

APPENDIX A  
NOTICE OF VIOLATION

Texas Utilities Electric Company  
Comanche Peak Steam Electric Station, Unit 1

Docket No.: 50-445/85-11  
Permit: CPPR-126

During an NRC inspection conducted on August 1-31, 1985, of Comanche Peak Response Team activities, a violation of NRC requirements was identified. The violation involved a failure to report nonconforming conditions identified during reinspection of the essential lighting system in the Unit 1 safeguards building. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

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

Paragraph 3.1.1 of Procedure CP-QP-16.0, Revision 17, dated July 1, 1985, states, in part, "When a nonconforming condition is identified, the individual shall immediately apply a Hold Tag, when practical . . . ."

Paragraph 3.1.2 of this procedure states, in part, "Nonconforming conditions shall be reported on the NCR form . . . ."

Contrary to the above, during a NRC witnessed reinspection on August 6-7, 1985, of essential lighting system ESBI-42 (Unit 1, safeguards building, elevation 773 ft.) by an Evaluation Research Corporation (ERC) inspector and a TUGCO QC inspector, nonconforming hardware items were identified with respect to design document requirements. The identified nonconforming items were outside of the defined ERC reinspection activity scope and the TUGCO inspector stated that they would be documented on a NCR form. As of August 29, 1985, a NCR had not been written, a hold tag had not been applied and NRC followup established that a documented record of the nonconforming items had not been maintained.

This is a Severity Level IV violation (Supplement II)(445/8511-V-01).

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

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Dated at Arlington, Texas,  
this 11th day of October, 1985.