

TEXAS UTILITIES GENERATING COMPANY

2001 RYAN TOWER - DALLAS, TEXAS 75201

October 18, 1978
TXX-2895

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

Mr. W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76011

Docket Nos. 50-445/Rpt. 78-13
50-446/Rpt. 78-13

COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
RESPONSE TO NRC
INSPECTION REPORT NO. 78-13
DOCKET NOS. 50-445 & 50-446
FILE NO. 10130

Dear Mr. Seidle:

We have reviewed the report on the inspection conducted by Mr. R. G. Taylor (August 1-31, 1978) of the activities authorized by NRC Construction Permit Nos. CPPR-126 and 127 for the Comanche Peak facility. We have responded to the findings listed in Appendix A of your "Inspection Report" dated September 19, 1978.

To aid in the understanding of our response, we have repeated the requirement and your finding, followed on the same page by our corrective action.

We believe the attached information to be responsive to the Inspector's findings. If you have any questions, please advise.

Very truly yours,

R. J. Gary
R. J. Gary

RJG:dla
Attachment

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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted on August 30, 1978, it appears that certain of your activities were not conducted in full compliance with Appendix B to 10 CFR 50 as indicated below:

Failure to Follow Concrete Testing Procedures

Criterion V of Appendix B requires that established instructions, procedures, or drawings be followed for all activities affecting quality.

Texas Utilities Generating Company Procedure QI-QP-11.1-10, Revision 0, "Sampling Fresh Concrete," paragraph 3.1.2 requires that samples be taken at two or more intervals during the discharge of the middle portion of the batch.

Contrary to the above:

The IE inspector observed on the above date, during placement of concrete in a reactor building interior wall, that a concrete laboratory technician took a single sample rather than at two or more intervals during the discharge of the middle portion of the batch. Discussions with the technician and the laboratory supervisor confirmed that this was the standard, but undocumented, practice when taking samples where cylinder strength tests are not a requirement.

This is an infraction.

Corrective Steps Which Have Been Taken and Results Achieved:

Immediately following identification of the noncompliance, the Laboratory Field Coordinator verbally informed all field personnel of the correct sampling techniques for obtaining mid-load acceptance test samples. Additional formal discussions were conducted with all personnel by the Test Laboratory and Product Assurance Supervisor on August 31, 1978.

Corrective Steps Which Have Been or Will Be Taken to Avoid Further Noncompliance

At the time this noncompliance was observed, all laboratory personnel were in the process of being retrained and recertified. This program, as established, results in observation of technique as well as written or oral verification of a technician's knowledge of procedural requirements. Certification is then accomplished to procedures applicable

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to the work activities for the various technician grades that have been established.

To assure the effectiveness of the training and certification program, monthly surveillances are planned of the testing activities until an adequate confidence level is established, then periodically to maintain this confidence level.

Date of Full Compliance

Corrective action was initiated immediately following the NRC inspection and was fully implemented on August 31, 1978. Training of all personnel was completed by October 17, 1978. The surveillance program will be implemented no later than October 31, 1978.