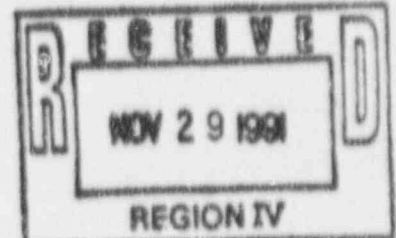


Log # TX-91410  
File # 10130  
IR 91-51  
Ref. # 10CFR2.201

November 27, 1991

William J. Cahill, Jr.  
Group Vice President

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



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)-UNIT 1  
DOCKET NO. 50-445  
NRC INSPECTION REPORT NOS. 50-445/91-51; 50-446/91-51  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated October 28, 1991, concerning the inspection conducted by the NRC staff during the period September 30 through October 4, 1991. This inspection covered activities authorized by NRC Operating License NPF-87 and Construction Permit CPPR-127. Attached to the October 28, 1991, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation (445/9151-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

OB/tg  
Attachments

c - Mr. R. D. Martin, Region IV  
Mr. T. A. Bergman, NRR  
L. A. Yandell, Region IV  
Resident Inspectors, CPSES (?)

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PDR ADDCK 05000445  
Q PDR

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

Texas Utilities Electric Company

(Comanche Peak Steam Electric  
Station, Unit 1 & 2)

Docket Nos. 50-445  
and 50-446

## AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Notice of Violation 50-445/91-51; 50-446/91-51 for the captioned facility; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

William Caldwell

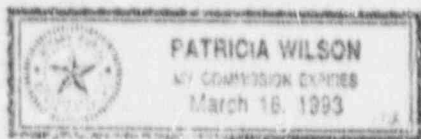
William J. Conill, Jr.  
Group Vice President, Nuclear

STATE OF TEXAS

COUNTY OF SOMERVELL

Subscribed and sworn to before me, on this 27th day of **November**, 1991.

Peterson Wilson  
Notary Public



**NOTICE OF VIOLATION**  
(445/9151-01; 446/9151-01)

10 CFR 50.49(f) requires that "each item of electric equipment important to safety must be qualified by": testing identical equipment under the same or similar conditions with supporting analysis; testing a similar item with supporting analysis; experience with identical or similar equipment under similar conditions with supporting analysis; or, analysis with partial test data.

10 CFR 50.49(j) requires that "[a] record of the qualification . . . must be maintained in an auditable form . . . to permit verification that each item of electric equipment important to safety . . . is qualified for it's application . . . ."

Environmental qualification data package EEQSP-ES-100-03, Revision 2, Supplement 2, "Harsh Environment Okonite T-95 and No. 35 Splicing Tape," issued on August 10, 1989, provided information to be used to determine the qualification of V-type splices without jacketing tape in the crotch of the splice.

Contrary to the above, on October 3, 1991, Supplement 2 of data package EEQSP-ES-100-03 did not contain sufficient information to demonstrate the qualification of the subject splices in accordance with 10 CFR 50.49.

**RESPONSE TO NOTICE OF VIOLATION**  
(445/9151-01; 446/9151-01)

TU Electric acknowledges the violation and the requested information follows:

1. Reason for Violation

A one time deviation Design Change Authorization (DCA) 94555 was issued against CPSES Unit 2 Specification CPSES-2-2004 for dual voltage Motor Operated Valves (MOVs). The subject DCA authorized installation of "V"-type splices without jacketing tape in the crotch of the splice. A review of the qualification package EEQSP-ES-100-03 Revision 2, its Supplements 1, 2 and 3, and associated documentation and interviews with cognizant personnel concluded that package EEQSP-ES-100-03, Revision 2, through Supplement 2 issued on August 10, 1989, appeared to allow the subject configuration, consistent with information in the possession of TU Electric at that time.

However, as part of its corrective actions for Notice of Violation 445/8960-V-02, which was issued for inadequate installation of multi-wire splices, TU Electric issued DCA-78713 R/12 against Electrical Specifications ES-100, to address the additional limitations on Okonite tape and to clarify installation details for in-line and "V"-configuration taped splices. Specifically, the configuration of two, three and four wire "V" splices were to be treated the same as an in-line splice: i.e., the jacketing tape was to be applied continuously from one cable, over the bolted connection and continuing onto the next conductor(s) following the "V" configuration. Subsequently, on October 18, 1989, Supplement 3 was added to Equipment Qualification (EQ) package EEQSP-ES-100-03 to address this change.

Based on this information, the following conclusions have been reached regarding the reasons for the condition noted in the Notice of Violation:

- A) The Unit 1 procedure used to develop, revise and supplement EQ packages was silent with regard to voiding changed, superseded or deleted information when new supplements are issued. As a result, when supplement 3 to EEQSP-ES-100-03 was issued, the information indicating that the subject configuration was qualified through supplement 2 was not clearly voided.
- B) Personnel performing the interdisciplinary review on DCA 94555 using package EEQSP-ES-100-03 failed to identify that information in supplement 3 superseded prior information on the qualification of the subject splices.

## 2. Corrective Steps Taken and Results Achieved

TU Evaluation Form (TUE) No. 91-2326 was issued to document the condition allowed by DCA-94555 to the Electrical Specification CPES-E-2004. DCA-94555 was revised to rework affected valves listed in the DCA, and required the taping to comply with the specification and the EQ package through supplement 3. The subject EQ package was clarified to clearly state the qualified configurations allowed.

An interface meeting was held with TU Electric EQ group and Unit 2 EQ personnel to enhance communication regarding the EQ packages, their applicability to Unit 2, and to enhance the methodology for EQ package updates.



3. Corrective Actions Taken to Preclude Recurrence

The procedure governing the preparation of EQ packages will be revised to clarify the use of supplements and for voiding information which is no longer applicable due to the newly issued supplements.

Additionally, a review of all of the EQ packages was performed. No other similar situations were identified which could have resulted in the misapplication of the package. This review indicated that incorporation of a record of change sheet would enhance the usability of the packages. This enhancement will be incorporated in the EQ package preparation procedure. A backfit to the EQ packages will be performed to comply with the revised procedures, by January 31, 1992.

4. Date When full Compliance Will Be Achieved

Full compliance will be achieved by January 31, 1992.