

QTQ-107

TEXAS UTILITIES GENERATING COMPANY

File

OFFICE MEMORANDUM

To: R. G. Tolson *RG*

Dallas, Texas January 22, 1982

Subject: COMANCHE PEAK STEAM ELECTRIC STATION

EVALUATION OF AUDIT RESPONSE

TCP-24

PROTECTIVE COATINGS

QA AUDIT FILE: TCP-24

Your additional response to TCP-24 logged TUQ-1085, dated December 30, 1981, has been evaluated by TUGCO QA. We consider your responses to Deficiency No. 1 and Concern No. 1 acceptable. No further response is necessary. As discussed with you, we plan to evaluate your preventive measures for Concern No. 1 during a site audit scheduled for the week of January 25-29, 1982. We will schedule an audit to evaluate your corrective actions as described in your response dated December 30, 1981, consistent with your April 30, 1982 implementation date.

Thank you for your cooperation.

DN Chapman

D. N. Chapman
Manager, Quality Assurance

DN
DNC/AV/DLA/RHS:med

cc: B. R. Clements
J. T. Merritt
G. R. Purdy
G. W. Parry

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JAN 25 1982

QUALITY ASSURANCE

TUQ-1085

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To D. N. Chapman Glen Rose, Texas December 30, 1981

Subject TUGCO QA Audit TCP-24-

Formal Response

Reference: TUQ-992, QTQ-96, TUQ-1016

The following represents our formal response to TUGCO QA Audit TCP-24.

DEFICIENCY NO. 1

Requirement:

QI-QP-11.4-10, Revision 1, paragraph 3.1.1 states, in part, "The surface temperature shall be determined by placing a calibrated surface temperature thermometer in contact with the substrate surface to be water blast cleaned.

CP-QP-13.0, Revision 2, paragraph 3.3 states, in part, "The quality engineering supervisor shall be notified in writing by the calibration facility when M&TE or reference standards are found to be out of calibration. He will assure that all equipment tested or calibrated by the deficient item since the last calibration is identified and sufficient investigation performed to either re-establish the acceptability of the equipment or to confirm a nonconformance with completed installations. The results of such investigation shall be documented.

Finding:

Contrary to the above the following discrepancy was found.

M&TE 444 used on 5/6/79 and 5/17/79 on RB #2 El. 808' for AZ 7⁰ - AZ 40⁰ was calibrated on 3/9/79 and calibration was due again on 6/9/79. The surface thermometer was found to be out of calibration on the high-range scale per IEI-25.

On 6/7/79 a letter was sent to the Paint Department Superintendent stating the above condition and requesting a check for possible nonconformance. The Paint Department Superintendent replied on 6/15/79 stating that the thermometer had not been used in conjunction with any final acceptance records. However a QC final acceptance of a surface application checklist was identified using M&TE 444 (checked out to the Paint Department) for final acceptance on 5/17/79.

RESPONSE

After further investigation into the nature of the condition identified by Deficiency No. 1, we have concluded that said condition is in fact not a deficiency. The subject QC inspection checklists for inspections performed on 5/4/79 at El. 808' in Reactor Containment Building Unit #2 indicate a concrete surface temperature reading of 62 °F. This reading is close to the

midpoint of the low range scale of M&TE 444 (0° to 110°F) and M&TE 444 was found to be within low-range calibration limits of IEI-25 during the calibration check conducted on 6/7/79. The high-range scale of M&TE 444 was found to be out of calibration on 6/7/79 but it was not used in this Quality Inspection. In addition, a further check of all concrete coatings records revealed that M&TE 444 was used by QC in 27 other Quality Inspections between 5/8/79 and 7/5/79 with recorded surface temperatures ranging from 72° to 88°F - all within the low-range scale. It should be noted here that since early 1980, all surface thermometers have been calibrated to the low-range scale only because it was determined that they were not being used in the high-range scale.

We have concluded that the condition noted in Deficiency No. 1 is not a deficiency, and therefore, no corrective action is required.

CONCERN NO. 1

During review of QC Inspection documentation, Auditors identified three types of problems occurring within the 8 packages (35 Inspection Documents) observed in the course of the audit. It is understood that no final acceptance of these documents has been made but it is felt the problems identified could have a detrimental impact on the final acceptance process of the records involved. The problems identified are:

1. Procedural Inconsistencies

Incorrect pot life	2 of 35
M&TE number not recorded	6 of 35
Applicable Quality Inspection not recorded	6 of 35
Applicator not listed	2 of 35
No date	1 of 35
No Inspector initials or signature	1 of 35
Mixing time/Batch number left blank	1 of 35
Dry Film Thickness recorded but not initialed or dated	1 of 35

The majority of the inspection documentation has not had final acceptance and has not been formally transmitted or accepted in Permanent Plant Records Vault.

D. N. Chapman
Page 3
December 30, 1981

2. Surface Temperature is required to be 5° higher than dew point prior to application. One checklist was found where this criteria was not met.
3. In 3 of the eight packages observed, the finish coat had been applied; however, checklists documenting the preceding applications (i.e. surfacer and surfacer repairs) had not been completed nor finally accepted.

Please indicate what actions you propose to take with the inspection documents currently stored in the PPRV to address the above three problem areas.

RESPONSE

An extensive review of concrete coatings inspection documentation is now in process. The problems which we have identified are similar in nature to those identified in Concern No. 1. We share your concern that these documentation problems could have a detrimental impact on the final acceptance process of subject documentation.

Corrective Action:

As indicated above, we have begun a review of all concrete coatings inspection documentation. Based upon problems noted in a preliminary review, we have initiated NCR numbers C-81-01613, R.1 and C-81-01823. These NCR's identify the fact that a majority of concrete coatings inspection reports issued prior to 11/11/81 exhibit omissions of various entries including dry film thickness, final acceptance signature and date, applicable inspection instruction, M&TE number for test equipment used, visual defects and continuity inspection results, names of qualified applicators, etc. We will attempt to complete entries in subject documentation based upon information available from corresponding inspection reports which contain the missing information or from field books and sketches maintained by QC Inspectors. All records for which missing entries cannot be obtained shall be presented to Civil Engineering for evaluation and inclusion as part of disposition to the above mentioned NCR. In some cases it may be necessary to perform destructive testing on concrete coatings to verify conformance to Specification AS-31 and Quality Instructions.

Action to Prevent Recurrence:


As previously noted in our preliminary response to prevent recurrence of conditions noted in Concern No. 1, the following action has been taken:

- 1) Quality Instructions describing coatings application on concrete substrate have been incorporated into a single Inspection Instruction QI-QP-11.4-10, "Inspection of Concrete Substrate Surface Preparation and Coatings Application and Repair", which was issued 11/11/81.
- 2) All Protective Coating inspection personnel were indoctrinated in the new QI-QP-11.4-10 including explicit instructions on completion of new inspection reports.

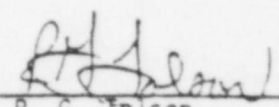
D. N. Chapman
Page 4
December 30, 1981

Date Corrective Action to be Fully Implemented:

As noted above corrective action is presently in process of being implemented. We anticipate that corrective action on concrete coatings documentation will be fully implemented by April 30, 1982.


RGT/RAQ/GTB/dg1

cc: H. Williams
R. A. Cummings


R. G. Tolson
TUGCo Site QA Supervisor

TUQ-1016

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

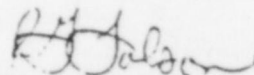
To D. N. Chapman

Glen Rose, Texas November 17, 1981

Subject

TUGCO QA Audit TCP-24
"Action to Prevent Recurrence"
Reference: TUQ-992 and QTQ-96

Attached find preliminary response to prevent recurrence of findings/
concerns expressed in TCP-24. As stated in TUQ-992, formal response
to this audit will be provided on or before January 4, 1982.



R. G. Tolson
TUGCO Site QA Supervisor

X - RGT/CTB/b11

PRELIMINARY RESPONSE TO PREVENT RECURRENCE

Preliminary action to prevent recurrence is complete. Quality Procedure CP-QP-11.4 was revised 10/29/81 to require documentation be completed and submitted to the Permanent Plant Records Vault in a timely fashion. Quality Instructions concerning inspection of surface preparation of steel substrate, primer application and repair have been consolidated into a single inspection instruction QI-QP-11.4-1, "Inspection of Steel Substrate Surface Preparation and Primer Application and Repair". This procedure was issued 10/23/81.

Quality Instructions describing application and repair of seal and finish coat were combined into a single instruction QI-QP-11.4-5, "Inspection of Steel Substrate Seal and Finish Coat Application and Repair", which is to be issued this date.

Quality Instructions describing coating application on concrete substrate have been incorporated into a single Inspection Instruction QI-QP-11.4-10, "Inspection of Concrete Substrate Surface Preparation and Coatings Application and Repair", which was issued 11/11/81.

All Protective Coating inspection personnel were indoctrinated in new procedures/instructions, including explicit instructions on completion of new inspection reports.

QTQ-96

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To R. G. Tolson

Dallas, Texas November 13, 1981

Subject TUGCO QA AUDIT TCP-24

The extension requested for additional time to provide response to audit TCP-24 will be conditional. The extended time requested for response to corrective action is acceptable; however, it is necessary that your response to prevent recurrence be submitted by November 23, 1981.

DN Chapman
D. N. Chapman

Manager, Quality Assurance

R. G. Tolson
DNC/AV/DLA/RHS:med

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QUALITY ASSURANCE

TUG-992

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To D. N. Chapman

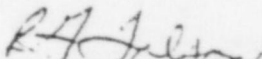
Glen Rose, Texas October 30, 1981

Subject

TUGCO QA Audit TCP-24

Due to the amount of program restructuring in the area of protective coatings as a result of the NRC citation on the subject, we are requesting an extension until January 4, 1981 to provide response to the subject audit.

Additional time is necessary to evaluate the program before providing response.



R. G. Tolson
TUGCO Site QA Supervisor

RGT/CTB/bt1