

Matthew

**TEXAS UTILITIES GENERATING COMPANY**

SKYWAY TOWER \* 400 NORTH OLIVE STREET, L.B. 81 \* DALLAS, TEXAS 75201

L. F. FIKAR  
EXECUTIVE VICE PRESIDENT

August 21, 1984

TXX-4262

Dockets: 50-445  
50-446

Mr. Thomas A. Ippolito  
Project Director for Comanche Peak  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

COMANCHE PEAK STEAM ELECTRIC STATION  
UNITS 1 AND 2  
ADDITIONAL QUESTIONS RELATIVE TO PROTECTIVE  
COATINGS ALLEGATIONS  
FILE NO. 906.1, 10010

Dear Mr. Ippolito:

Attached find our detailed response to your additional questions relative to protective coating allegations No.'s 15, 31 and 33 (as formalized in your memorandum of July 27, 1984). This completes our written responses to all of these additional questions.

Please let us know if we can provide any additional information.

Sincerely,

*L. F. Fikar*  
L. F. Fikar

LFF:pew  
Attachments

FOIA-85-59

(A40)

8511070066 851016  
PDR FOIA  
GARDEB5-59 PDR

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QUESTIONS RELATIVE TO ALLEGATION NO. 15

- a) What is the size of the total surface area having this coating system (Inorganic zinc over organic topcoat)?
- b) Explain the basis for this total surface area number.
- c) Are these areas entered in the coatings exemption log? Identify the NCR/DCA that covers these items.
- d) We have reviewed a Request for Information or Clarification (RFIC), dated 10/20/83 that authorizes the use of the inorganic zinc top over epoxy. We have also reviewed an earlier RFIC, dated 01/07/83 that does not permit zinc to be applied over epoxy. What is the engineering justification for this change in requirements?
- e) Has inorganic zinc actually been applied over epoxy in overlap areas? If so, identify the applicable IR's.

Response:

- a) The available data does not permit a precise estimate of the area involved. However, we have performed a sample review of the existing data on the Unit 1 liner plate. Based on certain assumptions necessary to calculate total area, the surface area involved ranges from about 2500 to 6500 square feet. The lower value is realistic and the upper value is considered conservative.
- b) The basis for this estimate was a statistically sound sampling of primer repair records. Assumptions made included:
  - 1) Overlap at the edge of the repair area was 1.5 inches;
  - 2) Each 100 ft.<sup>2</sup> area of the liner experienced an average of about 5.5 repairs; and
  - 3) Size of the individual repair areas ranged from 1 to 3 square feet.

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QUESTIONS RELATIVE TO ALLEGATION NO. 15

- c) No
- d) The referenced RFIC's were addressing degree of overlapping coating systems. In a repair area, there is not a well defined separation between topcoat, primer and substrate. Within the repair area, there is a "feathered" area which has inorganic zinc applied over topcoat.
- e) All primer repairs will probably contain areas where inorganic zinc was applied over epoxy. Inspection records of primer repair areas are available for review.

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QUESTIONS RELATIVE TO ALLEGATION NO. 31

- a) Provide location of records identifying limited access and inaccessible areas.
- b) Provide total area of identified limited access and inaccessible areas. Explain the basis for this estimate.
- c) Indicate the level of supervision that is authorized to determine whether an area is limited access or inaccessible.

Response:

- a) Some inspection reports (IR's) and Travelers reference inaccessible or limited access areas.
- b) Total areas are estimated as follows:

<u>Coated Surface</u>	<u>Estimated Area (FT<sup>2</sup>)</u>
<u>Inaccessible</u>	
Liner	1400
Concrete	1000
Miscellaneous Steel	1000
<u>Limited Access</u>	
Liner	200
Concrete	1000
Miscellaneous Steel	1500

The above figures were based on the combined input from four experienced coating (field) engineers/technicians and are considered to be conservative.

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QUESTIONS RELATIVE TO ALLEGATION NO. 31

- c) Certified QC inspectors, Quality Engineers, or Coatings Engineers are authorized to make this determination.

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QUESTIONS RELATIVE TO ALLEGATION NO. 33

Provide names, qualification dates and levels, and assignment dates for all individuals who were assigned as lead inspectors or in other quality supervision functions for coatings since January 1982.

Response:

NOTE: See attached Table of Contents from Protective Coatings Inspection Manual for identification of inspection functions.

William S. Avery - Assignment Date: March 1982 - January 1983

QI-QP-11.4-1/11.4-5 (Certified 12/15/81, Level I)

QI-QP-11.4-23/11.4-24 (Certified 03/08/82, Level I)

QI-QP-11.4-10 (Certified 03/08/82, Level I)

William Dunham - Assignment Date: February 1983 - August 1983

QI-QP-11.4-1/11.4-5 (Certified 12/28/81, Level I)

QI-QP-11.4-10 (Certified 03/31/82, Level I)

QI-QP-11.4-23/11.4-24 (Certified 06/25/82, Level I)

Mike E. Foote - Assignment Date: September 1983 - December 1983

Civil Level III (Certified 02/18/82)

Everett Mouser - Assignment Date: August 1983 - October 1983

No Protective Coatings Certifications

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QUESTIONS RELATIVE TO ALLEGATION NO. 33

Robert Wallace - Assignment Date: March 1982 - May 1983

QI-QP-11.4-23/11.4-24 (Certified 03/08/82, Level I)

QI-QP-11.4-10 (Certified 03/08/82, Level I)

QI-QP-11.4-1/4-5 (Certified 03/08/82, Level I)

Harry Williams - Assignment Date: January 1982 - August 1983

Civil Level III (Certified 08/03/81)

Neil Britton - Assignment Dates: March 1982 - February 1983  
and October 1983 - May 1984

QI-QP-11.4-1/11.4-5 (Certified 11/25/81, Level I)

QI-QP-11.4-23 (Certified 11/25/81, Level I)

QI-QP-11.4-10 (Certified 02/09/82, Level I)

QI-QP-11.4-24 (Certified 02/09/82, Level I)

QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)

QI-QP-11.4-29 (Certified 03/13/84, Level I)

CP-QP-11.4 (Certified 04/27/84, Level II)

Protective Coatings Level III (Certified 05/04/84)

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QUESTIONS RELATIVE TO ALLEGATION NO. 33

David Ambrose - Assignment Date: February 1984 - Present

QI-QP-11.4-23/11.4-24 (Certified 01/18/83, Level I)  
QI-QP-11.4-1/11.4-5 (Certified 03/31/83, Level I)  
QI-QP-11.4-10 (Certified 06/08/83, Level I)  
QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)  
QI-QP-11.4-29 (Certified 03/13/84, Level I)  
CP-QP-11.4/Daughter Instr. (Certified 05/17/84, Level II)

Fred Dunham - Assignment Date: July 1982 to March 1984

QI-QP-11.4-1/11.4-5 (Certified 05/12/82, Level I)  
QI-QP-11.4-10 (Certified 05/14/82, Level I)  
QI-QP-11.4-23/11.4-24 (Certified 06/03/82, Level I)  
QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)  
QI-QP-11.4-29 (Certified 03/13/84, Level I)  
CP-QP-11.4/Daughter Inst. (Certified 04/02/84, Level II)  
Protective Coatings (Certified 04/02/84, Level III)

Jim Wren - Assignment Date: April 1984 to Present

QI-QP-11.4-26 (Certified 02/02/84, Level I)  
QI-QP-11.4-27 (Certified 02/10/84, Level I)  
CP-QP-11.4/Daughter Inst. (Certified 05/17/84, Level II)



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QUESTIONS RELATIVE TO ALLEGATION NO. 33

Gary Yando - Assignment Date: September 1983 to Present

QI-QP-11.4-1/11.4-5 (Certified 05/06/82, Level I)  
QI-QP-11.4-23/11.4-24 (Certified 05/06/82, Level I)  
QI-QP-11.4-10 (Certified 05/14/82, Level I)  
QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)  
CP-QP-11.4/Daughter Inst. (Certified 06/07/84, Level II)  
QI-QP-11.4-29 (Certified 07/12/84, Level II)

Joy Underwood - Assignment Date: June 1984 to Present

QI-QP-11.4-1/11.4-5 (Certified 01/24/83 Level I)  
QI-QP-11.4-10 (Certified 01/24/83 Level I)  
QI-QP-11.4-23/11.4-24 (Certified 01/24/83, Level I)  
QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)  
QI-QP-11.4-29 (Certified 03/28/84, Level I)  
CP-QP-11.4/Daughter Inst. (Certified 06/07/84, Level II)

James Uehlien - Assignment Date: January 1984 to Present

QI-QP-11.4-23/11.4-24 (Certified 07/26/83, Level I)  
QI-QP-11.4-1/11.4-5 (Certified 08/05/83, Level I)  
QI-QP-11.4-26 (Certified 01/03/84, Letter)  
CP-QP-11.4/Daughter Inst. (Certified 05/17/84, Level II)  
QI-QP-11.4-29 (Certified 07/12/84, Level II)

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QUESTIONS RELATIVE TO ALLEGATION NO. 33

M.G. Krisher - Assignment Date: September 1983 to Present

Protective Coatings (Certified 09/08/83, Level III)

C.C. Randall - Assignment Date: June 1982 to September 1983

No Protective Coatings Certifications

Mickey Finn - Assignment Date: August 1983 to Present

QI-QP-11.4-10 (Certified 03/08/82, Level I)

QI-QP-11.4-1/11.4-5 (Certified 03/08/82, Level I)

QI-QP-11.4-23/11.4-24 (Certified 03/08/82, Level I)

QI-QP-11.4-26/11.4-27 (Certified 01/03/84, Letter)

CP-QP-11.4/Daughter Inst. (Certified 06/07/84, Level II)

QI-QP-11.4-29 (Certified 07/12/84, Level II)

Ken Wolverton - Assignment Date: October 1983 - February 1984

No Protective Coatings Certifications

Paul Leyendecker - Assignment Date: April 1984 to July 1984

QI-QP-11.4-26 (Certified 02/02/84, Level I)

QI-QP-11.4-27 (Certified 02/10/84, Level I)

CP-QP-11.4 and Daughter Instr. (Certified 06/07/84, Level II)