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IR 92-62
Ref. # 10CFR2.201

TU ELECTRIC

March 22, 1993

William J. Cahill, Jr.
Group Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NO. 50-445/92-62; 50-446/92-62
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated February 19, 1993, concerning the special inspection conducted between December 14, 1992, and January 21, 1993. This inspection was conducted to review programmatic and implementation issues regarding the station temporary modification program.

Attached to the February 19, 1993, letter was a Notice of Violation (NOV). This notice identified violations regarding the technical and administrative implementation of the station temporary modification program. TU Electric accepts these violations.

In response to these issues, TU Electric initiated interim corrective actions to assure that temporary modifications in place were properly reflected on plant drawings and consistent with existing plant conditions, and that future temporary modifications could be implemented safely. Additionally, TU Electric established an Evaluation Team which identified causal factors, preventive actions, and generic implications for the issues. The results of the Evaluation Team were presented to your staff during a January 15, 1993, management meeting. Actions regarding the generic programmatic weaknesses identified by the Evaluation Team are summarized in Attachment 1.

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Attachment 2 provides TU Electric's reply to the Notice of Violation pursuant to 10CFR2.201 and the terms of the notice.

Sincerely,

William J. Cahill, Jr.
William J. Cahill, Jr.

By: *Roger D. Walker*
Roger D. Walker
Manager of Regulatory
Affairs for NEO

OB/tg
Attachments

c - Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandell, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR

SUMMARY OF TU ELECTRIC ACTIONS

As a result of the Evaluation Team investigation of problems with temporary modifications, TU Electric is taking the following actions to address potential generic implications:

1. Identify and evaluate programs likely to be challenged by planned activities so that changes and/or enhanced performance monitoring can be undertaken to prevent or provide early detection of problems.
2. Review other programs like the temporary modification program which may create the potential for incompatibilities in plant activities and establish controls to prevent such problems.
3. A task team has reviewed the design modification and minor modification processes to determine if either has any of the specific problems identified with the temporary modification process and actions are being taken as appropriate.
4. Reemphasize evaluation of corrective action effectiveness as part of Nuclear Overview's routine duties.
5. Nuclear Overview is coordinating an integrated effort to evaluate ONE Forms, Plant Incident Reports, and Industry Operating Experience Reports open longer than six months to assure appropriate priorities have been assigned to closing these items.
6. Nuclear Overview will routinely review Overview findings open greater than 90 days to determine whether corrective actions are proceeding on a schedule consistent with the importance of the items and report the results to Senior Management.

With regard to specific temporary modification issues, TU Electric will:

1. Improve the methodology for assuring that temporary modifications are reflected on vital station drawings;
2. Improve the coordination and scheduling of temporary modifications and other activities which are potentially impacted (such as clearances) to assure compatibility;
3. Require additional engineering review to assure the technical adequacy of temporary modifications;
4. Improve the field visibility of temporary modifications to provide increased assurance that personnel will recognize when temporary modifications are installed;

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5. Enhance the procedure on temporary modifications to more clearly define responsibilities, accountabilities, and management expectations.

RESTATEMENT OF VIOLATION A
(445/9262-01; 446/9262-01)

Criterion VI of Appendix B to 10 CFR Part 50 and Comanche Peak Steam Electric Station Final Safety Analysis Report, Amendment 81, Section 17.2.6, "Document Control," state that measures shall be established to control the issuance of documents such as instructions, procedures, and drawings which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, on December 30, 1992, it was identified that established procedures were not adequate to assure that documents, including changes, were distributed to and used at the location where the prescribed activity is performed. Specifically, vital station Drawing M1-0259, "Boron Recycle System," located in the Work Control Center was not marked up to show the additional piping and valves installed by Temporary Modification 92-1-103, Revision 1. Vital station drawings located in the Clearance Processing Center were not marked up to show any temporary modifications applicable to Units 1 or 2.

RESPONSE TO VIOLATION A
(445/9262-01; 446/9262-01)

TU Electric accepts the violation and provides the following information, as requested:

1. Reason for the Violation

These errors were attributable to less than adequate procedural controls to assure that the drawings posted with active Temporary Modifications (TMs) were maintained at the locations where the prescribed activity was being performed. Additionally, the responsibilities for coordinating these activities were not clearly defined, nor clearly understood by personnel involved.

2. Corrective Steps Taken and Results Achieved

TU Electric initiated ONE Forms to document the conditions identified. The subject vital station drawings were updated to correctly reflect the status of the subject Temporary Modifications.

3. Corrective Steps Taken to Avoid Further Violation

TU Electric has taken the following interim actions:

A dedicated system engineer has been assigned as the TM coordinator. The TM coordinator provides to the Operations department a report listing the vital station drawings which are impacted by TMs in a timely manner. The Operations shift administrative staff checks impacted vital station drawings (as required) to ensure that the updates are maintained. TU Electric will keep these interim actions in place until the actions discussed in Attachment 1 on specific temporary modification issues are in place.

TU Electric will enhance its procedures based on recommendations from the Evaluation Team to improve the methodology for assuring that TM information is made available to the users, including more clearly defining responsibilities and accountabilities.

4. Date of Full Compliance

The enhancements to the TM procedure will be complete prior to the third refueling outage for Unit 1.

RESTATEMENT OF VIOLATION B
(445/9262-02; 446/9262-02)

Criterion XVI of Appendix B to 10 CFR Part 50 and Comanche Peak Steam Electric Station Final Safety Analysis Report, Amendment 85, Section 17.2.16, "Corrective Action," state that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, established measures were not adequate to assure that deficiencies with the implementation of the temporary modification program were promptly identified and corrected to preclude repetition of significant conditions adverse to quality.

1. The corrective actions taken to preclude repetitive deficiencies with maintaining vital station drawings updated to reflect active temporary modifications were not adequate. On July 10, 1992, Operations Notification and Evaluation (ONE) Form 92-651 identified that vital station Drawing M1-0235 was not properly updated to reflect Temporary Modification 92-1-13. The corrective actions taken did not preclude subsequent occurrences as identified on ONE Form 92-821, dated August 19, 1992; ONE Form 92-981, dated October 8, 1992; ONE Form 92-1561, dated December 7, 1992; and ONE Form 93-082, dated January 8, 1993.
2. The cause for safety-related Transformer CP1-ECTRET-02 remaining energized on November 11, 1992, after Clearance 1-92-01073 was implemented, was not determined and corrected to preclude a repetition of the problem on December 3, 1992, when Transformer CPX-EPMCND-21 remained energized after Clearance X-92-02849 was implemented. Following the second event, corrective actions again were not implemented to identify and correct the temporary modification implementation deficiency which resulted in the transformers remaining energized.
3. Plant Incident Report 91-0555 dated April 18, 1991, had not been dispositioned to resolve implementation problems with the temporary modification program.

4. Prompt corrective actions were not taken to resolve a temporary modification configuration control deficiency identified on ONE Form 92-0668, dated July 14, 1992. It was identified that, although two isolation points had been installed on a steam generator drain line, only one was documented and removed when the temporary modification was closed. One of the corrective actions identified in the ONE Form was to revise Temporary Modification 91-1-052 to reflect the second isolation point. This corrective action was not implemented and, on November 16, 1992, while attempting to drain the steam generator, it was identified that the line was still isolated but not documented in any temporary modification.

RESPONSE TO VIOLATION B
(445/9262-02; 446/9262-02)

TU Electric accepts the violation and provides the following information, as requested:

1. Reason for the Violation

During the second refueling outage Nuclear Overview identified these issues as an adverse trend. The issues were reviewed by management and it was concluded that these issues alone did not pose a significant plant configuration control issue. Notwithstanding, TU Electric initiated a task team to review issues relating to TMs. The task team's review of the ONE Form (relating to TMs) concluded that corrective actions taken to resolve the previously addressed issues appeared to be sufficient to correct specific deficiencies. However, a root cause evaluation of these issues remained open.

TU Electric believes that the condition identified was caused by failure to fully recognize the commonality in causes of the individual events in a timely manner. The ONE Form procedure did not clearly define the time limits for dispositioning the ONE Forms.

2. Corrective Steps Taken and Results Achieved

The Evaluation Team has reviewed the ONE Forms. These ONE Forms have been dispositioned, evaluation of generic implication and root cause analysis has been performed and appropriate corrective actions are in place.

3. Corrective Steps Taken to Avoid Further Violations

The ONE Form procedure was revised apart from this violation as part of a Quality Assurance Audit, and now provides guidance on timely disposition of ONE Forms and Plant Incidents affecting safety. Additionally, Nuclear Overview is coordinating a reevaluation of open ONE Forms, Plant incidents, and industry operating experience reports over six months old to assure appropriate prioritization.

4. Date of Full Compliance

TU Electric is in compliance.

RESTATEMENT OF VIOLATION C
(445/9262-03; 446/9262-03)

Technical Specification 6.8.1a requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Appendix A to Regulatory Guide 1.33, paragraph 1a, requires that administrative procedures be developed for controlling equipment status (e.g., locking and tagging).

Administrative Procedure STA-605, Revision 11, "Clearance and Safety Tagging," Section 2.2, establishes the applicability of this procedure to identify the established forms, tags, and documents that are necessary for the users of this procedure to adequately impact, prepare, hang, log, and restore clearances. Section 4.2 defines the clearances as assurance that a component, subsystem, or system is isolated or configured as specified on the clearance report.

Contrary to the above, Administrative Procedure STA-605, Revision 11, was not adequate to assure that users of the procedure identified the documents that are necessary to adequately impact, prepare, hang, log and restore clearances as indicated by the following examples:

On November 11, 1992, Clearance Order 1-92-01073 was implemented to deenergize safety-related Transformer CP1-ECTR5T-02; however, Temporary Modification 92-1-66 was not considered in the clearance report resulting in the transformer remaining energized.

On December 3, 1992, Clearance Order X-92-02849 was implemented to deenergize non-safety-related Transformer CPX-EPMLNB-21; however, Temporary Modification 92-1-30 was not considered in the clearance order resulting in the transformer remaining energized.

RESPONSE TO VIOLATION C
(445/9262-03; 446/9262-03)

TU Electric accepts the violation and provides the following information, as requested:

1. Reason for the Violation

TU Electric believes that these events were caused by less than adequate implementation of existing requirements of procedure regarding real time impacting of activities.

2. Corrective Steps Taken and Results Achieved

TU Electric management took the following interim actions. Operations department now evaluates the impacts of TMs on all "accepted" and "prepared" clearances prior to shift supervisor authorization for installation. Evaluation is also performed by the Operations Department for "accepted" clearances for impact by installed TMs.

3. Corrective Steps Taken to Avoid Further Violation

TU Electric believes that the interim actions in place will prevent recurrence. TU Electric is evaluating the need to enhance the procedure on impacting clearances, after evaluating the results of the interim actions.

4. Date of Full Compliance

The revision to the procedure on clearances if needed, will be completed prior to the third refueling outage of Unit 1.