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TU ELECTRIC

September 19, 1994

C. Lance Terry
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 NOS. 50-445/94-15; 50-446/94-15
RESPONSE TO NOTICE OF VIOLATION

REF: Phone call between Dwight Chamberlain, NRC and
Roger Walker, TU Electric of August 31, 1994.

Gentlemen:

TU Electric has reviewed the NRC's letter of August 4, 1994, concerning the inspection conducted during the period of May 29 through July 9, 1994. This inspection included a review of activities authorized for the Comanche Peak Steam Electric Station Unit 1 and 2 facility.

Enclosed in the August 4, 1994 letter was a Notice of Violation (NOV). This notice identified a violation regarding the presence of invalid work request tags on plant equipment. As discussed during the referenced phone call, the requested NOV response date was extended two weeks. The attachment provides TU Electric's response to the Notice of Violation 445/94-15-01; 446/94-15-01.

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

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ADQ:clc
Attachment

c- Mr. L. J. Callan, Region IV
Mr. D. D. Chamberlain, Region IV
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Mr. T. A. Bergman, NRR

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NOTICE OF VIOLATION
50-445/94-15-01; 50-446/94-15-01

CPSES Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 9.e, recommends that general procedures for the control of maintenance, repair, replacement, and modification should be prepared before reactor operation is begun.

Administrative Procedure STA-606, Revision 21, "Work Requests and Work Orders," Section 6.2.16, states that, upon the voiding of an Action Request, the work request tags **should be removed** from the component as appropriate. Section 6.3.2 states that, upon the voiding of a Work Order, the work request tags **should be removed** from the component as appropriate. Section 6.6.4.20 states that field work request tags **should be removed** at the completion of work.

Administrative Procedure STA-202, Revision 23, "Administrative Control of CPSES Nuclear Engineering and Operations Procedures," Section 4.1.4.6, states that the use of the term "should" in procedural steps **indicates a firm CPSES management expectation** that the step be performed and that any deviation is a departure from the norm and requires supervisory concurrence.

Contrary to the above, field work request tags were not removed from safety-related equipment following the voiding of action requests or work orders or the completion of work, and supervisory concurrence was not obtained for deviations from Procedure STA-606. As a result, the inspector identified three examples where the failure to appropriately remove work request tags presented a barrier to the identification of necessary work on safety-related equipment.

[*NOTE: BOLD/HIGHLIGHT FOR ADDED EMPHASIS]

RESPONSE TO NOTICE OF VIOLATION
50-445/94-15-01; 50-446/94-15-01

Although we recognize the inspector's concern and have a similar management concern involving work request (WR) tags, TU Electric denies this violation, we do not believe that the tags represent a regulatory requirement because the work request tag process could be eliminated from the procedure and the procedure in question would continue to provide the proper controls for maintenance activities. The work request function is clearly a programmatic enhancement beyond regulatory requirements which was implemented for efficiency and to provide a program that strives for excellence. The work request tag system does not present a barrier to the repair and maintenance of safety-related equipment. TU Electric does not believe the failure to remove work request tags from safety-related equipment following the voiding of action requests, work orders, or at the completion of work is a violation of regulatory requirements including Technical Specification (T/S) 6.8.1 for the reasons provided below.

A. MAINTENANCE PROGRAMS AND PROCEDURES ARE EFFECTIVE WITH OR WITHOUT WORK REQUEST TAGS

T/S 6.8.1 requires that written procedures be established and maintained to cover activities related to the applicable procedures recommended in Appendix A of Regulatory Guide 1.33.

Appendix A section 9, RG 1.33 states in part:

9. Procedures for Performing Maintenance

- a. Maintenance that can affect the performance of safety-related equipment should be preplanned and performed in accordance with written procedures....appropriate to the circumstances.

TU Electric believes that historically the programs and procedures initiated for maintenance activities have proven to be effective whether or not work request tags were used as part of the maintenance activity.

The three examples cited in the Notice of Violation did not present a barrier to the identification of needed work activities.
Per STA-606, "Work Requests and Work Orders", Priority 5 (Routine) work is defined as:

Routine (5) Routine work to be done to support Operations.
Non-critical items that do not impact reliability.
Priority 5 is used for working off the backlog of non-impacting routine tasks on plant equipment, as determined by the 12 Week Surveillance/Work Plan. Also enhancement or cosmetic work.

The three examples cited in the Notice of Violation involved leaking valves in safety-related systems. These three valves (2CS-0023, 2-8351A and 2SI-8981) do not affect the ability of the associated safety-related systems to perform the function. The previously identified valve leakage was work that would have been classified as Priority 5 (Routine). If any of this work would have become a safety issue (e.g., a leaking valve exceeded T/S requirements) it would have been identified by other station programs and promptly corrected.

These specific Station Programs include the following:

1. The Reactor Coolant System Operational Leakage is verified within Technical Specification limits by the performance of OPT-303, "Reactor Coolant System Water Inventory", every three days.
2. OWI-104, "Operations Department Logkeeping and Equipment Inspections" requires that each Auxiliary and Radwaste Operator performs inspection rounds of his/her assigned area using equipment inspection guidelines obtained from applicable log sheets to perform a satisfactory review of equipment. The Field Support Supervisor, Unit Supervisor, or Shift Manager should be consulted when questions arise. Operations supervisors regularly make plant tours with operators, observing proper inspection rounds performance and general operating conditions.
3. Any time Technical Specification, TRM, or ODCM related equipment becomes degraded to where component or system OPERABILITY is in question, action shall be initiated in accordance with ODA-308, "LCO Tracking Program," to document and track degraded plant conditions.
4. System Engineers perform system walkdowns per TSP-206, "System Walkdowns". These walkdowns focus on such items as status of alarms, work window activities, current system condition and/or system operability. Routine walkdowns are performed as required and a documented walkdown is performed quarterly. Discrepancies, deficiencies and/or concerns are resolved with the appropriate site documents.
5. Comanche Peak maintains a Leak Reduction Program. The stated goals are to accurately identify and categorize components which have leakage, expedite leak repair when warranted, and thus reduce the amount of leaking components. This program includes primary and secondary components. The three valves in question are included in the Leak Reduction Program. During the last two months of this program the number of leaks were reduced by 20 percent.

B. VIOLATIONS SHOULD NOT BE ISSUED BASED ON MANAGEMENT EXPECTATIONS

The word "should" as used by TU Electric in our plant procedures, is intended to indicate CPSES management expectations as specified in CPSES plant procedure STA-202. TU Electric has identified management expectations which exceed regulatory requirements in some activities in order to further improve our performance. By issuing this violation against a CPSES management expectation and not a regulatory requirement, the staff has limited TU Electric's ability to direct personnel in the performance of their duties by redefining the condition under which a violation could be issued. TU Electric recognizes that if in the course of inspection activities that an NRC inspector determines that TU has inappropriately used the word "should" when "shall" is the appropriate word in the procedure, and the step in question has not been performed correctly, then a valid citation for failure to follow procedure exists. TU Electric does not believe that is the case in this instance.

TU Electric management understands that policies or practices not related to regulatory activities are of importance to TU Electric and reflects upon our capability to manage plant activities when such policies or practices are not followed. We appreciate it when ineffective implementation is brought to TU Electric's attention with the staff's expectation that TU Electric should assure that policies and desired practices are either followed or changed to reflect actual practices.

TU Electric is concerned that this part of the work control process has not met management expectations. TU Electric had initiated a Task Team (ONE Form 94-730) prior to the NRC findings to investigate the potential for identified work not being completed. The charter of this task team included examining methods for the removal of work request tags from plant equipment. Some of the actions that we have implemented or intend to implement as a consequence of our review are as follows:

- 1) Maintenance Department personnel performed a walkdown to identify all work request tags hanging in the field. These tags were removed and, where appropriate, new work request tags were initiated and hung in the field.
- 2) Responsible Work Group (RWG) Management raised expectation levels to ensure tags are removed from the field after work is complete.
- 3) Planning has updated the Planner's Guide to provide a formal standard step for work request tag removal from the field in the Work Order.
- 4) STA-606 will be changed for the originator to specify on the work request card the specific location the tag is placed in the field.
- 5) The Zone Accountability Program (ZAP) Team Supervisors have raised expectations to an ownership level of work request tags hanging in their respective areas and to monitor them on a routine basis for validity.

- 6) Quality Control (QC) will include work request tags in their monthly housekeeping inspections. A sample will be verified in each building during the housekeeping inspections. The information will be trended to determine if problems continue.

Although not cited, the inspector noted that the corrective actions for a similar violation identified in NRC inspection report 50-445/92-14 were not effectively incorporated into procedures which governed the work control process. We concur that the station procedures do not contain the corrective actions as stated in the response to the previous violation. However, it was not the intent of TU Electric to incorporate the verification of removal of the work request tags into a specific procedure. TU Electric did, however incorporate these instructions in the appropriate desk top work aids.

In summary, TU Electric does not believe that the cited NOV is a violation. The CPSES maintenance programs and procedures are effective with or without work request tags. In the examples cited, the failure to remove invalid tags did not create a barrier to identifying needed repairs on safety related equipment. Violations should not be issued based on management expectation's alone. In spite of the fact that TU Electric does not believe this NOV is a violation, TU Electric recognizes the importance of meeting its expectations, even if they do not relate directly to a safety concern and appreciates it when the NRC points out problems in this area. With respect to invalid work request tags, TU Electric has a significant effort underway to minimize their presence in the field.