



TU ELECTRIC

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File # 10130
Ref. # IR 94-10

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 NO. 50-445 AND 50-446
RESPONSE TO REQUEST FOR INFORMATION REGARDING
ACTIONS TAKEN FOR APRIL 22, 1994, EVENT;
INSPECTION REPORT 50-445; 50-446/9410

Gentlemen:

TU Electric has reviewed the subject Inspection Report, which documents the inspection results of your staff for the period of March 30, 1994, through April 30, 1994, at Comanche Peak Steam Electric Station.

In this inspection report the staff requested that TU Electric identify the corrective and preventive actions for the event of April 22, 1994, where the shift supervision erroneously referenced 10CFR50.54(x) during the required reporting of a reactor trip. The requested information is provided below.

On April 22, 1994, the Vice President, Nuclear Operations, issued an instructional memorandum detailing guidance for invoking 10CFR50.54(x) to the Operations department. All licensed operations personnel were trained on this guidance. Additionally, on April 29, 1994, a memorandum providing management policy for interpretation of NRC regulations or License basis requirements, including Technical Specifications, was also issued by the Vice President, Nuclear Operations. The memorandum stated that the Regulatory Affairs staff should be consulted prior to implementing an interpretation of a Regulatory document. The requirements for nonroutine reporting were reemphasized to shift supervision. Finally, specific training on Management's expectations and clarification for when 10CFR50.54(x) applies has been incorporated into the Shift Manager's qualification program.

Based on our review, TU Electric believes that the Operations Administration Procedures are adequate with respect to guidance for invoking 10CFR50.54(x). TU Electric has enhanced Operations Department Administration (ODA) procedure ODA-407 to provide additional guidance and clarification to the CPSES operations staff for their use when deviating from an Emergency Operating Procedure or invoking 10CFR50.54(x), when required.

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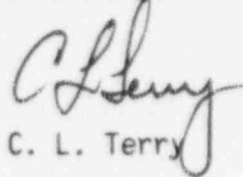
P. O. Box 1002 Glen Rose, Texas 76043

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Should you require additional information with respect to training material or the applicable procedure changes, please contact Obaid Bhatti at (817)897-58

Sincerely,



C. L. Terry

OB:bm

cc: Mr. L. J. Callan, Region IV
Mr. D. D. Chamberlain, Region IV
Resident Inspectors, CPSES