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12/19/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

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

DO NOT WRITE IN THESE SPACES

Docket Nos. 50-445
and 50-446

85 DEC 24 A11:11

(Application for an
Operating License)

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CASE'S RESPONSE TO APPLICANTS' 11/12/85 CHANGES
TO AFFIDAVITS IN SUPPORT OF APPLICANTS'
MOTIONS FOR SUMMARY DISPOSITION

On November 18, 1985, CASE advised the Board Chairman and Applicants' counsel Mr. Wooldridge (and NRC Staff counsel Mr. Treby a few days later) that CASE wanted to respond in writing to Applicants' changes filed November 12, 1985, to their affidavits in support of their Motions for Summary Disposition. There were no objections, and this is CASE's response /1/. CASE's response is primarily in the form of the attached Affidavit of CASE Witness Jack Doyle in Response to Applicants' Changes in Affidavits Attached to Their 1984 Motions for Summary Disposition; this response should be considered in conjunction with the responses to the individual Motions for Summary Disposition already filed by CASE.

There are also a few additional comments for the Board's consideration. Applicants state in many cases that Stone & Webster will address the issue in question. However, it is still not clear that Stone & Webster will be addressing the specific issues which have been raised by the

/1/ Additional response may be appropriate following discovery; however, CASE Witness Jack Doyle wanted to go ahead and get the attached information into the hands of the Licensing Board as soon as possible for its consideration.

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Walsh/Doyle allegations, the exact manner in which such issues will be addressed, the extent of such addressing, etc. Further, it is not clear whether, and in what manner, the root causes and generic implications of such issues will be addressed by Stone & Webster. We will be pursuing these matters further in discovery in the near future.

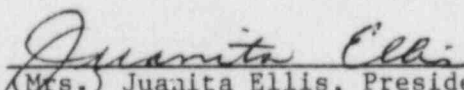
Applicants have not clarified or made any corrections to their affidavits supporting their motions for summary disposition concerning quality assurance for design, or safety factors (see footnote 3, pages 2 and 3 of Applicants' affidavit). CASE does not (as Applicants state they do) interpret the Board's Order to be limited to information presented in the affidavits which was derived from tests and analyses performed for the express purpose of addressing the issues in this proceeding. Clarification is needed from the Board as to the scope of its intention in this regard, and if Applicants' interpretation is incorrect, the Board should order Applicants to also address any clarifications or changes to their affidavits in support of their motions for summary disposition concerning quality assurance for design, and safety factors.

We also call the Board's attention to the fact that there are some aspects of the issues in question which Applicants have not addressed, regarding which CASE relies on our original responses to Applicants' Motions for Summary Disposition. Regarding generic stiffness (pages 27 and 28), Applicants utilized generic deflection, not generic stiffness in support design; Applicants still seem not to have understood one of CASE's primary concerns -- that Applicants were mixing apples and oranges apparently

without even realizing it. And, regarding Richmond inserts (pages 57 and 58 of Applicants' affidavit), it is not clear which equation Stone & Webster is going to use.

In addition to the preceding, we also call the Board's attention to the attached DALLAS MORNING NEWS article dated today, regarding what CASE considers to be new and significant information which is pertinent to the discussion on page 17 of Mr. Doyle's attached 12/14/85 affidavit. The information in the article was made public on the first day (yesterday) of a two-day NRC Staff/Applicants meeting, and the Board and parties will have access to the transcript later. (As might be expected, CASE will also be pursuing these matters further on discovery.)

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound
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Faulty inspections found at Comanche Peak N-plant

By David Real

Staff Writer of The News

An engineering supervisor who set unrealistic quotas for inspections has been dismissed from Comanche Peak and all work that he supervised on cable-tray supports at the nuclear plant has been halted because of flaws, utility and federal officials said Wednesday.

A second supervisor also may be dismissed, said Bill Council, executive vice president of Texas Utilities Generating Co., which is responsible for building the plant.

Although three months' work has been wasted because of the errors, Council said the impact on the plant's cost and schedule impact would be insignificant.

Vince Noonan, Nuclear Regulatory Commission project director for Comanche Peak, said that federal regulators found 19 problems in 32 cable-tray supports that had been approved by a utility contractor, Ebasco Services Inc., late last month.

"There were a number of findings that we felt the utility should have found before we found them," Noonan said.

The problems were confined to the first of the plant's two reactor

units in areas under the supervisor's responsibility, Council said. The other unit, scheduled to begin operations six months after its twin, was not affected. The first unit is scheduled to begin operations in mid-1987.

The inspection was designed to verify that cable-tray supports were built according to design drawings, he said. The trays contain electrical wiring that controls and monitors critical reactor equipment. In the worst example, a 12-inch-wide cable tray was incorrectly shown on drawings as 24 inches wide, he said.

The drawings, once verified, will be used in a computer program to confirm that the plant has been designed properly and will operate safely.

An investigation ordered by Council found that the supervisor had reinterpreted work procedures to eliminate double-checking of inspection results and had placed production quotas on inspection teams.

Teams had been ordered to complete inspections on four pipe supports a day, Council said.

"I physically went out and crawled many of those supports myself and I don't see how you can do more than two a day — and they

were told to get four," Council said.

He said quality suffered when the engineering workers began speeding up to meet the quota and did not double-check work performed by inspectors, as required.

"That's where the breakdown occurred," Council said. "That was wrong."

He said that two other breakdowns occurred because the inspections were not formally included in surveillance activities and were never audited by quality assurance inspectors.

Council said he ordered the inspections be stopped immediately when he learned of the NRC results on Dec. 3. He started work on an action plan to respond to the problems, ordered a sampling program in Unit 2 that confirmed the problem was isolated to the supervisor in Unit 1, started rewriting procedures to avoid misinterpretation and began retraining inspectors and engineers. Work on cable-tray supports should resume sometime after Christmas, he said.

Noonan said the whole incident raised concerns about the confidence the NRC has in the utility, but said the immediate action taken by Council was "gratifying."

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

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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's Response to Applicants' 11/12/85 Changes to Affidavits in Support
of Applicants' Motions for Summary Disposition

have been sent to the names listed below this 19th day of December, 1985,
by: Express Mail where indicated by * and First Class Mail elsewhere.

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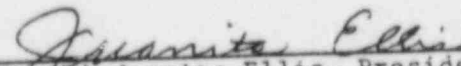
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