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March 30, 1990

Dennis M. Crutchfield, Associate Director  
for Special Projects  
Office of Nuclear Reactor Regulation

Subject: NRC Operational Readiness  
Assessment Team (ORAT),  
Report 50-445/446-89/200-200

Dear Mr. Crutchfield:

As you know, the Citizens Association for Sound Energy (CASE) has been actively involved in monitoring the Comanche Peak Nuclear Power Plant. In that regard, we participated in the exit of the Operational Readiness Assessment Team (ORAT). H. Shannon Phillips, Sr., CASE Consultant, evaluated the inspection documented in the referenced report to determine if NRC Inspection Procedure 93806 was followed. Our consultant concluded that the NRC performed a thorough inspection and that the results were well documented. The NRC inspection team identified significant deficiencies in several different areas.

Although the NRC performed a through inspection CASE is concerned about several areas where deficiencies were identified in the NRC report. We believe the following areas deserve further scrutiny.

- Organizations appear to operate too independently of each other and, as a result, the information flow between organizations is often adequate.
- Maintenance work was performed that was outside the scope of the original work order but the shift supervisor was not notified. Organizations often make such decisions without sufficient authority. Also no nonconformance report (ONE form) was initiated when maintenance identified potentially adverse conditions.
- Problems with housekeeping and material control have occurred and were identified by the NRC dating back to 1985. CASE is concerned that TU Electric has been unable to effectively solve the problem. The NRC ORAT inspection found the applicant's program ineffective.

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- Problems with overdue preventive maintenance items continue.
- Problems with developing procedures that effectively accomplish goals, objectives, and tasks continue.
- Problems with determining root causes of deficiencies continue. The ORAT inspection stated that TU Electric has a tendency to address the specific deficiency and rarely mention the program failures.

If you have in any questions please contact me at (414) 731-1917 or Mrs. Juanita Ellis, The President of CASE, at (214) 946-9446.

Sincerely,

*Billie Pirner Garde (SB)*

Billie Pirner Garde  
Attorney for CASE

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