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IR 93-02
Ref. #10CFR2.201

April 15, 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 50-445/93-02; 50-446/93-02
RESPONSE TO NOTICE OF VIOLATION

REF: 1) TU Electric letter logged TX-93001 from
William J. Cahill, Jr. to the NRC
dated January 30, 1993.

Gentlemen:

TU Electric has reviewed the NRC's letter dated March 17, 1993, concerning the inspection conducted by the NRC staff during the period of January 4 through January 30, 1993. This inspection covered activities authorized for the Comanche Peak Electric Station Facility. Attached to the March 17, 1993, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

The March 17, 1993, letter identified commitments to three actions in response to these violations. The committed actions are correct as stated in the NRC's letter and have been completed or incorporated into the plant's programs as noted in the attached responses.

Sincerely,

William J. Cahill, Jr.

JG/ds
Attachment

c - Mr. J. L. Milhoan, Region IV
Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR
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VIOLATION A
(446/9302-01)

Criterion V of Appendix B to 10 CFR 50 states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

1. Contrary to the above, during the period of January 4-30, 1993, NRC identified that Procedures ISU-001, ISU-101B, ISU-240B, ISU-260B, and ISU-280B, which would have been used in initial startup and power ascension testing, were inappropriate because they required the licensee's staff to conduct unspecified activities described as performance of "applicable" or "appropriate" portions of referenced procedures.
2. The licensee specified that preoperational testing should be conducted in accordance with requirements given in CPSES Startup Administrative Procedure (SAP) CP-SAP-07B, "Preoperational Testing." SAP CA-SAP-07B required that deficiencies identified during preoperational testing be processed in accordance with requirements given in SAP CP-SAP-16. Paragraph 6.8.1.8 of SAP CP-SAP-07B required that the test group supervisor shall approve a retest for performance by signing the "Required Retest" block on the Startup Deficiency Report (SDR).
 - (a) Contrary to the above, during 12 preoperational test results evaluations, the licensee identified numerous examples in which preoperational tests had not been conducted in accordance with administrative requirements. Specifically, there were hundreds of violations by startup test engineers of administrative requirements given in SAP CP-SAP-07B and/or SAP CP-SAP-16. These violations, which included errors such as failure to record test activities in the applicable test logs, the failure to ensure that appropriate procedure step signoffs were obtained prior to proceeding to subsequent procedure steps, and failure to initiate proper deficiency documentation for test discrepancies, occurred during preoperational testing in the time frame of March to December 1992.
 - (b) Contrary to the above, the inspectors identified two instances (SDRs 2974 and 3033) in which the test group supervisor approved retests for performance on October 2, 1992, which was after the retests were performed on September 30, 1992.

ITEM 2(a)

(1) Reason for Violation

Early in 1992, significant changes were made to the administrative procedures controlling the Preoperational Test Program. Although training was provided to test engineers, it appears to have been weak with regard to administrative details related to conducting and documenting preoperational testing. This did not become apparent until resources were allocated to perform detailed reviews of preoperational test results by Startup, Engineering, Quality Assurance and Operations in the fall of 1992.

Errors found during these reviews were documented on Startup Deficiency Reports (SDR's) and resolved. These SDR's and resolutions were included with the preoperational test results packages to be evaluated for impact on test results by the Joint Test Group. This evaluation led to the conclusion that there was no adverse impact on the acceptability of the final test results.

(2) Corrective Steps Taken and Results Achieved

All preoperational test results have been reviewed. The resolutions for the startup administrative procedure violations have been accepted by the Joint Test Group.

(3) Corrective Steps Taken to Prevent Recurrence

The Preoperational Test Program for CPSES is complete; however, the following corrective steps are in effect to prevent a similar occurrence during ISU testing:

- (a) In addition to required reading, specific training has been conducted for test personnel on the administrative details regarding the conduct and documentation of ISU Testing.
- (b) Test results are reviewed promptly to assure that the ISU Program is being implemented properly.
- (c) While not initiated as a corrective action for this specific problem, the Independent Safety Engineering Group provides a comprehensive overview of plant activities associated with the ISU program. This provides additional feedback regarding the effectiveness of the program implementation.

(4) Date When Full Compliance Will be Achieved

Full compliance has been achieved.

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Errors found during these reviews were documented on Startup Deficiency Reports (SDR's) and resolved. These SDR's were included with the preoperational test results packages to be evaluated for impact on test results by the Joint Test Group.

(2) Corrective Steps Taken and Results Achieved

All preoperational test results have been reviewed. The resolutions for the startup administrative procedure violations have been accepted by the Joint Test Group.

(3) Corrective Steps Taken to Prevent Recurrence

The Preoperational Test Program for CPSES is complete; however, the following corrective steps are in effect to prevent a similar occurrence during ISU testing:

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- (c) While not initiated as a corrective action for this specific problem, the Independent Safety Engineering Group provides a comprehensive overview of plant activities associated with the ISU program. This provides additional feedback regarding the effectiveness of the program implementation.

(4) Date When Full Compliance Will be Achieved

Full compliance has been achieved.

ITEM 2(b)

(1) Reason for Violation

A test engineer performed a retest for two Startup Deficiency Reports. It was obvious to the engineer that the retest was required to complete that portion of the preoperational test, but he failed to realize that an administrative procedure required approval of the related SDR's prior to conducting the retest.

(2) Corrective Steps Taken and Results Achieved

A review of the documentation associated with the two SDR's and retest confirmed that there was no technical impact resulting from this procedure violation.

(3) Corrective Steps Taken to Prevent Recurrence

Training has been conducted for ISU test personnel on the conduct of and documentation for ISU testing.

(4) Date When Full Compliance Will be Achieved

Full compliance has been achieved.

VIOLATION B
(446/9302-02)

Criterion XVI of Appendix B to 10 CFR 50 and the licensee's approved quality assurance program, Revision 87, require that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the inspectors found on January 7, 1993, that the licensee's actions to prevent repetition of a violation of requirements pertaining to the administrative handling of documents was not effective because Procedure Change Notice 6 (effective November 21, 1992) to Procedure SOP-313, "Turbine Pant Cooling Water System," was not in the control room copy of the procedure. This is a repetition of a similar problem identified in Violation 446/9232-01.

Response to Violation B
(446/9302-02)

(1) Reason for Violation

Procedure Change Notice 6 to Procedure SOP-313, "Turbine Plant Cooling Water System", was received by the control room staff but was lost. As a result, the change was not placed in Procedure SOP-313 as required.

(2) Corrective Steps Taken and Results Achieved

A review was made to determine whether any adverse impact had occurred to the plant as a result of using SOP-313 without the change incorporated. No adverse impact had occurred.

Procedure Change Notice 6 was placed in SOP-313. Also, all SOP's in the control room were promptly reviewed for other such occurrences. None were found.

Additionally, all other procedures in the control room have been reviewed for this problem. No other occurrences were found.

(3) Corrective Steps Taken to Prevent Recurrence

A standing order has been issued to control room personnel which describes the procedural control process and emphasizes the importance of promptly posting changes to procedures.

(4) Date When Full Compliance Will Be Achieved

Full compliance has been achieved.