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August 5, 1994

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
RESPONSE TO NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(SALP) REPORT 50-445/94-99; 50-446/94-99

Gentlemen:

Via your letter of June 27, 1994 you transmitted the results of your SALP for CPSES Units 1 and 2. The SALP report was your assessment of our regulatory performance for the SALP period beginning May 30, 1993 through May 28, 1994. Subsequently on July 28, 1994 a meeting was conducted between the NRC staff and CPSES staff in which the results of your SALP assessment were discussed. At that meeting and via your June 27, 1994 letter you asked that any written comments TU Electric may wish to provide on the NRC SALP assessment be submitted within 30 days of the SALP meeting. This letter transmits TU Electric's written response to the letter and supplements our oral responses provided at the meeting of July 28, 1994.

Your assessment of CPSES indicated superior performance in the areas of Engineering and Plant Support while the Maintenance and Plant Operations areas were evaluated as having good performance. We appreciated your recognition of CPSES's high level of performance. We also appreciated the open and candid discussion of our performance that occurred at the meeting on July 28, 1994. We found both the report and the meeting discussion to be quite helpful. As we stated in the meeting we intend to use the constructive criticisms provided in both forums to supplement our own self assessment program in our efforts to achieve excellence.

We believe that the additional comments we provided at the SALP meeting were adequate with respect to the functional areas of Engineering, Plant Support, and Plant Operations. Consistent with our comments at the SALP meetings we do wish to provide written comments on the Maintenance functional area and they are provided as Attachment 1.

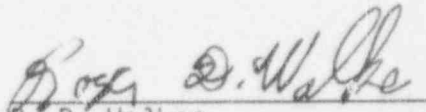
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In conclusion we wish to reaffirm our commitment to continued improvement at CPSES. We recognize our need for continued diligence in pursuing that improvement and appreciate your candid assessment and verbal comments. We do request that you consider our comments in any reassessment of the SALP functional area of Maintenance and trust that you will find our comments helpful.

Sincerely,

William J. Cahill, Jr.

By: 
R. D. Walker
Regulatory Affairs Manager

RDW:clc

Attachment
Enclosure

cc: Mr. L. J. Caillan, Region IV
Ms. Melanie Miller, Region IV
Resident Inspectors, CPSES
Mr. T. A., Bergman, NRR

ATTACHMENT 1

COMMENTS ON THE MAINTENANCE FUNCTIONAL AREA

As we stated in the meeting of July 28, 1994 (overhead view graph material, Enclosure 1) we believe our performance in the SALP functional area of Maintenance during the last assessment period was at the level of a SALP Category 1 and wish to provide you with additional information for your use in reassessing the SALP functional area of Maintenance for CPSES as we requested at that meeting. We would note that our performance in our opinion has been at a sustained high level in the Maintenance area in that our previous SALP assessment indicated very limited areas for suggested improvements (primarily a suggestion to identify and effect corrective actions to preclude instances of missed surveillances which has been accomplished).

During the assessment period a considerable effort was put forth by Maintenance personnel to continue human performance improvements, manage corrective maintenance action backlog, and improve the material condition of the plant. We have had very good results in all of these efforts and we intend to continue to improve in these areas.

General Comments

Specific organizational initiatives were undertaken during the assessment period. These initiatives were undertaken to enhance our support of safe and reliable plant operations. We believe these initiatives resulted in improved organizational performance, improved work practices, better communications and increased support to operations while reducing overtime costs. Some of these changes are: the maintenance planners were merged with Work Control to form a centralized group, a move was made to a new facility, the electricians and mechanics were put on a rotating shift to better support operations and a layer of management was eliminated to achieve a flattened organization resulting in more effective organizational communications.

Noted Successes and Accomplishments

Unit 2 reached commercial operation without a significant increase in the maintenance backlog.

Maintenance staffing was enhanced with the hiring of permanent utility employees to support the operation of a two-unit plant. Additionally, training was accomplished to support qualification of personnel to support both units.

The surveillance program was further enhanced with the consolidation of the planners which led to one group tracking and scheduling the surveillances for maintenance. The success of this enhancement is evidenced by no missed surveillance activities by maintenance.

Maintenance was instrumental in the reduction of Radwaste through:

- o minimized use of plastic sheeting,
- o re-use of protective floor coverings and drop clothes when possible,
- o good use of "hot" tool room supplies,
- o use of washable tool bags, and
- o good radwaste contamination control practices and measures

Training for supervisors was completed in supervisory methods and observation training.

Maintenance exhibited a consistently high quality level for the work performed.

The MOV testing program in accordance with NRC Generic Letter 89-10 continues to be a major strength.

In the area of material condition, marked improvements have occurred due to strong management and personnel involvement.

Improperly alarming annunciator list was brought to a low level and painting projects have been completed throughout the plant.

During 1RF03, 27 design modifications and 136 minor modifications were implemented. These included the installation of the new plant computer system, RM-11 Radiation Monitoring system upgrade, and eliminating the potential for MOV hot shorts.

In addition, temperature problems with the 1A main feed pump were corrected, implementation of leak reduction programs have increased plant efficiency and modification of the crossover drain system increased the performance of the High Pressure Drain system.

The decision was made to have a Unit 2 mid-cycle outage to repair steam leaks and perform other maintenance items while ensuring efficiency from the unit during the remainder of the initial fuel cycle.

On site, the Zone Accountability Program (ZAP) area coordinators have been assigned specific areas. These coordinators lead teams which are responsible for the physical condition of their area.

Site areas have been cleaned up as the construction has finished. Examples include the removal of temporary buildings and new landscaping.

Several Maintenance groups have joined in the Texas "Adopt-A-Highway" program adjacent to the plant.

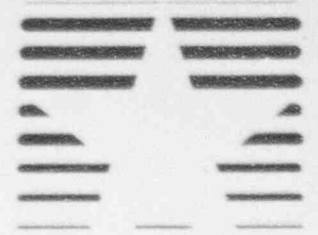
Numerous remodeling projects were completed (such as the MSC, administration building, etc.).

Benchmark of CPSES Performance compared to other SALP Category 1 and 2 Performers

TU Electric compared our maintenance performance to 30 plants achieving a recent SALP rating of 1 (nine plants) or 2 (21 plants) in the functional area of maintenance. Our review indicates that CPSES exceeds the performance of the plants rated Category 2 in quality of procedures or work instructions, surveillance performance, M&TE control, correction of SALP identified issues and personnel error reduction. Our review of the SALP Category 1 plants indicate to us that our performance was more consistent with this group in that commonalties exist with respect to strong planning and scheduling, a comprehensive check valve program, comprehensive surveillance program and comprehensive material condition program. Additionally, the Category 1 plants experienced procedure compliance findings on a scale equivalent to or broader than CPSES in the maintenance area.

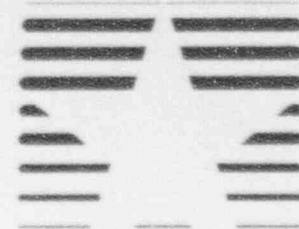
As the enclosed slides used at the July 28, 1994 meeting indicate, TU Electric believes our record with respect to corrective maintenance backlog, personnel error rate, and safety system performance has been consistent with SALP Category 1 performance throughout the SALP assessment period.

MAINTENANCE INITIATIVES



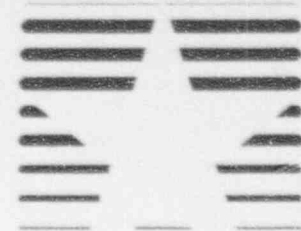
- GOAL :
 - TO ENHANCE PERFORMANCE
- ACTION :
 - REORGANIZED & MERGED WITH WORK CONTROL
 - MOVED TO A NEW FACILITY
 - PUT ELECT. & MECH. ON THE SAME SHIFT AS OPERATIONS
 - ELIMINATED ONE LAYER OF MANAGEMENT
- RESULT :
 - ORGANIZATION IMPROVED PERFORMANCE
 - IMPROVED COMMUNICATIONS
 - REDUCED OVERTIME

MAINTENANCE SALP 2 COMPARISON



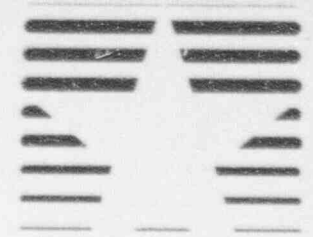
- CPSES MAINTENANCE PERFORMANCE APPEARED TO EXCEED THE PERFORMANCE OF SITES DESCRIBED IN 21 REPORTS REVIEWED. MAINTENANCE HAD **NO** WEAKNESSES IDENTIFIED IN THE FOLLOWING AREAS :
 - QUALITY OF PROCEDURES OR WORK INSTRUCTIONS
 - MISSED SURVEILLANCES
 - M&TE CONTROL PROBLEMS
 - RECURRING SALP EVALUATION ITEMS
 - PERSONNEL ERROR PROGRAM

MAINTENANCE SALP 1 COMPARISON



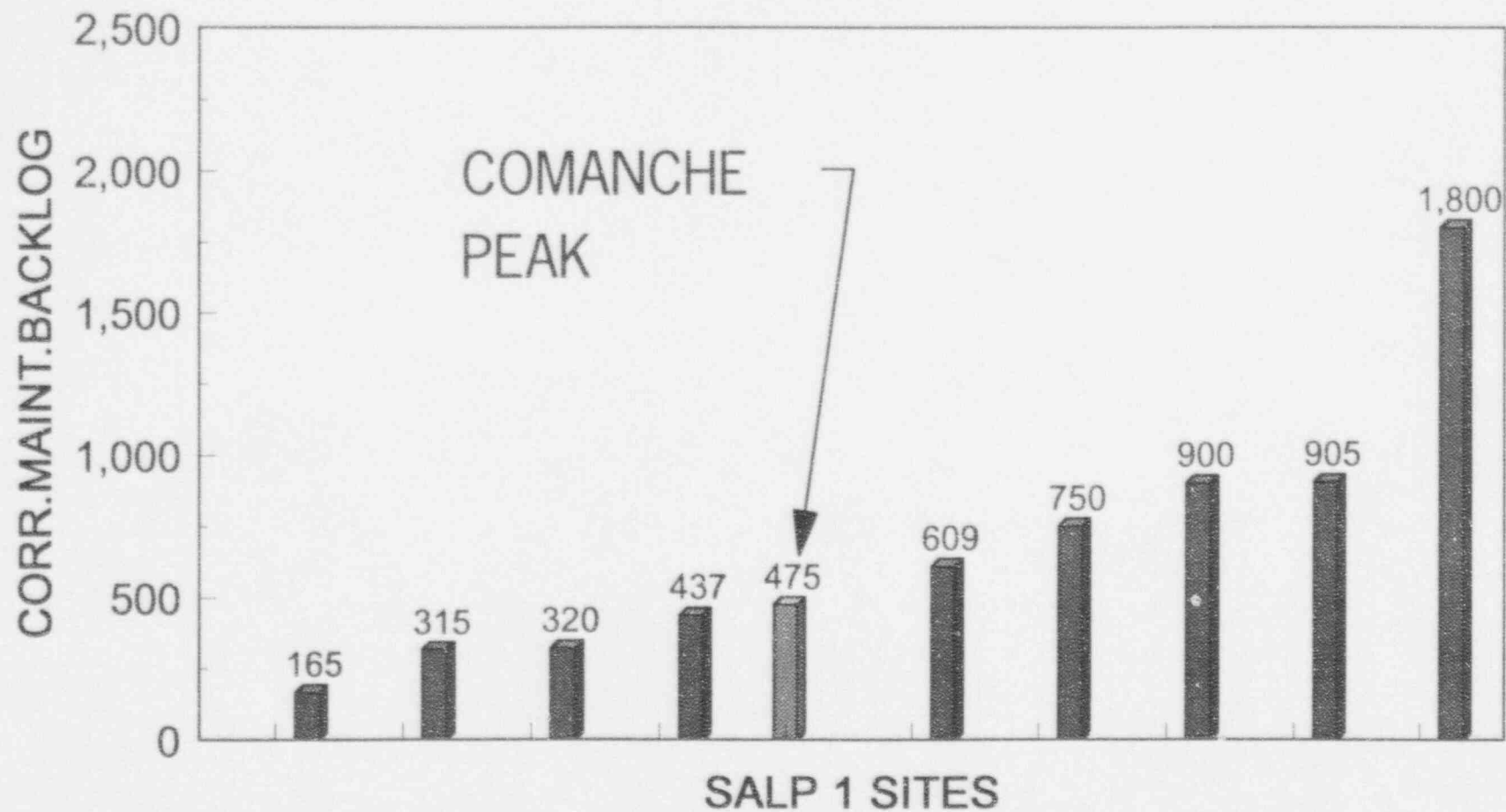
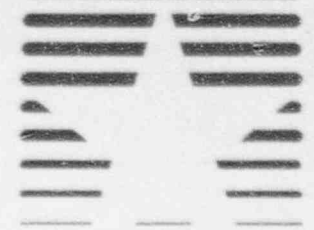
- CPSES MAINTENANCE PERFORMANCE COMPARED TO 9 SITES WITH SALP 1 MAINTENANCE RATINGS
 - STRONG MAINTENANCE PLANNING AND SCHEDULING
 - CHECK VALVE SURVEILLANCE PROGRAM A STRENGTH
 - MATERIAL CONDITION OF THE PLANT EXCELLENT AT THE END OF THE EVALUATION PERIOD

MAINTENANCE SALP 1 COMPARISON

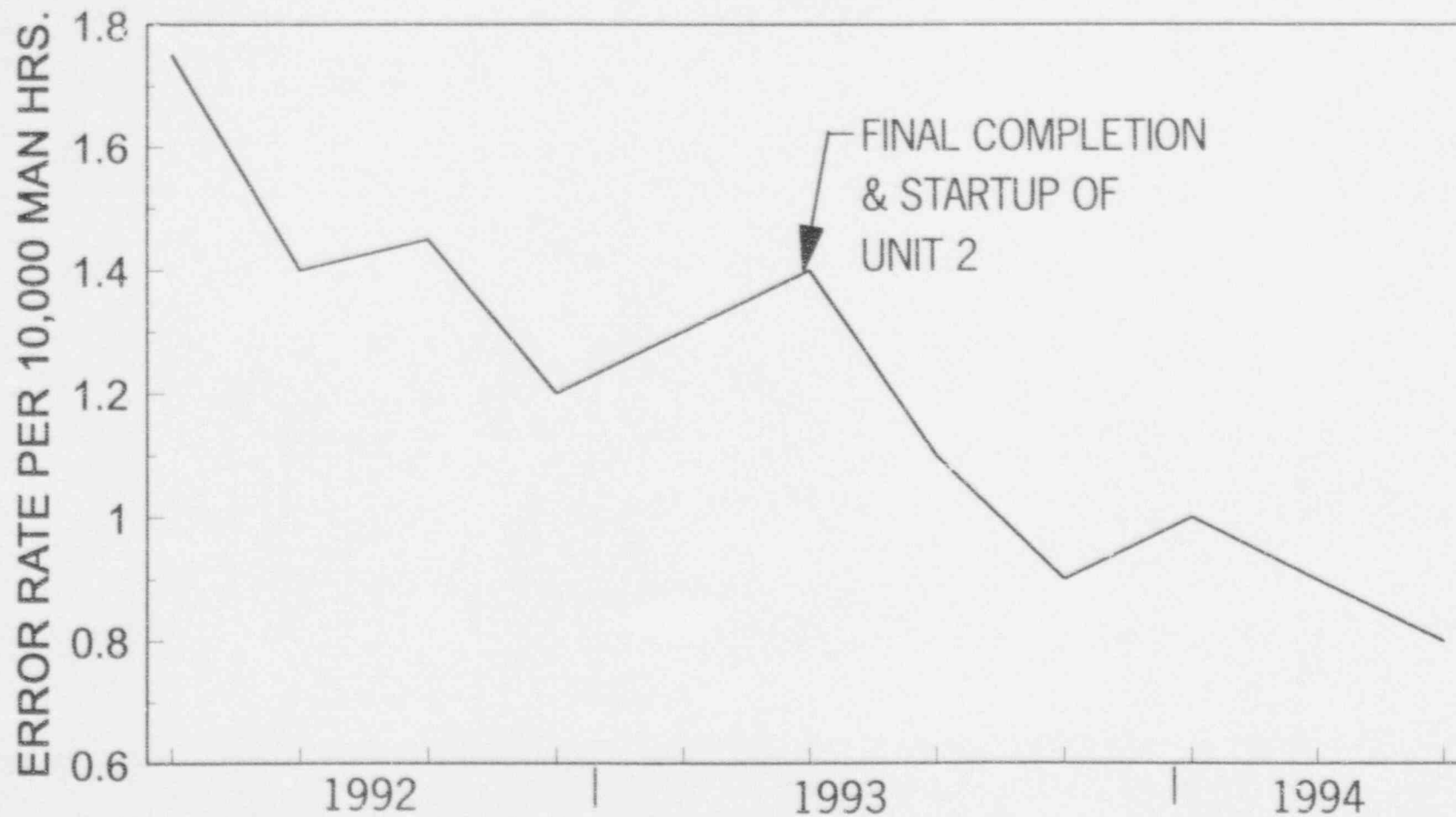
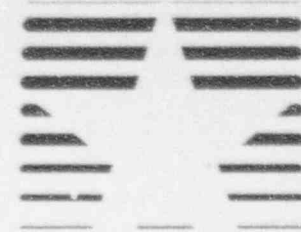


- SAFETY SYSTEMS PERFORMANCE REMAINING STRONG
- MAINTENANCE AND SURVEILLANCE PROGRAMS CONTINUED TO BE STRONG
- ONLY ISOLATED EXAMPLES OF PROCEDURAL ADHERENCE PROBLEMS

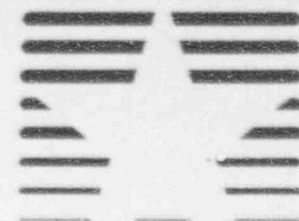
CORRECTIVE MAINT. BACKLOG COMPARISON TO SALP 1 SITES



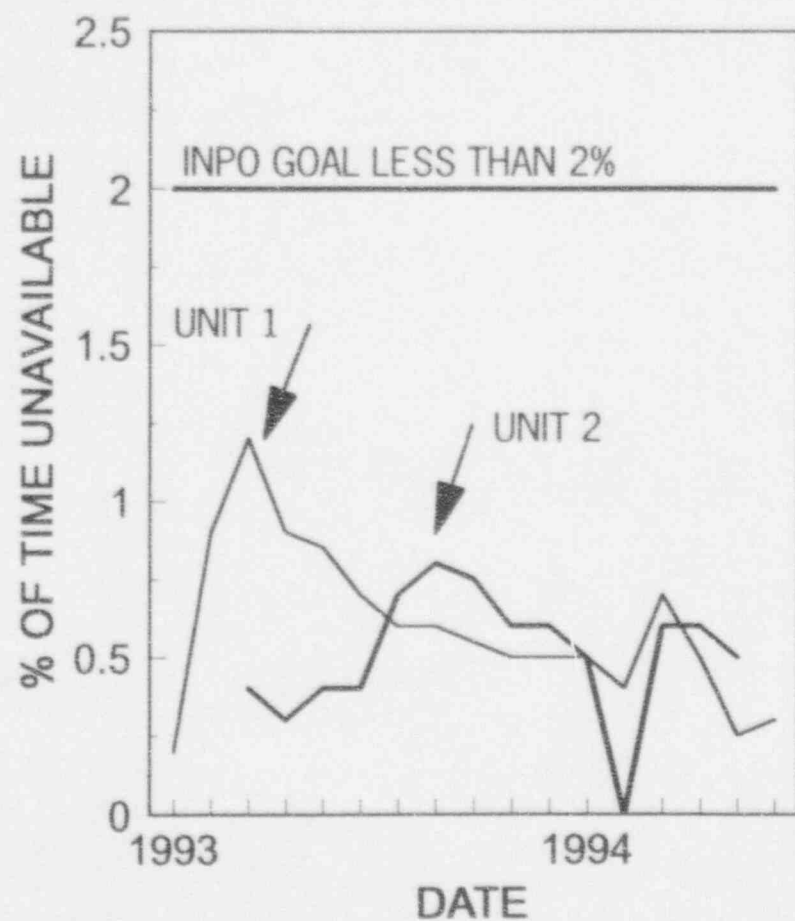
TOTAL ERROR RATE



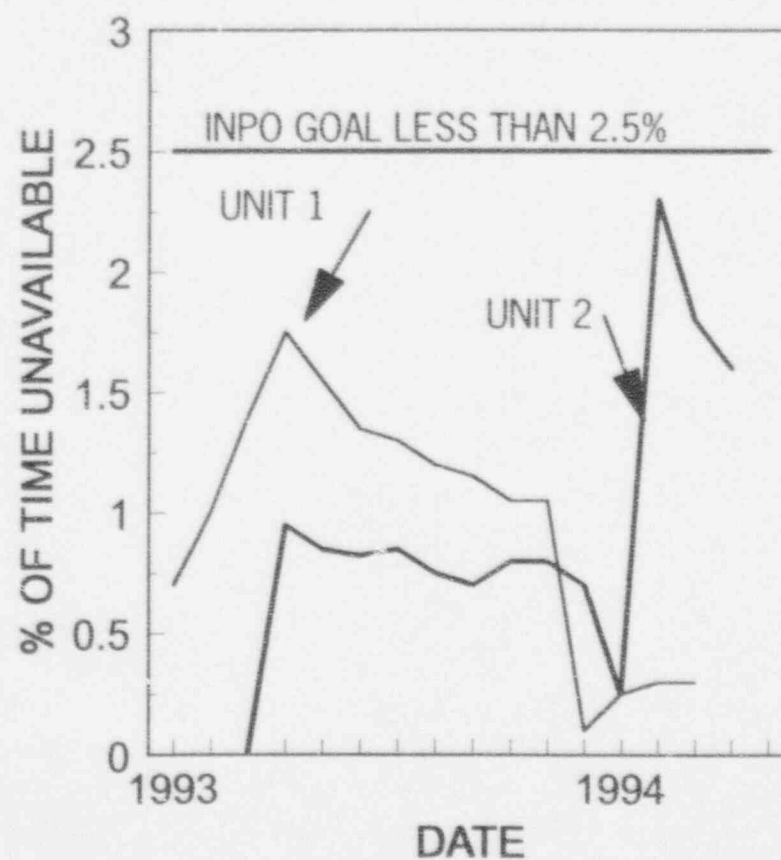
SAFETY SYSTEM PERFORMANCE



HIGH PRESSURE SAFETY INJECTION



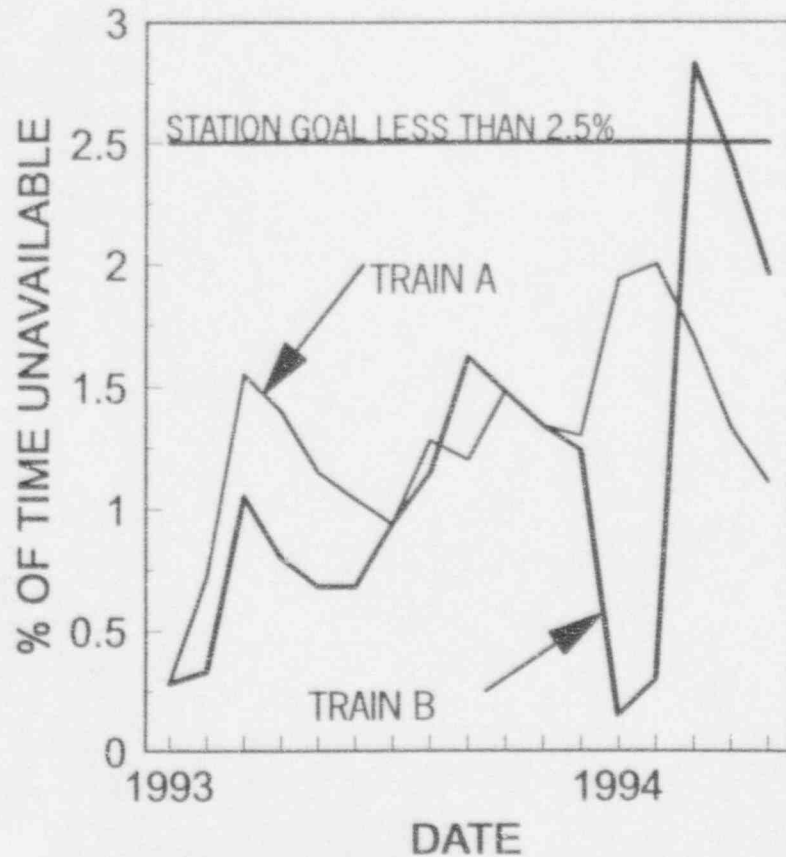
AUX. FEEDWATER



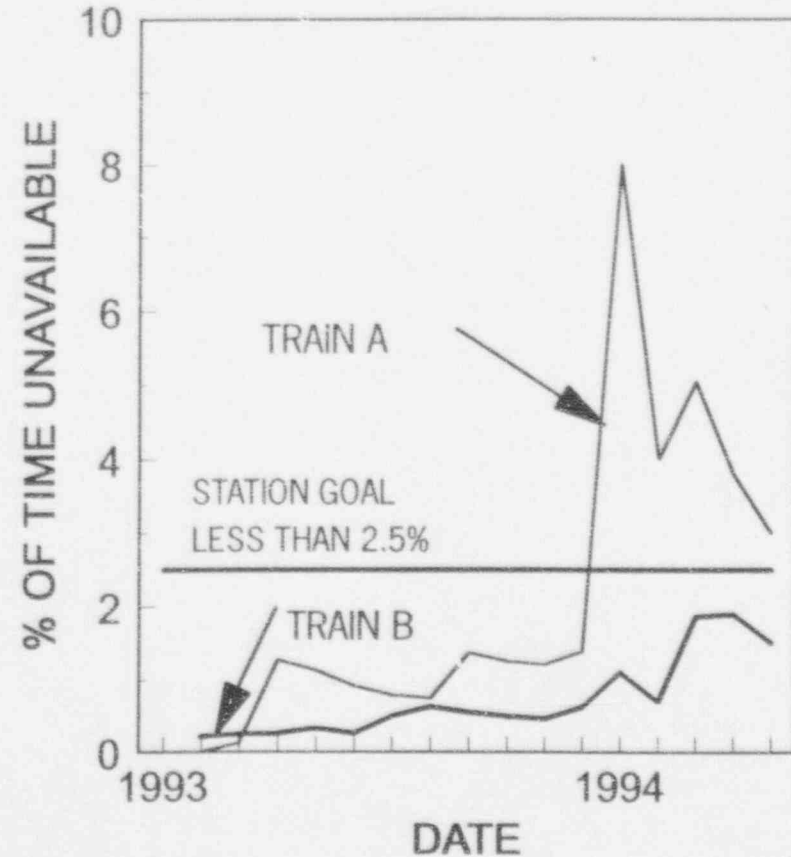
SAFETY SYSTEM PERFORMANCE



EMERGENCY AC POWER SYSTEMS
UNIT 1



EMERGENCY AC POWER SYSTEMS
UNIT 2

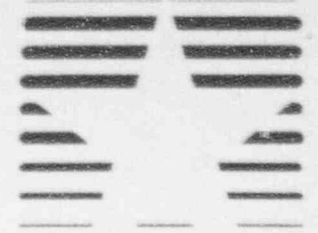


SUCSESSES



- SUPPORT OF UNIT 2 REACHING COMMERCIAL OPERATION
- 2 UNIT STAFFING AND TRAINING
- SURVEILLANCE PERFORMANCE
- INSTRUMENTAL IN RADWASTE REDUCTION
- SUPERVISOR DEVELOPMENT
- QA ACCOUNTABILITY
- GENERIC LETTER 89-10 MOV TESTING PROGRAM

MATERIAL CONDITION



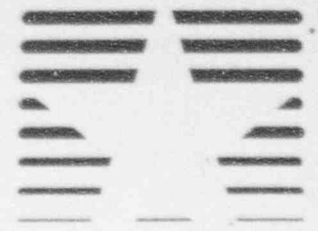
- MATERIAL CONDITION SIGNIFICANTLY IMPROVED
 - PAINTING
 - ANNUNCIATORS
 - MODIFICATIONS
 - COMPUTER REPLACEMENT
 - RM-11 RADIATION MONITORING
 - MOV HOT SHORTS

MATERIAL CONDITION



- MAIN FEEDPUMP PERFORMANCE
- LEAK REDUCTION
- HP TURBINE DRAIN PERFORMANCE
- UNIT 2 MID CYCLE OUTAGE

PLANT CLEANLINESS



- ZAP PROGRAM
- SITE RECLAMATION
- HIGHWAY CLEANUP
- HOUSEKEEPING IMPROVEMENTS