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October 28, 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)  
NRC INSPECTION REPORT NOS. 50-445/92-37 AND 50-446/92-37  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 28, 1992, the inspection was conducted by the NRC staff during the period of August 17 through August 20, 1992. These inspections covered activities authorized by NRC Operating License NFP-87 and Construction Permit CPPR-127. Attached to the September 28, 1992, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,

  
William J. Cahill, Jr.

JET/ds  
Attachment

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

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**NOTICE OF VIOLATION**

**(445/9237-01)**

**(446/9237-01)**

10CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by and accomplished in accordance with instructions, procedures, or drawings.

1. CPSES Administrative Procedure STA-737, "Boric Acid Corrosion Detection and Evaluation," Revision 0, paragraph 6.3 requires that, for each source of leakage identified, the systems engineer shall "Check to see if either a work request (WR) or an open work order exist which addresses the leakage. If not, initiate a WR noting the items determined in Section 6.2."

Contrary to the above, during a containment building walkdown and visual examination of principal locations for leakage and/or presence of boric acid crystals, conducted on October 3, 1991, 54 components were identified by the system engineers as displaying boric acid leakage and were correctly recorded on Form OPT-303A-2, "RCS Identified Leakage." However, no documented evidence was made available to the inspector which would confirm that a verification had been made to assure that a WR or work order had been initiated for each source of identified leakage.

2. CPSES Administrative Procedure STA-737, "Boric Acid Corrosion Detection and Evaluation," Revision 0, paragraph 6.4, subparagraph 6.4.1 requires that the systems engineer(s) list each principal location, in accordance with Attachment 8.A, on the Form OPT-303A-2. As a minimum (if no leakage found), the form should state, for each principal location, condition "OK."

Contrary to the above, the documented results of the October 3, 1991, containment walkdown did not contain the above listing.

TU Electric accepts the violation and the requested information follows:

(1) Reason for Violation

The reason for the violation was error on the part of plant personnel to comply with requirements of the governing procedure. In performing the walkdown, plant personnel did not document those principle locations which were observed to be free from boric acid crystals or corrosion. In completing the records, the general work order which accomplished the cleaning of components within the containment was not recorded for those components where boron crystals were discovered.

(2) Corrective Steps Taken and Results Achieved

An Operations Notification and Evaluation ONE Form was generated to document that principle locations, where no leakage was discovered, had not been noted on the OPT-303A-2 form. Additionally, a ONE Form was initiated to document the failure to record the applicable work order number as required by STA-737.

(3) Actions Taken to Preclude Recurrence

CPSES Administrative Procedure STA-737, "Boric Acid Corrosion Detection and Evaluation" has been revised to list all of the principle locations on the data sheet. This action serves as an aid in the comprehensive documentation of all principle locations. The system engineer charged with effecting this program was made cognizant of the violation and the procedural requirement to record associated work orders where sources of boric acid leakage is identified.

(4) Date On Which Full Compliance Will Be Achieved

TU Electric is in full compliance.