



TU ELECTRIC

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Ref. # 10CFR2.201

William J. Cahill, Jr.
Group Vice President

October 13, 1992

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
NR INSPECTION REPORT NO. 50-445/92-32; 50-446/92-32
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 16, 1992, concerning the inspection conducted by the NRC staff during the period August 17-20, 1992. This inspection covered activities authorized by Construction Permit No. CPPR-127. Attached to the September 16, 1992, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation (446/9232-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: *Roger D. Walker*
Roger D. Walker
Manager of Regulatory
Affairs for NEO

JG/tg
Attachment

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NOTICE OF VIOLATION
(446/9232-01)

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, Revision 85, require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

The following examples of the failure to follow procedures were observed:

1. Procedure CP-SAP-26, "Startup Operating Instructions," Revision 2, paragraph 6.3, requires expired startup operating instructions to be logged out of the index and discarded from control room files.

Contrary to the above, the inspector found on August 17, 1992, that 9 of a sample of 19 startup operating instructions were expired but not logged out and discarded from control room files (i.e., 2-92-RC-SOI-HFT-SOP-101B, expiration date August 10, 1992; 2-92-RH-SOI-HFT-SOP-102B, expiration date August 11, 1992; 2-92-RC-SOI-HFT-SOP-108B, expiration date August 16, 1992; 2-92-SI-04, expiration date April 25, 1992; 2-92-RH-01, expiration date April 25, 1992; 2-92-RH-02, expiration date March 29, 1992; 2-92-RH-04, expiration date February 15, 1992; 2-92-RH-07, expiration date July 6, 1992; and 2-92-RH-08, expiration date July 5, 1992).

2. Procedure ODA-104, "Operations Department Document Control," Revision 7, with Procedure Change Forms 1 through 4, paragraph 6.6.1, requires the control room to maintain such procedures as prerequisite testing procedures.

Contrary to the above, the inspector found on August 18, 1992, that the file of prerequisite testing procedures in the control room: (a) did not contain the current revision of Procedure XCP-ME-7, which was issued July 24, 1992; (b) contained Procedure XCP-ME-10, which had been deleted on August 26, 1991; and (c) did not contain Procedure XCP-ME-17, which was issued May 7, 1992.

3. Procedure CP-SAP-07B, "Preoperational Testing," Revision 1, paragraph 6.3.1, requires the control room to have a copy of approved test procedures.

Contrary to the above, the inspector found on August 18, 1992, that four of a sample of 15 preoperational test procedures in the control room were missing at least one change notice (i.e., Change 1 of PT-07-02, which was issued August 10, 1992; Changes 2 and 3 of PT-39-01, which were issued August 6 and 7, 1992, respectively; Change 6 of PT-74-02, which was issued July 27, 1992; and Change 6 of PT-90-03, which was issued July 20, 1992).

4. Procedure CP-SAP-07B, "Preoperational Testing," Revision 1, paragraph 6.4.6, requires the startup test engineer to take an approved test procedure change to the startup records center for marking of the document as the "Official Test Copy" and distribution of copies.

Contrary to the above, the inspector found on August 19, 1992, that Test Procedure Change 3 to Test Procedure PT-39-01, which was approved on August 7, 1992, had not been taken to the startup records center for marking as the "Official Test Copy" and distribution of copies.

RESPONSE TO NOTICE OF VIOLATION

(446/9232-01)

TU Electric accepts the violation and the requested information follows:

1. Reason for Violation

The violation cited four examples of the failure to follow procedures.

- a. The first three were examples of improper control of procedures retained in the control room for use by operations and test personnel. The reason for the lack of control of these procedures is that no individual was assigned responsibility and accountability for this task.
- b. The fourth example recounts a situation where a test engineer failed to process a test procedure change notice in a timely manner. This problem occurred because the engineer failed to give adequate attention to details of the administrative procedure governing test procedure changes.

2. Corrective Steps Taken and Results Achieved

- a. A review and evaluation has been completed for those procedures cited in the violation which are retained in the control room. Those procedures which were no longer needed in the control room have been removed. Those procedures which remained were updated in accordance with administrative procedures such that only current and valid copies were retained.
- b. The test procedure change (number 3) to test procedure 2CP-PT-39-01 has been taken to the records center and processed in accordance with administrative procedures.

3. Corrective Steps to Prevent Recurrence

- a. Operations management has assigned an individual to the control room on an interim basis to resolve the two of problems identified in the

violation regarding control and maintenance of control room documents. This individual will review documents to assure that their present status is current. In addition, this individual will review the administrative handling of these documents and identify changes required to preclude recurrence of similar problems. Finally, when any required changes have been implemented, this individual will monitor the status of these documents until management is confident that underlying problems which led to this violation have been resolved.

- b. A review of ongoing preoperational test procedures was conducted to determine the extent of the problem regarding untimely processing of test procedure changes. No other examples were found. Based on this, this problem is considered an isolated occurrence. The test engineer involved has been counseled regarding the importance of timely processing of test procedure changes.

4. Date When Full Compliance Will Be Achieved

Full compliance has been achieved. Any changes identified to preclude recurrence of similar problems will be implemented by November 30, 1992.