TU ELECTRIC

Log # TXX-92504
File # 10130
IR 92-31
Ref. # 10CFR2.201

October 16, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
DOCKET NO. 50-445
NRC INSPECTION REPORT NOS. 50-445/92-31; 50-446/92-31
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 24, 1992, concerning the inspection conducted by the NRC staff during the period July 19 through August 29, 1992. This inspection covered activities authorized by NRC Operating License NPF-87 and Construction Permit CPPR-127. Attached to the September 24, 1992, letter was a Notice of Violation (NOV).

TU Electric hereby responds to the Notice of Violation (445/9231-01) 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

OB/tg
Attachment

c - Mr. J. L. Milhoan, Region IV
Resident Inspectors, CPSES (2)

19:100

IE01
1/1

NOTICE OF VIOLATION
(445/9231-01)

Comanche Peak Steam Electric Station Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision , February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 9.e, recommended that general procedures for the control of maintenance, repair, and modification work should be prepared before reactor operation is begun. These procedures should include information on areas such as the method for obtaining permission and clearance for operations personnel to work and for logging such work.

Maintenance department administrative Procedure MDA-111, "Maintenance Department Troubleshooting Activities," Revision 0, Section 6.2, established the requirements for controlling troubleshooting activities. Section 6.2.1 required that, prior to performing troubleshooting activities, the individual obtain permission to commence a troubleshooting activity and also obtain Verification Sheet Form STA-694-2 or equivalent.

Contrary to the above, on August 25, 1992, at 10:54 , a troubleshooting activity was performed on Annunciator Cabinet CP1-EC -09, Bay 2, Power Supply 22, without first having obtained permission from the unit supervisor and without having obtained the verification sheet. The electrical maintenance technician had received permission to enter the cabinet bay to plan a corrective maintenance activity. While assessing the work activity, the electrical maintenance technician began troubleshooting the circuit and removed a fuse associated with the power supply. When the fuse was replaced, a loss of annunciator logic power occurred to approximately 40 percent of the main control board annunciators, rendering them inoperable. The annunciator logic power supply was energized at 11:57 a.m. the same day.

RESPONSE TO NOTICE OF VIOLATION
(445/9231-01)

TU Electric accepts the violation and the requested information follows:

1. Reason For Violation

   TU Electric believes that this was an isolated incident with respect to obtaining permission prior to performing troubleshooting activities; obtaining verification sheet form STA-694-2 or equivalent; and less than adequate self-verification process. Additionally, TU Electric

acknowledges that during this incident supervisory oversight of a work activity did not consistently ensure that management's expectation were met.

TU Electric performed a review of Independent Safety Engineering Group's (ISEG) field notes and Nuclear Overview Department's Trend Analysis Data. The purpose of this review was to determine if a trend existed in the area of less than adequate self verification from July 1992, through September 10, 1992. This review did not identify an adverse trend. Additionally, some Quality Control and ISEG personnel were requested to review this incident to determine if they had observed similar incidents regarding less than adequate self verification, no significant matters of concern were identified.

2. Corrective Steps Taken and Results Achieved

TU CPSES maintenance management discussed this incident with the personnel involved, and reemphasized management's expectation regarding procedure compliance and adequate communication with control room personnel.

3. Corrective Action Taken to Preclude Recurrence

TU Electric has reemphasized management's expectation regarding procedure compliance, adequate communication with the control room personnel, and self verification with maintenance supervision.

Station Administration Procedure STA-694 "Station Verification Activities" has been revised to clarify the basis, requirements and methods for self verification and self-checking activities performed on station equipment.

4. Date When Compliance Will Be Achieved

Full compliance has been achieved.