

JUL 30 1985

In Reply Refer To:  
Dockets: 50-445/84-32  
50-446/84-11

Texas Utilities Electric Company  
ATTN: M. D. Spence, President, TUGCO  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Gentlemen:

Thank you for your letter of March 11, 1985, in response to our letter and Notice of Violation dated February 15, 1985. We have reviewed your reply and find it addresses the concerns raised in item 3 of our Notice of Violation. We will review your corrective actions for items 1 and 2 as part of our examination of the Comanche Peak Response Team Program Plan. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

"Original Signed By:  
D. R. HUNTER"

Dorwin R. Hunter, Chief  
Reactor Project Branch 2

cc:  
Texas Utilities Electric Company  
ATTN: B. R. Clements, Vice  
President, Nuclear  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Texas Utilities Electric Company  
ATTN: J. W. Beck, Manager,  
Licensing  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

RPB2/PSB  
DMHunnicut:gb  
4/10/85

RPB2  
DRHunter  
AA/85

8508050167 850730  
PDR ADOCK 05000445  
Q PDR

DRS&P  
RPDenise  
A/15/85

NRE  
VNOon  
5/8/85

bcc to DMB (IE01)

bcc distrib. by RIV:

\*RPB2

\*RRI-OPS

\*RRI-CONST

\*D. Hunnicutt, TaskForce

\*R. Bangart, D/DRSS

V. Noonan, NRR

S. Treby, ELD

\*RIV File

\*MIS System

\*RSTS Operator

\*EP&RPB

R. Denise, D/DRSP

R. Martin, RA

Juanita Ellis, Pres.- CASE

Renea Hicks, A/Atty General, EP Div.-TX

TEXAS DEPT. OF HEALTH RESOURCES

\*D. Weiss, LFMB (AR-2015)

\*w/766

**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

**BILLY R. CLEMENTS**  
VICE PRESIDENT, NUCLEAR OPERATIONS

March 11, 1985  
TXX-4435

Dorwin R. Hunter, Chief  
Reactor Project Branch 2  
U.S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Docket Nos.: 50-445  
50-446 - 8411

COMANCHE PEAK STEAM ELECTRIC STATION  
RESPONSE TO NRC NOTICE OF VIOLATION  
INSPECTION REPORT 84-32  
FILE NO.: 10130

Dear Mr. Hunter:

We have reviewed your letter dated February 15, 1985 regarding the inspection conducted under the Resident Inspection Program by H.S. Phillips of activities authorized by NRC Construction Permit CPPR-125 for Comanche Peak Units 1 and 2.

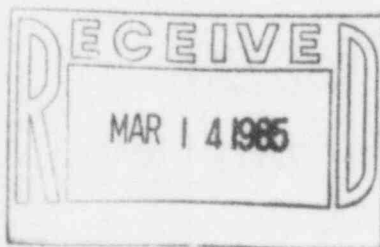
Our review of the findings cited in the Notice of Violation under Appendix A to your letter indicates that two of the findings are similar in nature to those identified by the NRC Technical Review Team (TRT). In accordance with one of your proposed response options, we have elected to respond to findings 1 and 2 of the Notice of Violation as part of the Comanche Peak Response Team Action Plan.

We are providing a response to Finding No. 3 in Appendix A of your letter. To aid in the understanding of our response, we have repeated the finding from the Notice of Violation followed by a summary of our corrective actions. The documentation of specific corrective actions is available at the TUGCo QA Dallas office for your Inspector's review.

If you have any questions, please advise.

Very truly yours,

*Richard E. Kaller*  
*for*  
B.R. Clements



BRC:tlg

Attachment

IC-004/85

cc: NRC Region IV (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. V.S. Noonan

ATTACHMENT

FAILURE TO PROPERLY CERTIFY A  
VENDOR COMPLIANCE INSPECTOR

Failure to Properly Certify a Vendor Compliance Inspector

Criterion V of 10 CFR 50, Appendix B, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

TUGCO Procedure DQP-VC-4, Revision 6, dated January 5, 1984, requires that Level II inspectors (Corporate QA) shall attend and satisfactorily complete nondestructive testing courses including eddy current testing.

Contrary to the above, one of six inspector's files had no documentation to show that the inspector had attended and completed an eddy current testing course. Subsequent, discussions revealed that he had been certified without meeting this requirement. The vendor compliance supervisor stated that this inspection skill is not needed since there is no present vendor work activity which would require this skill; therefore, this procedure was revised and the requirement omitted during this inspection.

This is a Severity Level V Violation. (Supplement II) (445/8432-05; 446/8411-05)

Corrective Steps which have been taken and the results achieved:

The certification of the inspector without the required eight (8) hour training was an oversight. A review of all six (6) Vendor Compliance Inspector's work reflected no instance where eddy current testing was involved. The procedure revision discussed below was processed to reflect our actual inspection needs.

Corrective steps which have been taken to avoid further violations:

As there is no present nor planned vendor work activity which would require this skill, TUGCo Procedure DQP-VC-4 has been revised by deleting the requirement for an eight (8) hour training course in eddy current testing. Should the need for a familiarity with eddy current testing arise, the Vendor Compliance Supervisor will take the necessary action to either train or obtain a qualified inspector.

Date when full compliance will be achieved:

Procedure DQP-VC-4 was revised August 27, 1984.