

TU ELECTRIC

Log # TXX-91256
File # 10010
Ref. # 10CFR2.201

July 19, 1991

William J. Cahill, Jr.
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) UNIT 2
DOCKET NO. 50-446
NRC INSPECTION REPORT NOS. 50-445/91-21; 50-446/91-21
REPLY TO A NOTICE OF DEVIATION

REF: 1) TU Electric letter logged TXX-91095 from W. J. Cahill, Jr. to NRC,
dated April 29, 1991
2) NRC Letter dated January 22, 1988, from Stuart Ebner to
W. G. Council, Jr. to NRC

Gentlemen:

TU Electric has reviewed NRC's letter dated June 14, 1991, concerning the inspection conducted by Messrs. R. M. Latta, S. D. Bitter, and C. E. Johnson during the period April 24 through June 4, 1991. This inspection covered activities authorized by NRC Construction Permit CPPR-127 for CPSES Unit 2. A Notice of Deviation was attached to the June 14, 1991 letter. TU Electric's reply to the Notice of Deviation is provided in the attachment to this letter. Per discussions between Mr. Dwight Chamberlain of the NRC Region IV staff and Mr. W. G. Guldemon of TU Electric, the due date for this response was extended from July 14 to July 19, 1991.

The NRC letter also requested that TU Electric provide an assessment of any actions taken or planned to assure the validity of the commitment tracking process at Comanche Peak Steam Electric Station.

It has been and continues to be TU Electric's policy to maintain compliance with commitments made to the NRC. Further, it has been TU Electric's policy to contact NRC prior to implementing changes to commitments involving scope or intent. TU Electric has only rarely made exception to this policy and then when it was believed that guidance existed which allowed implementation

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of changes prior to notification. In those cases where prior notification is not made, it continues to be TU Electric's policy to notify the NRC shortly after implementation of the changes. In all cases, proposed changes are evaluated to assure that compliance with regulatory requirements will be maintained and that the proposed changes are technically justifiable.

During discussions with the NRC staff prior to the issuance of the Notice of Deviation, it became apparent that TU Electric's application of previous guidance on prior notification of changes to commitments may not have been entirely consistent with NRC's current expectations regarding such notifications. As described in the attached reply to the Notice of Deviation, TU Electric has taken a number of interim actions to assure that such notifications are made in a conservative manner. However, it is believed that additional discussions between our respective staffs would be beneficial to assure our staffs have a consistent understanding of the approaches to be taken to change commitments over the operational life of CPSES. Accordingly, I have directed Mr. Roger Walker to initiate such discussions.

TU Electric believes that the existing commitment tracking process is functioning to provide assurance that commitments are identified, actions necessary for implementation are tracked, and proposed changes are evaluated to determine whether they are consistent with previous commitments or require changes in commitments. A brief description of the process and some of the actions previously taken to validate it are described below.

Central to the commitment tracking process is the Commitment Tracking System (CTS). CTS is a computerized database used as a management tool to assist in assuring regulatory and selected internal and industry commitments are appropriately implemented and maintained. Commitments are extracted from regulatory documents by the Licensing Department. For TU Electric generated documents such as the Safety Analysis Report and docketed correspondence, affected management is made aware of commitments during the document preparation and review process and commitments are extracted at or shortly after issuance and entered into CTS. For NRC generated documents such as Safety Evaluation Reports, commitments are extracted following receipt and entered into CTS. As part of the process for identifying commitments, a primary organization is designated as having lead responsibility and a copy of the commitment is provided to that organization for action. If the commitment includes a specified completion date, completion is tracked to that date. If a completion date is not included as part of the commitment, a date is assigned either by the primary organization or the Licensing Department. Status reports are periodically transmitted by the Licensing Department to primary organizations and progress is monitored in completing actions necessary to resolve commitments.

Site wide access to the CTS database is provided for viewing and/or obtaining hard copy information on commitments. However, changes to the database can only be made by the Licensing Department. Substantive changes to regulatory commitment descriptions can be made only with the approval of a TU Electric officer or his/her designee.

As part of the commitment maintenance process, procedures which control revisions to documents such as procedures and specifications require the proposed revision to be reviewed against governing documents such as the Safety Analysis Report and Design Basis Documents and applicable commitment information in CTS to assure that no unintentional deviations from commitments occur. By requiring review of the CTS database, additional assurance is provided that commitments contained in docketed correspondence or other relevant source documents are not inadvertently revised or deleted.

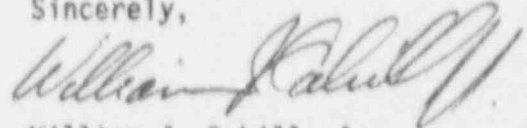
In 1988 various commitment tracking processes were transitioned into the current system. During this period, Project organizations jointly participated in review and revision of relevant information to enhance the existing database. As part of these efforts, reasonable assurance as to the validity of the database was obtained through spot checks, surveillances and audits.

As part of Unit 2 restart activities, the Licensing Department and the Unit 2 Project performed a number of reviews to assure pertinent Unit 2 commitments were identified to responsible organizations. Initially, this involved providing all open and incorporated Unit 2 commitments to the Unit 2 Project organization for verification of correct assignment of primary organizations and assignment of scheduled completion dates consistent with scheduled project activities. This was followed by a review of the applicability of all identified incorporating documents to Unit 2. Subsequently, the Licensing Department performed a review of all commitments designated as applicable to only Unit 1 to determine whether any of those commitments were applicable to Unit 2. A limited number of discrepancies were identified and corrected.

The commitment tracking process has been audited and has been used regularly as a source of information for audits and surveillances of other project activities. These activities have provided overall assurance of the validity of the database and, consequently, the overall process. When audit findings pertinent to the process have been identified, appropriate corrective action has been taken. Additionally, through routine use of the process by project organizations occasional errors are identified, and corrected. Finally, the Licensing Department utilizes the CTS as its primary tool for assembling closure packages for regulatory issues. In this regard documentation is assembled which demonstrates that commitments pertinent to the issue being addressed have been appropriately resolved. To date, this process has identified relatively few discrepancies and these few have been corrected.

Based on these activities, TU Electric believes that the CTS database is complete and appropriate controls exist to assure the commitments are appropriately maintained.

Sincerely,



William J. Cahill, Jr.

Attachment

TLH/bm

c - Mr. R. D. Martin, Region IV
Mr. M. B. Fields, NRR
Resident Inspectors, CPSES (2)

NOTICE OF DEVIATION
446/9121-01

TU Electric letter TXX-4946 dated August 4, 1986, provided the response to Enforcement Action (EA) 86-09. Specifically, in response to Item I.C.8, which identified deficiencies in the ASME Quality Control inspection process, the licensee modified Procedure QI-QAP-11.1-28, Revision 30, to require weld mapping of each structural weld on Unit 2 safety-related component supports.

Contrary to the above, as documented in TU Electric letter TXX-91095 dated April 29, 1991, the requirement to perform this weld mapping process for Unit 2 component supports was deleted from the ASME Quality Control Inspection Procedure AQP-11.3, Revision 4. Consequently, these committed inspection attributes were not performed on Unit 2 component supports subsequent to the resumption of construction activities in January 1991.

Reply to Notice of Deviation
446/9121-01

1. Reason for the Deviation

In its response to enforcement action EA 86-09, Item I.C.8 (TXX-4946 dated August 4, 1986) TU Electric stated that the reason for the violation was isolated human error based on the limited number of deficiencies. As corrective action, TU Electric committed to a comprehensive reinspection of supports per Issue Specific Action Plans (ISAPs) VII.b.3 and VII.c. Additionally, as an enhancement, TU Electric noted that procedure QI-QAP-11.1-28 had been revised on April 15, 1985, prior to receipt of enforcement action EA 86-09, to address the lessons learned from Unit 1, including weld mapping.

Weld mapping was implemented in Unit 2 until work activities were suspended in early 1988. In July 1988 the requirement to perform weld mapping was deleted during a procedure revision; however, this information was inadvertently not forwarded to commitment tracking personnel. In 1989, during a review of commitment tracking information, it was identified that the procedural requirement for weld mapping had been deleted and the commitment was placed in an open status. In late 1989, Quality Assurance requested via memorandum to the Licensing Department that the commitment which required weld mapping be deleted based on the satisfactory reinspection of structural welds during Unit 1 completion as discussed below. However, action was not taken to withdraw the commitment at that time because no work was in progress on Unit 2, resources were focused on the imminent licensing of Unit 1, and it was recognized that Unit 2 commitments would be reevaluated as part of Unit 2 restart.

As part of Unit 1 restart activities, the open commitment was assigned to the Unit 2 Quality organization and assigned a scheduled date in late 1990 consistent with the anticipated date for submitting a letter to the NRC withdrawing the commitment. However, the scheduled date for submitting this letter was slipped several times owing to a perception that prior notification to the NRC was not required in this case. This perception was based on a number of factors. While TU Electric understood the importance of notifying the NRC of any changes in the scope and intent of commitments, it was believed in this case that the threshold for prior notification regarding changes in commitments of this type had been established in a January 22, 1988 letter from Mr. Stewart D. Ebnetter, Director, Office of Special Projects to Mr. William G. Counsil, Executive Vice President of TU Electric, the subject of which was CPSES Licensing and Corrective Action Programs. This letter, which addressed both Unit 1 and Unit 2, constituted NRC approval of the Comanche Peak Response Team (CPRT) and Corrective Action Program (CAP) plans. The letter states that, "These plans adequately describe the means by which TU Electric intends to establish the adequacy of the design and construction of Comanche Peak Steam Electric Station." The letter goes on to state that, "Accordingly, any future changes to these plans that would affect the basis for this approval, as described in the enclosed evaluation, must be approved by the NRC before implementation."

As noted in Section IV of the evaluation enclosed with the January 22, 1988 letter, TU Electric was in the process of reviewing the CAP to distinguish between those actions for Unit 2 which will result from CAP efforts and those which are incorporated into the routine construction management process. The results of that review were submitted to the NRC via letter logged TXX-88373, dated April 14, 1988. In this letter TU Electric noted that it would review the hardware for Unit 2. The letter went on to state that, "the details of the review for Unit 2 will vary from the Unit 1 program based upon the current status of construction and QC acceptance of hardware and upon the applicability of lessons learned from the implementation of PCHVP for Unit 1." The letter further states that, "where the implementation of the PCHVP for specific attributes of Unit 1 systems, structures or components demonstrates that the installed hardware complies with the design or that it is unnecessary to conduct 100% inspections or walkdowns, and that validations can be completed through engineering evaluation, engineering evaluations could also be used for Unit 2."

Review of the ISAP VII.b.3 and VII.c results for Unit 1 confirmed that the deficiencies which resulted in the violation described in EA 86-09, Item I.C.8 were extremely limited. As a result, it was concluded that the original inspections of support welds, which did not include the requirement to weld map, provided adequate assurance of the quality of the welds. It should be noted that the NRC's closure of EA 86-09, Appendix A, Item I.C.8, documented in inspection reports 50-445/89-47; 50-446/89-47, addresses the results of the reinspections of pipe supports conducted pursuant to ISAPs VII.b.3 and VII.c and the CAP requalifications for pipe supports and concludes that the issue was properly evaluated and addressed. No mention is made of weld mapping. TU Electric concluded through its technical evaluation of PCHVP attributes that inspection of Unit 2 support welds for the attributes in question was not required, and similarly that weld mapping was no longer required on Unit 2. As the processes employed to reach these conclusions were consistent with the information provided to NRC in TXX-88373, it was concluded that the decision to suspend weld mapping was a "lesson learned" for which prior notification to the NRC was not required. Notwithstanding, TU Electric recognized the need to notify the NRC of this change within a reasonable period of time of implementation for two reasons. First, such notification would assure that the information on the docket would be accurate at the time of licensing. Second, should withdrawal of the commitment be found unacceptable by the NRC, weld mapping could be reinitiated with backfit inspections as appropriate. As a result, Reference 1 was submitted shortly after structural welding activities were reinitiated on Unit 2 in April 1991.

An additional factor which contributed to the decision that prior notification of the change to NRC was not required was the fact that the change in commitment did not constitute a change to the Quality Assurance Program as described in the Safety Analysis Report. Consequently, notification was not required pursuant to 10CFR50.55 (f)(3).

2. Corrective Steps Taken and Results Achieved

As an interim measure, pending discussions between TU Electric and the NRC staff regarding approaches for changing commitments, the Executive Vice President directed that no changes to Unit 2 regulatory commitments be implemented without his express approval.

At the direction of the Unit 2 Project Manager and Licensing Department management, a review was completed of the computer program which tracks issues which may require notifications to the NRC. Based on this review and the evaluation described below, the tracking program was updated to better define why and when notifications to the NRC may be needed.

An evaluation of open Unit 2 commitments assigned to Engineering, Construction, and QA/QC was performed to identify whether changes in methodologies pertinent to commitments had been implemented or were planned. While a number of contemplated changes were identified with respect to planned activities, no changes were identified with regard to activities in progress. This information was used to update the aforementioned tracking program schedule to identify a higher priority for substantive methodology changes.

An ongoing evaluation of commitments assigned to the Startup Group has identified no substantive changes in methodologies which have been implemented. This evaluation will continue and if such changes are proposed, appropriate NRC notifications will be completed. A similar evaluation for open Unit 2 Operations Group commitments will be completed prior to system or area turnovers to Operations.

3. Corrective Steps Which Will Be Taken To Avoid Further Deviations

An office memorandum was issued by the Unit 2 Project Manager which discussed interim guidance for evaluation of commitments. This memorandum directed the evaluation discussed in Section 2 above and also stressed the need to properly understand and evaluate commitments prior to implementing methods to satisfy them. This memorandum and the steps taken in Section 2 should prevent further deviations.

4. Date When Corrective Action Will Be Completed

All corrective actions will be completed prior to system and area turnovers to Unit 2 Operations.