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IR 95-03
Ref. # 10CFR2.201

C. Lance Terry
Group Vice President

May 4, 1995

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. 50-445/95-03; 50-446/95-03
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated April 4, 1995, concerning the inspection conducted by Mr. Gilbert Guerra Jr., during the period of February 21 through February 24, 1995.

Per your instructions in the above letter, TU Electric hereby responds to the Notice of Violation in Attachment 1 of this letter. Attachment 2 notes specific examples which were cited in the violation that TU Electric does not believe are representative of violation related events, but were considered near misses and included in the development of the response. The response provided in Attachment 1 is a summary of actions taken or planned by TU Electric. The details of the cause analyses, and the corrective and preventive actions are available for your review on site.

Please do not hesitate to contact me, or Mr. Neil Harris at (817) 897-5449 to coordinate any additional information you may need to facilitate closure of these issues.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. L. Terry".

C. L. Terry

NSH:tg
Attachments

cc: Mr. L. J. Callan, Region IV
Mr. D. F. Kirsch, Region IV
Resident Inspectors

9505090112 950504
PDR ADDCK 05000445
Q PDR

P. O. Box 1002 Glen Rose, Texas 76043

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REPLY TO THE NOTICE OF VIOLATION

RESTATEMENT OF VIOLATION CRITERIA
(445/9503-01; 446/9503-01)

Technical Specification (TS) 6.8.3.e states, in part, that a program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the dose to members of the public from radioactive effluents as low as is reasonably achievable (ALARA). The program (1) shall be contained in the ODCM, (2) shall be implemented by operation procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded.

RESTATEMENT OF PART A OF THE VIOLATION
(445/9503-01; 446/9503-01)

FAILURE TO IMPLEMENT LIQUID SAMPLING REQUIREMENTS

Offsite Dose Calculation Manual (ODCM) surveillance requirement 4.11.1.1.1 states, in part, that radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

- Section 1B of Table 4.11-1 requires that a sample be taken and analyzed prior to each batch release.

Contrary to the above, on January 18, 1994, the licensee identified that a condensate polisher backwash recovery tank in Unit 1 overflowed resulting in an unplanned, nonroutine release without the sample and analysis required by Section 1B of Table 4.11-1.

- Section 1A of Table 4.11-1 requires that a sample be taken and analyzed prior to each batch release.

Contrary to the above, on March 5, 1994, the licensee identified that during a plant transient waste water holdup tank No. 1 was released to the Low Volume Waste pond resulting in an unplanned, nonroutine release without the prior sample and analysis required by Section 1A of Table 4.11-1.

- Note 2 to Table 4.11-1 states that prior to sampling for analyses, each batch shall be isolated and then thoroughly mixed by a method described in Part II of the ODCM to assure representative sampling. Contrary to the above, on June 16 and again on June 26, 1994, the

licensee identified that while attempting to release the contents of waste monitor tank No. X-02, the licensee failed to obtain a representative sample of the tank and the associated discharge header prior to release as required by Note 2 to Table 4.11-1.

- Section 1A of Table 4.11-1 requires that a sample be taken and analyzed prior to each batch release.

Contrary to the above, on July 5, 1994, during a discharge of waste monitor tank No. X-02, the volume in waste monitor tank No. X-01 decreased by 3 percent due to a valve leak and was released to Outfall 101 resulting in an unplanned, nonroutine release without the prior sample and analysis required by Section 1A of Table 4.11-1.

- Section 2A of Table 4.11-1 requires that a daily grab sample be taken once per 24 hours while a release is occurring from the low volume waste pond to the circulating water discharge.

Contrary to the above, on August 7, 1994, the daily grab sample required by Section 2A of Table 4.11-1 for releases from the low volume waste pond to the circulating water discharge was missed. This item was previously identified in NRC inspection Report 50-445/93-45; 50-446/93-45 as a noncited violation.

RESTATEMENT OF PART B OF THE VIOLATION (445/9503-01; 446/9503-01)

FAILURE TO IMPLEMENT GASEOUS SAMPLING REQUIREMENTS

ODCM surveillance requirement 4.11.2.1.1 states, in part, that radioactive gaseous wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-2.

- Note 3 to Section 3 of Table 4.11-2 states that sampling and analysis be performed following shutdown, startup, or a thermal power change exceeding 15 percent of rated thermal power within a 1-hour period.

Contrary to the above, on July 6, 1993, the licensees identified that a required sample of the plant vent for noble gas and tritium was not obtained following a startup of Unit 2 on July 3, 1993, as required by Section 3 of Table 4.11-2, Note 3.

- Section 3 of Table 4.11-2 requires that the particulate filters from the plant vent be saved and composited quarterly for strontium-89 and strontium-90 analyses.

Contrary to the above, the licensee identified that the plant vent composite particulate sample filter for the period October 5-6, 1993, was not saved for the quarterly strontium-89 and strontium-90 analyses as required by Section 3 of Table 4.11-2.

- Section 1 of Table 4.11-2 requires that a sample be taken and analyzed prior to each batch release.

Contrary to the above, on January 14, 1994, the licensee identified that while attempting to perform a leak check on gas trap (TBX-GHGTBT-01), approximately 7 psig was released from gas decay tank No. X-03 resulting in an unplanned, nonroutine release without the sample and analysis required by Section 1 of Table 4.11-2.

- ODCM surveillance requirement 4.11.2.1.1 states, in part, that radioactive gaseous wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-2.

Contrary to the above, on February 14, 1994, the licensee identified a release path from the Unit 2 reactor coolant drain tank through a leaking hydrogen header line, resulting in an unplanned, nonroutine release through an unmonitored pathway without the sampling and analysis program as required by Table 4.11-2.

RESTATEMENT OF PART C OF THE VIOLATION (445/9503-01; 446/9503-01)

FAILURE TO IMPLEMENT LIQUID EFFLUENT MONITORING REQUIREMENTS

ODCM Action 3.3.3.4.b. requires, in part, that with less than the minimum number of radioactive liquid effluent monitoring instrumentation channels operable, take the action shown in Table 3.3-7.

- Action 31 of Table 3.3-7 states that with the number of channels operable less than required by the minimum channels operable requirement, effluent releases via this pathway may continue provided grab samples are analyzed for principal gamma emitters at a lower limit of detection of no more than 5 E-7 microcurie/ml at least once for 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcurie/gram dose equivalent I-131.

Contrary to the above, on November 14, 1993, the licensee identified that turbine building sump monitor WJ. 2-RE-5100 was out of service, and the 24 hour grab sample required by Action 31 of Table 3.3-7 was missed.

- Action 31 of Table 3.3-7 states that with the number of channels operable less than required by the minimum channels operable requirement, effluent releases via this pathway may continue provided grab samples are analyzed for principal gamma emitters at a lower limit of detection of no more than 5 E-7 microcurie/ml at least once for 24 hours when the specific activity of the secondary coolant is

less than or equal to 0.01 microcurie/gram dose equivalent I-131.

Contrary to the above, on January 24, 1994, the licensee discovered that turbine building sump monitor No. 1-RE-5100 was in manual alignment to the low volume waste pond and the surveillance requirements for Action 31 of Table 3.3-7 requiring sampling of the radiological effluents at least once per 24 hours was missed 4 times.

RESTATEMENT OF PART D OF THE VIOLATION
(445/9503-01; 446/9503-01)

FAILURE TO IMPLEMENT GASEOUS EFFLUENT MONITORING REQUIREMENTS

ODCM Action 3.3.3.5.b requires, in part, that with less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels operable, take the action shown in Table 3.3-8.

- Action 35 of Table 3.3-8 states that with the number of channels operable less than required by the minimum channels operable requirement, effluent releases via this pathway may continue provided the sample flow rate is estimated at least once per 4 hours.

Contrary to the above, on February 26, 1994, the licensee identified that sample flow rate monitor No. 5570A was out of service for 4 hours and 35 minutes and the required Action 35 of Table 3.3-8 requiring sample flow rates to be estimated at least once per 4 hours was missed.

RESPONSE TO VIOLATION
(445/9503-01; 446/9503-01)

TU Electric accepts the violation, and provides the requested information.

1. Reason for the Violation

To determine the cause(s) for the events, an independent evaluation team was formed to review these events. The team ascertained that, although previous corrective actions taken for each of the individual examples cited for the violation appeared to be adequate, the assessment of generic considerations for controlling ODCM related activities was less than adequate.

The previous efforts, including an August 1994 task team, focused on single department/problem corrective actions rather than collectively assessing all groups involved with the ODCM and the effluent monitoring and sampling programs. This resulted in the failure to identify an adverse trend associated with unplanned releases and missed ODCM surveillances caused by the cumulative affects of:

- a. problems with equipment design and condition.
- b. less than adequate personnel communication practices where pertinent information was not communicated and/or misunderstood between individuals, and
- c. less than adequate and/or improper personnel work practices in the use of work documents, self-checking actions or followup requirements.

The current evaluation team also noted that the delineation for the overall responsibility for monitoring and controlling the implementation of the ODCM program and related activities was unclear.

It should be noted that the last identified reportable effluent monitoring event occurred in August 1994. Four additional Radiological Environmental Monitoring Program (REMP) events have occurred, of which the last event was in February 1995. No additional events have occurred since that date.

2. Corrective Steps Taken and Results Achieved

Based upon the preliminary findings noted by the inspector during the inspection exit, an evaluation team was formed to review missed ODCM surveillances (including those related to the Radiological Environmental Monitoring Program (REMP)), the monitoring and discharge systems, structures and components, and to identify any additional corrective actions and program enhancements.

The evaluation team made several recommendations for improvements and an implementation plan was developed. To date, the following actions have been taken:

- a. A trending and analysis process associated with ODCM activities has been implemented to provide a tool to assess problems and allow proactive intervention and/or correction based on adverse trends related to the ODCM. The program is in place at this time.
- b. Facility management will be kept apprised of ODCM concerns/problems using current internal reporting methods. ODCM information will be included in the Monthly Management Report.

3. Corrective Steps Taken to Avoid Further Violations

To further preclude future incidents of this nature, the following additional actions have been identified for implementation:

- a. Improved responsibility criteria for monitoring and controlling the ODCM program implementation for CPSES.

- b. A review of the effluent monitoring and discharge systems and components for possible enhancements to mitigate ODCM violations or unplanned releases will be performed. Any approved recommendations will be identified, tracked and implemented as required per facility programs.

As part of defining and improving ODCM responsibilities, a review and reassessment of the ODCM's 'unplanned release' criteria for reportability will be performed. The criteria may be modified if necessary, subsequent to the completion of this review and reassessment.

4. Date of Full Compliance

TU Electric is in full compliance at this time and intends to complete the corrective actions detailed in this response by November 1, 1995.

REPLY TO THE NOTICE OF VIOLATION

TU Electric accepts the violation based on the repetitive nature of the missed ODCM surveillances. However, based on our review of the examples identified in the cited violation, some were not examples of missed ODCM surveillances. These exceptions are described below.

Event 1 (Inspection Report Violation Part A, Example 1 - Liquid Effluent Sampling)

The Unit 1 Condensate Polisher Backwash Recovery Tank (CBPRT) overflowed on January 18, 1994 without sampling or analysis. This event was identified by the licensee on Corrective Action document ONE-94-0084. Specific actions were identified and implemented to preclude further occurrences of this type. Although sampling and analysis was required by station procedures, Note 6 to Table 4.11-1 of the ODCM requires sampling and analysis of this tank when the analysis of the most recent Low Volume Waste Pond (LVW) discharge composite sample shows activity greater than 10% of the Effluent Concentration Limits specified in 10CFR20, Appendix B. The most recent LVW Pond composite sample prior to the CPBRT overflow, had no detectable activity, and therefore, sampling of the CPBRT was not required pursuant to ODCM requirements.

Events 2 and 3 (Inspection Report Violation Part A, Example 3 - Liquid Effluent Sampling)

Planned releases of Waste Monitor Tank No. 2 on June 16 and June 26, 1994, were terminated due to high radiation alarms from the effluent radiation monitor. These events were identified by the licensee on Corrective Action documents ONE-94-0828 and ONE-94-0865. Specific actions were identified and implemented to preclude further occurrences of this type. These events were cited as examples of ODCM violations due to failure to representatively sample the tanks prior to discharge as required by Note 2 to Table 4.11-1 of the ODCM.

During these events, no release to the environment occurred. The radiation monitor alarms resulted from detecting higher activity water which had remained in the discharge/processing header following a previous waste processing evolution. When the planned discharges of the Waste Monitor Tank were attempted, the higher activity water remaining in the header caused the monitor to alarm and the release was automatically terminated prior to any discharge occurring. It should be noted that the liquid effluent monitor setpoint is administratively set to alarm if detected activity differs from grab sample results of the intended volume to be discharged.

The discharge isolation valve is located a sufficient distance downstream from the monitor to close and prevent any water which triggered the monitor from being discharged. This water was then drained from the header and not discharged to the environment. Followup sampling of the Waste Monitor Tank confirmed the initial samples were representative of the tank contents. After the problem was corrected, the Waste Monitor Tank was discharged in accordance with ODCM requirements.

These three events are considered near misses and were included in the evaluation described in Part 2 of the Response in Attachment 1.