

APPENDIX B
NOTICE OF DEVIATION

Texas Utilities Electric Company (TUEC)
Comanche Peak Steam Electric Station, Unit 1

Dockets: 50-445/85-11
Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of August 1-31, 1985, of Comanche Peak Response Team (CPRT) activities, two deviations from commitments to the NRC were identified. The deviations involved a failure to comply with objectivity criteria reporting requirements and instances where the location of incorporated revisions was not denoted in procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the deviations are listed below:

- A. Section VII, "CPRT Objectivity Guidance," of the CPRT Program Plan, Revision 2, states, in part, " . . . all five Review Team Leaders and those assisting the Review Team Leaders in various capacities, including issue coordinators, are experienced nuclear industry consultants who have not been previously involved with the CPSES activities that they are now reviewing. . . . While these objectivity criteria are expected to be fully met, any exceptions will be promptly identified by the CPRT and provided to the NRC along with any necessary justification."

Contrary to the above, the issue coordinator for Issue-Specific Action Plans VII.a.1, VII.a.7, VII.a.8, and VII.b.1 (each associated with ASME activities to some degree) was a contract employee to Brown & Root from July 1980 to January 1981 whose duties included at least one Comanche Peak audit of ASME activities; however, this individual was not identified to the NRC with any justification regarding objectivity even though the individual has been in the present position since May 1985 (445/8511-D-02).

- B. Paragraph 5.2.4 of Procedure CPP-001, Revision 0, states, in part, "Incorporated revisions shall be indicated by a side bar in the right hand margin opposite the revision"

Contrary to the above, (1) CPP-016, Revision 1, was issued on August 9, 1985, and of the numerous changes made, five were not indicated by a side bar; (2) CPP-006, Revision 1, and CPP-009, Revision 1, were issued, respectively, on August 9 and August 13, 1985, with numerous changes, but not all changes were indicated by the required side bar; and (3) CPP-010, Revision 1, was issued on August 13, 1985, with none of the changes indicated by the required side bar (445/8511-D-01).

Texas Utilities Electric Company is hereby requested to submit to this office, within 30 days of the date of this Notice of Deviation, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to

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avoid further deviation from commitments made to the Commission; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: OCT 11 1985