



William J. Cahill, Jr.
Executive Vice President

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Ref. # 10CFR2.201

August 28, 1991

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. 50/445/91-29; 50-446/91-29
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated July 29, 1991, concerning the inspection conducted by the NRC staff during the period June 5 through July 16, 1991. This inspection covered activities authorized by NRC Operating License NFF-87 and Construction Permit CPPR-127. Attached to the July 29, 1991, letter was a Notice of Violation.

TU Electric hereby replies to the Notice of Violation (446/9129-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

JAA/bm
Attachment

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

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Q PDR

400 North Olive Street L.B. 81 Dallas, Texas 75201

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NOTICE OF VIOLATION
(446/9129-01)

Criterion V of Appendix B to 10 CFR 50, as implemented by Section 5.0 of the TU Electric Quality Assurance Manual, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, o[f] a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Comanche Peak Steam Electric Station, Unit 2, Procedure 2PP-3.05, Revision 1, "Procedure for Processing of TU Evaluation (TUE) Forms and Conditional Release Requirements (CRRs)," paragraph 4.24, defines "Use-As-Is" as "A disposition which may be assigned for a nonconformance when it can be established that the discrepancy shall result in no conditions adverse to safety and that the item under consideration will continue to meet all engineering functional requirements. This disposition requires technical justification by Engineering of the item's acceptability for use."

Contrary to the above, the technical justification provided in TUE Forms 90-023, 91-463, and 91-464, which provided for the bulk closures of approximately 550 nonconformance reports associated with commodity clearance violations, were not properly implemented in that there is no objective evidence to indicate that these deficiencies were specifically evaluated by engineering to preclude potentially adverse interactions due to seismically and thermally induced displacements.

REPLY TO NOTICE OF VIOLATION
(446/9129-01)

TU Electric accepts the violation and the requested information follows:

1. Reason For Violation

This procedural violation resulted from efforts by the responsible engineering group to reconcile (with current programs) the Unit 2 commodity clearance nonconformance reports (NCRs) written in the 1987 to 1988 time frame. In performing this reconciliation, the responsible engineering group assigned a disposition of "Use-As-Is" to the three TU Evaluation (TUE) forms that collectively captured these previously identified NCRs. The technical justification provided for this disposition on these TUE forms gave a special definition to "Use-As-Is" that was not recognized at the time as being inconsistent with governing procedure 2PP-3.05. The "special definition" indicated that any of the clearance deviations documented on the original NCRs, that represented the potential for adverse interactions, would be independently

identified and corrected by the commodity clearance program governed by 2-EAP-011, "Engineering Assessment Procedure - Commodity Clearance." Following the commodity clearance engineering walkdowns conducted in Unit 2 (to baseline hardware status prior to recommencement of construction), a sampling of the original 550 NCRs was performed to provide additional assurance that the program had addressed these NCRs. This was subsequently documented in Report PTR-0025, Rev. 0, "Sampling Review of Commodity Clearance Nonconformance Reports." Following confirmation that the approach was technically sound, the three associated TUE forms were closed with a "Use-As-Is" disposition. This deficiency was limited to the documentation of the NCR dispositions and did not affect the technical adequacy of the Unit 2 commodity clearance program which was provided as the engineering basis for the disposition.

2. Corrective Steps Taken and Results Achieved

The three TUE forms in question have been reopened by initiation of a new TUE form. The new TUE form will document the resolution of each commodity clearance deviation for the 550 NCRs. This TUE form will be dispositioned and closed in accordance with procedure 2PP-3.05.

3. Corrective Steps Taken To Avoid Further Violations

To preclude recurrence, it has been emphasized via an Engineering Quality Accountability meeting that TUE Form dispositions must address resolution of each non-conforming condition.

4. Date When Full Compliance Will Be Achieved

Compliance with the requirements of procedure 2PP-3.05 was re-established with the opening of TUE form 91-1778 on August 12, 1991.