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Ref. # 10CFR2.201

May 26, 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. 50-44E AND 50-446
NRC INSPECTION REPORT NOS. 50-445/93-10; 50-446/93-10
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated May 3, 1993, concerning the inspection conducted by the NRC staff during the period March 15 through March 19, 1993. Attached to the May 3, 1993, letter was a Notice of Violation (NOV).

TU Electric understands that a response to Violation B in the NOV is not required. However, a clarification regarding the telephone conversation on April 5, 1993, is hereby provided. TU Electric has revised the test procedure to require independent review of the prerequisites, as well as the overall test package. This is in lieu of prohibiting the preparer of the prerequisites from being the overall test package reviewer as stated in Section 1.2 of the subject Inspection Report.

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

Sincerely,

William J. Cahill, Jr.

OB:bm
Attachment

cc: Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandell, Region IV
Resident Inspectors, CPSES ()

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PDR ADOCK 05000445
Q PDR

P. O. Box 1002 Glen Rose, Texas 76043-1002

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NOTICE OF VIOLATION
(445/9310-04; 446/9310-04)
VIOLATION A

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

Procedure STA-206, "Review of Vendor Documents and Vendor Technical Manuals", Revision 17, Section 6.2.2, states that the vendor documents (received at the site) are adequately identified and reference specific Comanche Peak Steam Electric Station applications, whenever applicable.

Contrary to the above, the licensee failed to properly identify the applications of Limitorque Maintenance Update 92-02 and, as a result, failed to evaluate the applications of a change to the criteria determining the acceptable tolerance for actuator torque switch repeatability.

RESPONSE TO VIOLATION A
(445/9310-04; 446/9310-04)

TU Electric accepts the violation and the requested information follows:

1. Reason For Violation

The control of vendor notices, such as Limitorque Maintenance Updates, is governed by the Vendor Equipment Technical Information Program (VETIP) at CPSES. The VETIP Coordinator initiates a "Vendor Document Review Traveler" (VDRT) upon receipt of the vendor document. The VDRT is routed to the assigned groups for an Interdisciplinary Review (IDR) based on the scope of the document. After completion of the VDRT, the vendor notice is then incorporated into the appropriate vendor manual and routed for review, including an assessment of procedural impact, to organizations that have listed the manual as a reference in their procedures. In the case of Limitorque Maintenance Update 92-02 the VETIP Program accomplished all of the prescribed steps required under that Program.

There were two reasons why the Update was not being evaluated for programmatic impact on the CPSES Motor Operated Valve (MOV) Program. First, the Responsible Engineer in the MOV Program who performed the IDR incorrectly assumed that the Design Group was familiar with the update and would initiate any required changes. Second, the test procedures that are impacted by the increased margin for repeatability do not reference the vendor manual. Therefore, copies of the vendor manual change were not sent to the Component Test Group for review and an assessment of the procedural impact.

2. Corrective Steps That Have Been Taken And The Results Achieved

Upon discovery, an Operations Notification and Evaluation (ONE) Form was issued to document this deviation. A technical evaluation has been initiated to determine the impact of Limitorque Maintenance Update 92-02. Changes to the program will be implemented as required.

Additionally, cognizant personnel have been made aware of this violation, and management expectations regarding a thorough review has been reemphasized.

3. Corrective Steps That Will Be Taken To Preclude Recurrence

Station Administration procedure STA-754, "Motor Operated Valve Program," has been enhanced. This enhancement ensures that a review and evaluation of the Limitorque Maintenance and Technical updates are performed by the required organizations.

Procedures for the performance of MOV diagnostic testing are being revised to add the Limitorque Maintenance Manual as a reference. As a result, the test group will be notified of the required changes to the manual, such as the addition of a Maintenance Update.

4. Date When Full Compliance Will Be Achieved

The Technical Evaluation of Limitorque Maintenance Update 92-02 should be completed by July 1, 1993.

Revision of the MOV testing procedures will be completed by September 1, 1993.