



Log # TXX-92505
File # 10130
IR 92-33
Ref. # 10CFR2.201

November 5, 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 2
DOCKET NO. 50-446
NRC INSPECTION REPORT NOS. 50-445/92-33; 50-446/92-33
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated October 6, 1992, concerning the inspection conducted by the NRC staff during the period September 8 through September 10, 1992. This inspection covered activities authorized by NRC Operating License NPF-87 and Construction Permit CPPR-127. Attached to the October 6, 1992 letter was a Notice of Violation (NOV).

TU Electric hereby responds to the Notice of Violation (446/9233-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

By: J. S. Marshall
J. S. Marshall
Generic Licensing Manager

OB/ds
Attachment

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

090105

9211100146 921105
PDR ADOCK 05000445
Q PDR

JE01

NOTICE OF VIOLATION
(446/9233-01)

10 CFR Part 50, Appendix B, Criterion V, as implemented by Section 5 of the TU Electric Quality Assurance Manual, states, in part, that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Procedure 2PP-3.05, "Procedure for Processing of TU Evaluation Forms (TUE) and Conditional Release Requests, "Section 4, defines a "Programmatic/Repetitive Condition" as "[a] condition which requires evaluation beyond that required for individual nonconformances or deficiencies. These conditions require a determination of cause, an evaluation of generic implications, corrective action, and preventive action. (Attachment 8.D)".

Procedure 2PP-3.05, Attachment 8.C, contains instruction for the RIO to determine if the "TUE [has] potential impact or impose differences to Unit 1. If yes, enter TE/ONE Form/DM number."

- a) Contrary to the above, the licensee failed to identify, in TUE 92-5633, Revision 1, the multiple loose instrument fittings as a condition that would require evaluations beyond that required for individual nonconformances or deficiencies.
- b) Contrary to the above, the licensee failed to identify, in TUE 92-5633, Revision 1, a condition that had potential impact to Unit 1.

RESPONSE TO NOTICE OF VIOLATION
(446/9233-01)

TU Electric accepts the violation and the requested information follows:

1. Reason for Violation

- a) As a result of five (5) TUE forms which identified loose ECSA fittings and a walkdown of twenty-nine (29) additional ECSAs, TUE 92-5633 was issued to document the need for an evaluation as a programmatic/repetitive condition. TUE 92-5633 was the subject of a special Quality Accountability meeting at which it was determined that further evaluation or root cause analysis was not necessary since the total population was known and it was believed that all deficient ECSAs would be identified and reworked.

- b) It was determined through personnel interviews that verbal communication regarding this issue did occur with Unit 1 personnel. However, this was not documented on a Technical Evaluation (TE) form as required by procedure. This lack of documentation was caused by the engineer believing a TE was not required because the Unit 1 specification contained a process for correcting the condition if identified.

2. Corrective Steps Taken and Results Achieved

The conditions noted on TUE 92-5633 were upgraded to programmatic/repetitive and documented on TUE 92-6300. In addition, the failure to write a TE was documented on TUE 92-5633, Revision 1, and TE 92-1944 was issued. The description in the Notice of Violation should have referred to TE 92-5633 Revision 0 instead of Revision 1.

TU Electric reviewed additional TUE forms identified within the quality accountability meeting notes, and did not find other TUE conditions which should have been categorized as programmatic/repetitive conditions.

3. Corrective Action Taken to Preclude Recurrence

An assessment of the Unit 2 nonconformance and corrective action process was performed to assure compliance with regulatory requirements, Quality Assurance Program requirements and licensing commitments. The assessment was performed by an independent reviewer not associated with the Unit 2 corrective action program. Root cause determination and generic implication evaluation were part of this assessment. This evaluation concluded that the threshold for initiation of a programmatic/repetitive TUE form, in this case, was too high. However, it was concluded that overall the TUE program was in compliance with applicable requirements and commitments. This assessment is available for review at CPSES.

A memorandum from the Unit 2 Project Manager has been issued to re-emphasize management's expectation regarding procedure compliance and proper documentation of actions taken for deviations found during construction activities.

4. Date When Compliance Will Be Achieved

Full compliance has been achieved.