QA/QC requirements and is provided as Enclosure 1. The issue of construction QA/QC at Comanche Peak is multifaceted and is addressed, in part, by many records, documents and in testimony from various sources including the staff, applicant, intervenor, and allegers. The background of this contention and associated records span several years. Various NRC offices have been involved, including Region IV, OI, NRR, OELD and IE. Because of their involvement with Comanche Peak regulatory activities, I am appointing the following personnel as resource support to the panel in their areas of expertise:

Joe Scinto, OELD  
Vince Noonan, NRR  
Thomas Ippolito, AEOD  
James Gagliardo, IE  
Brooks Griffin, OI  
Dorwin Hunter, R-IV  
Chet Poslusny, NRR\*  
Ted Sullivan, NRR\*

~~8503130514 PDR~~  
7PP

\*Administrative and technical support as requested by Panel Chairman

FOIA-85-59

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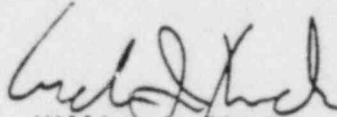


These individuals may be asked to assist in this effort when issues involving their specific area of expertise are being considered, and I request your support in making them available on an "as-needed" basis.

The product of this effort will be the assistance to the Director, Comanche Peak Project, in preparing a position that integrates the staff findings and conclusions regarding this Contention. In addition this effort may require panel members, or the panel as a whole, to be prepared to testify concerning panel recommendations in support of the staff position on Contention 5 as identified by the Director, Comanche Peak Project. Enclosure 2 provides the charter for the panel.

The work schedule of the panel as developed by the Director, Comanche Peak Project, is to be consistent with the hearing schedule and shall be closely coordinated with ELD.

The panel will work under the direction of Vincent S. Noonan, Director, Comanche Peak Project, and should provide periodic status briefings to the Deputy Director, NRR.



William J. Dircks  
Executive Director for Operations

Enclosures: As stated

cc: Panel Members  
Panel Resource Personnel  
T. Murley  
J. Martin

ADDRESSEES FOR MEMORANDUM DATED FEB 28 1985

Victor Stello, Jr, DEDROGR  
Harold R. Denton, NRR  
James Taylor, IE  
Guy H. Cunningham, III, ELD  
Clemens J. Heltemes, AEOD  
Nelson Grace, RII  
James Keppler, RIII  
Robert Martin, RIV  
Ben Hayes, OI

ENCLOSURE 1

COMANCHE PEAK CONTENTION 5\*

Contention 5. The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC) and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak.  
(CFUR 4A-ACORN 14-CASE 19 JOINT Contention)

\*Reproduced from Board Order Subsequent to the Prehearing Conference of April 30, 1980 (dated June 16, 1980)

## ENCLOSURE 2

### COMANCHE PEAK CONTENTION 5 PANEL CHARTER

#### I. PURPOSE

The purpose of this panel is to assist the Director, Comanche Peak Project, to evaluate in an integrated manner the information developed by the staff which bears upon QA/QC and overall plant quality. The objectives are:

- A. To assist the Director, Comanche Peak Project to make the staff determination regarding the findings required by 10 CFR 50.57(a) as related to Contention 5.
- B. To provide an integrated review and feedback to the Director, Comanche Peak Project, on information bearing on Contention 5 along with the identification of problem areas and appropriate recommendations for NRC actions or proposed solutions.
- C. To be prepared to testify as needed individually or as a panel, concerning panel recommendations in support of the staff position on Contention 5 as identified by the Director.

#### II. MEMBERSHIP

Edward Jordan, IE (Chairperson)  
Richard Vollmer, IE  
Alan Herdt, P-II  
Robert Warnick, R-III  
James Sniezek, DEDROGR  
Ashok Thadani, NRR

#### III. PANEL SCOPE

- A. Under the guidance of the Director, Comanche Peak Project the panel shall become familiar with and consider findings of past and current NRC staff activities and applicant actions in response to NRC findings as they relate to the matters addressed in Contention 5. Specifically, the panel shall consider the results of:
  - 1) Region IV inspections
  - 2) CAT inspections

- 3) OI investigations
- 4) Technical Review Team inspections
- 5) Enforcement actions
- 6) Special Review Team inspection
- 7) SALP reports
- 8) Staff analysis of CYGNA Report
- 9) Staff summary of the Hearing Record

Additionally, the panel may examine the result of other staff activities which may bear on their findings related to Contention 5 if directed to do so.

- B. The Director, Comanche Peak Project will arrange for staff members to brief the panel on findings related to Contention 5. The Director will also set up meetings with the intervenor and the applicant to discuss matters which they respectively believe are most significant as related to Contention 5. Any such meetings will be open to the public. The panel should properly characterize the collective concerns raised by the staff, intervenor and applicant and review/comment on the applicants plan to address these concerns. The panel should then advise the Director, Comanche Peak Project on its recommendations.
- C. During conduct of panel activities, the panel should advise the Director, Comanche Peak Project of areas where it appears additional NRC activity may be warranted in order to address the issues raised in Contention 5.

#### IV. PANEL OPERATING PROCEDURES

- A. Panel meetings will be held as established by the Chairperson. The Director, Comanche Peak Project will arrange all meetings with the applicant, intervenor or allengers. Meetings with NRC staff and staff consultants shall be considered predecisional.
- B. A quorum for conduct of panel business will consist of four members. In the temporary absence of the Chairperson, the Chairperson may designate an acting Chairperson.
- C. Briefings by the principal NRC reviewers in each of the areas identified in Section III.A will be obtained. Reviewers will summarize the scope of their reviews, deficiencies noted, root causes of such deficiencies and applicant corrective actions. Likewise, the reviewers are to discuss those areas where no deficiencies were found.
- D. The panel should analyze the information presented by NRC reviewers contained in source documents which the panel reviews, obtained by discussions with the applicant, intervenor and staff and observed during site reviews in arriving at its recommendations regarding Contention 5 and should continually provide feedback to the Director, Comanche Peak Project.



- E. The panel should keep apprised of the ongoing agency activities related to Contention 5 and promptly identify conflicts or problems to the Director, Comanche Peak Project.

V. RECORD AND REPORTING

- A. The panel will work under the direction of Vincent S. Noonan, Director of the Comanche Peak Project, and should provide periodic status briefings to the Deputy Director, NRR.
- B. The panel shall keep such records of activities to assist it in arriving at recommendations regarding Contention 5, as requested by the Director. Such records shall be considered predecisional until staff testimony regarding Contention 5 is provided to the Hearing Board.

AE-13

④

IR 82-29

(category 1)

folder 80

US NUCLEAR REGULATORY COMMISSION

OFFICE OF INVESTIGATIONS

DOCUMENT COVER SHEET

WARNING

82-291

Return to  
N.H.

- ☐ The attached document/report has not been reviewed pursuant to 10 C.F.R. § 2.790(a) exemptions nor has any exempt material been deleted. Do not disseminate nor discuss its contents outside NRC. Treat as "OFFICIAL USE ONLY".
- ☒ Pursuant to 10 C.F.R. § 2.750(a), the attached document/report has been reviewed and all exempt material except proprietary has been deleted. This document/report is suitable for dissemination to licensee, vendor, etc., for a proprietary review.
- ☐ The attached document/report is in PDR form.

DATE: NOV 23 1982

FOIA-85-59

D/G

W/C

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DEC 21 1982

Dockets: 50-445/82-29  
50-446/82-15

Texas Utilities Generating Company  
ATTN: Mr. R. J. Gary, Executive Vice  
President & General Manager  
2001 Bryan Tower  
Dallas, Texas 75201

Gentlemen:

This refers to the investigation conducted by Mr. R. K. Herr of the Office of Investigation, and Messrs. L. E. Martin and D. L. Kelley of our staff during the period August 4 to September 17, 1982, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for the Comanche Peak facility, Units 1 and 2.

Areas examined during the investigation and our findings are discussed in the enclosed investigation report.

Within the scope of this investigation, we found no instance where you failed to meet NRC requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

Should you have any questions concerning this investigation, we will be pleased to discuss them with you.

Sincerely,

Original Signed by  
G. L. MADSEN

G. L. Madsen, Chief  
Reactor Project Branch 1

Enclosure:

Appendix - NRC Investigation Report  
50-445/82-29; 50-446/82-15

cc:

Texas Utilities Generating Company  
ATTN: H. C. Schmidt, Project Manager

2001 Bryan Tower  
Dallas, Texas 75201

D/ES

RPS-A

RPB

DRRP&EP

RA-RIV

FJohnson:ic

Westerman

GLMadsen

JGagliardo

JCollins

DEC 21 1992

bcc to DMB (IE01)

bcc distrib. by RIV:

D. L. Kelley, RRI

R. G. Taylor, RRI

L. E. Martin, RIV

R. K. Herr, OI

J. T. Collins, RA

Info. Systems

RPB1

RPB2

TPB

RIV File

C. Wisner, PAO

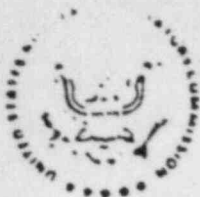
Texas State Dept. Health

Juanita Ellis

David Preister

Richard Fouke





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

OFFICE OF INVESTIGATIONS

DATE: November 23, 1982

REPORT OF INVESTIGATION

TITLE: Comanche Peak Steam Electric Station  
Alleged Electrical Deficiencies

SUPPLEMENTAL: DN 50-445/50-446

CASE NUMBER: 4-82-012

CONTROL OFFICE: REGION IV STATUS: CLOSED

PERIOD OF INVESTIGATION: August 4 - September 17, 1982

REPORTING INVESTIGATOR:

Richard K. Herr  
Richard K. Herr, Acting Director  
OI Field Office, Region IV

PARTICIPATING PERSONNEL:

Lawrence E. Martin, Reactor Inspector  
Reactor Project, Section B, Region IV

D. L. Kelley,  
Senior Resident Reactor Inspector  
Reactor Project, Section A, Region IV

REVIEWED BY:

Roger A. Fortuna  
Roger A. Fortuna, Acting Deputy Director  
Office of Investigations

APPROVED BY:

James A. Fitzgerald  
James A. Fitzgerald, Acting Director  
Office of Investigations

~~8410310193 RR~~



## SUMMARY

Investigation of alleged electrical deficiencies that occurred from August, 1979 to January, 1980 in the construction phase of the Comanche Peak Nuclear Power Plant at Glen Rose, Texas, included an interview of [REDACTED], the review of numerous electrical records, and the inspection by NRC personnel of identified alleged electrical "deficiencies." Investigation disclosed that three of the four basic alleged "deficiencies" were in the areas of non-safety wiring. During August and September, 1982 all alleged deficiencies were examined and no irregularities were found. Review of nonconformance report records did identify similar deficiencies discovered in the December 1979 through January/February 1980 time frame; however, these deficiencies were properly addressed in 1980.

---

DETAILS

Purpose of Investigation

The purpose of this investigation was to investigate allegations of electrical "deficiencies" during the 1979/1980 construction phase of the Comanche Peak Steam Electric Station, Glen Rose, Texas.

Background

On August 4, 1982, [REDACTED] met with NRC Investigator R. K. Herr at the NRC offices in Arlington, Texas. [REDACTED] provided reporting investigator a copy of a statement executed on [REDACTED]

[REDACTED] explained that [REDACTED] worked at the Comanche Peak construction site in the [REDACTED]

[REDACTED] remarked that [REDACTED] alleged "electrical faults of construction" at the Comanche Peak site located in Glen Rose, Texas.

Interview of [REDACTED]

[REDACTED] Brown and Root, contractors for Comanche Peak construction, was interviewed by NRC Investigator R. K. Herr at the construction site located in Glen Rose, Texas. [REDACTED] explained that he was present during the 1979 time frame, and in December 1979, the electrical department created a "termination crew." [REDACTED] stated that this crew would check out all electrical (safety and non-safety) wiring to ensure that work had been accomplished and that the work was done satisfactorily. [REDACTED] remarked that the men assigned to the work crews would submit handwritten reports to show what work was done, where the work was done, and the status of the work. [REDACTED] emphasized that this crew checked the electrical wiring before the Quality Control Inspectors were advised that the electrical wiring was ready for inspection. [REDACTED] explained that the termination crew conducted a preinspection review of all electrical work. [REDACTED] also pointed out that, if a deficiency was noticed and reported, the deficiency would be addressed before the Quality Control Inspector would conduct his inspection. [REDACTED] explained that this extra "check out" by the electrical personnel was used as a management tool to show the electrician where problems arose and to point out various potential deficiencies. [REDACTED] stated that the Quality Control Inspector could still find various deficiencies, and that the practice of utilizing "termination crews" to check the electrical wiring is no longer being used. [REDACTED] remarked that "termination crews" were not a requirement in the Brown and Root procedure or instructions, but were merely an extra check for the electrical department itself, and therefore, none of the handwritten reports or status sheets were kept.



The Review of [REDACTED] Daily Time Sheet

On August 31, 1982, a review of [REDACTED] Daily Time Sheet, [REDACTED] by NRC Investigator R. K. Herr at the Comanche Peak construction site, Glen Rose, Texas was accomplished. This review disclosed that [REDACTED] worked for Brown and Root (contractors) from [REDACTED]. The records further disclosed that from [REDACTED] [REDACTED] worked on non-safety related wiring. According to the records, [REDACTED] worked for the "termination crew" from [REDACTED].

Interview of [REDACTED]

On September 2, 1982, [REDACTED] employed at the Comanche Peak construction project, Glen Rose, Texas, was interviewed by NRC Investigator R. K. Herr and NRC Inspector L. E. Martin at [REDACTED]. [REDACTED] executed a signed sworn statement, Attachment (2), wherein he identified four areas of alleged "deficiencies" and drew a map depicting the exact location of these deficiencies. [REDACTED] further described these deficiencies as follows:

- (1) Motor control center located in the circulation water system: use of 1000 MCM cable, using 750 MCM lug that was drilled to accept larger cable.
- (2) Auxiliary Building, Reactor No. 1: lug designed for an approximate screw size of 3/8 inch was used on a terminal block designed for #10 screws.
- (3) Switch Gear Room, Reactor No. 1, black cable: lug designed for 1/2 inch screws were used on terminal blocks designed for #10 screws.
- (4) Annunciator logic panels, Control Room, Reactor No. 1, black cable: improper cable splicing and wiring to the wrong side of lugs.

[REDACTED] other general allegations of deficiencies identified in his previous statement of June 14, 1982, were addressed in the following manner. [REDACTED] expressed concern with the improper installation and check-out of Cannon type plugs. [REDACTED] was provided NRC Inspection Report 50-445/80-13, dated May 21, 1980. [REDACTED] stated that after reading the NRC Inspection Report, the report answered all his concerns in this area. [REDACTED] had also expressed concern regarding the patching/repairing of damaged cable, faulty grounding, and wiring not protected from abrasions. [REDACTED] was provided eight nonconformance reports covering the above general allegations that were issued from December 20, 1979 to March 18, 1980 and subsequently corrected. [REDACTED], after reviewing the nonconformance reports, stated that the deficiencies identified in the nonconformance reports and subsequent corrections appeared to address the concerns that he identified in his previous statement of June 14, 1982.

[REDACTED] explained that [REDACTED], he was not in a position to determine if his concerns were addressed properly, pointing out that he did not have access to the nonconformance reports or NRC inspection reports. Further, [REDACTED] remarked that most of his work was with non-safety cable. However, he stated that between January 2 and January 11, 1980 he was assigned to the Electrical Department "termination check-out crew" that went around to ensure that all work was done properly, and that some of the items he checked could have been safety related.

[REDACTED] stated that he was unaware of QA/QC activities or procedures that took place subsequent to the check-out crew activities on all safety-related activities. [REDACTED] also expressed concern that when cad-welding was done, welders only protected an area of about 3 feet; however, [REDACTED] had not inspected any of these to determine if any cables had been damaged and could not identify any specific areas for follow-up by NRC.

## Inspection of Alleged Deficiencies

On August 31, 1982, Dennis L. Kelley, NRC Senior Resident Reactor Inspector (SRI), assigned to Comanche Peak, Glen Rose, Texas, met with NRC Investigator R. K. Herr to review the allegations set forth by [REDACTED]

Allegation Number 1: Kelley was able to physically locate the motor control center (MCC) located in the circulating water system, as described in the allegation concerning the use of 1000 MCM cable with a 750 MCM lug. Kelley stated that he inspected the area in question and found no 1000 MCM cable in the motor control center. Kelley reported that he did find one 750 MCM cable in MCC XB3-2 that is matched up to the proper lugs. He also found that the MCC 1B3-2 contained paired 350 MCM cables properly terminated. Kelley remarked that as of August 31, 1982, no improper wiring was evident in the MCC's of the circulating water system.

On September 17, 1982, Kelley advised that the areas of the alleged deficiencies that were identified by [REDACTED] in his statement of September 2, 1982 (see below), were located with the assistance of the maps drawn by [REDACTED]

Allegation Number 2, Auxiliary Building, Reactor No. 1, improper screw size for lugs: Kelley stated that he physically located this area utilizing Map No. 1, and found that there were no washer/screws in panel 5 or 6. However, he did discover a number of screws with attached washers. Kelley explained that upon close examination he found that the washer attached to the screws is an intricate part of the screw (manufactured together) and it not an add-on as it may appear at first glance. Kelley stated that some screws contained brass plate and some contained chrome plate. Kelley remarked that the chrome plate gives the appearance of a steel washer and could easily be mistaken for steel. Kelley concluded that as of September 1982, there was no improper wiring in this area.

Allegation Number 3, Switch Gear Room, Reactor No. 1, improper screw size for lugs: Kelley stated he physically located this area utilizing Map No. 2 and found that the same conditions existed as per Allegation No. 2, above. Kelley added that as of September 1982, when he inspected Switch Gear Room, Reactor No. 1, no improper wiring was observed.

Allegation Number 4, Control Room, Reactor No. 1, splicing and cable termination to wrong side of fuse block with some shaving of the lugs: Kelley stated he physically located this area, using Map No. 3, and found no evidence of shaving or erroneous termination of cable. Kelley further stated that he checked the section in question as well two other sections in the control panel and found that there was no evidence of lugs being shaved and added that blocks were of such a nature that it makes no difference which side accepts power leads. Kelley remarked that there were three blocks located in this area at the time of his examination. He did not find any improper wiring. Kelley confirmed [REDACTED] statement that the wiring in this area is black cable wiring, and is non-safety.



Kelley stated that during his inspection effort, he also examined safety and non-safety cable in the location of ~~XXXXXX~~ concern, utilizing Map No. 4, to determine if any cables were pulled too tight. Kelley explained that the cables are tied off with tie wraps and anchored with adhesive clips to hold wires down and stated he found adequate slack in these cables. Kelley pointed out that these conditions are in existence at the present time. However, he could not comment on the conditions as they existed in January 1980.



atus of Investigation

e status of this investigation is CLOSED.

Attachments

Attachment 1 - [REDACTED] signed statement . . . . . 6-14-82 . COPY ALL

Attachment 2 - [REDACTED] signed sworn statement 9-06-82 ORIG OI:RIV/CY ALL

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RIV Official File Copy

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Dockets: 50-445/82-29  
50-446/82-15

Texas Utilities Generating Company  
ATTN: Mr. R. J. Gary, Executive Vice  
President & General Manager  
2001 Bryan Tower  
Dallas, Texas 75201

Gentlemen:

This refers to the investigation conducted by Mr. R. K. Herr of the Office of Investigation, and Messrs. L. E. Martin and D. L. Kelley of our staff during the period August 4 to September 17, 1982, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for the Comanche Peak facility, Units 1 and 2.

Areas examined during the investigation and our findings are discussed in the enclosed investigation report.

Within the scope of this investigation, we found no instance where you failed to meet NRC requirements.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

Should you have any questions concerning this investigation, we will be pleased to discuss them with you.

Sincerely,

Original Signed by  
G. L. MADSEN

83071140385 PDR  
LP

G. L. Madsen, Chief  
Reactor Project Branch 1

Enclosure:  
Appendix - NRC Investigation Report  
50-445/82-29; 50-446/82-15

FOI 4-85-597  
D/2

RIV Official File Copy

cc:  
Texas Utilities Generating Company  
ATTN: H. C. Schmidt, Project Manager  
2001 Bryan Tower  
Dallas, Texas 75201

OFFICE	D/ES	RPS-A	RPB	DRRP&EP	RA-RIV
NAME	EJohnson:jc	Twesterman	GLMadsen	JGagliardo	JCollins
DATE	12/9/82	12/9/82	12/9/82	12/20/82	12/2/82

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk  
Dallas, Texas 75224

214/946-9446

4-82-012

30 Aug 82

A-82-55

August 4, 1982

Mr. Richard Herr  
Acting Director, Field Office Investigations  
U. S. Nuclear Regulatory Commission  
Room 1114  
Arlington, Texas

Dear Mr. Herr:

I am attaching a copy of the statement of [REDACTED] who states that he worked at the Comanche Peak nuclear power plant until he was arrested there on [REDACTED]

He alleges certain specific electrical faults of construction at Comanche Peak which we believe should be investigated more thoroughly than the only other avenue open to us, that of presenting his statement as a limited appearance statement in the operating license hearings for Comanche Peak. The members of the Board in those proceedings, the NRC Staff attorney Marjorie Rothschild, and the attorney for the Applicants, Nicholas Reynolds, are aware of the alleged's name, his assumed name at the time he worked at the plant, the date he was picked up onsite, and the fact that his allegations concern electrical matters including problems with the control panels. They do not know the specific details of his allegations.

We ask that you expedite this investigation as much as possible and that the following be done:

1. That the investigation be made by you personally.
2. That information regarding your investigation not be given to [REDACTED] or [REDACTED] prior to your making the actual physical investigation yourself.
3. That I be kept apprised of the progress of your investigation.
4. That I be provided with a copy of the investigation report as soon as possible (I assume this would be in the form of an Inspection and Enforcement Report).
5. That the Applicants be asked to waive the usual period for review for proprietary information due to the fact that the Comanche Peak licensing hearings are due to resume September 13.

Sincerely,

CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)

*Juanita Ellis*  
(Mrs.) Juanita Ellis, President

~~8511200301~~  
PDR-IP



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

IR 82-29

OFFICE OF INVESTIGATIONS

DATE: November 23, 1982

REPORT OF INVESTIGATION

TITLE: Comanche Peak Steam Electric Station  
Alleged Electrical Deficiencies

SUPPLEMENTAL: DN 50-445/50-446

CASE NUMBER: 4-82-012

CONTROL OFFICE: REGION IV STATUS: CLOSED

PERIOD OF INVESTIGATION: August 4 - September 17, 1982

REPORTING INVESTIGATOR:

Richard K. Herr  
Richard K. Herr, Acting Director  
OI Field Office, Region IV

PARTICIPATING PERSONNEL:

Lawrence E. Martin, Reactor Inspector  
Reactor Project, Section B, Region IV

William D. Kelley,  
Senior Resident Reactor Inspector  
Reactor Project, Section A, Region IV

REVIEWED BY:

Roger A. Fortuna  
Roger A. Fortuna, Acting Deputy Director  
Office of Investigations

APPROVED BY:

James A. Fitzgerald  
James A. Fitzgerald, Acting Director  
Office of Investigations

~~8410310193 IR~~



## SUMMARY

Investigation of alleged electrical deficiencies that occurred from August, 1979 to January, 1980 in the construction phase of the Comanche Peak Nuclear Power Plant at Glen Rose, Texas, included an interview of [REDACTED], the review of numerous electrical records, and the inspection by NRC personnel of identified alleged electrical "deficiencies." Investigation disclosed that three of the four basic alleged "deficiencies" were in the areas of non-safety wiring. During August and September, 1982 all alleged deficiencies were examined and no irregularities were found. Review of nonconformance report records did identify similar deficiencies discovered in the December 1979 through January/February 1980 time frame; however, these deficiencies were properly addressed in 1980.

DETAILS

Purpose of Investigation

The purpose of this investigation was to investigate allegations of electrical "deficiencies" during the 1979/1980 construction phase of the Comanche Peak Steam Electric Station, Glen Rose, Texas.

Background

On August 4, 1982, [REDACTED] met with NRC Investigator R. K. Herr at the NRC offices in Arlington, Texas. [REDACTED] provided reporting investigator a copy of a statement executed on [REDACTED]. [REDACTED] explained that [REDACTED] worked at the Comanche Peak construction site in the [REDACTED]. [REDACTED] remarked that [REDACTED] alleged "electrical faults of construction" at the Comanche Peak site located in Glen Rose, Texas.

Interview of [REDACTED]

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- (1) Motor control center located in the circulation water system: use of 1000 MCM cable, using 750 MCM lug that was drilled to accept larger cable.
- (2) Auxiliary Building, Reactor No. 1: lug designed for an approximate screw size of 3/8 inch was used on a terminal block designed for #10 screws.
- (3) Switch Gear Room, Reactor No. 1, black cable: lug designed for 1/2 inch screws were used on terminal blocks designed for #10 screws.
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[REDACTED] other general allegations of deficiencies identified in his previous statement of June 14, 1982, were addressed in the following manner. [REDACTED] expressed concern with the improper installation and check-out of Cannon type plugs. [REDACTED] was provided NRC Inspection Report 50-445/80-13, dated May 21, 1980. [REDACTED] stated that after reading the NRC Inspection Report, the report answered all his concerns in this area. [REDACTED] had also expressed concern regarding the patching/repairing of damaged cable, faulty grounding, and wiring not protected from abrasions. [REDACTED] was provided eight nonconformance reports covering the above general allegations that were issued from December 20, 1979 to March 18, 1980 and subsequently corrected. [REDACTED], after reviewing the nonconformance reports, stated that the deficiencies identified in the nonconformance reports and subsequent corrections appeared to address the concerns that he identified in his previous statement of June 14, 1982.

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Allegation Number 1: Kelley was able to physically locate the motor control center (MCC) located in the circulating water system, as described in the allegation concerning the use of 1000 MCM cable with a 750 MCM lug. Kelley stated that he inspected the area in question and found no 1000 MCM cable in the motor control center. Kelley reported that he did find one 750 MCM cable in MCC XB3-2 that is matched up to the proper lugs. He also found that the MCC 1B3-2 contained paired 350 MCM cables properly terminated. Kelley remarked that as of August 31, 1982, no improper wiring was evident in the MCC's of the circulating water system.

On September 17, 1982, Kelley advised that the areas of the alleged deficiencies that were identified by [REDACTED] in his statement of September 2, 1982 (see below), were located with the assistance of the maps drawn by Chandler.

Allegation Number 2, Auxiliary Building, Reactor No. 1, improper screw size for lugs: Kelley stated that he physically located this area utilizing Map No. 1, and found that there were no washer/screws in panel 5 or 6. However, he did discover a number of screws with attached washers. Kelley explained that upon close examination he found that the washer attached to the screws is an intricate part of the screw (manufactured together) and it not an add-on as it may appear at first glance. Kelley stated that some screws contained brass plate and some contained chrome plate. Kelley remarked that the chrome plate gives the appearance of a steel washer and could easily be mistaken for steel. Kelley concluded that as of September 1982, there was no improper wiring in this area.

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Kelley stated that during his inspection effort, he also examined safety and non-safety cable in the location of [REDACTED] concern, utilizing Map No. 4, to determine if any cables were pulled too tight. Kelley explained that the cables are tied off with tie wraps and anchored with adhesive clips to hold wires down and stated he found adequate slack in these cables. Kelley pointed out that these conditions are in existence at the present time. However, he could not comment on the conditions as they existed in January 1980.



Status of Investigation

The status of this investigation is CLOSED.

Attachments

Attachment 1 - [REDACTED] signed statement

6-14-82 COPY ALL

Attachment 2 - [REDACTED] signed sworn statement

9-05-82 ORIG 01:RIV/CY ALL

AH-12

7. Williams

Talked me  
about this  
PT

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF INVESTIGATIONS FIELD OFFICE REGION IV  
811 RYAN PLAZA DRIVE SUITE 100  
ARLINGTON TEXAS 76010

REPORT OF INQUIRY

September 20, 1983

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION:  
ALLEGED POOR MANAGEMENT PRACTICES

REPORT NUMBER: Q4-83-023

1. On September 16, 1983, [redacted] and [redacted] at Comanche Peak Steam Electric Station (CPSES), entered the Office of Investigations Field Office (OIFO), Region IV, and requested the opportunity to talk to an investigator. [redacted] was interviewed at the OIFO, Region IV, by NRC Investigator H. Brooks GRIFFIN. [redacted] stated he was employed at CPSES from [redacted] at which time he quit because he was "unhappy" with his job. [redacted] said his foreman was [redacted] and his general foreman was [redacted].
2. [redacted] stated that [redacted] and [redacted] hired pipefitter [redacted] (not further identified) as an electrician, and once realizing he [redacted] was not trained as an electrician, continued to employ him rather than admit their [redacted] and [redacted] mistake. [redacted] said other electricians (not further identified) were made to perform [redacted] work. [redacted] said that [redacted] was hired in [redacted] and that [redacted] voluntarily terminated his employment with Brown & Root, Inc., in [redacted] 1983 (reason for [redacted] leaving unknown). [redacted] said that after [redacted] quit, he was assigned by [redacted] to rework many of the jobs formerly performed by [redacted]. [redacted] said [redacted] placed a lot of pressure on him to complete this rework.
3. [redacted] complained that pressure was applied by [redacted] wherein he would not allow him to requisition material (not further identified) from the Fat Shop, and that he [redacted] had to find various required materials laying around the site needed to complete these tasks. [redacted] said that [redacted] threatened to fire him or [redacted] for "looking around" (scurrying) for materials, even though it was the [redacted] only source for material.
4. [redacted] also said that [redacted] would give him verbal instructions and would not give him [redacted] the documentation for work he was assigned to perform. [redacted] said he often had to ascertain the problems (not further identified) he was to repair from other workers assigned to the area. [redacted] said that [redacted] would not assist him (provide him with supervision), and regularly accused him of "screwing off" (wasting time). [redacted] said he did his work properly.
5. [redacted] said he did have a problem with 60 or 70 cable tray hangers (not further identified) on elevation 810 in the Safeguards Building which were not constructed according to the instructions contained in the DCAs (Design Change Authorizations). [redacted] stated he could not recall the specific instructions that were violated in the DCAs. [redacted] recalled he used blueprint numbers 8901, 902, and 930 (not further identified) to work on the 60 or 70 hangers.

FOIA-85-597

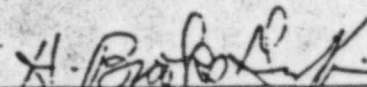
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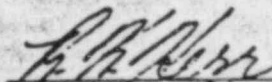
6. This report is provided for your information only. The Office of Investigations Field Office, Region IV, does not plan on conducting any further investigation.

INVESTIGATOR'S NOTE: [REDACTED] was vague regarding specific details relating to his concerns and was unable to provide any further identifying data.



H. Brooks Griffin, Investigator  
Office of Investigations Field Office  
Region IV

APPROVED:



K. K. Herr, Director  
Office of Investigations Field Office  
Region IV

cc: W. J. Ward, QI:HQ  
P. C. Baci, OI:HQ  
✓ C. T. Collins, RIV  
T. F. Westerman, RIV



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

DO NOT DISCLOSE

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REPORT OF INQUIRY

September 20, 1983

SUBJECT:

COMANCHE PEAK STEAM ELECTRIC STATION:  
ALLEGED POOR MANAGEMENT PRACTICES

REPORT NUMBER:

Q4-83-023

AQE-10

FOIA-85-59

D/70

1. On September 16, 1983, [REDACTED], a [REDACTED] at Comanche Peak Steam Electric Station (CPSES), entered the Office of Investigation Field Office (OIFO), Region IV, and requested the opportunity to talk to an investigator. [REDACTED] was interviewed at the OIFO, Region IV, by NRC Investigator H. Brooks GRIFFIN. [REDACTED] stated he was employed at CPSES from [REDACTED] at which time he quit because he was "unhappy" with his job. [REDACTED] said his foreman was [REDACTED] and his general foreman was [REDACTED].
2. [REDACTED] stated that [REDACTED] and H. [REDACTED] hired pipefitter [REDACTED] (not further identified) as an electrician, and once realizing he [REDACTED] was not trained as an electrician, continued to employ him rather than admit their ([REDACTED] and [REDACTED]) mistake. [REDACTED] said other electricians (not further identified) were made to perform [REDACTED] work. [REDACTED] said that [REDACTED] was hired in [REDACTED] and that [REDACTED] voluntarily terminated his employment with Brown & Root, Inc., in [REDACTED] (reason for [REDACTED] leaving unknown). [REDACTED] said that after [REDACTED] quit, he was assigned by [REDACTED] to rework many of the jobs formerly performed by [REDACTED]. [REDACTED] said [REDACTED] placed a lot of pressure on him to complete this rework.
3. [REDACTED] complained that pressure was applied by [REDACTED] wherein he would not allow him to requisition material (not further identified) from the Fab Shop, and that he ([REDACTED]) had to find various required materials laying around the site needed to complete these tasks. [REDACTED] said that [REDACTED] threatened to fire him on [REDACTED] for "looking around" (scrounging) for materials, even though it was his ([REDACTED]) only source for material.
4. [REDACTED] also said that [REDACTED] would give him verbal instructions and would not give him [REDACTED] the documentation for work he was assigned to perform. [REDACTED] said he often had to ascertain the problems (not further identified) he was to repair from other workers assigned to the area. [REDACTED] said that [REDACTED] would not assist him (provide him with supervision), and regularly accused him of "screwing off" (wasting time). [REDACTED] said he did his work properly.
5. [REDACTED] said he did have a problem with 60 or 70 cable tray hangers (not further identified) on elevation 810 in the Safeguards Building which were not constructed according to the instructions contained in the DCAs (Design Change Authorizations). [REDACTED] stated he could not recall the specific instructions that were violated in the DCAs. [REDACTED] recalled he used blueprint numbers 5901, 902, and 930 (not further identified) to work on the 60 or 70 hangers.

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## UNITED STATES

## NUCLEAR REGULATORY COMMISSION

OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV

WILLIAM BLAZA DRIVE, SUITE 1000  
DALLAS, TEXAS 75011

DO NOT DISCLOSE

## REPORT OF INQUIRY

August 29, 1983

SUBJECT:

COMANCHE PEAK STEAM ELECTRIC STATION:  
ALLEGED INTIMIDATION OF ELECTRICAL CRAFT PERSONNEL

REPORT NUMBER:

Q4-83-021

1. On August 23, 1983, [REDACTED] Electrical Department, Brown and Root Incorporated (B&R), Comanche Peak Steam Electric Station (CPSES), telephonically contacted NRC Region IV. [REDACTED] related his concerns regarding activities in the Electrical Department to William Seidle, NRC Branch Chief, Reactor Project Branch, and William Johnson, NRC Section Chief, Reactor Project Section C, Division of Resident Reactor Project & Engineering Program. [REDACTED] requested he be provided confidentiality. On August 23, 1983, information concerning [REDACTED]'s allegations was verbally provided to NRC Investigator D. D. DRISKILL.
2. On August 25, 1983, [REDACTED] was interviewed by NRC Investigators D. D. DRISKILL and W. E. FROST at his residence in [REDACTED]. He provided a signed statement, Attachment (1), and executed a Confidentiality Agreement, Attachment (2). [REDACTED] stated that his primary concern relates to the lack of training B&R provides to Electrical Department personnel at CPSES. He stated these personnel are required to read CPSES Manual S-0910, which is the criteria for fabrication and installation of electrical conduit hangers, during their first day on the job. He stated personnel are then required to sign a form stating that respective individual has read and understands the S-0910 Manual. He explained this manual contains approximately 400 to 500 pages of technical data and is impossible for a person to learn in one day. [REDACTED] explained that B&R offers a voluntary 40-hour training course regarding S-0910, however, this course is offered only during off-duty hours, without pay. [REDACTED] estimated that less than 3% of the Electrical Department personnel attend this course. [REDACTED] stated he believes the on-duty training in S-0910 is inadequate. [REDACTED] stated he believes most electrical personnel do not have an adequate working knowledge of S-0910.
3. [REDACTED] also explained that S-0910 is issued to every foreman for use by his crew. He stated that all of the Electrical Department foreman and general foreman understand their personnel must refer to the S-0910 during the performance of their jobs. [REDACTED] explained that TUGCO has a Work Sampling Group whose personnel walk around the site recording what activity craft personnel are performing. [REDACTED] stated one of the categories of activity noted is "idle." [REDACTED] stated electrical personnel are considered to be "idle," if observed reading S-0910. He stated that as a result of this, electrical personnel are frequently told by all their supervisors that they should not get caught reading S-0910. [REDACTED] stated these circumstances officially discourage the use of the required manual by electrical craft personnel during the performance of their duties.
4. [REDACTED] stated another of his concerns is the poor morale of electrical craft workers. He stated the poor morale is the result of threats and harassment

a training copy of the manual which contains about 1/3 of the actual S-0910 manual. The on-duty training program for S-0910 at CPSES is non-existent. In my opinion this is inadequate for a nuclear facility. I would estimate that less than 3% of the electrical department personnel attend the voluntary class. I believe that the majority of electrical department personnel do not have a working knowledge of the manual. I believe the lack of training contributes to a lot of poor workmanship and poor morale, in that many of our people don't feel very well versed in their occupational requirements. I also know that Electrical QC inspectors are given training, on-duty, in S-0910.

Another problem area relating to S-0910 is the fact that it contains information <sup>for</sup> electrical craft needs to use in doing their job. Our Foreman and General Foreman know we must use this manual in the performance of our jobs. A real problem is created for us by the TJCC Work Sampling Group. Personnel from this group walk around the site preparing a record of what personnel are doing. The various categories personnel are recorded as

TEXAS UTILITIES GENERATING COMPANY  
SKYWAY TOWER \* 400 NORTH OLIVE STREET, L.B. #1 \* DALLAS, TEXAS 75201

BILLY R. CLEMENTS  
VICE PRESIDENT, NUCLEAR OPERATIONS

May 22, 1984

Mr. John T. Collins  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

Dear Mr. Collins:

Enclosed is a copy of our final report dated May 15, 1984, regarding issues surrounding the "T-shirt incident" of March 8, 1984. I believe this report, together with its attachments, accurately reflects the seriousness with which senior management views such matters and the level of effort we put into their investigation and resolution.

Should you have any questions, please advise.

Very truly yours,

*Billy R. Clements*

BRC:ln

Enclosure

cc: Darrell G. Eisenhut w/attachment

FOIA-85-597  
D/316

~~6466151 PDR~~

A DIVISION OF TEXAS UTILITIES ELECTRIC COMPANY

*Ippolito*

*Per review*

*follow up. This  
raises a number  
of questions.*

*DL*

*6.18*

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

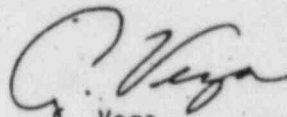
To D. N. Chapman Glen Rose, Texas May 22, 1984  
Subject Transmittal of Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will formally transmit the subject report dated May 15, 1984.

The report concludes that there was no intent on the part of the inspectors to convey any concerns or any message that would reflect adversely on an inspector's objectivity. Accordingly no repercussions and/or disciplinary actions have been or will be taken.

Of the six inspectors that I interviewed on March 9, 1984, two are still working in Unit No. 1 Safeguards Building; one is working in the Unit 1 Control Building; two have left of their own accord; and one is working in Unit 2. All reassignments have been made due to decreased activity in the Unit 1 Safeguards Building and a need for additional resources in the other areas.

We will continue our efforts to promote free expression of concerns without fear of retribution and to maintain a strong and effective QA/QC program at CPSES.



A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements



## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To D. N. Chapman Glen Rose, Texas May 15, 1984

Subject Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will document actions taken as a result of interviews with six (6) electrical inspectors who, on March 8, 1984, wore T-shirts with the phrase "I'm in the business of picking nits". Upon receiving a report of this, TUGCO site management decided to locate them in separate quarters to protect them from potential adverse reaction by other site personnel and to have them conveniently available for interviews. The inspectors were advised that these shirts reflected adversely on their professionalism and objectivity as inspectors.

Concurrent with this action, the inspector's work stations were examined to obtain and secure company property that might be compromised if disciplinary actions were taken. The items secured included copies of Non-Conformance Reports (NCR's) and Inspection Reports (IR's), and original IR's, Master Data Case Work Packages, controlled and "information" drawings, and miscellaneous notes and notebooks. The miscellaneous notes and notebooks were returned to the inspectors the next day. Immediately after, on the same day, an NRC representative confiscated the remaining documents. The following week, we requested the NRC representative to Xerox the original documents in their possession and return the originals to us so that we could proceed with our work. The NRC representative complied with our request.

The inspectors subsequently were interviewed separately by Mr. Boyce Grier on March 8 and 9, 1984, and by Mark Welch and myself on March 9, 1984. Mr. Boyce Grier's report is included as Attachment A. During these meetings several comments and concerns were voiced. Additional interviews with sixteen Electrical QC Inspectors were conducted to obtain as much information as possible in areas of concern.

The following salient points were made during the meetings with different degrees of concurrence among the inspectors interviewed:

1. The inspectors stated a strong displeasure at the publicity that had been given to their wearing of the T-shirts. They attributed a phone call to a newspaper to one person whom they described as "being intelligent but with very little common sense". The person who allegedly called the newspaper was also described as having coined the phrase, and they stated there was no connection between this phrase and any other previous incident at Comanche Peak. The inspectors stated there was no intent to convey a message or concern by wearing these T-shirts. They further pointed out that approximately twenty (20) inspectors had worn these shirts the previous Monday and that "nobody made a big deal about it".



2. They stated that up to about a week before then, there was "finger pointing" going on between building management personnel and QC. They believed QC was being described as uncooperative and causing unnecessary delays. They stated that the main reasons for the delays were inadequate inspection packages provided by the Paper Flow Group and the craft turning in work for inspection prematurely to obtain progress credit. They did note, however, an improvement in the inspection packages since the program was initially implemented as part of the Building Organization Concept. (ATTACHMENTS)
3. Some inspectors voiced a concern with respect to inspection procedures. They believed that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements. 15
4. A concern was voiced over cable terminations. They stated their inspections were identifying problems with lighting terminations and had heard rumors that inspection procedures were being changed to delete such inspections. 1
5. Some inspectors voiced a disagreement with "us as-is" dispositions on Non-Conformance Reports (NCR's), principally because of the number of such dispositions. Management's commitment to quality was questioned because a "use-as-is" disposition did not require craft to build it per the original requirement. Two examples were cited. The two NCR's are included as Attachments B and C. 6
6. Concerns were voiced on documentation. Some inspectors were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving Inspection Reports (IR's) has been a problem. 18

During our meeting, the following points were established:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management has been and remains totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. There was a need to place more emphasis on communicating information to inspectors, especially when inspection procedures are revised such that inspections are reduced in scope or deleted. The reasons, for these actions, such as equipment declassification; alternate inspection programs; or inspection or test provisions (such as prerequisite or preoperational tests) during other project phases, should be communicated. Such communication was also necessary on certain NCR's dispositioned "use-as-is". 6

4. There was a need to promote more feedback and discussion, not only within QA and QC, but with the Engineering and Quality Engineering function.

On March 16, 1984, I was assigned to Comanche Peak as TUGCO Site QA Manager. Concurrently, Quality Engineering was organized also reporting to the Manager, Quality Assurance in Dallas. During meetings at the site on March 16, 1984, with QA and QC supervision, TUGCO's commitments to a safe and reliable plant; to a strong and effective QA/QC organization; to free and open communication at all levels in QA/QC; to an emphasis on QA/QC procedures that assure design commitments are being met; were communicated. Subsequent to that meeting, I issued a letter logged TUQ-1982 dated March 22, 1984, entitled "QA Policy" that reaffirms these commitments. A copy of that letter is included as Attachment D.

Since that letter, I have held meetings with every element of QA and QC organization here on site. TUGCO top management, including Mr. M. D. Spence and Mr. B. R. Clements, have attended some of these meetings with me. A memo to file dated April 30, 1984, reflecting top management involvement, is included as Attachment E.

In regard to the "finger-pointing", the QC inspectors cited inadequate inspection packages and premature submittal of work for inspection as reasons for delays.

The Inspectors stated that they had seen significant improvement in the quality of the packages, attributing the initial problems to "growing pains" with the Paper Flow Groups under the Building Management Concept. However, I have directed that a surveillance be conducted in these areas of concern. A copy of this directive is included as Attachment F. In addition to the above surveillance a task force (the CPSES Monitors Team) has been commissioned by the Assistant Project General Manager and myself to perform an oversight function on the entire records processing activity at Comanche Peak. The Paper Flow Group in each Building Task Force would be included within the inspection scope of the CPSES Monitors Team. The document commissioning this effort is included as Attachment G. This on-going effort will continue to assure QA records are being processed in an efficient and correct manner.

In regard to premature submittal of work for inspection, this matter had already been identified by our trending program. A Corrective Action Request (CAR), logged TUQ-1955, designated CAR-036, dated March 1, 1984, was issued requiring corrective action in four areas where a problem with "failure to assure work is completed correctly prior to a request for inspection" was identified. The Corrective Action Request is included as Attachment H.

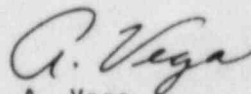
The concern on cable terminations has been addressed. On January 24, 1984, we verbally informed the NRC of a deficiency regarding cable terminations. On March 29, 1984, a final report was submitted in accordance with 10 CFR 50.55(e), describing actions taken. Supporting documentation is on record at CPSES.

Terminations used in junction boxes for power and control cable for 1E applications are qualified in accordance with IEEE 323-1974. The report has been reviewed and approved as meeting all requirements. Contrary to the rumors, Revision 16 to the procedure, which was issued on March 12, 1984 and remains in effect as of this date, continues to provide for removal of the covers of Class 1E power and control junction boxes, and for inspections.

In regard to the lighting terminations, the inspectors were advised that lighting fixtures are not Class 1E. Concerns related to failure of the lighting fixture terminations in the open-circuit and short-circuit mode were discussed with the inspectors involved. Engineering documentation addressing both failure modes was reviewed with them and discussed at length. The inspectors were satisfied that the integrity of the Class 1E power and distribution systems is not compromised.

The investigation clearly indicates that the T-shirts were worn in a spirit of levity, with no intent to convey messages or concerns. A greater number of inspectors had worn the shirts previously without incident. The investigation clearly indicates there was an unwarranted over-reaction on the part of management towards the wearing of the T-shirts on Thursday, March 8, 1984. This over-reaction in itself gave this incident inordinate and inappropriate attention.

Our efforts to encourage QA/QC personnel to voice their concerns is continuing. We continue to emphasize an open-door policy without fear of retribution. Mr. Boyce Grier is making every effort to provide greater visibility to his presence on site. We are continuing to place emphasis, during our training meetings, on reasons for procedural changes and continue to encourage inquiries on dispositions of NCR's, or on any other area of concern. We believe our efforts are being successful. We continue to maintain a highly effective Quality Assurance, Quality Control and Quality Engineering organization at Comanche Peak. We believe that our combined efforts continue to assure that we are building a safe and reliable plant that is in full compliance with all applicable requirements.



A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements



## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT A

## OFFICE MEMORANDUM

To R. G. Tolson

Glen Rose, Texas March 15, 1984

Subject Interviews of Electrical QC Inspectors  
Safeguards Building Task Force

On March 8 and 9, 1984, I conducted interviews of sixteen Electrical QC inspectors assigned to the Safeguards Building Task Force. A summary of the results of the individual interviews is attached. The following is a summary of my analysis of the results in the principal areas discussed during the interviews.

Procedures

Three-fourths of the inspectors interviewed have concerns with respect to inspection procedures. They believe that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements. It is their perception that requirements are being relaxed because inspectors have found too many problems that impact on schedule. They believe this is the reason that post construction inspections are being held up while the procedure is being revised. One inspector felt that inspectors should have more input into procedure changes and opportunity to comment on new procedures and proposed changes. Two inspectors had no problems with procedures and two were silent on the subject. 15

Documentation

Three-fourths of the inspectors interviewed have concerns about documentation. They were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving IR's has been a problem. Five of these inspectors believed that the situation with documentation is improving while two other inspectors said they saw no improvement. Three inspectors had no problems with documentation and one was silent on the subject. 16

Training

Three-fourths of the inspectors either have no problem with training or were silent on the subject. The remaining one-fourth felt that training could be improved. For the training currently being conducted they complained about the instructors who only read a procedure and answered questions during a training session. One felt the training would be more helpful if the instructors would discuss examples of inspection problems and describe how they were resolved. 10

R. G. Tolson  
Page 2  
March 15, 1984

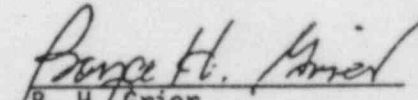
NCR's

None of the inspectors interviewed stated that they have any problem with issuing NCR's. One inspector did say that he had had some problems in the past but none now. One-half of the inspectors stated that they often disagree with the disposition of NCR's, principally because they feel that an excessive number are dispositioned "use-as-is".

Management

Two inspectors expressed concern because management did not seem to care about quality. Two other inspectors expressed the view that Area Management felt QC was overdoing inspections and causing delays in meeting schedules. Two other inspectors were concerned about pressure they perceived from management to meet turnover schedule, and one inspector felt the shutdown of inspections in the areas of post construction verification, separation and lighting was harassment by management.

If you have questions or wish to discuss this matter further, please let me know.

  
B. H. Grier

BHG/b11  
Attachment  
cc: B. R. Clements  
D. N. Chapman



Summary of Interviews With  
Electrical QC Inspectors - Safeguards Task Force

Inspector A

Did pre-post construction inspections. Found many problems in first room inspected. Room not ready for inspection. Followed procedure as written. Found 50-60% bad terminations. Noted evidence of rat damage to cables. Could not get SWA's to look at equipment. Only one SWA issued for pump motor. Training has been good. Documentation is a problem because of missing documents in folders. Three packages obtained today had nothing (DCA's, CMC's, IRN's) in folders. Feels situation with documentation is not improving. Has no problems with issuing NCR's when required. No problems with NCR dispositions.

Inspector B

Short time in Safeguards Task Force. Feels cooperation in Safeguards is not as good as in former group where everything went smooth. Regularly opened junction boxes during post construction inspections in former group. Training going good and has been helpful. Instructors mostly read procedures and respond to questions. Should bring up more examples of inspection problems encountered and discuss resolution. Has no problems with issuing NCR's. No problems with dispositions.

Inspector C

Concerned about newspaper article and statement about damage being done during inspection. Concerned about Area Management statements that QC inspectors are "overdoing their job". Feels that inspection procedures are changed too frequently. Believes terminal blocks which do not have lugs should not be used on safety equipment. Feels reaction when anyone goes to the NRC is intimidation. Believes Safeguard Electrical QC group is feeling heat because they spoke up about problems. Has no problems issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Believes inspectors need more freedom to do their job. Suggested that interviews of inspectors be conducted routinely with random selection of inspectors to be interviewed. Feels craft personnel were back of lock-up of inspectors wearing t-shirts and search of their personal effects. Has been unable to find some IR's in vault.

Inspector D

Feels Safeguard QC group has too many agreements with construction and doesn't follow inspection procedures because of informal arrangements. Concerned about newspaper article and statement about damage being done by inspectors. Finds this statement directed toward entire group to be intimidating. During training some of the QE's just read procedures and sometimes cannot respond to questions. Has problems with documentation packages with missing DCA's and IR's. Experience in the other Area groups is much better and sees no improvement in Safeguards PFG. Turned three packages back this morning because they were incomplete. No problem with issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Feels shutdown of PCV, separation and lighting inspections by Safeguards group when other area groups are not shut down is harassment by QA/QC and craft management.

Inspector E

Has no problem with inspections but feels procedures are changed too frequently. Feels training is alright. Has problems with documentation and receiving incomplete packages from PFG. Has spent more than half day looking for documents. Feels situation with documentation is improving. Has no problems with issuing NCR's but feels too many are dispositioned "use-as-is". Believes procedure changes are in direction of relaxing inspection requirements. Concerned that management doesn't care about quality. Would like to feel that he did a good job in his inspections.

Inspector F

Has concerns about lighting terminations where cable slack is not as prescribed. Inspected three rooms and found problems with 90% of terminations in two rooms but no problems in third room. Variation in results apparently due to difference in workmanship. Feels training is going well. Has had problems with incomplete document packages and IR lists not complete. Has no problems with issuing NCR's. Feels QC works well with engineers to resolve NCR's and has no problems with disposition.

Inspector G

Inspections have found problems with lighting terminations, also with power and control terminations and conduit identification. Feels procedure is being changed because inspectors have been looking too far. Understands Class 1E lighting is not to be inspected. Concerned because evidence of rat damage has been observed. Feels push from Area Management to meet turnover schedule. Has no problems with issuing NCR's. Has no problems with document packages.

Inspector H

Has had problems with interpretation of post construction inspection procedure. Procedure is being changed and feels problems are being resolved. Training will be conducted in revised procedure. Documentation has been a problem because of documents missing from packages. Feels situation is improving. Has no problem with issuing NCR's. Sometimes does not agree with NCR disposition.

Inspector I

Concerned that inspection procedures are being changed to eliminate removing of covers on junction boxes. Feels this may be compromising quality because inspections will be only a cosmetic look. Has problems with response from QE on questions. No problems with documentation. No problems with issuing NCR's. Sometimes does not agree when disposition is "use-as-is".

Inspector J

Has no problems with inspection procedures. Feels training being conducted is good. Has had problem with incomplete document packages but feels situation is improving. Has no problems now with issuing NCR's but has had problems in the past. Feels disposition "use-as-is" is excessive. Has gone to supervisor, QE and engineer to resolve disagreements on disposition. Feels post-construction inspections are being limited. Concerned because QA management and Area Management don't seem to care about quality. Does not believe there is any way equipment is being damaged by inspection.

Inspector K

Concerned because of problems with procedures and shut down of inspections. Has no problems with training. Has problems with incomplete document packages.

Inspector L

Has found number of problems with lighting terminations during inspections. Feels inspections now being limited. Understands inspection procedure is being changed. Believed now procedure will not find problems. Training now going on is reading procedures and responding to questions. No problems with documentation. No problems with issuing NCR's but some problems with dispositions.

Inspector M

Concerned because inspection procedures are being changed frequently. Some procedures have been changed 3-4 times since Task Force was formed. One procedure was changed twice last week. Has found problems with documentation packages. Found four packages concerning same cable tray with different numbers assigned to the packages. Also problem getting DCA's. Previously had own print, but now can't get print when someone else has it checked out. No problems issuing NCR's.

Inspector N

Understands post construction inspection procedure is being revised to relax requirements. Concerned because of problems that have been identified with lighting terminations. Feels procedure requirement for STE or EE present when equipment is opened inhibits inspectors. Has no problems issuing NCR's. Feels electrical problems are not limited to the Safeguards Building. Training being conducted consists of instructor reading inspection procedures and answering questions. Feels documentation support is improving. Has had problem retrieving IR's. Concerned about promotion policy. Feels his pay increase is overdue.

Inspector O

Feels inspection procedures are a problem. There is no system for inspectors to request changes in procedures or for commenting on new procedures. Believes there should be system for feedback from inspectors. Feels there is pressure on craft to meet turnover schedule resulting in conflicts between craft, Area Management and QC. Feels PFG was not ready for Task Force operation. Has had problems with duplicate documentation packages and with retrieving IR's. Two people are assigned to the records vault to correct problems. Has no problems issuing NCR's or with dispositions. Believes inspector training should be improved. Feels testing for certifications is not strict enough.

Inspector P

Has no problems with inspection procedures. Believes Area Management feels that problems with delays are because of QC. Has no problems with training. Feels that documentation problems are being resolved. Has had problems retrieving IR's. Has no problems issuing NCR's. Believes separation was not built-in in the Safeguards Building. Feels that construction training in separation criteria was lacking.



NONCONFC

FOR INFORMATION ONLY

184-00048

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Rm # 35 Safeguard	Class 1 E Conduit	C13G12678	810'	N/A

## NONCONFORMING CONDITION

The aluminum LB (vendor supplied) where flex conduit C13G12678 attaches to CPI-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. # 01081 E, Item # 1. Location is East end of Diesel Generator on skid.

Hold tag applied.

ARMS  
INDEXED

QA RECORD	
RTN.	QA REVIEW
X	30 1/14/84
FILE NO.	
15.1	
SUBJECT NO.	
NCR #	

REFERENCE DOCUMENT: QI-QP 11.3-40 REV 13 1' PARA

REPORTED BY: Eddie Snyder DATE: 1 15 184

ENGINEER REVIEW/APPROVAL: [Signature]	DATE: 1 15 184
ACTION ADDRESSEE: Jones/Conzatti	DEPARTMENT: Electric Eng

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

THE LOOSENESS OF THE VENDOR SUPPLIED AND INSTALLED LB. IS DUE TO THE LB BEING BACKED-OFF ENOUGH TO ALLOW POSITIONING FOR ALIGNMENT TO MEET FIELD CONFIGURATION. WORKMANSHIP AND SYSTEM INTEGRITY HAVE NOT BEEN COMPROMISED; THEREFORE, INSTALLATION IS ACCEPTABLE AS IS.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1 10 184

QA REVIEW APPROVAL: [Signature] DATE: 1 11 184

POSITION VERIFICATION &amp; CLOSURE: [Signature] DATE: 1 14 184

COMMENTS: FINAL IR E-1-0012896



REPORTING PERSONNEL

UNIT	STRUCTURE SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION
1	Sanitary	Condensate	C13612678	810

NONCONFORMING CONDITION

The alum. num L.B. (vendor supplied) where flex cond. C13612678 attaches to CP1-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. # 01081 E. Item # 1 Location is East end of Diesel Generator on skid.  
Hold to supplier.

REFERENCE DOCUMENT: QI QP 11.3 40 REV 13 PARA

REPORTED BY: Eddis Snyder DATE: 1/15/84

QE REVIEW/APPROVAL: [Signature] DATE: 1/15/84

ACTION ADDRESSEE: Jones/Corr. ATT1 DEPARTMENT: Electric

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

The looseness of the vendor supplied and installed L.B. is due to the L.B. being backoff enough to be able to allow positioning for alignment to meet field configuration. Workmanship and system integrity have not been compromised; therefore, installation is acceptable as-is.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1/16/84

QE REVIEW APPROVAL: Charlie Townsend DATE: 1/19/84

DISPOSITION VERIFICATION & CLOSURE: DATE: 1/1

COMMENTS: [Redacted] FOR INFORMATION ONLY [Redacted]

ACTION ADDRESSEE

JE

INSPECTION REPORT

E-1-0012896

Reviewed by Wayne Whithead Level II Date 1/12/84

NONCONFORMING CONDITION **FOR INFORMATION ONLY**

189-00049

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 85 Safeguard	Class 1 E Conduit	C12G04794	810'	N/A

## NONCONFORMING CONDITION

The flex conduit for C12G04794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 <sup>3rd #12</sup> Flex is located in Diesel Generator Room #85 at the F.O. Drip Return - CFI-DOAPDW-02m at the east end of the Diesel Gen. on the South side. Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA       

REPORTED BY:

Eddie Snyder

DATE:

1/5/84

REVIEW/APPROVAL:

DATE:

1/5/84

ACTION ADDRESSEE

Jones / CONTACT!

DEPARTMENT

ELECT ENGR.

## DISPOSITION:

REWORK XXX REPAIR        USE AS IS XXX SCRAP       

1. THE LOOSENESS OF THE FLEX AT THE EQUIPMENT END IS DUE ONLY TO THREAD-PLAY IN THE RE FITTING THAT CONNECTS THE FLEX TO THE EQUIPMENT. THERE IS PROPER THREAD ENGAGEMENT, AND THE WORKMANSHIP HAS NOT BEEN COMPROMISED; THEREFORE INSTALLATION IS ACCEPTABLE AS IS.
2. WHERE FLEX CONNECTS TO THE EMBEDDED CONDUIT, REWORK TO TIGHTEN FLEX

## QA RECORD

RTM	QA REVIEW
<u>2</u>	<u>1/11/84</u>
FILE NO.	<u>15.7</u>
SUBFILE NO.	<u>NCR #</u>

ARMS  
INDEXED

ENG. REVIEW/APPROVAL

Ch. E. Galt

DATE:

1/10/84

QA REVIEW APPROVAL:

CDT Hulse R. D. Pendergast

DATE:

1/12/84

DISPOSITION VERIFICATION &amp; CLOSURE:

H. Johnson

DATE:

1/14/84COMMENTS: FINAL I.R. E-1-0013496

NONCONFORMAL

284-00049

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 55 Safeguard	Class 11 Conduit	C12404794	810'	N/A

## NONCONFORMING CONDITION

The flex conduit for C12404794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 <sup>thru #2</sup> DA Flex is located in Diesel Generator Room #85 at the F.O. Dr. Return CPI-DOAPDW cam at the east end of the Diesel Gen. on the South.

Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA

REPORTED BY: Eddie Smyler DATE: 1/5/84

QE REVIEW/APPROVAL: [Signature] DATE: 1/15/84

ACTION ADDRESSEE: Jones/CONTIN. DEPARTMENT: Elec. &amp; Engr.

DISPOSITION: REWORK (2) XXX REPAIR USE AS IS (1) XXX SCRAP

- (1) The looseness of the flex at the equipment end is due only to thread-play in the RE fitting that connects the flex to the equipment. There is proper thread engagement, and the workmanship has not been compromised; therefore, installation is acceptable as is.
- (2) Where flex connects to the embedded conduit, rework to tighten flex.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1/16/84

QE REVIEW APPROVAL: Charlie Townsend DATE: 1/19/84

DISPOSITION VERIFICATION &amp; CLOSURE: DATE: 1/1

COMMENTS:



## INSPECTION REPORT

ARMS  
INDEXED

DATE \_\_\_\_\_

Reviewed by Wayne Whithead Level II Date 1/13/84



# INSPECTION REPORT

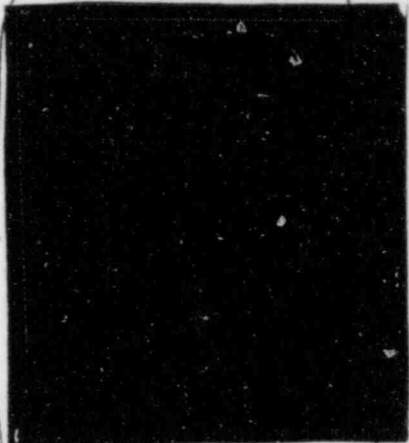
Reviewed by Wendell Pittsford Level II Date 11/14/84

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

QI-QD 11.4-28 Rev. 4  
GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
JOHNNY WASYLYSZYN	<i>Johnny Wasylyszyn</i>	HQ-92	
<i>Seacott Corder</i>	<i>Seacott Corder</i>	HQ-67	
EDDIE NIEDECKEN	<i>Eddie Nuducken</i>	2922	
JAMES UEHLEIN	<i>James Uehlein</i>	E114	
Terry A. Webb	<i>Terry A. Webb</i>	E-116	
Marion Kiernan	<i>M Kiernan</i>	HQ95	
<i>J. FAZI</i>	<i>J. FAZI</i>	HQ169	

*Neill Britton*  
INSTRUCTOR'S SIGNATURE

HOURS OF TRAINING: 45 min.

TIME: 9:20 AM - 10:05 AM

DATE: 4-17-84

DI-QP 11.4-28 Rev. 4

GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

Neil Britton  
INSTRUCTOR'S SIGNATURE, 1-17-84

HOURS OF TRAINING: 8 45 min

TIME: 9:20 AM - 10:05 AM

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

GIVEN BY: Bill Fitch (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)

SIGNATURE

BADGE #

SSN

Wm M. UnderwoodWm M. UnderwoodED68Wm M. FitchWm M. FitchL-777Y. Larry LambY. Larry LambHQ-210Jackie D. BrownJackie D. BrownHR-06

INSTRUCTOR'S SIGNATURE

1 hr. 10 MIN.

HOURS OF TRAINING:

45 MIN

TIME:

9:00A - 9:45A8:00A - 9:10AWb  
4-17-84

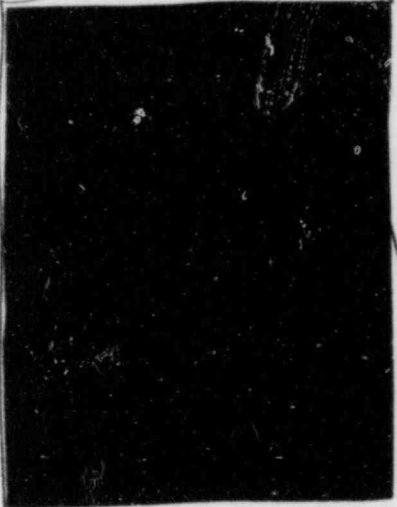


TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

G.T.E.P. 11.4-78 REV. 4GIVEN BY: WILL BUTTER (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>WILL BUTTER</u>	<u>WILL BUTTER</u>	<u>112127</u>	
<u>TRIG PRINSKI</u>	<u>Trig Prinski</u>	<u>4933</u>	
<u>Edward T. Mc Ger</u>	<u>Edward T. Mc Ger</u>	<u>2984</u>	
<u>D. B. Dionne</u>	<u>D. B. Dionne</u>	<u>TUGCO 667</u>	
<u>Paul Higgins</u>	<u>Paul Higgins</u>	<u>HQ-82</u>	
<u>JACK GALLAGHER</u>	<u>Jack Gallagher</u>	<u>Dick 5</u>	
<u>Dennis Finn</u>	<u>Dennis Finn</u>	<u>112127</u>	
<u>WILL BUTTER</u>	<u>WILL BUTTER</u>	<u>112127</u>	

INSTRUCTOR'S SIGNATURE

1 hr 10 MIN.

HOURS OF TRAINING:

45 MIN.

NB

TIME:

9:00A - 9:45A  
8:00A - 9:10A

4-17-84



TUQ-1982

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984  
Subject QA Policy

Effective March 16, 1984, I assumed the position of TUGCO Site QA Manager at Comanche Peak.

I ask for your support in carrying out the following policies and objectives:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management is totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. TUGCO Management strongly supports and encourages all QA/QC personnel to express quality related concerns. I wish to promote free discussion between inspectors, their "leads", QC supervisors and QA management. I wish to encourage the use of the Request for Information and Clarification (RFIC) as a means to communicate questions on procedures and instructions. I also wish to point out the availability of Mr. Boyce Grier to listen to any of your concerns. While your first recourse on concerns should be to your supervision, if you are not satisfied with the response from supervision, or for any reason you prefer not to go to supervision, Mr. Grier is available. I maintain an "open-door" policy. Please feel free to visit with me at any time. I encourage you to voice your concerns without fear of retribution. We will make every effort to address your concerns in a complete manner.
4. Quality Engineering is being reorganized reporting directly to the TUGCO Manager, Quality Assurance in Dallas. This provides an added measure of independence for that organization in order to assure that inspection procedures and instructions accurately reflect design requirements. Quality Engineering will also be working toward improving our program for training on inspection procedures and instructions.

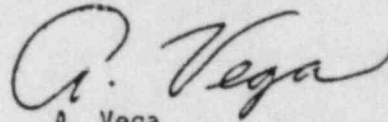
We intend to place more emphasis on systematically informing the affected inspection forces of changes to inspection procedures and instructions, especially when changes appear to relax or delete procedural requirements. Our objective is to communicate reasons for the above changes, such as declassifications, alternate inspection programs or inspections or test provisions during other project phases such as preoperational testing.

Our objective is to continue to promote a high degree of confidence that inspection procedures and instructions, which prescribe inspection work activities, accurately address design requirements.

-2-

I again request your support so that together we can continue to work toward a safe and reliable Comanche Peak Steam Electric Station.

Thank you,

A handwritten signature in cursive script, appearing to read "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT E

## OFFICE MEMORANDUM

To File Glen Rose, Texas April 30, 1984

Subject Top Management Participation in  
Site Meetings with QC Inspectors

This will document Mr. Mike D. Spence's involvement in meetings with QC Inspectors at Comanche Peak S.E.S. These meetings included both informal meetings and formal training classes. The attendance rosters for the formal meetings are attached. Mr. Spence, as President of TUGCO, presented top management's priorities and commitments as they apply to Comanche Peak.

The meetings between Site QA Management and the inspectors were undertaken to personally re-emphasize the QA policy elements documented in memorandum TUQ-1982, dated March 22, 1984, a copy of which is attached.

Mr. Spence stated that Texas Utilities because of its size has many important priorities. However, Texas Utilities has no higher priority than constructing Comanche Peak correctly.

Mr. Spence stated that Site QA Management's commitment to an open door policy and more informative communication is a reflection of his policies. As examples, he stated that inspectors have the right to ask for information and receive information on use-as-is dispositions on NCR's. He supported the intent to inform inspectors of underlying reasons for changes to inspection procedures.

Mr. Spence also emphasized TUGCO's responsibility for the safety of Comanche Peak. He stated his belief that this is a responsibility that TUGCO has accepted and which it cannot delegate to any organization. He stated his belief that quality cannot be legislated; that it must originate with top management support for quality. He further stated that quality cannot be inspected into the plant; that it must be built by the craftsman into the plant. He discussed the economics and the management support for "building it right the first time" as opposed to building it right on the second or third effort. Mr. Spence stated he saw Quality Assurance as an essential tool in assuring an effort is done correctly the first time.

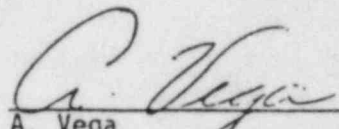
Mr. Spence then opened the meeting for questions, declaring an "open season on the President of TUGCO".

File  
Page 2  
TUQ-2046A

During this part of each meeting, the inspector's questions, concerns and comments were addressed. These included:

- The effect of security measures, in the permanent plant records vault, on inspector's accessibility to records.
- The review of QA records by non-QA organization personnel.
- Possibility of across-the-board salary increases.
- History/purpose of Component Modification Cards (CMC's).
- Plans related to the completion of Unit 2.
- Sources of financing for the project.
- Status of the licensing process.
- State of the nuclear industry, especially plans for new plants, in the present regulatory environment.
- Inquiries as to what TUGCO is doing to present the positive aspects of Comanche Peak.

I believe these meetings have made a significant contribution in improving communications with the inspection forces.

  
A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements  
D. M. Chapman



## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984  
Subject QA Policy

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4. Quality Engineering is being reorganized reporting directly to the TUGCO Manager, Quality Assurance in Dallas. This provides an added measure of independence for that organization in order to assure that inspection procedures and instructions accurately reflect design requirements. Quality Engineering will also be working toward improving our program for training on inspection procedures and instructions.

We intend to place more emphasis on systematically informing the affected inspection forces of changes to inspection procedures and instructions, especially when changes appear to relax or delete procedural requirements. Our objective is to communicate reasons for the above changes, such as declassifications, alternate inspection programs or inspections or test provisions during other project phases such as preoperational testing.

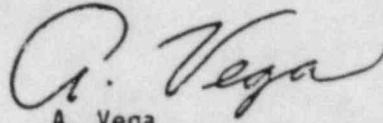
Our objective is to continue to promote a high degree of confidence that inspection procedures and instructions, which prescribe inspection work activities, accurately address design requirements.



-2-

I again request your support so that together we can continue to work toward a safe and reliable Comanche Peak Steam Electric Station.

Thank you.

A handwritten signature in cursive script that reads "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT F

## OFFICE MEMORANDUM

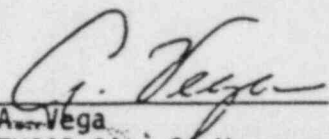
To C. H. Welch Glen Rose, Texas March 21, 1984  
Subject Inspector Interviews

CONFIDENTIAL

Concerns have been expressed related to document packages and duplicate packages with different numbers for the same components, presented to inspectors for their use in conducting inspections.

A concern has also been expressed on the retrieveability of IR's. The problem appears to have been observed during the establishment of work packages related to the integrated building management system. An improvement has been noted in some instances.

Please arrange for a surveillance of this activity and advise me by March 23, 1984, of your schedule for conducting this surveillance.

  
A. Vega  
TUGCO Site QA Manager

AV/b11

cc: B. R. Clements  
D. N. Chapman  
B. H. Grier

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT G

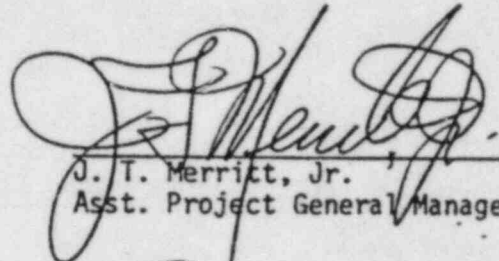
## OFFICE MEMORANDUM

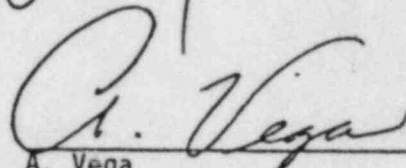
To Distribution Glen Rose, Texas March 30, 1984

Subject COMANCHE PEAK STEAM ELECTRIC STATION

The CPSES Monitors Team is established as a management oversight group under my direction. Its purpose is to monitor records processing activities as they relate to construction and startup activities. Initially, efforts will concentrate on records necessary to complete construction within security boundary of Unit 1 and common. The scope will include all of the departments cited on the attached flow diagram between the points labeled DCC and PPRV/BOP Vaults. Activity reports and recommendations will be made on a regular basis to me and the management of the groups affected.

This team is being chartered as a result of an already successful monitoring effort in DCC and requests made by several building managers. It supplements the existing QA internal audit program.

  
J. T. Merritt, Jr.  
Asst. Project General Manager

  
A. Vega  
TUGCO Site QA Manager

JTM:AV:pew

cc: B. J. Murray  
G. B. Crane  
F. L. Powers  
J. A. Dittmar  
R. D. Gentry  
H. A. Hutchinson  
C. Boyd  
C. Welch  
C. Osborne  
L. M. Richman  
L. D. Platt

J.T. MERRITT

STAFF ADVISOR  
L. RICHMAN

MONITORS GROUP

— L. D. PLATT, LEAD

— J. P. MENARD

— L. H. ROSSON

— J. SWAIN

— D. CALICUTT



DESIGN RECORDS  
GENERATION

RECORDS  
REPOSITORY\*  
(OPERATIONS)

A & E

ENGINEERING\*

VENDORS

\* PERMANENT PLANT  
DRAWINGS

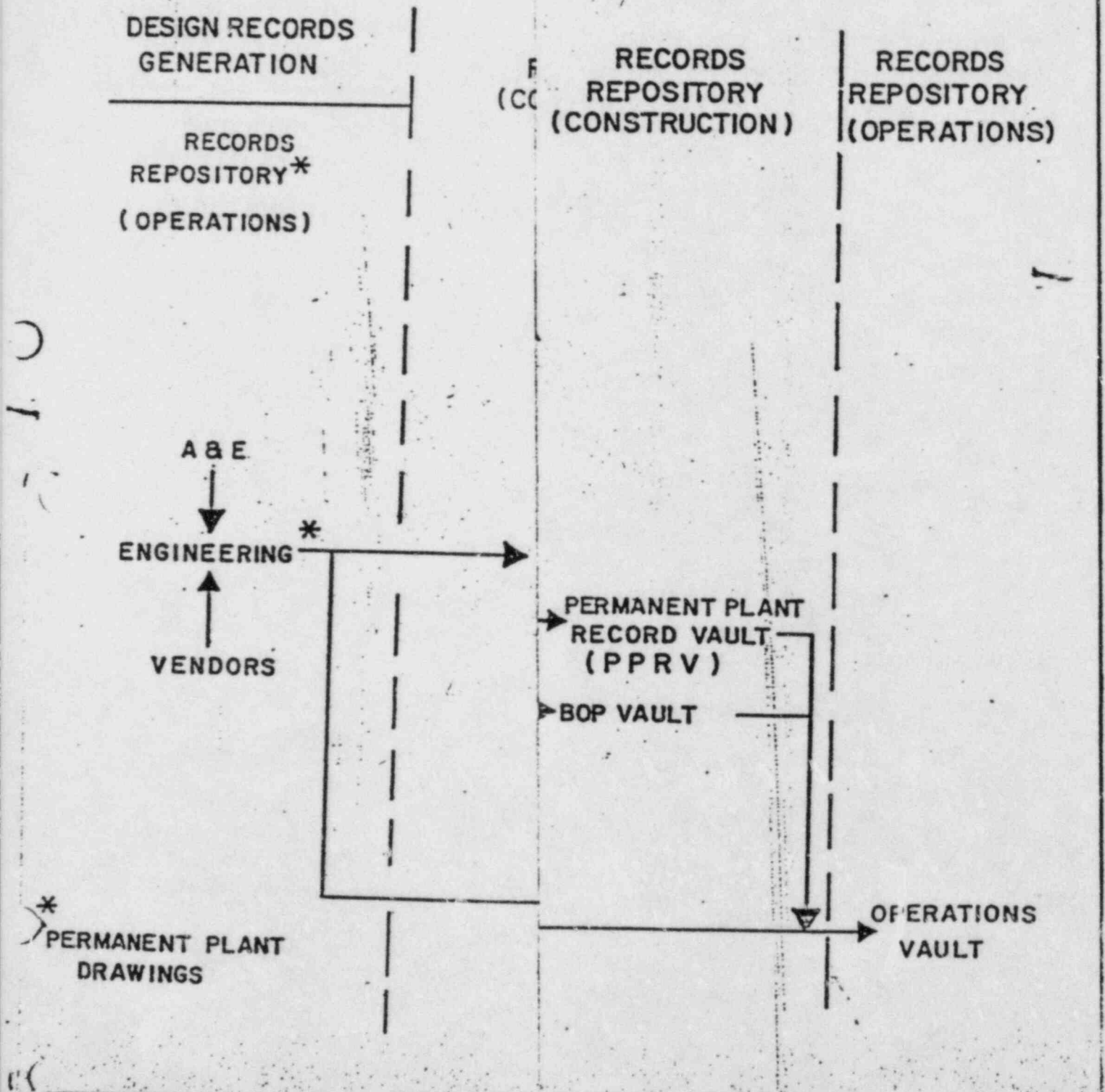
RECORDS  
REPOSITORY  
(CONSTRUCTION)

RECORDS  
REPOSITORY  
(OPERATIONS)

PERMANENT PLANT  
RECORD VAULT  
(PPRV)

BOP VAULT

OPERATIONS  
VAULT





## OFFICE MEMORANDUM

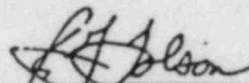
To J. T. Merritt Glen Rose, Texas March 1, 1984Subject Corrective Action Request (CAR-036)  
Control of Deficiencies  
RE: Corrective Action Report Fourth Quarter 1983 (Attachment)

A review of the fourth quarter trend report indicates that the percentage of inspection reports documenting deficiencies is unsatisfactory in several areas and appears to warrant corrective action.

The following shows the type of work inspected, the percentage of inspection reports documenting deficiencies, the major deficiency trend categories, and, based on discussions with inspection supervisors, the apparent causes for the deficiencies:

1. Electrical Cables showed an unsat rate of 14%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure the work is completed correctly prior to a request for inspection.
2. Electrical work other than cables and terminations (E) showed an unsat rate of 12.8%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure work is completed correctly prior to a request for inspection.
3. Miscellaneous Structural Steel (MS) showed an unsat rate of 14.2%. The major trend category is fabrication errors due to misdrilled holes, improper dimensions, and/or improper material. The apparent causes appear to be a lack of clear fabrication requirements and failure to assure work is completed correctly prior to a request for inspection.
4. Protective Coatings (PC) showed an unsat rate of 34.4%. The major trend category is inadequate surface preparation. The apparent cause is a failure to assure work is completed correctly prior to a request for inspection.

Please provide a written response to this office on or before March 16, 1984, describing the action you have taken or intend to take to correct these matters and prevent recurrence and your estimated date for completion of corrective action.



R. G. Tolson  
TUGCO Site QA Supervisor

RGT/BCS/GWP/GAS/pr  
Attachment

cc: J. D. Hicks  
D. N. Chapman

Available on Shelves

August 15, 1984

\* [REDACTED], ExOrdinary Deposition Electrical 7c

August 16, 1984

C. Brandt, Deposition QA/QC, Coatings  
G. Rudy, Prefiled Testimony QA/QC

August 16 & 18, 1984

G. Bennett, Prefiled Testimony QA/QC

August 17, 1984

A. Keys, Prefiled Testimony QA/QC  
N. Britton, Prefiled Testimony QA/QC

August 19, 1984

FOIA-85-59

D/326

S. Haggard, Deposition Coatings  
D. Etheridge, Deposition Coatings  
K. Lipford, Prefiled Testimony QA/QC  
J. Johnson, Prefiled Testimony C/M  
J. Callicut, Prefiled Testimony C/M

\* On Camera can be obtained from Confidential file.

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

BILLY R. CLEMENTS  
VICE PRESIDENT, NUCLEAR OPERATIONS

May 22, 1984

Mr. John T. Collins  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

Dear Mr. Collins:

Enclosed is a copy of our final report dated May 15, 1984, regarding issues surrounding the "T-shirt incident" of March 8, 1984. I believe this report, together with its attachments, accurately reflects the seriousness with which senior management views such matters and the level of effort we put into their investigation and resolution.

Should you have any questions, please advise.

Very truly yours,

*Billy R. Clements*

BRC:ln

Enclosure

cc: Darrell G. Eisenhut w/attachment

*Ippolito*

*Per review*

*follow up. This  
raises a number  
of questions.*

*DL*

*6.18*

*FOIA-85-597  
D/262*

~~8406010051 PDR~~

*36pp*

A DIVISION OF TEXAS UTILITIES ELECTRIC COMPANY

TUQ-2134

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

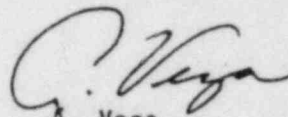
To D. N. Chapman Glen Rose, Texas May 22, 1984  
Subject Transmittal of Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will formally transmit the subject report dated May 15, 1984.

The report concludes that there was no intent on the part of the inspectors to convey any concerns or any message that would reflect adversely on an inspector's objectivity. Accordingly no repercussions and/or disciplinary actions have been or will be taken.

Of the six inspectors that I interviewed on March 9, 1984, two are still working in Unit No. 1 Safeguards Building; one is working in the Unit 1 Control Building; two have left of their own accord; and one is working in Unit 2. All reassignments have been made due to decreased activity in the Unit 1 Safeguards Building and a need for additional resources in the other areas.

We will continue our efforts to promote free expression of concerns without fear of retribution and to maintain a strong and effective QA/QC program at CPSES.



A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements



## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To D. N. Chapman Glen Rose, Texas May 15, 1984Subject Final Report on Issues Resulting  
From Interviews with Electrical Inspectors

This will document actions taken as a result of interviews with six (6) electrical inspectors who, on March 8, 1984, wore T-shirts with the phrase "I'm in the business of picking nits". Upon receiving a report of this, TUGCO site management decided to locate them in separate quarters to protect them from potential adverse reaction by other site personnel and to have them conveniently available for interviews. The inspectors were advised that these shirts reflected adversely on their professionalism and objectivity as inspectors.

Concurrent with this action, the inspector's work stations were examined to obtain and secure company property that might be compromised if disciplinary actions were taken. The items secured included copies of Non-Conformance Reports (NCR's) and Inspection Reports (IR's), and original IR's, Master Data Base Work Packages, controlled and "information" drawings, and miscellaneous notes and notebooks. The miscellaneous notes and notebooks were returned to the inspectors the next day. Immediately after, on the same day, an NRC representative confiscated the remaining documents. The following week, we requested the NRC representative to Xerox the original documents in their possession and return the originals to us so that we could proceed with our work. The NRC representative complied with our request.

The inspectors subsequently were interviewed separately by Mr. Boyce Grier on March 8 and 9, 1984, and by Mark Welch and myself on March 9, 1984. Mr. Boyce Grier's report is included as Attachment A. During these meetings several comments and concerns were voiced. Additional interviews with sixteen Electrical QC Inspectors were conducted to obtain as much information as possible in areas of concern.

The following salient points were made during the meetings with different degrees of concurrence among the inspectors interviewed:

1. The inspectors stated a strong displeasure at the publicity that had been given to their wearing of the T-shirts. They attributed a phone call to a newspaper to one person whom they described as "being intelligent but with very little common sense". The person who allegedly called the newspaper was also described as having coined the phrase, and they stated there was no connection between this phrase and any other previous incident at Comanche Peak. The inspectors stated there was no intent to convey a message or concern by wearing these T-shirts. They further pointed out that approximately twenty (20) inspectors had worn these shirts the previous Monday and that "nobody made a big deal about it".



2. They stated that up to about a week before then, there was "finger pointing" going on between building management personnel and QC. They believed QC was being described as uncooperative and causing unnecessary delays. They stated that the main reasons for the delays were inadequate inspection packages provided by the Paper Flow Group and the craft turning in work for inspection prematurely to obtain progress credit. They did note, however, an improvement in the inspection packages since the program was initially implemented as part of the Building Organization Concept. CATEGORIES
3. Some inspectors voiced a concern with respect to inspection procedures. They believed that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements. 15
4. A concern was voiced over cable terminations. They stated their inspections were identifying problems with lighting terminations and had heard rumors that inspection procedures were being changed to delete such inspections. 1
5. Some inspectors voiced a disagreement with "use-as-is" dispositions on Non-Conformance Reports (NCR's), principally because of the number of such dispositions. Management's commitment to quality was questioned because a "use-as-is" disposition did not require craft to build it per the original requirement. Two examples were cited. The two NCR's are included as Attachments B and C. 6
6. Concerns were voiced on documentation. Some inspectors were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving Inspection Reports (IR's) has been a problem. 18

During our meeting, the following points were established:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management has been and remains totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. There was a need to place more emphasis on communicating information to inspectors, especially when inspection procedures are revised such that inspections are reduced in scope or deleted. The reasons for these actions, such as equipment declassification; alternate inspection programs; or inspection or test provisions (such as prerequisite or preoperational tests) during other project phases, should be communicated. Such communication was also necessary on certain NCR's dispositioned "use-as-is" 6

4. There was a need to promote more feedback and discussion, not only within QA and QC, but with the Engineering and Quality Engineering function.

On March 16, 1984, I was assigned to Comanche Peak as TUGCO Site QA Manager. Concurrently, Quality Engineering was organized also reporting to the Manager, Quality Assurance in Dallas. During meetings at the site on March 16, 1984, with QA and QC supervision, TUGCO's commitments to a safe and reliable plant; to a strong and effective QA/QC organization; to free and open communication at all levels in QA/QC; to an emphasis on QA/QC procedures that assure design commitments are being met; were communicated. Subsequent to that meeting, I issued a letter logged TUQ-1982 dated March 22, 1984, entitled "QA Policy" that reaffirms these commitments. A copy of that letter is included as Attachment D.

Since that letter, I have held meetings with every element of QA and QC organization here on site. TUGCO top management, including Mr. M. D. Spence and Mr. B. R. Clements, have attended some of these meetings with me. A memo to file dated April 30, 1984, reflecting top management involvement, is included as Attachment E.

In regard to the "finger-pointing", the QC inspectors cited inadequate inspection packages and premature submittal of work for inspection as reasons for delays.

The Inspectors stated that they had seen significant improvement in the quality of the packages, attributing the initial problems to "growing pains" with the Paper Flow Groups under the Building Management Concept. However, I have directed that a surveillance be conducted in these areas of concern. A copy of this directive is included as Attachment F. In addition to the above surveillance a task force (the CPSES Monitors Team) has been commissioned by the Assistant Project General Manager and myself to perform an oversight function on the entire records processing activity at Comanche Peak. The Paper Flow Group in each Building Task Force would be included within the inspection scope of the CPSES Monitors Team. The document commissioning this effort is included as Attachment G. This on-going effort will continue to assure QA records are being processed in an efficient and correct manner.

In regard to premature submittal of work for inspection, this matter had already been identified by our trending program. A Corrective Action Request (CAR), logged TUQ-1955, designated CAR-036, dated March 1, 1984, was issued requiring corrective action in four areas where a problem with "failure to assure work is completed correctly prior to a request for inspection" was identified. The Corrective Action Request is included as Attachment H.

The concern on cable terminations has been addressed. On January 24, 1984, we verbally informed the NRC of a deficiency regarding cable terminations. On March 29, 1984, a final report was submitted in accordance with 10 CFR 50.55(e), describing actions taken. Supporting documentation is on record at CPSES.

Terminations used in junction boxes for power and control cable for 1E applications are qualified in accordance with IEEE 323-1974. The report has been reviewed and approved as meeting all requirements. Contrary to the rumors, Revision 16 to the procedure, which was issued on March 12, 1984 and remains in effect as of this date, continues to provide for removal of the covers of Class 1E power and control junction boxes, and for inspections.

In regard to the lighting terminations, the inspectors were advised that lighting fixtures are not Class 1E. Concerns related to failure of the lighting fixture terminations in the open-circuit and short-circuit mode were discussed with the inspectors involved. Engineering documentation addressing both failure modes was reviewed with them and discussed at length. The inspectors were satisfied that the integrity of the Class 1E power and distribution systems is not compromised.

The investigation clearly indicates that the T-shirts were worn in a spirit of levity, with no intent to convey messages or concerns. A greater number of inspectors had worn the shirts previously without incident. The investigation clearly indicates there was an unwarranted over-reaction on the part of management towards the wearing of the T-shirts on Thursday, March 8, 1984. This over-reaction in itself gave this incident inordinate and inappropriate attention.

Our efforts to encourage QA/QC personnel to voice their concerns is continuing. We continue to emphasize an open-door policy without fear of retribution. Mr. Boyce Grier is making every effort to provide greater visibility to his presence on site. We are continuing to place emphasis, during our training meetings, on reasons for procedural changes and continue to encourage inquiries on dispositions of NCR's, or on any other area of concern. We believe our efforts are being successful. We continue to maintain a highly effective Quality Assurance, Quality Control and Quality Engineering organization at Comanche Peak. We believe that our combined efforts continue to assure that we are building a safe and reliable plant that is in full compliance with all applicable requirements.

*A. Vega*

A. Vega  
TUGCO Site QA Manager

AV/b11

cc: M. D. Spence  
B. R. Clements



## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT A

## OFFICE MEMORANDUM

To R. G. Tolson Glen Rose, Texas March 15, 1984Subject Interviews of Electrical QC Inspectors  
Safeguards Building Task Force

On March 8 and 9, 1984, I conducted interviews of sixteen Electrical QC inspectors assigned to the Safeguards Building Task Force. A summary of the results of the individual interviews is attached. The following is a summary of my analysis of the results in the principal areas discussed during the interviews. copy

Procedures

Three-fourths of the inspectors interviewed have concerns with respect to inspection procedures. They believe that procedures have been changed too frequently and that changes have been in the direction of relaxing requirements. It is their perception that requirements are being relaxed because inspectors have found too many problems that impact on schedule. They believe this is the reason that post construction inspections are being held up while the procedure is being revised. One inspector felt that inspectors should have more input into procedure changes and opportunity to comment on new procedures and proposed changes. Two inspectors had no problems with procedures and two were silent on the subject. 15

Documentation

Three-fourths of the inspectors interviewed have concerns about documentation. They were experiencing problems with incomplete document packages and with duplicate packages with different numbers for the same component. Several inspectors indicated that retrieving IR's has been a problem. Five of these inspectors believed that the situation with documentation is improving while two other inspectors said they saw no improvement. Three inspectors had no problems with documentation and one was silent on the subject. 18 &  
16

Training

Three-fourths of the inspectors either have no problem with training or were silent on the subject. The remaining one-fourth felt that training could be improved. For the training currently being conducted they complained about the instructors who only read a procedure and answered questions during a training session. One felt the training would be more helpful if the instructors would discuss examples of inspection problems and describe how they were resolved. 10

R. G. Tolson  
Page 2  
March 15, 1984

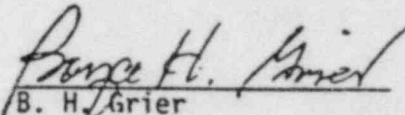
NCR's

None of the inspectors interviewed stated that they have any problem with issuing NCR's. One inspector did say that he had had some problems in the past but none now. One-half of the inspectors stated that they often disagree with the disposition of NCR's, principally because they feel that an excessive number are dispositioned "use-as-is". 6

Management

Two inspectors expressed concern because management did not seem to care about quality. Two other inspectors expressed the view that Area Management felt QC was overdoing inspections and causing delays in meeting schedules. Two other inspectors were concerned about pressure they perceived from management to meet turnover schedule, and one inspector felt the shutdown of inspections in the areas of post construction verification, separation and lighting was harassment by management.

If you have questions or wish to discuss this matter further, please let me know.

  
B. H. Grier

BHG/b11  
Attachment  
cc: B. R. Clements  
D. N. Chapman



Summary of Interviews With  
Electrical QC Inspectors - Safeguards Task Force

(over)

Inspector A

Did pre-post construction inspections. Found many problems in first room inspected. Room not ready for inspection. Followed procedure as written. Found 50-60% bad terminations. Noted evidence of rat damage to cables. Could not get SWA's to look at equipment. Only one SWA issued for pump motor. Training has been good. Documentation is a problem because of missing documents in folders. Three packages obtained today had nothing (DCA's, CMC's, IRN's) in folders. Feels situation with documentation is not improving. Has no problems with issuing NCR's when required. No problems with NCR dispositions.

1 & 13

10 & 16

Inspector B

Short time in Safeguards Task Force. Feels cooperation in Safeguards is not as good as in former group where everything went smooth. Regularly opened junction boxes during post construction inspections in former group. Training going good and has been helpful. Instructors mostly read procedures and respond to questions. Should bring up more examples of inspection problems encountered and discuss resolution. Has no problems with issuing NCR's. No problems with dispositions.

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Inspector C

Concerned about newspaper article and statement about damage being done during inspection. Concerned about Area Management statements that QC inspectors are "overdoing their job". Feels that inspection procedures are changed too frequently. Believes terminal blocks which do not have lugs should not be used on safety equipment. Feels reaction when anyone goes to the NRC is intimidation. Believes Safeguard Electrical QC group is feeling heat because they spoke up about problems. Has no problems issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Believes inspectors need more freedom to do their job. Suggested that interviews of inspectors be conducted routinely with random selection of inspectors to be interviewed. Feels craft personnel were back of lock-up of inspectors wearing t-shirts and search of their personal effects. Has been unable to find some IR's in vault.

1

F

6

Inspector D

Feels Safeguard QC group has too many agreements with construction and doesn't follow inspection procedures because of informal arrangements. Concerned about newspaper article and statement about damage being done by inspectors. Finds this statement directed toward entire group to be intimidating. During training some of the QE's just read procedures and sometimes cannot respond to questions. Has problems with documentation packages with missing DCA's and IR's. Experience in the other Area groups is much better and sees no improvement in Safeguards PFG. Turned three packages back this morning because they were incomplete. No problem with issuing NCR's. Feels too many NCR's are dispositioned "use-as-is". Feels shutdown of PCV, separation and lighting inspections by Safeguards group when other area groups are not shut down is harassment by QA/QC and craft management.

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6  
3

Inspector E

Has no problem with inspections but feels procedures are changed too frequently. Feels training is alright. Has problems with documentation and receiving incomplete packages from PFG. Has spent more than half day looking for documents. Feels situation with documentation is improving. Has no problems with issuing NCR's but feels too many are dispositioned "use-as-is". Believes procedure changes are in direction of relaxing inspection requirements. Concerned that management doesn't care about quality. Would like to feel that he did a good job in his inspections.

15  
6

Inspector F

Has concerns about lighting terminations where cable slack is not as prescribed. Inspected three rooms and found problems with 90% of terminations in two rooms but no problems in third room. Variation in results apparently due to difference in workmanship. Feels training is going well. Has had problems with incomplete document packages and IR lists not complete. Has no problems with issuing NCR's. Feels QC works well with engineers to resolve NCR's and has no problems with disposition.

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Inspector G

Inspections have found problems with lighting terminations, also with power and control terminations and conduit identification. Feels procedure is being changed because inspectors have been looking too far. Understands Class 1E lighting is not to be inspected. Concerned because evidence of rat damage has been observed. Feels push from Area Management to meet turnover schedule. Has no problems with issuing NCR's. Has no problems with document packages.

CONDUIT IDENTIFICATION

1  
2

Inspector H

Has had problems with interpretation of post construction inspection procedure. Procedure is being changed and feels problems are being resolved. Training will be conducted in revised procedure. Documentation has been a problem because of documents missing from packages. Feels situation is improving. Has no problem with issuing NCR's. Sometimes does not agree with NCR disposition.

Inspector I

Concerned that inspection procedures are being changed to eliminate removing of covers on junction boxes. Feels this may be compromising quality because inspections will be only a cosmetic look. Has problems with response from QE on questions. No problems with documentation. No problems with issuing NCR's. Sometimes does not agree when disposition is "use-as-is".

Inspector J

Has no problems with inspection procedures. Feels training being conducted is good. Has had problem with incomplete document packages but feels situation is improving. Has no problems now with issuing NCR's but has had problems in the past. Feels disposition "use-as-is" is excessive. Has gone to supervisor, QE and engineer to resolve disagreements on disposition. Feels post construction inspections are being limited. Concerned because QA management and Area Management don't seem to care about quality. Does not believe there is any way equipment is being damaged by inspection.

Inspector K

Concerned because of problems with procedures and shut down of inspections. Has no problems with training. Has problems with incomplete document packages.

Inspector L

Has found number of problems with lighting terminations during inspections. Feels inspections now being limited. Understands inspection procedure is being changed. Believed now procedure will not find problems. Training now going on is reading procedures and responding to questions. No problems with documentation. No problems with issuing NCR's but some problems with dispositions.

Inspector M

Concerned because inspection procedures are being changed frequently. Some procedures have been changed 3-4 times since Task Force was formed. One procedure was changed twice last week. Has found problems with documentation packages. Found four packages concerning same cable tray with different numbers assigned to the packages. Also problem getting DCA's. Previously had own prints but now can't get print when someone else has it checked out. No problems issuing NCR's.

Inspector N

Understands post construction inspection procedure is being revised to relax requirements. Concerned because of problems that have been identified with lighting terminations. Feels procedure requirement for STE or EE present when equipment is opened inhibits inspectors. Has no problems issuing NCR's. Feels electrical problems are not limited to the Safeguards Building. Training being conducted consists of instructor reading inspection procedures and answering questions. Feels documentation support is improving. Has had problem retrieving IR's. Concerned about promotion policy. Feels his pay increase is overdue.

Inspector O

Feels inspection procedures are a problem. There is no system for inspectors to request changes in procedures or for commenting on new procedures. Believes there should be system for feedback from inspectors. Feels there is pressure on craft to meet turnover schedule resulting in conflicts between craft, Area Management and QC. Feels PFG was not ready for Task Force operation. Has had problems with duplicate documentation packages and with retrieving IR's. Two people are assigned to the records vault to correct problems. Has no problems issuing NCR's or with dispositions. Believes inspector training should be improved. Feels testing for certifications is not strict enough.

Inspector P

Has no problems with inspection procedures. Believes Area Management feels that problems with delays are because of QC. Has no problems with training. Feels that documentation problems are being resolved. Has had problems retrieving IR's. Has no problems issuing NCR's. Believes separation was not built-in in the Safeguards Building. Feels that construction training in separation criteria was lacking.



NONCONFC

FOR INFORMATION ONLY

784-00048

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm # 85 Safeguard	Class 1 E Conduit	C13612678	810'	N/A

## NONCONFORMING CONDITION

The aluminum LB (vendor supplied) where flex conduit C13612678 attaches to CP1-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. #01081E, Item #1. Location is East end of Diesel Generator on skid.

Hold tag applied.

ARMS  
INDEXED

QA RECORD	
RTM.	QA REVIEW
X	20 1/14/84
FILE NO.	
151	
SUBMIT NO.	
NCR #	

REFERENCE DOCUMENT: QI-QP 11.3-40 REV 13 1 PARA

REPORTED BY: Eddie Snyder DATE: 1 15 84

DE REVIEW/APPROVAL:	DATE:
<i>[Signature]</i>	1 15 84
ACTION ADDRESSEE	DEPARTMENT
Jones/Conzatti	LECT ENGR

DISPOSITION: Rework \_\_\_\_\_ Repair \_\_\_\_\_ Use as is XXX Scrap \_\_\_\_\_

THE LOOSENESS OF THE VENDOR SUPPLIED AND INSTALLED LB. IS DUE TO THE LB BEING BACKED-OFF ENOUGH TO ALLOW POSITIONING FOR ALIGNMENT TO MEET FIELD CONFIGURATION. WORKMANSHIP AND SYSTEM INTEGRITY HAVE NOT BEEN COMPROMISED; THEREFORE, INSTALLATION IS ACCEPTABLE AS IS.

ENG. REVIEW/APPROVAL *[Signature]* DATE: 1 10 84DE REVIEW APPROVAL: CBT 11/10/84 *[Signature]* DATE: 1 12 84POSITION VERIFICATION & CLOSURE: *[Signature]* DATE: 1 14 84

COMMENTS: FINAL IR E-1-0012896



137 48

REPORTING PERSONNEL

UNIT	STRUCTURE SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION
1	km # 35 Safeguard	Conduit	C13612678	810

## NONCONFORMING CONDITION

The aluminum LB (vendor supplied) where flex conduit C13612678 attaches to CP1-MEATKW-02m is loose. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 E. Item # 1 Location is East end of Diesel Generator on skid.

Hold to supplier.

REFERENCE DOCUMENT: QI QP 11.3 40 REV 13 PARA

REPORTED BY:

Eddie Snyder

DATE:

1/15/84

OE REVIEW/APPROVAL:

DATE:

1/15/84

ACTION ADDRESSEE

Jones/Corr 7.471

DEPARTMENT

Electrical

DISPOSITION:

REWORK

REPAIR

USE AS IS XXX

SCRAP

The looseness of the vendor supplied and installed L.B. is due to the L.B. being backed off enough to allow positioning for alignment to meet field configuration. Workmanship and system integrity have not been compromised; therefore, installation is acceptable as-is.

ENG. REVIEW/APPROVAL

C. E. Conath

DATE:

1/16/84

OE REVIEW APPROVAL:

Charlie Torman

DATE:

1/19/84

DISPOSITION VERIFICATION &amp; CLOSURE:

DATE:

1/1

COMMENTS

FOR INFORMATION ONLY

# INSPECTION REPORT

# INSPECTION REPORT

[illegible]

Reviewed by Wayne Kitchard Level II Date 1/12/84

NONCONF

FOR INFORMATION ONLY

589-00049

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 85 Safeguard	Class 1 E Conduit	C12G04794	810'	N/A

## NONCONFORMING CONDITION

The flex conduit for C12G04794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 <sup>thru #12</sup> DA Flex is located in Diesel Generator Room #85 at the F.O. Drip Return - CP1-DOAPDW-02m at the east end of the Diesel Gen. on the South side. Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA

REPORTED BY:

Eddie Snyder

DATE:

1/5/84

QE REVIEW/APPROVAL:

DATE:

1/15/84

ACTION ADDRESSEE

Jones / COMINT

DEPARTMENT

Elect Engr.

DISPOSITION:

REWORK XXX REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

1. THE LOOSENESS OF THE FLEX AT THE EQUIPMENT END IS DUE ONLY TO THREAD-PLAY IN THE RE FITTING THAT CONNECTS THE FLEX TO THE EQUIPMENT. THERE IS PROPER THREAD ENGAGEMENT, AND THE WORKMANSHIP HAS NOT BEEN COMPROMISED; THEREFORE INSTALLATION IS ACCEPTABLE AS IS.
2. WHERE FLEX CONNECTS TO THE EMBEDDED CONDUIT, REWORK TO TIGHTEN FLEX

QA RECORD

RTM	QA REVIEW
<u>2</u>	<u>1/14/84</u>
FILE NO.	<u>15.1</u>
SUBFILE NO.	<u>NCR #</u>

ARMS  
INDEXED

ENG. REVIEW/APPROVAL

Ch. E. Gith

DATE:

1/10/84

QE REVIEW APPROVAL:

CDT 1/10/84 B. D. Pendley

DATE:

1/12/84

DISPOSITION VERIFICATION &amp; CLOSURE:

H. Johnson

DATE:

1/14/84COMMENTS: FINAL I.R. E-10073496



REPORTING PERSONNEL

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Rm. 55 Safeguard	Class 1 Conduit	C12904794	810'	N/A

NONCONFORMING CONDITION

The flex conduit for C12904794 is loose on both ends. This has been identified on Post Construction Verification Deficiency Report I.D. # 01031 D<sup>th</sup> Flex is located in Diesel Generator Room # 55 at the F.O. Dr., Return CP1-DOAPDW cam at the east end of the Diesel Gen on the South. Hold tag applied

REFERENCE DOCUMENT: QT-QP 11.3-40 REV 13 PARA

REPORTED BY: Eddie Snyder DATE: 1/5/84

QE REVIEW/APPROVAL: [Signature] DATE: 1/15/84

ACTION ADDRESSEE: Jones/CONTACT DEPARTMENT: Elect. 57102

DISPOSITION: REWORK (2) XXX REPAIR USE AS IS (1) XXX SCRAP

- (1) The looseness of the flex at the equipment end is due only to thread-play in the RE fitting that connects the flex to the equipment. There is proper thread engagement, and the workmanship has not been compromised; therefore, installation is acceptable as is.
- (2) Where flex connects to the embedded conduit, rework to tighten flex.

ENG. REVIEW/APPROVAL: [Signature] DATE: 1/16/84

QE REVIEW APPROVAL: Charlie Townsend DATE: 1/19/84

DISPOSITION VERIFICATION & CLOSURE: DATE: 1/1

COMMENTS:

## INSPECTION REPORT

ARMS  
INDEXED

DATE:

Reviewed by Wynne Wilford Level II Date 4/13/84



Reviewed by Wayne Whitehead Level II Date 11/14/84

TUQ-1982

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984

Subject QA Policy

Effective March 16, 1984, I assumed the position of TUGCO Site QA Manager at Comanche Peak.

I ask for your support in carrying out the following policies and objectives:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management is totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. TUGCO Management strongly supports and encourages all QA/QC personnel to express quality related concerns. I wish to promote free discussion between inspectors, their "leads", QC supervisors and QA management. I wish to encourage the use of the Request for Information and Clarification (RFIC) as a means to communicate questions on procedures and instructions. I also wish to point out the availability of Mr. Boyce Grier to listen to any of your concerns. While your first recourse on concerns should be to your supervision, if you are not satisfied with the response from supervision, or for any reason you prefer not to go to supervision, Mr. Grier is available. I maintain an "open-door" policy. Please feel free to visit with me at any time. I encourage you to voice your concerns without fear of retribution. We will make every effort to address your concerns in a complete manner.
4. Quality Engineering is being reorganized reporting directly to the TUGCO Manager, Quality Assurance in Dallas. This provides an added measure of independence for that organization in order to assure that inspection procedures and instructions accurately reflect design requirements. Quality Engineering will also be working toward improving our program for training on inspection procedures and instructions.

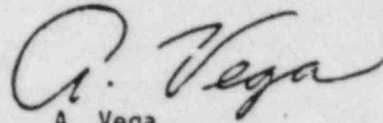
We intend to place more emphasis on systematically informing the affected inspection forces of changes to inspection procedures and instructions, especially when changes appear to relax or delete procedural requirements. Our objective is to communicate reasons for the above changes, such as declassifications, alternate inspection programs or inspections or test provisions during other project phases such as preoperational testing.

Our objective is to continue to promote a high degree of confidence that inspection procedures and instructions, which prescribe inspection work activities, accurately address design requirements.

-2-

I again request your support so that together we can continue to work toward a safe and reliable Comanche Peak Steam Electric Station.

Thank you,

A handwritten signature in cursive script that reads "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT E

## OFFICE MEMORANDUM

To File Glen Rose, Texas April 30, 1984

Subject Top Management Participation in  
Site Meetings with QC Inspectors

This will document Mr. Mike D. Spence's involvement in meetings with QC Inspectors at Comanche Peak S.E.S. These meetings included both informal meetings and formal training classes. The attendance rosters for the formal meetings are attached. Mr. Spence, as President of TUGCO, presented top management's priorities and commitments as they apply to Comanche Peak.

The meetings between Site QA Management and the inspectors were undertaken to personally re-emphasize the QA policy elements documented in memorandum TUQ-1982, dated March 22, 1984, a copy of which is attached.

Mr. Spence stated that Texas Utilities because of its size has many important priorities. However, Texas Utilities has no higher priority than constructing Comanche Peak correctly.

Mr. Spence stated that Site QA Management's commitment to an open door policy and more informative communication is a reflection of his policies. As examples, he stated that inspectors have the right to ask for information and receive information on use-as-is dispositions on NCR's. He supported the intent to inform inspectors of underlying reasons for changes to inspection procedures.

Mr. Spence also emphasized TUGCO's responsibility for the safety of Comanche Peak. He stated his belief that this is a responsibility that TUGCO has accepted and which it cannot delegate to any organization. He stated his belief that quality cannot be legislated; that it must originate with top management support for quality. He further stated that quality cannot be inspected into the plant; that it must be built by the craftsman into the plant. He discussed the economics and the management support for "building it right the first time" as opposed to building it right on the second or third effort. Mr. Spence stated he saw Quality Assurance as an essential tool in assuring an effort is done correctly the first time.

Mr. Spence then opened the meeting for questions, declaring an "open season on the President of TUGCO".

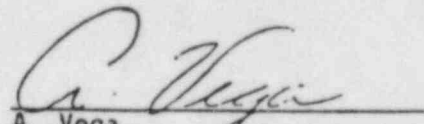


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Page 2  
TUQ-2046A

During this part of each meeting, the inspector's questions, concerns and comments were addressed. These included:

- The effect of security measures, in the permanent plant records vault, on inspector's accessibility to records.
- The review of QA records by non-QA organization personnel.
- Possibility of across-the-board salary increases.
- History/purpose of Component Modification Cards (CMC's).
- Plans related to the completion of Unit 2.
- Sources of financing for the project.
- Status of the licensing process.
- State of the nuclear industry, especially plans for new plants, in the present regulatory environment.
- Inquiries as to what TUGCO is doing to present the positive aspects of Comanche Peak.

I believe these meetings have made a significant contribution in improving communications with the inspection forces.

  
A. Vega  
TUGCO Site QA Manager

AV/b11  
cc: M. D. Spence  
B. R. Clements  
D. N. Chapman




TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

QI-QD 11.4-28 REV. 4  
GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
JOHNNY WASYLYSZYN	<i>Johnny Wasylszyn</i>	HQ-92	
Seacoth Corder	<i>Seacoth Corder</i>	HQ-67	
EDDIE NIEDECKEN	<i>Eddie Nuducken</i>	Z922	
JAMES UHLEIN	<i>James Uehlein</i>	E114	
Terry H. Webb	<i>Terry H. Webb</i>	E-116	
Marion Kiernan	<i>M Kiernan</i>	HQ95	
J. FAZI	<i>J. Fazi</i>	HQ169	

*Neill Britton*  
INSTRUCTOR'S SIGNATURE


HOURS OF TRAINING: 45 min.TIME: 9:20 AM - 10:05 AM

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

QI-QP 11.4-28 Rev. 4  
GIVEN BY: NEILL BRITTON (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>David Miller</u>	<u>David Miller</u>	<u>E894</u>	
<u>GENE JOHNSON</u>	<u>Gene Johnson</u>	<u>SL002</u>	
<u>Loren M. Scott</u>	<u>Loren M. Scott</u>	<u>HQ.201</u>	
<u>RICHARD L. GIBSON</u>	<u>Richard L. Gibson</u>	<u>E125</u>	
<u>DAVID E. ELTHRIDGE</u>	<u>David E. Elthridge</u>	<u>V820</u>	

Neill Britton  
INSTRUCTOR'S SIGNATURE 4-17-84  
HOURS OF TRAINING: 45 min.  
TIME: 9:20 AM - 10:05 AM

DATE: \_\_\_\_\_

GIVEN BY: Bill Felt (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

[illegible]

Will F. Smith  
INSTRUCTOR'S SIGNATURE 1 hr. 10 min.

HOURS OF TRAINING: 45 min

TIME: 9:00A - 9:45A

8:00A - 9:10A

TRAINING RECORD  
COMANCHE PEAK STEAM ELECTRIC STATION

DATE: 4-17-84

THE UNDERSIGNED ACKNOWLEDGE RECEIPT OF SPECIALIZED TRAINING IN:

GT-EP 11.4-29 REV. 4GIVEN BY: Will Feltz (INSTRUCTOR) THIS DATE, AT COMANCHE PEAK PROJECT.

NAME (PRINTED)	SIGNATURE	BADGE #	SSN
<u>Will Feltz</u>	<u>Will Feltz</u>	<u>167197</u>	
<u>TRIF POKINSKI</u>	<u>Trif Pokinski</u>	<u>4933</u>	
<u>Edward T. McSor</u>	<u>Edward T. McSor</u>	<u>2984</u>	
<u>D. B. Dionne</u>	<u>D. B. Dionne</u>	<u>TUGLO 667</u>	
<u>Paul Higgins</u>	<u>Paul Higgins</u>	<u>HQ-82</u>	
<u>JACK GALLAGHER</u>	<u>Jack Gallagher</u>	<u>Dicks</u>	
<u>Dennis Finn</u>	<u>Dennis Finn</u>	<u>11214</u>	
<u>Will Feltz</u>	<u>Will Feltz</u>	<u>167197</u>	

INSTRUCTOR'S SIGNATURE Will FeltzHOURS OF TRAINING: 1 hr 10 min.TIME: 9:00A - 9:10ATIME: 8:00A - 9:10AHB  
4-17-84



## OFFICE MEMORANDUM

To Site QA/QC Personnel Glen Rose, Texas March 22, 1984  
Subject QA Policy

Effective March 16, 1984, I assumed the position of TUGCO Site QA Manager at Comanche Peak.

I ask for your support in carrying out the following policies and objectives:

1. TUGCO Management has been and remains totally committed to a safe and reliable plant in full compliance with all applicable requirements.
2. TUGCO Management is totally dedicated to a strong and effective Quality Assurance/Quality Control program at Comanche Peak.
3. TUGCO Management strongly supports and encourages all QA/QC personnel to express quality related concerns. I wish to promote free discussion between inspectors, their "leads", QC supervisors and QA management. I wish to encourage the use of the Request for Information and Clarification (RFIC) as a means to communicate questions on procedures and instructions. I also wish to point out the availability of Mr. Boyce Grier to listen to any of your concerns. While your first recourse on concerns should be to your supervision, if you are not satisfied with the response from supervision, or for any reason you prefer not to go to supervision, Mr. Grier is available. I maintain an "open-door" policy. Please feel free to visit with me at any time. I encourage you to voice your concerns without fear of retribution. We will make every effort to address your concerns in a complete manner.
4. Quality Engineering is being reorganized reporting directly to the TUGCO Manager, Quality Assurance in Dallas. This provides an added measure of independence for that organization in order to assure that inspection procedures and instructions accurately reflect design requirements. Quality Engineering will also be working toward improving our program for training on inspection procedures and instructions.

We intend to place more emphasis on systematically informing the affected inspection forces of changes to inspection procedures and instructions, especially when changes appear to relax or delete procedural requirements. Our objective is to communicate reasons for the above changes, such as declassifications, alternate inspection programs or inspections or test provisions during other project phases such as preoperational testing.

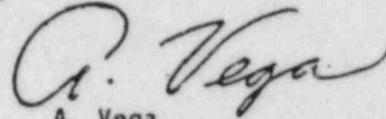
Our objective is to continue to promote a high degree of confidence that inspection procedures and instructions, which prescribe inspection work activities, accurately address design requirements.



-2-

I again request your support so that together we can continue to work toward a safe and reliable Comanche Peak Steam Electric Station.

Thank you,

A handwritten signature in cursive script that reads "A. Vega".

A. Vega  
TUGCO Site QA Manager

AV/b11

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT F

## OFFICE MEMORANDUM

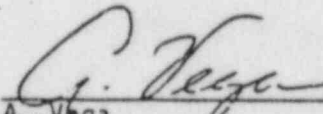
To C. H. Welch Glen Rose, Texas March 21, 1984  
Subject Inspector Interviews

CONFIDENTIAL

Concerns have been expressed related to document packages and duplicate packages with different numbers for the same components, presented to inspectors for their use in conducting inspections. 15

A concern has also been expressed on the retrieveability of IR's. The problem appears to have been observed during the establishment of work packages related to the integrated building management system. An improvement has been noted in some instances. 16

Please arrange for a surveillance of this activity and advise me by March 23, 1984, of your schedule for conducting this surveillance.

  
A. Vega  
TUGCO Site QA Manager

AV/b11

cc: B. R. Clements  
D. N. Chapman  
B. H. Grier

## TEXAS UTILITIES GENERATING COMPANY

ATTACHMENT G

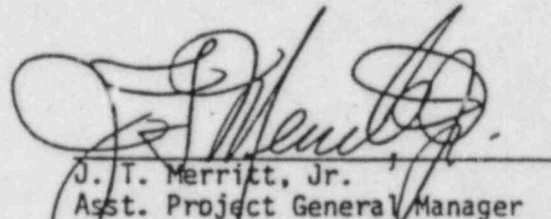
## OFFICE MEMORANDUM

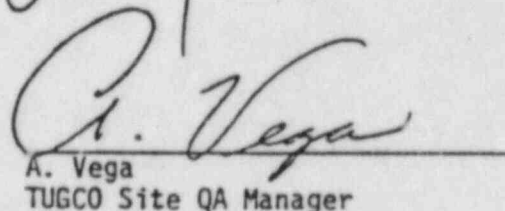
To Distribution Glen Rose, Texas March 30, 1984

Subject COMANCHE PEAK STEAM ELECTRIC STATION

The CPSES Monitors Team is established as a management oversight group under my direction. Its purpose is to monitor records processing activities as they relate to construction and startup activities. Initially, efforts will concentrate on records necessary to complete construction within security boundary of Unit 1 and common. The scope will include all of the departments cited on the attached flow diagram between the points labeled DCC and PPRV/BOP Vaults. Activity reports and recommendations will be made on a regular basis to me and the management of the groups affected.

This team is being chartered as a result of an already successful monitoring effort in DCC and requests made by several building managers. It supplements the existing QA internal audit program.

  
J. T. Merritt, Jr.  
Asst. Project General Manager

  
A. Vega  
TUGCO Site QA Manager

JTM:AV:pew

cc: B. J. Murray  
G. B. Crane  
F. L. Powers  
J. A. Dittmar  
R. D. Gentry  
H. A. Hutchinson  
C. Boyd  
C. Welch  
C. Osborne  
L. M. Richman  
L. D. Platt

J.

STAFF ADVISOR  
L. RICHMAN

MON

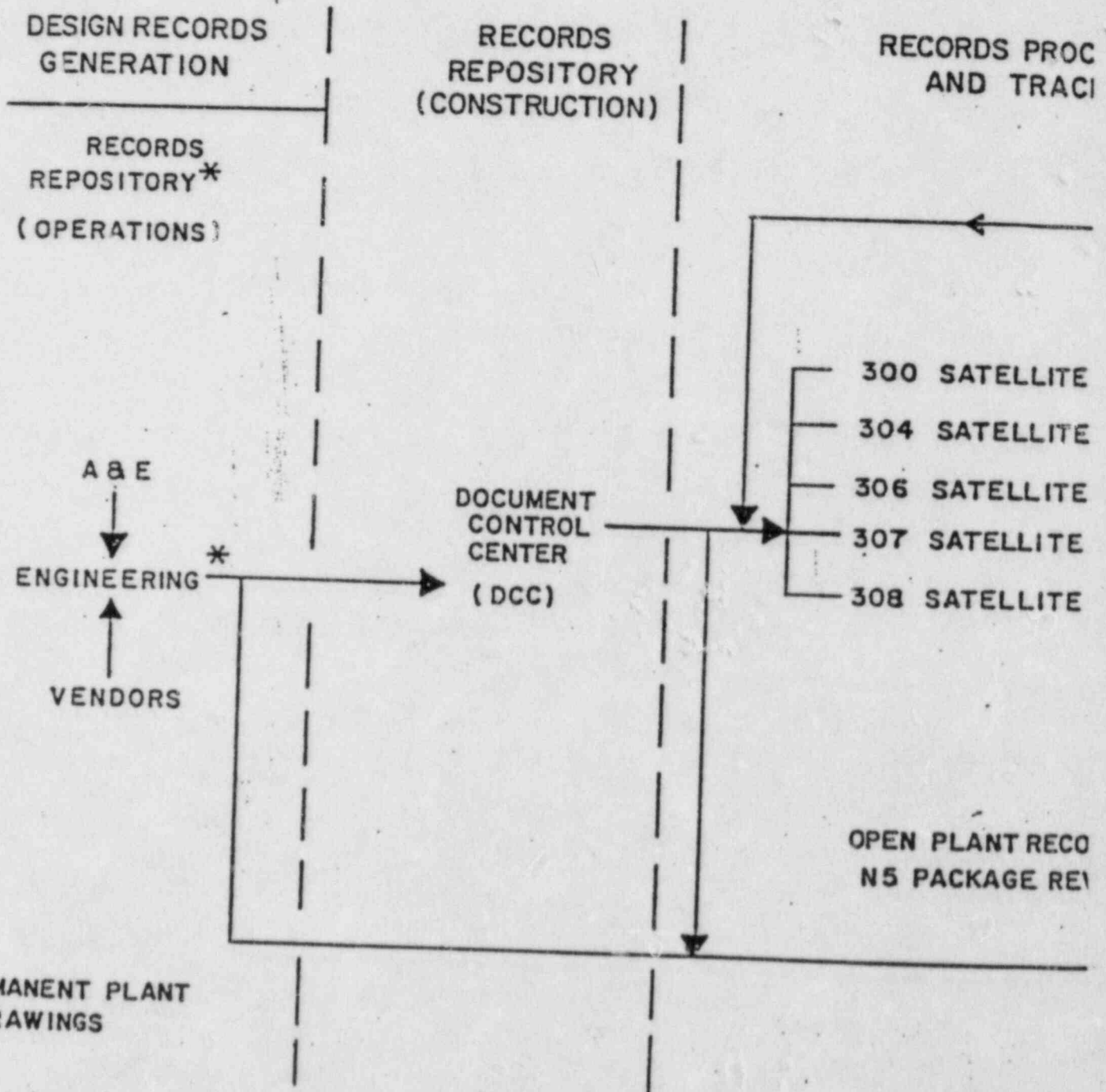
MERRITT

TORS GROUP

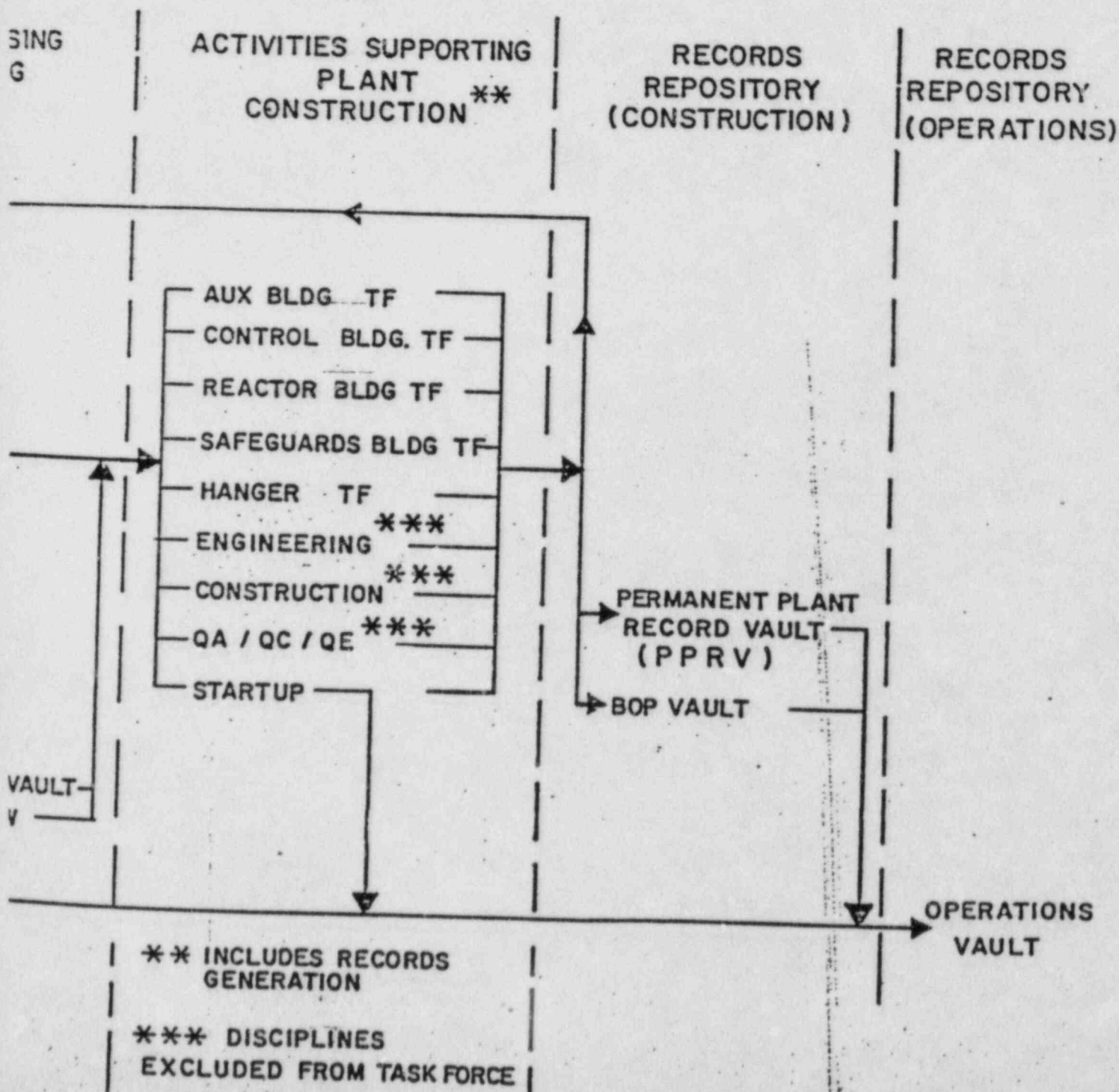
- L. D. PLATT, LEAD
- J. P. MENARD
- L. H. ROSSON
- J. SWAIN
- D. CALICUTT



# CPSES RECORDS



# FLOW PATHS



## OFFICE MEMORANDUM

To J. T. Merritt Glen Rose, Texas March 1, 1984Subject Corrective Action Request (CAR-036)  
Control of Deficiencies

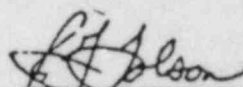
RE: Corrective Action Report Fourth Quarter 1983 (Attachment)

A review of the fourth quarter trend report indicates that the percentage of inspection reports documenting deficiencies is unsatisfactory in several areas and appears to warrant corrective action.

The following shows the type of work inspected, the percentage of inspection reports documenting deficiencies, the major deficiency trend categories, and, based on discussions with inspection supervisors, the apparent causes for the deficiencies:

1. Electrical Cables showed an unsat rate of 14%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure the work is completed correctly prior to a request for inspection.
2. Electrical work other than cables and terminations (E) showed an unsat rate of 12.8%. The major trend category was work incomplete/not per requirements. This trend appears to be caused by a failure to assure work is completed correctly prior to a request for inspection.
3. Miscellaneous Structural Steel (MS) showed an unsat rate of 14.2%. The major trend category is fabrication errors due to misdrilled holes, improper dimensions, and/or improper material. The apparent causes appear to be a lack of clear fabrication requirements and failure to assure work is completed correctly prior to a request for inspection.
4. Protective Coatings (PC) showed an unsat rate of 34.4%. The major trend category is inadequate surface preparation. The apparent cause is a failure to assure work is completed correctly prior to a request for inspection.

Please provide a written response to this office on or before March 16, 1984, describing the action you have taken or intend to take to correct these matters and prevent recurrence and your estimated date for completion of corrective action.



R. G. Tolson  
TUGCO Site QA Supervisor

RGT/BCS/GWP/GAS/pr  
Attachment

cc: J. D. Hicks  
D. N. Chapman



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NOV 9 1984

MEMORANDUM FOR: Darrell G. Eisenhut, Director  
Division of Licensing

FROM: Vincent S. Noonan, Project Director  
for Comanche Peak  
Division of Licensing

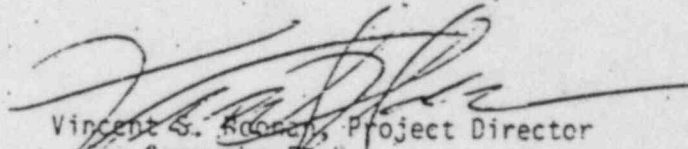
SUBJECT: COMANCHE PEAK ACTION ITEMS - SCHEDULE UPDATE

Enclosed is the first update to the tabulation of Comanche Peak Action Items. This updates the tabulation of October 23, 1984, and provides scheduled actions in the areas of Technical Review Team, Licensing, Inspections, and Legal.

Significant changes are noted below:

- Civil/Electrical/Test Programs alleged feedback interviews are resulting in additional work on SSER sections. SSER issue date rescheduled to 11/20/84.
- Meeting with Applicant on Coatings and Miscellaneous Areas rescheduled from 11/20/84 to 11/21/84.
- Meeting with Applicant on Mechanical and QA areas rescheduled to 12/6/84. This delay is to allow alleged feedback interviews and complete drafting SSER sections.
- Hearing on O.B. Cannon issues is rescheduled for 11/19/84; Hearing on Weld Travelers is rescheduled for 11/26/84. Other Hearing matters are postponed, pending completion of the TRT effort.

I will be pleased to discuss this with you at your request.

  
Vincent S. Noonan, Project Director  
for Comanche Peak  
Division of Licensing

Enclosure: As stated

cc: See next page

Contact: R. Weissman  
49-28432

FOIA-85-59

D/274

~~8512030076 PAR~~

48pp



cc: R. Martin, Region IV  
P. Livermore, Region III (TRT)  
R. Bangart, Region IV  
J. Calvo, TRT  
L. Shao, TRT  
R. Keimig, TRT  
P. Matthews, TRT  
B. Hayes, OI  
R. Herr, OI  
E. Christenbury, OELD  
J. Scinto, OELD  
E. Case, NRR  
R. Vollmer, DE  
R. Bernero, DSI  
H. Thompson, DHFS  
T. Speis, DST  
B. J. Youngblood, DL  
T. Novak, DL  
R. Wessman, DL  
A. Vietti, DL  
R. C. Tang, DL  
W. Olu, TIDC  
P. DeYoung, IE



# TRT ACTION ITEMS

## Area: Civil/Electrical/Test Programs Allegations

Note: Issues in these areas provided to applicant 09/18/84

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
Civil Executive Summary for SSER (Electrical/Test Program summaries complete)	Shao	Complete
Finalize 33 SSER sections	Group Leaders	11/09
Alleger feedback contacts (Arrange interviews)	Tang/Wessman	11/06
Complete major alleger feedback interviews (2-3 interviews to complete week of 11/12)	Jeng/Calvo/Keimig	11/09
Integrate 33 SSER sections into SSER	Tang/Hofmayer	11/09
Draft SSER to management	Tang	11/13
Issue SSER	LB#1	11/20
Complete evaluation of witness "F" allegations and alleger feedback results	Calvo/Keimig/Jeng	12/07
Integrate final results of witness "F" allegations and alleger feedback contacts into supplemental SSER	Tang	12/14
Response to ASLB memo of 10/01/84 on "Concerns on Startup QA"	Keimig	11/30

## Area: Coatings Allegations

Identify applicant actions (all but one)	Matthews	Complete
Draft 7 SSER Sections	Matthews	11/09
Alleger Feedback Contacts (Arrange interviews)	Tang/Wessman	11/09
Complete alleger feedback interviews	Matthews	11/16
Integrate TRT Findings with results of NPR coatings safety analysis	Matthews (CSB, RSB, CPB to assist)	11/16
Include last applicant action item	McCracken	11/16
Meet with applicant	Noonan	11/21
Evaluate results of alleger feedback	Matthews	11/30
Finalize 7 SSER coatings sections	Matthews	11/30
Coatings Executive Summary for SSER	Matthews	11/30
Integrate coatings SSER sections with Mechanical/QA/Misc.	Tang	12/14

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
<u>Area: Mechanical Allegations</u>		
Identify applicant actions	Shao/Hou	Complete
Draft 47 SSER sections	Shao/Hou	11/09
Allegor feedback contacts (Arrange interviews)	Tang/Wessman	11/09
Complete allegor feedback interviews	Shao/Hou	11/30
Meet with applicant	Noonan	12/06
Evaluate results of allegor feedback	Shao	11/30
Finalize 47 SSER mechanical sections	Shao/Hou	12/07
Mechanical allegations executive summary for SSER	Shao/Hou	12/07
Integrate Mechanical SSER section with Coatings/QA/Misc.	Tang/Saffell	12/14
<u>Area: Miscellaneous Allegations</u>		
Identify applicant actions	Bangart	Complete
Draft 21 SSER sections	Bangart	Complete
Allegor feedback contacts (Arrange interviews)	Tang/Wessman	11/09
Complete allegor feedback interviews	Bangart	11/16
Meet with applicant	Noonan	11/21
Evaluate results of allegor feedback	Bangart	11/30
Finalize 21 SSER Misc. sections	Bangart	11/30
Miscellaneous allegations executive summary for SSER	Bangart	11/30
Integrate Misc. section of SSER with Coatings/QA/Mechanical sections	Tang/Saffell	12/14
<u>Area: QA/QC Allegations</u>		
Draft 69 SSER sections	Livermore	11/23
Identify applicant actions	Livermore	11/23
Allegor feedback contacts (Arrange interviews)	Tang/Wessman	11/09
Re-examine liner plate issue with Witness "y"	Livermore/Curry/Richards	11/16
Complete allegor feedback interviews	Livermore	11/16
Review tentative QA Assessments with DL management	Noonan/Livermore	11/20
Meet with applicant	Noonan	12/06
Evaluate results of allegor feedback	Livermore	12/07
Finalize 69 SSER sections	Livermore	12/14
QA Allegation Executive Summary for SSER	Livermore	12/14
Integrate QA section of SSER with Coatings/Mechanical/Misc. sections	Tang	12/14

<u>Item</u>	<u>Lead Responsible</u>	<u>Completion Date</u>
<u>Area: General TRT Items</u>		
Close site office	Gagliardo	Complete
Meeting with applicant on Program Plan Response of 10/08/84	Eisenhut/Noonan	Complete
NRR letter to Applicant on Program	Hofmayer	11/09
Plan and meetings of 10/19, 10/23		
Establish alleged feedback procedure and tentative contacts schedule	Tang/Hofmayer	-draft- 10/24
		-final- 11/09
Provide TRT input to 50.57(c) response	Vietti	Complete
Respond to GAP 9/26 letter	Tang	11/09
SSER Completion:		
Integrate 144 group inputs into allegations SSER (Mech/QA/Coatings/Misc.)	Tang/Hofmayer/Saffell	12/14
Management Review of SSER	Noonan	12/21
Publish SSER	LB#1	12/28
Obtain rest of [REDACTED]	Gagliardo	11/09
Allegations (evaluation will be incorporated in Mechanical Group reviews)		
Complete Review of Several Vendor Allegations:		
Diesel Generators (applicant's vendor inspection program)	Bangart	11/16
Grinnell Pipe Hangers	Shao/Hou	11/16
Include vendor reviews in Misc. section of SSER	Tang/Saffell	12/14
Develop Program for Handling future allegations at CPSES	Vietti/Bangart	11/09
Provide Potential Enforcement Actions resulting from TRT effort to Region IV for action	Gagliardo	12/28
Publish SSER addressing remaining TRT issues and results of alleged feedback contacts		01/85
Assess Applicant actions in response to NRC "Requests for Information" resulting from TRT effort. Prepare SSER	Group Leaders	02/85

LICENSING ACTION ITEMS

A. SER and SSER Unresolved Review Items

The following status assumes that SSER #6 (in final concurrence) is issued unchanged.

<u>Open Items</u>	<u>Assigned</u>	<u>NRR Staff Scheduled Completion</u>
(1) Preservice and inservice inspection and testing program for pumps and valves (not required for licensing as interim relief granted)	MEB/C. Hammer	-----
(2) Seismic and dynamic qualification of mechanical and electrical equipment (Awaiting Applicant response)	Bagchi/Lee	11/16/84
(3) Handling of heavy loads in conformance with Phase I guidelines of NUREG-0612.	ASB/P. Hearn	11/30/84
(4) Alternate safe shutdown; installation of source range neutron flux meter and temperature (Tc) meter at hot shutdown panel.	ASB/P. Hearn	10/26/84 (Resolved)
(5) Safe shutdown system; associated circuits	ASB/P. Hearn	11/30/84
(6) Fire protection per Appendix R	CHEB/J. Stang	11/16/84
(7) Steam generator tube rupture; isolation of steam generator within 30 minutes	RSB/S. Diab	11/30/84
(8) Impact of paint debris on containment sump and long term core cooling (Must consider results of Coatings TRT Group)	CSB/C. Li GIB/A. Serkiz RSB/B. Mann CPB/S. Sun	11/16/84

<u>Open Items</u>	<u>Assigned</u>	<u>NRR Staff Scheduled Completion</u>
(9) Cygna Independent Assessment Program (Phase 1 and 2)	D. Terao	11/30/84
 <u>Confirmatory Items</u>		
(1) Staff review of WECAN computer code	MEB/J. Rajan	11/09/84
(2) Dynamic analysis for asymmetric loads on the reactor cooling system	MEB/J. Rajan	11/09/84
(3) TMI II.D.1 Performance testing of relief and safety valves (need applicant response)	MEB/G. Hammer	-----
(4) TMI II.E.1.1 Test of turbine driven AFW pump to operate without ac power	ASB/P. Hearn	11/30/84
(5) TMI II.E.4.2 Capability of containment purge valves to close in accident conditions (EQB evaluation of 10/24 has open items - need Applic. action)	EQB/R. Wright	12/14/84
(6) Environmental qualification of N-16 detector and N-16 junction box	EQB/H. Garg	11/30/84
(7) Performance of natural circulation test per Branch Technical Position RSB 5-1.	RSB/S. Diab	Complete
(8) Pacific pump multi-vane diffuser linear indications	MTEB/D. Sellers	11/16/84
(9) Inservice Inspection Program	MTEB/M. Hum	11/16/84
(10) Response to Generic Letter 83-28, Salem ATWS Events	ICSB/H. Li	12/14/84



<u>Confirmatory Items</u>	<u>Assigned</u>	<u>NRR Staff Scheduled Completion</u>
(11) Response to Generic Letter 83-35, Small Break LOCA Analysis (II.K.3.30) (license condition established in SER #6)	RSB/J. Guttman	3/85

License Conditions

(1) Conformance with R.G. 1.97, Revision 2, Generic Letter 82-33	LCSB/J. Joyce	12/14/84 (interim report) 6/85 (final report)
(2) SPDS, Generic Letter 82-33	HFEB/Lipinski	12/14/84
(3) Procedures Generation Package (license condition established prior to OL)	PSRB/J.Clifford	3/85

B. Technical Specifications

(1) Reactor System Branch questions regarding relationship between stated and measured process variables. (awaiting applicant response)	RSB/S. Diab, B. Mann	12/14/84
(2) Accuracy of transient time flow meter (N-16) (awaiting applicant response)	CPB/L. Lois	11/30/84

C. Board Notifications

(1) Cross index of Board Notifications to SER and SSER sections. (a) Pump Seal integrity	LB#1/unassigned  LB#1/Burwell	3-man wks.  12/14/84
(2) Issue forthcoming Board Notifications (estimated)	LB#1/S. Burwell	2-man wks.

22  
C. Hearing Items - NRR Staff Support

(1) Motions for Summary Disposition  
on Piping and Pipe Supports

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
a. QA for pipe support design process	Teledyne/D. Landers	12/14/84
b. Pipe support stability (Applicant's response incomplete)	MEB/D. Terao	12/14/84
c. Cinched U-bolts	ETEC/H. Fleck, P. Chen	12/14/84
d. ASME/AWS Welding Codes	MEB/D. Terao	Complete
e. Upper lateral restraint (Applicant's response raised new issue)	SGEB/F. Rinaldi and Brookhaven	12/14/84
f. Use of generic stiffness in piping analysis. (Applicant's response incomplete)	EGCB/J. Fair	11/30/84
g. Richmond inserts (Applicant's response incomplete)	EGCB/J. Fair	12/14/84
h. Wall-to-wall and floor-to-ceiling piping supports	ETEC/H. Fleck, P. Chen	12/14/84
i. U-bolts as 2-way restraints	EGCB/J. Fair	12/14/84
j. Force distribution in axial restraints	ETEC/H. Fleck, P. Chen	12/14/84
k. Damping factors (Waiting on applicant's response)	EGCB/J. Fair	11/30/84
l. Safety factors	EGCB/J. Fair	11/16/84
m. Friction due to small thermal movements	EGCB/J. Fair	11/30/84

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
n. Local displacements and stresses (applicant's response incomplete)	ETEC/J. Brammer, P. Chen	12/14/84
o. Section property values	EGCB/J. Fair	11/30/84
p. Effects of gaps on seismic response of pipe support	EGCB/J. Fair	11/30/84
(2) Hearings on above Motions for Summary Disposition	Staff reviewers and consultants listed above	Estimated 8 man-wks.
(3) Staff input to OELD on response to 10 CFR 50.57(c) Motion	LB#1/S. Burwell RSB/W. Jenson CPB/M. Dunenfeld	Complete 11/2/84
(4) Staff affidavits on Cygna IAP (Phase 1 and 2)	MEB/D. Terao SGER/F. Rinaldi RIV/D. Hunnicutt	11/30/84
(5) Review of Cygna IAP (Phase 3)	Terao EG&G review - Staff Review -	12/7/84 12/21/84
(6) Review of Cygna IAP (Phase 4) (awaiting CYGNA submittal)	Terao Contractor - Tech Reviewers -	Estimated 6 man-weeks 18 man-weeks
(7) Support OELD in preparation of staff testimony, responding to ASLB Memorandum and Orders, and in preparation of Proposed Partial Initial Findings	Unassigned Leader	Estimated 18 man-weeks

E. Project Management Tasks

- (1) Correspondence, filing and information retrieval
- (2) Status tracking and reports
- (3) Meetings
- (4) SSER preparation
- (5) Technical Specifications
- (6) License preparation and concurrence
- (7) Regional Readiness
- (8) Briefing Book
- (9) Review for conformance with regulation and exemption requirements
- (10) FOIA actions

F. Miscellaneous

<u>Motion Subject</u>	<u>Assigned</u>	<u>Scheduled Completion</u>
Obtain affidavits from Vendor Inspection Branch and Region IV regarding QA applicable to TDI Diesels	Zech/IE Bangart/RIV	11/16/84



Description	Responsibility	Oct. 1985				Nov. 1985				Dec. 1985				Jan. 1986			
		Licensee Dependent				Licensee Dependent				Licensee Dependent				Licensee Dependent			
1. Complete Evaluation of Prep. Test Results	Res. Insp. (Ops)																
2. Witness "Mini" Hot Functional (Thermal Expansion)	Res. Insp. (Ops)																
3. Complete Operating Staff Inspection	Res. Insp. (Ops)																
4. Complete Inspection of Maintenance and Operating Procedures	Res. Insp. (Ops)																
5. Fire Protection/Prevention Assessment Team Inspection	RIV (Murphy) and BNL, IE, NRR: Staff																
6. Complete Open Inspection Items on Prep. Testing QA	Res. Insp. (Ops)																
7. Close Out of Open Inspection Findings	Res. Insp. (Ops/Con) Region Based Insp.																
8. Complete Pre OL Issuance Requirements of 2514 Program (Test Procedure Review)	Res. Insp. (Ops)																
9. Close Out of Remaining HEDs (Human Factors)	Res. Insp. (Ops)																
10. Emergency Preparedness Exercise and Evaluation*	RIV (Baird) and FEMA																
11. Emergency Preparedness Appraisal Significant Deficiency Items (9) Close Out	RIV (Baird)																
12. Radiation Protection and Radwaste Open Items (6) Close Out	RIV (Murray)																
13. Issue IE Procedure 94300 Letter	Res. Insp. (Ops)																

\*Emergency Preparedness Exercise Scheduled for 11/14/84



NOVEMBER 7, 1984

COMANCHE PEAK HEARING ISSUES

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
A. <u>PIPE SUPPORT DESIGN/QA</u>					
1) Letter to Applicants Requesting Information Relating to A500 Steel	Letter drafted and sent in May 1984 to Region IV. Unclear whether letter was sent to Applicants				
2) Applicants' Summary Dispo- sition Motion on AWS/ASME Codes for Weld Design	D. Terao. Completed	5/17/84	11/2/84	10/31/84	
3) CASE's Answer to Motion on AWS/ASME Codes for Weld Design	D. Terao	8/6/84	11/2/84	10/31/84	
4) Applicants' Summary Dispo- sition Motion on OBE/SSE Damping Factors	J. Fair/P. Chen Draft in progress	8/6/84	11/30/84	11/13/84	
CASE's Answer to Motion on OBE/SSE Damping Factors		5/17/84	11/30/84	11/15/84	
Applicants' Summary Dispo- sition Motion on Safety Factors	J. Fair. Draft in progress	5/21/84	11/30/84	11/15/84	
CASE's Partial Answer to Motion on Safety Factors		8/28/84	11/30/84	11/15/84	

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
6)	Applicants' Summary Disposition Motion on Friction due to Small Thermal Movements	J. Fair. Draft in progress	5/21/84	11/30/84	11/15/84
	CASE's Answer to Motion on Friction		8/6/84	11/30/84	11/15/84
	Applicants' Reply to CASE Answer		9/19/84		
	CASE Reply to Applicants' Reply		10/1/84		
7)	Applicants' Summary Disposition Motion on Section Property Values	J. Fair. Draft in progress	5/21/84	11/30/84	11/15/84
	CASE's Answer to Motion on Section Property Values.		8/13/84	11/30/84	11/15/84
8)	Applicants' Summary Disposition Motion on Effect of Gaps on Seismic Response	J. Fair. Draft in progress	5/21/84	11/30/84	11/30/84
	CASE's Answer to Motion on Effect of Gaps		8/13/84	11/30/84	11/15/84
9)	Applicants' Summary Disposition Motion on Upper Lateral Restraint	Brookhaven	5/21/84	12/15/84	12/1/84

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>FILE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	CASE's Partial Answer to Motion on Upper Lateral Restraint	8/28/84			
10)	Applicants' Summary Disposition Motion on Generic Stiffness	J. Fair. Draft in progress	5/22/84	11/30/84	11/15/84
	CASE's Partial Answer to Motion on Generic Stiffness	8/28/84			
11)	Applicants' Summary Disposition Motion on Richmond Inserts	J. Fair. Draft in progress	6/2/84	12/15/84	12/1/84
	CASE's Answer to Motion on Richmond Inserts	9/10/84			
12)	Applicants' Summary Disposition Motion on Stability	D. Teran. Draft in progress	6/18/84	12/15/84	12/1/84
	CASE's Motions and Answer to Motion on Stability	Answer to Motion sent on October 19, 1984	10/15/84		
13)	Applicants' Summary Disposition Motion on Wall to Wall Supports	P. Chen	6/26/84	12/15/84	12/1/84
	CASE's Partial Answer to Motion on Wall to Wall Supports	8/28/84			

ITEM	STATUS OR COMMENT	RECEIVED	DUE DATE	TECHNICAL STAFF COMPLETION DATE	HEARING DATE
Applicants' Reply to CASE's Answer		10/1/84			
14) Applicants' Summary Disposition Motion on Torsional Resistance of Axial Restraints	P. Chen	7/11/84	12/15/84	12/1/84	
CASE's Answer to Motion on Axial Restraints		8/28/84			
15) Applicants' Summary Disposition Motion on Local Displacements/Stresses	P. Chen	6/19/84	12/15/84	12/1/84	
CASE's Answer to Motion on Local Stresses		8/28/84			
Applicants' Reply to CASE's Answer		10/8/84			
16) Applicants' Summary Disposition Motion on U-Bolts (2-Way Restraints)	J. Fair. Draft in progress	5/24/84	12/15/84	12/1/84	
CASE's Answer to Motion on U-Bolts (2-Way Restraints)		8/20/84			
17) Applicants' Summary Disposition Motion on U-Bolts (Cinching)	P. Chen	6/30/84	12/15/84	12/1/84	
CASE's Answer to Motion on U-Bolt Cinching		9/28/84			



ITEM	STATUS OR COMMENT	RECEIVED	DATE	TECHNICAL STAFF COMPLETION DATE	HEARING DATE
18) Applicants' Summary Disposition Motion on Pipe Support Design QA/Weld Audit of Vendor	L. Landers	7/10/84	1/15/84	1/1/85	
CASE's Partial Answer to Summary Disposition Motion on Pipe Support Design QA		10/19/84	1/15/85	1/1/85	
CASE Summary Disposition Motion on Pipe Support Design QA	D. Landers	10/11/84	1/15/85	1/1/85	
<b>B. WELDING</b>					
1) Close-out of welding fabrication items from hearing:					
a. preheat	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20/84	
b. temp. indicating crayon use during interpass	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20	
c. adequacy of support with alleged downhill weld	Letter sent to Applicants, and reply received. Staff assessment necessary.			Affidavit containing Staff assessment due 11/20	



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
d. plug welds in cable spreading room; assurance that this is not generic	Letter sent to Applicants, and reply received. Staff assessment necessary.				
e. contact [REDACTED] and [REDACTED] regarding weave welding allegation by [REDACTED]					
f. Reverification of welder symbols on Class 5 hangers (CASE Exhibit 919, p.20)					
2) Response to p.5 of CASE's finding regarding hold-points for weave weld repairs	10/11/84 Telephone conference call				
<u>C. PROTECTIVE COATINGS</u>					
1) Applicants' Summary Disposition Motion on Near White Blast	Completed: Resolved in Applicants' favor				
2) Applicants' Protective Coatings Reinspection Program	May be affected by Applicants' Application to change Safety classification of Protective Coatings		1/15/85	12/28/84	

ITEM	STATUS OR COMMENT	RECEIVED	DUE DATE	TECHNICAL STAFF COMPLETION DATE	HEARING DATE
3) Applicants' Motion for Summary Disposition on [REDACTED] Report	Awaiting resulting of this phase of TRT	10/5/84	1/15/85 Deferred by October 10, 1984 Board Order	12/28/84	
4) Applicants' Summary Dispo- sition Motion on Maximum Roughness Surface Preparation	[REDACTED] - consultant (per [REDACTED]) See 3 above	6/26/84	1/15/85	12/28/84	
5) Applicants' Summary Dispo- sition Motion on Westinghouse Components Coatings	[REDACTED] (per [REDACTED]) See 3 above	9/16/84	1/15/85	12/28/84	
6) Board Notification 84-015, regarding adhesion testing of protective coating  Brookhaven Interim Report	TRT evaluation is scheduled for com- pletion by 12/28/84. Brookhaven Interim Report will be con- sidered by TRT	See March 15, 1984 Order, pp. 7-8		12/28/84	
D. OTHER CONSTRUCTION ADEQUACY ISSUES				12/28/84	
1) Results of Staff Walkdown Inspections	Inspection reports issued re: Fuel Building Cable Spreading Room Por- tions of Containment Room inspection com-				

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	pleted, awaiting report re: Safeguard Building Auxiliary Building				
2) Results of TRT Report					
3) CAT Report	Testimony concluded; proposed findings of fact currently being drafted. Awaiting findings of TRT				
4) Polar Crane shim reinspec- tion	Applicants filed response on 4/9/84 See Inspection Report 84-08				
5) Undocumented removal of cable trays	See 3/15/84 Order, p.9				
6) Reactor Vessel Mirror Shield	Staff Affidavit filed on June 4, 1984. Awaiting Board Response. TRT SSER being prepared			12/28/84	
<u>E. INTIMIDATION</u>					
1) Board's September 17, 1984 Memorandum Direct- ing Release of OI Reports	OI responded on 10/25/84. Board requests the Staff to advise it which reports are poten-		9/17/84		

ITEM	STATUS OR COMMENT	RECEIVED	DUE DATE	TECHNICAL STAFF COMPLETION DATE	HEARING DATE
	tially relevant to licensing proceeding. See Memorandum Request for Staff Analysis) dated 11/2/84				
2) Reopening of Inspection Report 79-15 (7/2/79) Involving Welding of Stainless Steel Fuel Pool Liners	Board request, See Tr. 16,744. Memo to Reg. IV sent on October 5, 1984			11/30/84	
3) Allegation re: Voiding of NCR by Applicants regarding incorrect dates of inspection on a weld data card.	TRT reviewing (QA group)			12/28/84	
4) Intimidation of Protective Coatings QCI				TRT Completed 12/28/84	
a. [REDACTED]	Closed by Board. Applicants submitted offer of proof. Board rejected offer.				
b. [REDACTED]	DOL transcript is record.				
c. [REDACTED]	Testimony of [REDACTED] received at Septem- ber 18-19, 1984 hear- ing session. Rebut- tal testimony filed by Applicants. TRT SSERs should address his concerns.				



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
d.	[REDACTED] memorandum	Testimony of [REDACTED] [REDACTED] received at October 1-2, 1984 hearing session. Further testimony from [REDACTED] and [REDACTED] scheduled for October 29-31, 1984 hearing session.			Nov. 19-21, 1984
5)	[REDACTED] (Should also be referred under OVERALL QA/QC PROGRAMMATIC ISSUES Category)			TRT Completed 12/28/84	
a.	[REDACTED] ordered to incorrectly approve traveller for valve where valve disc number did not match disc number on the data report.				
b.	ISO reviewers pressured to approve 40 ISO packages per week.				
c.	QC Supervisor [REDACTED] [REDACTED] ordered a reviewer to improperly approve a QES sheet.				



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
6) Witness F	TRT raised to 01				
a. ES-100/RG 1.75/IEEE-384 conflict; criteria involving separation between conduit and cable trays				TRT (electrical) 12/28/84	
b. Whether failure of Westinghouse Invertions was timely reported in accordance with NRC regulations, including Part 21, and § 50.55(e)				TRT (test) 12/28/84	
c. Adequacy of XCP-EEB Procedure for energized functional testing					
d. Adequacy of prerequisite and preoperational test procedures	Set forth in October 1, 1984 Order.				
e. 3 incidents of intimidation (See findings of fact)					
f. Whether [redacted] approval required for STEs to write-up NCRs (Witness F, Tr. 14,629)					
g. Correctness of Witness F's prerequisite tests on Westinghouse inverters.					

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
h. Whether Applicants' procedures specify "jump points" for testing of annunciators (Witness F, Tr. 14,538)					
i. Whether SWA procedure, or other document, directs STEs to collect SWAs on the same system					
j. Applicants' procedures (if any) for generating Start-up memoranda					
7) Termination of [REDACTED]	[REDACTED] testified by deposition of 7/3/84 that he was improperly terminated for reporting pipe gouge. [REDACTED] also claims that Staff was not responseive to his allegation in a meeting following his termination.				
8) [REDACTED]					
a. Hole on Polar crane rail					
b. Rejectable Welding on doors					

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
c. Inadequate welding on diesel generator skids - Programmatic QA/QC aspects					
9) EG&G Report on Climate of Intimidation at CPSES	Offered as Staff Testimony at September 21, 1984 hearing session				
10) T-Shirt Incident				TRT (electrical) 11/20/84	
a. Whether "destructive testing" (deliberately improper testing) of electrical components/ systems occurred in Safeguards building, both before and after T-shirt incident					
b. Follow-up on statements made to NRC by utility officials regarding "destructive testing."					
c. Adequacy of Procedures for conducting QC electrical inspections, and adequacy of implementation					

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
11) [REDACTED]					
a. Interview [REDACTED] [REDACTED] Deposition, and other members of his crew, to determine if a QC inspector was - intimidated					
b. Adequacy of procedures for placing hold tags on cable tray supports, and adequacy of implemen- tation					
12) [REDACTED]					
a. Whether stainless steel welding was improperly done while "arc gouging" was occurring in North Valve Room	[REDACTED] Deposition,				
b. Whether QC inspector who saw the improper welding was improperly prevented from stopping the arc gouging from continuing at the same time as the welding					

F. OVERALL QA/QC PROGRAMMATIC ISSUES

- 1) Results of TRT Report

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
2) Management commitment to an effective QA/QC program	See July 29, 1983 Order, pp. 21-22; September 23, 1983 Order, p.42, n.100				
3) Applicants new QA/QC program	Identified as an issue in March 15, 1984 Order, p.19. Evidence presented during July 1984 evidentiary depositions and September 10-21 hearing session.				
4) Trending of Non-Conforming Conditions	Open, See March 15, 1984 Order, p.20				
5) Implications of Applicants' failure to develop QA procedures for excavation activities	Open, See March 15, 1984 Order, p.6				
6) Reverse classification of non-safety related structures	Open, See March 15, 1984 Order, p.11				
7) Unqualified QA/QC Personnel	Open, See March 15, 1984 Order, p.12				
8) Adequate Number of QA/QC Personnel	Open, See March 15, 1984 Order, p.16				



<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
9) QC oversight of CB&I, as raised in Inspection Report 82-25/82-13	Open, See March 15, 1984 Order, p.12				
10) QC oversight of NPSI, as raised in Inspection Reports 82-22 and 82-14	Open, See March 15, 1984 Order, p.13				
11) Incorporation of CMC's at DCC	Open, See March 15, 1984 Order, p.15				
12) Computerization of Non-conformances	Open, See January 30, 1984 Order; March 15, 1984 Order, pp. 17-18. Applicants filed several filings. Latest is "Applicants' Response Concerning Record Retrieval" (June 29, 1984)				
13) Stainless steel fuel pool/refueling canal liner travellers, and procedures for conducting the QA/QC activities associated with welds for those structures (Originated with [REDACTED] allegations of HITs).	[REDACTED] testimony received at September 10-21, 1984 hearing session. CASE filed brief ("CASE"s Evidence of a Quality Control Breakdown") listing all problems with travellers on September 27, 1984. Further testimony				November 1-2, 1984

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
	from [REDACTED] expected for November 1-2, 1984 hearing session. Staff will need to respond to CASE's and Applicants' evidence on these issues.				
14)	Document Control problems as brought out by [REDACTED]				
15)	No response to [REDACTED] allegation that backfit program for CB&I pipe whip restraints was not taken seriously	Open, See	September 23, 1984	Board Order, p.32, n.81	
16)	Unstated management directive not to report problems (concern raised by [REDACTED])	Open, See 25, October 25, 1983 Board Order, p.11; September 23, 1983 Board Order, pp. 34-35; July 24, 1983 Board Order, p. 42			
17)	[REDACTED] pressured to approve Tennessee wall, Tube and Metal Audit	Open, See	September 23, 1983	Board Order, p. 42	

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
18) Adequacy of Applicants' Vendor QA Program with regard to TDI diesel generators	Applicants filed Response to Board's June 15, 1984 clarification on this subject.		11/30/84	11/20/84	
19) Board's October 1, 1984 Memorandum (Concerns About Startup QA)		10/1/84	11/15/84	11/1/84	
<u>G. CYGNA</u>					
1) Cygna IAP Report (Phases I and III)	Applicants' and Intervenor's testimony concluded in April/May. Staff SSER and testimony required	Nov. 1983			
2) Cygna Phase III Report	No Staff review initiated	July 1984			
3) Cygna Phase IV Report	To be litigated only if Applicants fail to prevail on <span style="background-color: black; color: black;">[REDACTED]</span> Summary Disposition issues				
4) Applicants' Motion to Set Schedule on Cygna Phase III Report		10/5/84	10/25/84		

<u>ITEM</u>	<u>STATUS OR COMMENT</u>	<u>RECEIVED</u>	<u>DUE DATE</u>	<u>TECHNICAL STAFF COMPLETION DATE</u>	<u>HEARING DATE</u>
II. <u>MISCELLANEOUS</u>					
1) Whether IDI for CPSES will be conducted; whether SSER on pump seal integrity will be issued.	Board questions in telephone call to Staff counsel. Memo sent to NRR.		8/22/84		



7/14/84

QA/QC  
~~Electrical~~

7c

Preliminary statements  
Background experience  
NRC interview  
Supervision of T-shirt wearers  
Building Management Program  
NRC interview: reasons for transfers of T-shirt 8  
Development of transfer table  
Work force at Safeguards Unit 2: March 1984  
Transfers following T-shirt incident  
Reasons for T-shirts (as told to NRC)  
Satisfaction of problems: management chain  
Miscommunication between QC inspectors and construction  
awareness of communication problems  
Lighting deficiencies  
Destructive testing: lighting examinations  
Familiarity with inspection procedures  
Identification of T-shirt wearers  
Destructive testing by Safeguards QC inspectors  
Brown & Root/TUGCO harassment, intimidation policy  
Handling of harassment, intimidation complaints  
Description of work area  
Events of March 8, 1984: discovery of T-shirts

7c

FOIA-85-597  
LD/306

MAC



Meeting in Tolson's office  
53134-139      Photographing of T-shirt 8

Detention in auditor's office

Treatment of Ebasco employee

██████████ preparation of statement

Tolson state of mind

Tolson contact: QA management, NRC

Detention in auditor's office: posting of "guard" 7c

Work area search

██████████ conversation with NRC resident

Grier interviews

Control of papers after confiscation

Reasons for sequestration

Disposition of confiscated work packages

March 9, 1984 Tolson meeting with inspectors

Release of T-shirters from auditor office

NRC confiscation of documents

March 9, 1984 Vega meeting with inspectors

Release of incident to newspapers

Frequency with which finding loose terminations

Destructive examination

Contacts with NRC during incident

Attempt at outside contacts

NRC Board Notification

NRC interview

Witness perception of T-shirt incident

Nit-picking onsite

Followup to QC inspector concerns

Transfer of T-shirters

Witness informed about T-shirts

Prior information regarding likelihood of T-shirts

Management practices in relation to incident

Witness position as new supervisor

Reasons for prior supervisor departure

Witness guidance re handling T-shirt incident

Awareness prior T-shirt incident

Meeting with Tolson 3/8/84

Corporate affiliation of QC inspectors

Reason for developing employee chart

Transfers

NRC interview

Auditor's office sequestration

NRC possession of documents

Explanation of ROF

Destructive testing/knowledge as to inspection procedures

Destructive examinations - electrical

Inspector certification

[REDACTED]  
[REDACTED] is [REDACTED] for TUGCO. [REDACTED]

AQ-46 NRC 4/6/84 interview concerning T-shirt incident - unsure as to why T-shirts worn; [REDACTED] of group the day of T-shirt incident. [REDACTED]

[REDACTED] role in development of Building Management Program; purpose of program to coordinate completion of construction work. [REDACTED]

Transfer of personnel following T-shirt incident discussed with NRC; NRC informed no discrimination apparent - transfers based on need. [REDACTED] development of table listing people in supervisory group, including T-shirt 8, and qualifications. Table provided to NRC. Reconstruction of table on the record. Discussions of transfers from group after T-shirt incident. [REDACTED]

Explanation to NRC test communications problem existed between QC and building management; inspectors not given full explanation as to why changes to procedures being made. [REDACTED]

Use of NRC interview notes to refresh witness recollection. [REDACTED]

Should inspector be dissatisfied with procedure, should pursue with management chain - Vore, Bennectin, their QC/QA management: Hicks, Tolson. No satisfaction at these levels - Boyce Grier. [REDACTED]

General situation wherein construction and building management not understand all concerns, deficiencies identified by inspectors i.e., lighting, separation, various electrical inspections. Specifics as to deficiencies - [REDACTED] awareness of deficiencies with respect to lighting. [REDACTED]

[REDACTED] awareness that inspectors might be doing inspections that could be considered destructive - but [REDACTED] not aware of any electrical QC procedures that provide for destructive examination. [REDACTED]

[REDACTED] general familiarity with inspection procedures [REDACTED]

Identification of T-shirt wearers. [REDACTED]

[REDACTED] no direct knowledge that QC inspectors performing destructive examinations - had heard some concern as result of conversations with Hicks and Tolson. [REDACTED]

Unaware as to written policy against harassment, intimidation at Comanche Peak. [REDACTED]

Electrical  
covered  
generically

7c  
AQE-12-1-1  
AQE-12-1-2  
AQE-12-1-3  
AQE-12-1-4  
AQE-12-1-5

Aware that complaints of harassment, intimidation do exist. Grier or NRC to perform investigation into incidents. Supervisor might also investigate basis of complaint. [REDACTED]

Possibility that QC inspectors could be influenced by knowledge of harassment, intimidation of other QC inspectors. [REDACTED]

[REDACTED] learned that inspectors wearing T-shirts from Harry Johnson - called Tolson's office for instructions before finding inspectors. Tolson or Hicks - told [REDACTED] to send T-shirt offsite to change [REDACTED]

[REDACTED] aware from prior conversations with Hicks that T-shirts might exist - if problem came up, wearers to be sent home. T-shirts viewed as having derogatory language to inspection group. [REDACTED]

Identification of T-shirt wearers. [REDACTED]

T-shirters asked to see Tolson for additional explanation as to why needed to change shirts. [REDACTED]

Meeting in Tolson office: inquiry as to tape recording meeting; preparation of memo stating Vore not wearing T-shirt; memo indicating that T-shirters refused to be photographed. [REDACTED]

Group moved to auditor's office with exception of Ebasco employee. [REDACTED]

[REDACTED] preparation of memo describing events. [REDACTED]

Tolson appearance of calm and businesslike. [REDACTED]

[REDACTED] belief that Tolson notified NRC of incident, however no direct information from Tolson that NRC had been notified. [REDACTED]

TUGCO employees (Cromeous, Randall) posted outside door of auditor's office to escort T-shirters as necessary. [REDACTED]

[REDACTED] accompanies security guards to inspector work area for confiscation of papers. Records, after confiscated, brought to Tolson's office, sorted into two piles by Cromeous: one pile to be returned to inspectors (personal items), other to be retained. NRC requested and took custody of documents not returned to inspectors. [REDACTED]

3 of T-shirt 8 sought IEEE publication. [REDACTED]

T-shirt and had separate interviews with Boyce Grier, released for day with pay, time sheets reflected that worked eight hour day. [REDACTED]

Statement signed by T-shirt 8 saying had not knowledge of release of occurrence of incident to newspapers. [REDACTED]



March 9, 1984 meeting between Vega and inspectors - inspectors expressed concerns with lighting terminations, control terminations. Bad judgment on part of inspectors to wear T-shirts. [REDACTED]

[REDACTED] had no knowledge as to whether inspectors sought outside help while in auditor's office. [REDACTED]

[REDACTED] view of incident - sees connections that T-shirts worn as [REDACTED] Slogan on shirt implies subjectivity in conducting inspections. [REDACTED]

Vega trips into field to followup on concerns raised by inspectors in March 9, 1984 meeting. [REDACTED]

Transfer of T-shirt wearers out of Safeguards Unit 2 unrelated to T-shirt incident. [REDACTED]

Of the 6 T-shirters - only [REDACTED] reviews onsite. [REDACTED]

Disposition of the other T-shirters. [REDACTED]

[REDACTED] prior knowledge that T-shirts may exist. [REDACTED]

[REDACTED] evaluation whether handling of event good management practice - would probably handle situation differently, likely not sequestered inspectors. [REDACTED]

[REDACTED] receipt of instructions from Hicks or Tolson as to how T-shirt incident should be handled. [REDACTED]

Although aware from Hicks, Tolson that T-shirts may exist onsite, appropriate response to send workers home, unaware of any prior incident where T-shirts had actually been worn. [REDACTED]

Inspectors informed that Tolson could be sought out to clear up questions as to why inspectors to be sent home. [REDACTED]

Employment affiliation of inspectors: all worked for [REDACTED] with exception of [REDACTED]

Table with work qualifications developed by [REDACTED] at request of Vega to memorialize rationale for transfers of individuals. [REDACTED]

Description of transfers from QC group: [REDACTED] from site by [REDACTED] 6 inspectors to Unit 2 QC (3 wore T-shirts); 2 to control building Unit 1 (both wore T-shirts); all remaining to Unit 2. [REDACTED]

NRC inspector part of Ippolito task force; discussion related to situations in safeguards building prior/after T-shirt incident. [REDACTED]



NRC took custody of documents not returned to inspectors after confiscation. [REDACTED] understood that main office or Arlington office had requested that documents be taken. [REDACTED]

[REDACTED] understanding of ROF. [REDACTED]

Unaware of any electrical QC procedure that calls for destructive examination, not part of [REDACTED] job to have detailed knowledge as to inspection procedures - inspector himself responsible for detailed knowledge. [REDACTED]

Ability for inspector to refer problems to quality engineer. [REDACTED]

Junction box inspection - not destructive examination. [REDACTED]

Unaware as to when QC inspectors were certified. [REDACTED]

7c

7/17/84

~~FOIA~~  
QA/QC  
Civil / Mechanical

Preliminary Statements

Witness qualifications, responsibilities

Post-construction verification program procedures and revisions

Electrical Inspections of Class IE equipment in 1983/training and certification of QC inspectors

Building management organizational structure and responsibilities

Installation inspections

Defective wiring, NCR E84-007095

Investigation of allegations of defective wiring

Vanlin Cummings exit interview

Destructive inspection of electrical equipment

NCRs on defective gauges for crimping lighting restraints

Building management concerns on reinspecting termination boxes

Temporary examination of post-construction inspections

Transfer of [REDACTED] appointment of [REDACTED]

Wearing of T-shirts prior to 3/8/84

Destructive inspections

[REDACTED] allegations on witness being less than candid

Wearing of T-shirts prior to 3/8/84

Who wore the T-shirts on 3/8/84

T-shirters told by Welch to go home

Meeting between T-shirters and Tolsen on 3/8/84

Events in the auditor's office on 3/8/84

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Meeting between T-shirters and Grier

T-shirters request a meeting with Vega

Fort Worth Star Telegram article about the T-shirt incident on 3/8/84

Paul Check notes on Clements initial revision of the 3/8/84 T-shirt incident

Vega and T-shirters meeting on 3/9/84; T-shirt safety concerns

Transfer of T-shirt personnel

Early April 1984 meeting between NRC (Eisenhut, Hayes) and T-shirters

Meeting between T-shirters and Grier

Meeting between Vega and T-shirters

Training/certification of QC electrical inspectors

NCRs on gauges for crimping lighting restraints

T-shirters 3/9/84 written statement on their intent

Transfer of [REDACTED] to Unit 2 and back to Unit 1

Proposed inspection procedures on closing out rooms with open NCRs; IEEE 346

Response of management of safety concerns

"Nit-picking" at Comanche Peak

Harassment and intimidation

Training, certification of QC electrical inspectors

Destructive examination

7c

[redacted] is currently a [redacted] at CPSES in a control building in Unit #1 (156). At the time of the 3/9/84 T-shirt incident ("incident") he was a [redacted]. His supervisor at the time immediately preceding the incident was [redacted] Ron Tolson was [redacted] supervisor. (approximately 17) also had a "lead" inspector, [redacted] was more or less [redacted]

The procedures specified for QC electrical inspection in the post-construction verification program are QI QP 11.3-40, Rev. 15 [redacted] was contacted by Vore and Tolson about revisions to the post-construction inspection procedures in March of 1984 before the T-shirt incident [redacted] and had discussed these revisions with the other [redacted] in January 1984. [redacted] was not concerned about the procedures but was concerned that lighting problems were not covered as extensively as they should be in the proposed revision [redacted] In the January meeting, [redacted] did not state any concerns with large pieces of equipment [redacted] or that the post-construction deficiency list would not be a permanent record of QA problems. In fact, he stated that the deficiency list was indeed a permanent record. [redacted] He also did not recall stating at the January meeting that the new procedures allowed craft to do on-the-spot repairs without logging them in. To the contrary, deficiencies were documented even if craft did fix them on-the-spot [redacted] He also didn't recall stating that the post-construction deficiency list was a violation of national standards [redacted] However, he did state at the January meeting that the proposed revision to the inspection procedures would allow rooms to be turned over with open non-conforming conditions. He notified Vore and Tolson of this and they agreed that the proposed revision would be in violation of IEEE Standard [redacted] Consequently, the existing procedures do not allow for rooms to be turned over with non-conforming conditions outstanding [redacted] To his knowledge no room was given final closure with open NCRs [redacted] Whitehead also didn't recall stating that the revised procedures would not allow the tracking of repairs done on equipment. In fact, the procedures allow all repairs to be "trackable" [redacted]

In November/December 1983, extensive inspections were done on electrical equipment and the inspectors discovered "substantial problems" [redacted] A certification program, including training, was required to be an inspector [redacted] However, [redacted] did not know of any special certification program for separation inspections in the November/December 1983 time frame [redacted]

Installation inspections were required on some equipment. This required a QC inspector to witness the actual installation of the equipment, e.g., power cable termination [redacted] This is in contrast to verification [redacted]



inspections where craft installs the equipment and QC goes out and confirms correct installation. [redacted] believed that the installation inspection was adequate to serve as a final inspection prior to turnover to the client. [redacted] In addition, he never found any equipment that had only the installation inspection performed. Installed equipment would still be subject to monthly inspections [redacted]

[redacted] was not familiar with the term "destructive inspection". He indicated that he was familiar with NCR E84-007095 (Exhibit 43-1), which involved a craft engineer John Barcum taking an action in violation of procedures [redacted]. However, he did not feel this was an "unusual" NCR [redacted]. He was aware through "rumor" that the same engineer may have "destroyed" electrical equipment [redacted]. Management never told [redacted] of any such complaints and there were no specific requests to pay special inspection attention to Barcum's work [redacted]. [redacted] would be concerned if the allegations made in Varlin Cummings exit interview were true (previously introduced as Exhibit 43-6).  
Note: There was no discussion or substantiation of any of the allegations made in this exit interview in the [redacted] testimony.

Inspections to check for defective wires consisted of opening the junction boxes and pulling the wires out to a point where the inspector could see the cables. At this point in the deposition [redacted] testimony clarified what Intervenor's counsel meant by "destructive inspection" or "destructive examination." The concern was whether, in performing the inspection, the inspectors were actually damaging the quality of the product [redacted]. The normal inspection would not be destructive [redacted]. [redacted] was not aware whether the NRC had been informed of these alleged destructive inspections [redacted]

Continuing objection made to relevance of the direct examination [redacted]

[redacted] testified that four or five junction boxes were opened by the craft hands for inspection by QC in accordance with procedures. These inspections probably involved [redacted]. [redacted] was not aware of Vore accusing these inspectors of "tearing up" equipment during the opening of the junction boxes [redacted]. These inspectors also didn't tell [redacted] that they were accused of being destructive [redacted]. NCRs may have been written on this equipment [redacted]. Inspectors continued to conduct similar inspections but new procedures called for a TUGCO engineer to be present and it was often difficult to find one. Consequently NCRs were written for all equipment when a TUGCO engineer was needed for the inspection but couldn't be located [redacted]

A number of NCRs were written on go/no-go gauges used for checking the crimps on lighting restraints (Exhibit 43-2). The concern in the NCRs was that the gauges were made of soft metal and could not be used as a reliable measure for checking the crimps [redacted]. [redacted] recalled that the inspectors told him that 50% of the lighting terminations they looked at had deficiencies. Note: It is unclear from the testimony whether these "deficiencies" were the same as those noted [redacted]



in the NCRs on crimps and/or whether these "deficiencies" were "substantial problems" found in November/December 1983 noted by [redacted] in earlier testimony (see [redacted]). However, it may be reasonable to assume that the deficiencies and substantial problems primarily related to the NCRs on crimps. [redacted] informed [redacted] of the deficiencies and he relayed the information to [redacted]. This led to reinspection of all lighting terminations in the third week of February 1984. [redacted] These reinspections upset Building Management even though reinspection was within the post-construction procedures. [redacted] was told by craft supervisor [redacted] that Building Management supervision complained to Merritt, Bennetson, and Tolson around the third week in February 1984. [redacted] In [redacted] opinion, the Building Management/craft attitude about the reinspection was understandable. [redacted] informed [redacted] that post-construction verification inspections would stop until Tolson could evaluate the Building Management complaints. This was about the end of February, beginning of March 1984. [redacted] The post-construction verification program was then started up again for a period of three or four days [redacted] and then terminated around the 4th or 5th of March 1984.\*

On March 7, 1984, [redacted] informed [redacted] that [redacted] was being transferred and [redacted] would be taking over as [redacted]. [redacted] also met with [redacted] and informed him that there would probably be some changes made to "get things back to normal." [redacted]

[redacted] told [redacted] about Tolson's concern about the junction box inspections actually loosening the terminals. [redacted] told [redacted] that he disagreed with this view. [redacted] never told [redacted] that any disciplinary action was contemplated against the inspectors for these alleged "mis-inspections." [redacted]

Intervenor's counsel expresses concern over witness's candor [redacted]

[redacted] and approximately twenty others, mostly electrical QC inspectors wore the "nit-picker" T-shirts ("T-shirts") several days prior to the March 8, 1984 incident. Nothing was said about the T-shirts at that time. [redacted] On March 8, 1984 twelve of the seventeen electrical QC inspection wore the T-shirts to work. [redacted] However, only eight of those inspectors were in the trailer when [redacted] came in and asked them to go home and change. [redacted] These eight were identified as [redacted]

[redacted] also told them they could talk with Tolson. [redacted] The T-shirters did meet with Tolson and unidentified other parties. [redacted] one of the T-shirters asked if he could tape the meeting. Tolson said no and left the room. [redacted]

T-shirters escorted to auditor's office by Bill Cromeans and C.C. Randall. [redacted] They were later taken to Boyce Grier's office. [redacted] Cromeans asked to take pictures and they refused. [redacted] The T-shirters were told they were being kept in the auditor's office to protect them from craft. [redacted] and the others did not feel in any danger nor were

they threatened by craft [redacted] Note: See Bill Clements deposition on July 18 as to Clement's motivation for sequestering them. Someone told the T-shirters that the NRC had been notified [redacted] About 1:30 they were told that they were being sent home with pay, and asked to please not wear the T-shirts again. Two of the electrical QC inspectors, Ron Jones and Gerald Pryor, brought them lunch [redacted] and told them that company personnel were going through their personal belongings. The inspectors were mad about this [redacted] They did not feel that they were free to leave the auditor's office because Cromeans and Randall and possibly Purdy told them they could not up. Again the reason given was protection of the T-shirters [redacted]. The T-shirters were angry and confused about this [redacted]

[redacted] in his meeting with Grier expressed concerns about changes in procedures, and dispositioning NCRs, but not much else [redacted]

[redacted] testified that there were several errors in a March 9, 1984 Fort Worth Star Telegram article on the incident, i.e., the statement that they was an organized group trying to sabotage the plant [redacted] He also testified that Paul Check's written summary of a Clement's phone call (Exhibit 38-4 on 7/10/84) was incorrect, i.e., not an organized disruption, construction was not completed, walkdowns had not been accomplished, the destructive inspections had not taken place, and the names of the T-shirters were incorrect [redacted]

T-shirters requested a meeting with Tolson [redacted] but eventually met with Tony Vega and Mark Welch on March 9, 1984 to discuss their concerns, i.e., lighting problems, loose terminations, suspension of post-construction verification program [redacted] They also signed a statement (Exhibit 43-3) disavowing release of information to Fort Worth Star Telegram and any connection with discrediting the quality control program or interfering with completion of CPSES. This statement was initiated and prepared by the T-shirters [redacted] indicated that a March 27, 1984 memo from A. Vega to D.N. Chapman accurately summarized the meeting [redacted] He elaborated on the concerns expressed at the meeting, i.e., never being told why the procedures were changed, some problems may be overlooked [redacted] QC inspectors felt that there was a lack of support from management, the use of the post-construction deficiency list, turning over a building to a client without closing all NCRs, 50-60% of inspections revealed flaws [redacted] Vega concerns on destructive inspections [redacted] craft supervision being able to override QC inspectors [redacted] dispositioning of NCRs [redacted] and inspector frustration about being able to do their job [redacted]

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} aH/aC

T-shirts made up because of a random comment by craft to [redacted] as a good description of an inspector's work. [redacted] felt that it was "just a T-shirt" [redacted] See [redacted] Whitehead expresses the opinion that "nitpicking" is just an expression that all craft people use in connection with QC inspectors [redacted]. The wearing of the T-shirt on March 8 did not have anything to do with [redacted] first day as [redacted]

Note: See [redacted] deposition, 7/16/84.

[redacted] and others [redacted] transferred to Safeguards Unit 2 supposedly because there was no longer enough work for them at Unit 1. [redacted] also thought that they were being transferred because they wore the T-shirts and because construction management wanted them out of Unit 1. [redacted] subsequently met with Vega to ascertain why he had been transferred. [redacted] He told Vega that he thought it was because of the T-shirt incident. Vega told him it was because Unit 1 did not need the [redacted]. [redacted] reply was that they did not have [redacted] in Unit 1. [redacted] Clements sat in on some of the meeting [redacted]

[redacted] has subsequently been transferred back to Unit 1. [redacted] He still believes the T-shirt incident was the real reason for his transfer, but did not have anything to do with the number of problems he identified in Unit 1. This was solely because he wasn't personally involved in inspections. [redacted] His opinion on the reason for his and the others transfer, was that they "were causing problems holding up Unit 1's completion". [redacted] However, Vega or Tolson never told them that. [redacted] He felt that he would not have been transferred if the T-shirt incident had not occurred, even in light of the QC problems they had identified [redacted]. He did not state to another inspector that he felt management was out to get him, although he did feel that management thought he was one of the ringleaders [redacted]

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In [redacted] meeting with the NRC on April 6, 1984 he told the NRC something to the effect that he felt "discriminated" against by being transferred to Unit 2. [redacted] At the meeting with Eisenhut, Hayes, Spence, and the T-shirters to find out what happened, [redacted] stated that the wearing of the T-shirts had nothing to do with the inspector's safety concerns. This was also stated in the March 9 meeting with Vega and Tolson. [redacted] He does not believe his present inspection responsibilities at the plant have been affected by the T-shirt incident. [redacted] He felt that management was responsive to legitimate safety concerns [redacted]. He does not feel that he was ever harassed, intimidated, or threatened in connection with the performance of his job [redacted]



~~CONFIDENTIAL~~  
Civil / Mehl

[REDACTED]  
Wednesday, July 25, 1984 (Evening)

DIRECT EXAMINATION BY INTERVENOR (ELOY GAITAN)

Preliminary statements

[REDACTED] EXHIBIT 1  
Marked for identification

Affidavit of [REDACTED]

Objection on admission of [REDACTED] Exhibit 1, including  
Staff Counsel's statement on relevancy

Concern with safety problem at CPSES involving a Q-cable  
that was spliced, which was discussed at an hour and  
forty-five minute long meeting with the NRC

[REDACTED] EXHIBIT 2  
Marked for identification

CASE Transcript of [REDACTED]  
Interview

Objection and voire-dire on admission of [REDACTED] Exhibit 2

[REDACTED] discusses meeting with NRC. Describes Mr. R.  
Stewart, Dan Tomlinson, and Richard Herr as having a  
"Gestapo attitude." Also discusses follow-up phone call  
with Stewart.

CROSS-EXAMINATION BY APPLICANTS (LEONARD BELTER)

[REDACTED] employment history at CPSES

Pipe hanger drawings as additional concern of [REDACTED]

Motives of NRC in asking about other information that  
[REDACTED] possessed re: other problems

[REDACTED] use of foul language at the meeting with NRC

[REDACTED] explains why he feels Stewart's statement at p.13  
of Exhibit 1 is inaccurate

[REDACTED] jobs at CPSES

"Gestapo attitude" is badgering questions, questions  
being cut-off from answering questions, etc. Tries to  
find examples.

BREAK, and objections that deposition be ended at 9:45  
p.m.

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Examples where one question interrupts another

Gestapo technique due to tone of voice; Stewart raised voice at this point

[REDACTED] gets annoyed easily; was annoyed in interview with NRC

[REDACTED] tries to explain basis for his belief that NRC was not interested in the information which Culton possessed.

Treatment of [REDACTED] in interview as "low-class"

BREAK, and objections that deposition be ended at 10:30 p.m.

NRC not interested in [REDACTED] information

Reason why [REDACTED] did not turn over into to Mr. Stewart; Stewart's interest in getting the information which [REDACTED] refused to turn over.

Reason for concluding the interview

[REDACTED] cannot identify any one question that, in and of itself, be found to be offensive —

CROSS-EXAMINATION BY NRC STAFF (GEARY MIZUNO)

Educational background of [REDACTED] 2 associate degrees

Reason for leaving CPSES

[REDACTED] EXHIBIT 3	Limited Appearance
Marked for identification	Statement by [REDACTED]

NRC interviewers indicated that they had read [REDACTED] limited appearance statement. Indication that Statement was interested in [REDACTED] concerns.

BREAK, and discussion on scheduling of [REDACTED] continuing deposition.

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Electrical  
Piping

[REDACTED] at CPSES [REDACTED]  
In his limited appearance statement, he raised two concerns: (1) a splice in an Q-electrical cable in the cable spreading room; (2) inaccuracy of drawings which he drafted, which he claims were used for installation of pipe supports [REDACTED]

[REDACTED] subsequently interviewed by the NRC, in an interview with Messrs. Robert Stewart, Don Tomlinson, and Richard Herr. [REDACTED] believes that he was intimidated, but that the NRC had a "Gestapo attitude"

[REDACTED] believes that this attitude is exemplified by the badgering questions, cut-off questions, rapid-fire questioning, and tone and loudness of Mr. Stewart's voice [REDACTED]

[REDACTED] also states that he believes that Stewart was not interested in his information, but is unable to provide a basis for his belief [REDACTED]

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