

TUELECTRIC

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Ref. # 10CFR2.201

September 25, 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. 50-445/92-24; 50-446/92-24
RESPONSE TO NOTICE OF VIOLATION

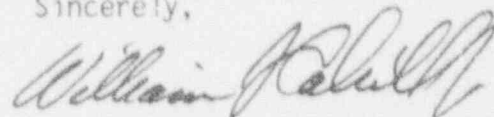
Gentlemen:

TU Electric has reviewed the NRC's letter dated August 12, 1992, concerning the inspection conducted by the NRC staff during the period June 7 through July 18, 1992. This inspection covered activities authorized by NRC Operating License NPF-87 and Construction Permit CPPR-127. Attached to the August 12, 1992, letter was a Notice of Violation (NOV).

On September 10, 1992, per conversation with Mr. L. A. Yandell, we requested and received an extension for submitting the response to this NOV until September 28, 1992.

TU Electric hereby responds to the Notice of Violation (445/9224-01) in the attachment to this letter.

Sincerely,



William J. Cahill, Jr.

OG/tg

Attachment

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

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NOTICE OF VIOLATION
(445/9224-01)

Criterion XVI of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected".

Procedure STA-421, Revision 2, "Operations Notification and Evaluation (ONE) Form," requires actual or potential adverse conditions be documented using the ONE Form process. Additionally, Procedure STA-422, Revision 5, "Processing of Operations Notification and Evaluation (ONE) Forms," Section 6.1.1, states, in part, "Any individual discovering an actual or potential adverse condition shall identify the condition in accordance with STA-421".

Contrary to the above, on June 23, 1992, a ONE Form was not initiated when the Motor Driven Auxiliary Feedwater Pump 1-01 inboard pump bearing packing extruded following an automatic auxiliary feedwater system actuation. The extruded packing resulted in an adverse condition requiring that the pump be declared inoperable and its packing replaced.

RESPONSE TO NOTICE OF VIOLATION
(445/9224-01)

TU Electric accepts the violation and the requested information follows:

1. Reason For Violation

TU Electric's review of the condition identified in the violation, associated documents, station procedures and interviews with the cognizant personnel revealed the following.

The maintenance personnel believed that the extruded packing was adequately documented on the work order which was initiated to repack the inboard and outboard stuffing boxes and to drain, flush, and refill the inboard bearing housing with oil. Since station procedure STA-606 "Work Requests and Work Orders" paragraph 6.6.3.18 provides adequate guidance on documenting as-found conditions, corrective actions, as-left conditions, and probable cause of problems/failure during the performance of maintenance activities; a ONE Form was judged unnecessary.

Section 15.0, paragraph 15.2.2.b of the CPSES Quality Assurance Manual states that nonconformance reports (ONE Forms) shall be initiated when the identified condition cannot be corrected i.e., reworked or scrapped, to comply with existing engineering or design requirements. The maintenance personnel believed that the requirements for initiating a

nonconformance report were met as delineated in the CPSES Quality Assurance Manual. It was concluded by this review that management expectations regarding issuance of a ONE Form were not met.

TU Electric evaluated the cause of this violation and compared it to causes for the violation identified in NRC Inspection Report 445/9220 and concluded that the causes for the events are different. In the spent fuel pool event (IR-9220), there was a lack of awareness and sense of urgency regarding the out of service status of non-Technical Specification safety related equipment. This led to the untimely issuance of a ONE Form. In the case of the Motor Driven Auxiliary Feed Water (MDAFW) pump, an appropriate level of management involvement occurred to ensure its prompt repair, testing, and return to an operable status.

2. Corrective Steps Taken and Results Achieved

A ONE Form was initiated to document the potential adverse condition in accordance with STA-421. MDAFW pump 1-01 has been reworked with the proper number of rings of packing. The maintenance history of MDAFW pump 1-02 has been reviewed to confirm that the proper number of packing rings are installed. The pump packing performance has been satisfactory since the packing replacement.

Regarding management expectations on issuance of ONE Forms for equipment problems, TU Electric management has reemphasized the need to initiate ONE Forms when failures of this nature occur.

3. Corrective Action Taken to Preclude Recurrence

During plan of the day meetings TU Electric has reemphasized the need to initiate ONE Forms when failures which are abnormal/unusual occur.

TU CPSES maintenance department will promulgate this violation and its response to maintenance supervisors as lessons learned.

Nuclear Overview has initiated an evaluation of the various procedures dealing with equipment performance issues. The purpose of this review is to determine if the procedures and their implementation are consistent with management expectations. Procedures reviewed include those on work requests and work orders, repetitive maintenance, equipment history, equipment performance monitoring, preventive maintenance predictive maintenance, the nuclear plant reliability data system, industry operating experience reviews, ONE Forms, root cause analysis, and failure analysis. Taken collectively, the procedures contain appropriate requirements for the analysis and correction of equipment performance problems. Evaluation of the implementation of these procedures is in progress and will be completed by mid-October.

4. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Nuclear Overview will complete its evaluation by mid-October.

Lessons learned to the maintenance supervisors will be completed by November 30, 1992.