

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER • DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

September 27, 1979
TXX-3049



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 76012

Docket Nos. 50-445/Rpt. 79-19
50-446/Rpt. 79-19

COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
RESPONSE TO NRC
INSPECTION REPORT NO. 79-19
DOCKET NOS. 50-445 & 50-446
FILE NO. 10130

Dear Mr. Seidle:

We have reviewed the report dated September 7, 1979 relative to the inspection conducted by Mr. L. D. Gilbert and other members of your staff during the period August 9, 10, and 13-16, 1979 of activities authorized by NRC Construction Permit Nos. CPPR-126 and 127 for the Comanche Peak facility. We have responded to the finding listed in Appendix A of that report.

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

We believe the attached information to be responsive to the inspectors' finding. If you have any questions, please advise.

Very truly yours,

R. J. Gary
R. J. Gary

Attachment

RJG:df

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Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on August 9-10 and 13-16, 1979, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permit No. CPPR-126 as indicated below:

Failure to Follow Nonconformance Procedures for Electrical Cable

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with the prescribed instructions, procedures, or drawings.

Quality Assurance Procedure, QAP 15.1, Revision 5, July 18, 1979, "Control of Nonconforming Items", paragraph 3.1.1 requires that "Nonconforming items shall be identified by a red "Hold" tag and when practicable segregated from acceptable items."

Figure 1B of QAP 15.1, Step No. 17 defines disposition: "Action to be taken to resolve/close the nonconformance."

Contrary to the above:

1. On August 14, 1979, the IE inspector determined that Nonconformance Report (NCR) E-1570 identified two cables (installed), one reel of cable by number (W-108-1), and a large number of both orange and green cable in the reel yard which were required to be a solid color, which instead have white stripes. Five working days after the NCR E-1570 was initiated, the only reel of nonconforming cable that had been tagged with the red "Hold" tag was reel No. W-108-1. QC had not tagged or segregated any of the other nonconforming reels of cable.
2. The disposition for NCR E-1570 stated "Cables E0102531 and E0102532 will have to be repulled utilizing orange jacketed cable."

The disposition did not address the action required for Reel No. W-108-1, or the other (approximately 20) reels of cable that were nonconforming. The disposition also did not address the inspection of previously installed cable.

This is an infraction.

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Corrective Steps Which Have Been Taken and Results Achieved

The subject nonconformance report has been formally revised to reflect all reels which exhibited the color striping problem. Affected reels were appropriately tagged to prevent inadvertent use or installation. These reels have been or will be returned to the supplier for proper color coding.

All safety-related cables that had previously been installed have been reinspected for verification of proper color coding. This effort identified two additional installed cables with improper color coding. All four cables were appropriately tagged, subsequently removed from the raceway system and scrapped.

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

Quality Instruction QI-QP-11.3-15, "Electrical Cable Installation", was revised (Rev. 2) to formally include cable type and color verification in the Inspection Program. Revision 3 of this instruction will include a Cable Reel Description Code which relates color to a numerical identification printed on the cable at periodic intervals. This coding will provide a backup check for color coding verification.

Corrective steps relative to implementation of the established non-conformance system have or will include the following:

- 1) All nonconformance reports are now routed prior to issue through the Site Quality Engineering (QE) Group who have the assignment of assuring proper identification and control of nonconforming items.
- 2) Added emphasis will be placed in the established ongoing site training program to assure that QC Supervisory personnel fully understand the need for proper identification of non-conforming conditions and have a basic understanding of the applicable QA criteria that must be considered for various types of nonconformances.

Date of Full Compliance

Corrective actions were initiated on August 22, 1979 by revision of the subject nonconformance report and the affected cables were reinstalled by September 13, 1979.

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Preventive measures were initiated on August 16 (QE efforts) and September 10, 1979 (formal revision of the subject instruction) and are scheduled for completion through development of training outline(s) no later than November 1, 1979.

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