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C. Lance Terry
Group Vice President

May 22, 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. 50-445/95-02; 50-446/95-02; 50-
445/95-04; 50-446/95-04 AND 50-445/95-06; 50-446/95-06
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letters dated March 13, 1995, and April 21, 1995. These aforementioned letters provide the results of three inspections recently completed at Comanche Peak Steam Electric Station, Units 1 and 2.

Attached to the April 21, 1995, letter were two reports. The first report is the routine resident inspection report conducted by Mr. A. T. Gody, Jr., and other inspectors from February 12 through March 25, 1995. The second report provided the results of the inspection of TU Electric's Inservice Inspection Program conducted by Mr. Claude Johnson during the period of March 13-24, 1995. These reports contained a Notice of Violation. TU Electric hereby responds to the Notice of Violation in attachment 1 to this letter.

The March 13, 1995, letter provided results from inspections conducted by Mr. A. T. Gody, Jr., and other inspectors from January 1 through February 11, 1995. This Inspection Report identified some issues which may be considered isolated; nonetheless, represent a departure from the overall strong performance you have observed at CPSES in the past. TU Electric concurs with the Inspection Report, and has taken these issues seriously.

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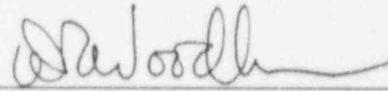
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In response to the issues raised by the subject inspection, TU Electric has placed increased emphasis on plant configuration control. The actions taken by TU Electric for the individual issues raised during the aforementioned inspection, and the actions to prevent recurrence are stated in attachment 2 to this letter.

The responses provided in the attachments are a summary of actions taken by TU Electric. The details of the root cause analyses, and the corrective preventive actions are available at site for your review. Please do not hesitate to contact me, or contact Obaid Bhatti at (817) 897-5839 to coordinate any additional information you may need to facilitate closure of these issues.

Sincerely,

C. L. Terry

By: 
D.R. Woodlan
Docket Licensing Manager

OB/ob
Attachments

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

REPLY TO THE NOTICE OF VIOLATION

RESTATEMENT OF PART A OF THE VIOLATION (445/9506-01)

1. Procedure TX-ISI-208, "Ultrasonic Examination Procedure For Welds In Ferritic Steel Piping Systems," Revision 2, requires surface temperature to be taken at the time of the ultrasonic examination to ensure that the temperature difference between the examination and basic calibration block surfaces do not exceed 25 degrees F.

Contrary to the above, on March 14, 1995, during ultrasonic examinations of Inservice Item TBX-2-2302-73.74.75 of the feedwater system, the inspector observed that the contractor nondestructive examination technician performing the ultrasonic examinations did not take the surface temperature.

2. Procedure TX-ISI-11, "Liquid Penetrant Examination," Revision 5, paragraph 6.4.1, requires, in part, that developer shall be applied after 5 minutes and no later than 10 minutes after final dry wipe of Penetrant removal.

Contrary to the above, on March 14, 1995, during a liquid Penetrant examination on Inservice Inspection Item TBX-1-4401-7, of the residual heat removal system, the inspector observed a contractor nondestructive examination technician apply developer after approximately 2-3 minutes after the final dry wipe of Penetrant removal from Weld 7.

3. Welding Procedure WLD-106, "ASME/ANSI General Welding Requirements," Revision 1, paragraph 6.8.1, requires, that preheat and interpass temperatures shall be in accordance with the applicable welding procedure specification and shall be measured with a contact pyrometer or temperature indicating crayon, i.e., "Tempil" stick.

Contrary to the above, on March 21, 1995, during an ASME Code replacement work activity of Valve 1CS-8384B of the chemical volume and control system, the inspector observed that a contractor welder in the process of making field welds 6A and 7A did not measure interpass temperatures.

RESPONSE TO PART A OF THE VIOLATION
(445/9506-01)

TU Electric accepts the violation, and provides the responses to each example, as requested.

EXAMPLE 1

1. Reason for Violation

TU Electric's review determined that, the technician involved in this violation was knowledgeable and skilled in the nondestructive examination (NDE) method being performed. This technician, and the other Inservice Inspection (ISI) technicians, were trained in the CPSES site specific NDE procedures and were provided with TU Electric's expectations regarding compliance with those site specific procedures. TU Electric believes that the cause of the violation was less than adequate attention to detail by the contractor nondestructive examination technician.

2. Corrective Steps Taken and Results Achieved

The temperatures of the subject examination surfaces were recorded by the examiner after he retrieved a surface pyrometer. This was accomplished by the technician, approximately 20 minutes after completion of the NDE examinations and prior to the identification of this deviation. The temperature recorded (80 degrees F) was within 1 degree of the temperature recorded during a magnetic particle examination on the same surfaces the previous day (81 degrees F). The basic calibration block surface temperature was recorded as 69 degrees F immediately prior to the subject examinations. TU Electric believes that, because there were no appreciable differences between the examination surface temperatures, and the system operating conditions had not changed between the time the magnetic particle examination was conducted and when the ultrasonic examination was conducted (the next day), the examinations, as performed, satisfy the requirements of ASME Section XI, Appendix III, paragraph III-3210 which in part states that, "for contact examinations, the temperature difference between the examination and basic calibration block surfaces shall not exceed 25 degrees F". Therefore, the integrity of the subject welds was not in question.

A review of the documentation of other ultrasonic weld examinations performed by this NDE technician and other contractor NDE technicians. The review found that the examination and basic contact block temperatures were recorded, and were in compliance with the procedures. Based on this review, TU Electric believes that this was an isolated occurrence, and no generic

implications existed.

3. Corrective Steps Taken to Preclude Recurrence

The ISI ultrasonic examination procedures were enhanced to provide more specific guidance, with respect to how and when the temperatures of examination surfaces should be recorded. The contractor ISI technicians were trained on these procedure enhancements.

Additionally, the contractor ISI technicians received refresher training regarding CPSES expectations on; self-verification, procedure compliance, and personnel performance. Furthermore, after discovery, ISI activities were suspended for 24 hours to provide a period of time for the retraining and for a program self-assessment. Upon restart of the ISI activities, TU Electric Nuclear Overview and NDE Level III personnel presence in the field was increased to survey in process examinations.

4. Date of Full Compliance

TU Electric is in full compliance.

EXAMPLE 2

1. Reason for Violation

The examiner involved in this violation was knowledgeable and skilled in the NDE method being performed. This technician and the other ISI technicians were trained in the CPSES site specific NDE procedures and were informed of TU Electric's expectations regarding compliance with those site specific procedures. TU Electric believes that the cause of the violation was less than adequate attention to detail by the contractor NDE technician.

2. Corrective Steps Taken and Results Achieved

In order to ensure the integrity of the subject weld, the required surface examination was reperformed by a different technician. This re-examination was witnessed by the Authorized Nuclear Inservice Inspector, and was verified to be in compliance with procedures and ASME Code requirements. Additionally, a review of documentation was conducted, which found that no other surface examinations were performed by the technician involved with this violation and that the subject examination, as originally performed, was in compliance with the governing ASME Code requirements stated in ASME Section V, Article 6. Based on this review, TU Electric believes that this was an isolated occurrence, and no generic implications existed.

3. Corrective Steps Taken to Preclude Recurrence

The technician involved and the other contractor ISI technicians qualified in surface examination methods were retrained to the CPSES site specific NDE surface examination procedures. Additionally, the contractor ISI examiners received refresher training with respect to TU Electric's expectations on self-verification, procedure compliance, and personnel performance. The ISI activities were suspended for 24 hours to provide a period of time for the retraining and for a program self-assessment. Upon restart of ISI activities, TU Electric Nuclear Overview and NDE level III personnel presence in the field was increased to survey in process examinations.

4. Date of Full Compliance

TU Electric is in full compliance.

EXAMPLE 3

1. Reason for Violation

TU Electric's review of the contractor welder involved in this violation indicated that the welder was knowledgeable, and skilled in the welding method being performed. TU Electric believes that the interpass temperature was not taken, due to less than adequate attention to detail by the welder involved.

2. Corrective Steps Taken and Results Achieved

A deficiency document was initiated to document the condition. Engineering resolution determined that, the identified condition would not have an adverse affect on the integrity of the weld. No additional actions were deemed necessary. A review of past performance by this welder did not reveal additional matters of concern.

3. Corrective Steps Taken to Preclude Recurrence

The contract welder involved in this deviation was retrained in the use of temperature indicating devices for welds. This event was shared with other contract welders as a lesson learned, and TU Electric's expectations with respect to attention to detail was re-emphasized. Based on this review, TU Electric believes that this was an isolated occurrence, and no generic implications existed.

4. Date of Full Compliance

TU Electric is in full compliance.

RESTATEMENT OF PART B OF THE VIOLATION
(445/9504-01)

1. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 9, "Procedures for Performing Maintenance", recommends that general procedures for the control of maintenance, repair, replacement, and modification work be prepared.

Accordingly, Licensee Procedure ODA-308, Revision 5, "LCO [Limiting Condition for Operation] Tracking Program", Section 6.4.2 states, in part, that an active limiting condition for operation action requirement (LCOAR) or an in progress LCOAR shall be initiated and that the unit supervisor shall ensure appropriate compensatory measures are taken when it is determined that a work order, clearance, etc. impacts the operability on any system which is Technical Specification related.

Corrective Maintenance Work Order 1-94-073961-00, for repair of Technical Specification related heat trace circuits, specified that an LCOAR and an impact review were required prior to the initiation of work.

Contrary to the above, neither an active nor an in-progress LCOAR was initiated, and compensatory measures were not implemented for corrective maintenance being performed on Unit 1 emergency borate piping heat trace Circuit 16 under Work Order 1- 94-073961 from December 13, 1994 until February 7, 1995.

2. CPSES Final Safety Analysis Report, Section 13.3b.4, entitled, "Administrative Procedures and Controls", states that administrative procedures and controls will be established to ensure the reliable performance of fire protection personnel, systems and equipment. Effective measures will be established to control the use and storage of combustibles and ignition sources."

Accordingly, licensee procedure for the "Control of Transient Combustibles, Ignition Sources and Fire Watches", (STA-729, Revision 5) Section 6.4.1.1 states that a fire watch shall be established when a fire permit is issued. Section 6.3 states that a CPSES fire permit is required when an ignition source is to be used.

Contrary to the above, on March 21, 1995, no fire watch was present during welding on Check Valve ICS-8443, an activity which used an ignition source and which had a fire permit issued.

RESPONSE TO PART B OF THE VIOLATION

TU Electric accepts the violation, and provides the responses to each example, as requested.

EXAMPLE 1

1. Reason for Violation

TU Electric's evaluation determined that, the maintenance personnel involved with the heat trace work neglected to have the open work order re-reviewed for impact by the Operation's staff, which would have triggered the need for a Limiting Condition for Operations(LCO). Additionally, an adequate review of the existing LCO was not performed by the Operations staff. For additional information please see attachment 2, section a) to this letter.

2. Corrective Steps Taken and Results Achieved

After the discovery of this event, TU Electric immediately verified that the temperature of the borate piping was above 65 degrees F, and established compensatory measure to ensure that the room temperature remained above 65 degrees F. Additionally, TU Electric performed a review of Operations logs and concluded that the room temperature remained above 65 degrees F during the time identified; therefore, operability of emergency boration was not affected. A work order was issued to repair/rework the affected portions of the heat trace. The subject work has been completed.

A deficiency document was issued to document the condition and to initiate corrective actions to preclude recurrence. These actions are stated in section 3 below.

3. Corrective Steps Taken to Preclude Recurrence

TU Electric has developed new Work Order standard steps for the TS heat trace circuits to require individual Work Orders. Management's expectations with respect to attention to detail were re-emphasized.

4. Date of Full Compliance

TU Electric is in full compliance.

EXAMPLE 2

1 Reason for Violation

Welding was being performed on Valve 1CS-8443. This work had been proceeding for several days, and a qualified Fire Watch had been assigned to the work location. On March 21, 1995, the qualified Fire Watch did not report to work. The Crew Foreman knew that a qualified fire watch was needed for this particular area, but failed to assign one to the crew working on Valve 1CS-8443. The welder performing the work also knew that a Fire watch was needed, and assumed that one of his helpers was a qualified Fire Watch. However, the qualifications dates of the helper had expired, which was not recognized by the welder.

TU Electric believes that less than adequate attention to detail was the cause for this violation. The crew foreman should have assigned another fire watch to replace the one that was absent, and the welder should have inquired if the qualification of his helper was still current. Nonetheless, TU Electric believes that this event did not cause a safety concern, since most of the individuals involved in this work crew were familiar with fire prevention and reporting of fires through their general employee training skills possessed. A review of deficiency documents did not reveal that the lack of assignment of Fire Watches was not a negative trend. Based on this review TU Electric believes that this was an isolated occurrence, and no generic implications existed.

2. Corrective Steps Taken and Results Achieved

A deficiency document was issued to document this event and has been included in the Trending Program. This issue was discussed with personnel involved with this event, and management's expectations with respect to attention to detail and communication were re-emphasized.

3. Corrective Steps Taken to Preclude Recurrence

As stated above, appropriate corrective actions were taken with the individuals involved. The responsible supervisor has reviewed this event with the personnel involved and stressed the importance of establishing a Qualified Fire Watch. The deficiency document has been included in the trending program, which periodically reviews deficiencies for significance and repetitive events. This program requires appropriate actions to be taken if an adverse trend is identified.

4. Date of Full Compliance

TU Electric is in full compliance.

NRC INSPECTION REPORT 50-445/446-95-02

TU Electric has reviewed the NRC's letter dated March 13, 1995, concerning the inspections conducted by Mr. A. T. Gody, Jr., and other inspectors during the period of January 1 through February 11, 1995. The inspection report identified issues which may indicate potential weaknesses in plant configuration management. The issues were: a) degraded heat trace on a Unit 1 emergency borate pipe; b) a wrong circuit card installed in the Unit 1 rod control system; and c) the use of a plastic tie wrap to secure a tornado damper in the open position.

As stated by the inspector the individual examples may be isolated occurrences, but they do represent a departure from the level of performance that TU Electric management expects from Comanche Peak personnel. TU Electric is responding to the Inspection report, and has taken these issues seriously. In response to the issues raised by the subject inspection, TU Electric has placed increased emphasis on plant configuration control. The actions taken by TU Electric for the individual issues raised during the aforementioned inspection, and the actions to prevent recurrence are stated below :

**SUMMARY OF ACTIONS TAKEN FOR INDIVIDUAL ISSUES RAISED DURING INSPECTION:
50-445/446-9502**

- a) The inspector noted in the inspection report that TU Electric immediately verified that the temperature of the borate piping was above 65 F and established compensatory measure to ensure that the room temperature remained above 65 degrees F. TU Electric performed a review of Operations logs and concluded that the room temperature remained above 65 degrees F during the time identified, therefore operability of emergency boration was not affected.

In addition to the above actions, TU Electric performed a root cause analysis of this event (One Form 95-113). The analysis determined that the work order (WO) contained both Technical Specification (TS) and Non-TS heat trace circuits. An impact review was performed and appropriate compensatory measures were initiated. It should be noted that, at CPSES, Non-TS work (in most cases) does not require an impact review. The initial troubleshooting on the heat trace circuits identified that some circuits were degraded, and the WO was sent to appropriate organization for rework/repair considerations. This condition and the upcoming Unit 2 outage contributed in the WO being considered as discretionary work which resulted in the WO not being re-impacted. It was deemed that the event was caused when the work order, which contained both TS heat trace circuits and Non-TS circuits, was planned, scheduled and rescheduled to be worked after the Unit 2 refueling outage; the responsible organization did not recognize that the WO

contained some work which was TS related, and an impact review was overlooked and was not requested. Without the impact review a Limiting Condition for Operations was not entered to track the degraded heat trace and/or compensatory measures taken to assure that the temperature of the boric acid piping did not drop below 65 degrees F. A review of Operation's logs indicated that the room temperature remained above 65 degrees F, hence the operability of the emergency boration was not affected.

To preclude recurrence TU Electric has developed new WO standard steps for the TS heat trace circuits to require individual WOs, which will not include Non-TS heat trace circuits. A lessons learned has been issued to document this issue and has been promulgated among the responsible organizations.

- b) In its second example the inspection report indicates that, a wrong circuit card was installed in Unit 1 due to the use of an informal I&C tracking memorandum which stated that decoder cards for Unit 1 should be replaced with cards from an I&C supervisor's desk instead of cards from the warehouse (which had been modified). In addition to the memorandum, a "Special Inspections/Handling Tag" was placed with the modified cards in the warehouse as a barrier to using the modified cards in Unit 1. After installing the modified cards in Unit 1, the I&C technician discovered the handling tag in the packing materials that came with the card, and notified his supervisor. The immediate action was to replace the wrong circuit card with the correct card. As noted by the inspector in the report, the installation of the wrong circuit card was discovered by the I&C Technician prior to completion of the work package for turnover. The correct card was installed and the rod control system was again tested satisfactory. This activity was accomplished within the required 48-hour LCO. To prevent further occurrences of this situation, the master parts list (MPL) for the Unit 1 Rod Control Logic Cabinet was changed to re-verify the modified circuit cards. A special entry has been made in the MPL, which specifies that minor modification (MM) 94-040 must be implemented to use the modified cards in Unit 1.

It should be noted, that the installation of the incorrect card had no effect on the safety function of the rod control system or the ability to reposition rods. The use of less than adequate work practices, i.e., informal method of work instruction led, to this error.

- c) Finally, the inspection report notes that, a plastic tie wrap was used as a temporary measure to hold the tornado damper open when temperatures exceeded Technical Specification limits in July 1994. In addition, administrative measures were not utilized to maintain cognizance over plant configuration so that when the temporary measure was not needed it could be removed.

TU Electric's root cause evaluation for this issue determined that an impact analysis had been conducted by system engineering at the time of the installation of the plastic tie wires. This impact analysis utilized similar methodology to determine the need for a temporary modification. It was deemed that a formal temporary modification was not warranted, since the use of the tie wire did not impact plant design. However, this analysis was not documented.

In order to preclude recurrence, the System Engineering Manager has issued an instructional memorandum to reinforce management expectations with respect to the use of temporary modifications. The memorandum provided several important instructional points to consider when performing impact analysis, when temporary modifications are warranted.

Additionally, the memorandum stated that, system walkdowns are to result in reviews of existing temporary modifications, including the continuing need for these modifications and the status of action needed to restore them. The System Engineers are expected to be cognizant of activities occurring on their systems and, for those involving or resulting in a temporary alterations to design configuration, critically examining the methods being used to control the alteration to assure it is the correct mechanism and appropriately implemented.

In summary, the memorandum is intended to reinforce the importance of controlling a temporary alteration to the plant to assure appropriate consideration of and compensation for their impacts. It is also intended to reinforce the importance of undertaking the decision to pursue temporary alteration only as temporary measures to allow permanent solutions to identified problems.

Although the examples noted represent a departure from TU Electric management's expectations, TU Electric does not believe that they either represent a breakdown in plant configuration management or are pervasive. Nonetheless, TU Electric has taken these issues and other anomalies which potentially relate to less than adequate management expectations seriously.

In addition to the actions taken for the heat trace, circuit card, and the plastic tie wire issue, TU Electric has taken positive measures to preclude recurrence and to reinforce management expectations. A site wide "pause for reflection" was conducted on March 22, 1995. The purpose of the sitewide meeting was to review the current events with all personnel. Details of this "pause for reflection" was discussed with the NRC Resident Inspectors at CPSES.