

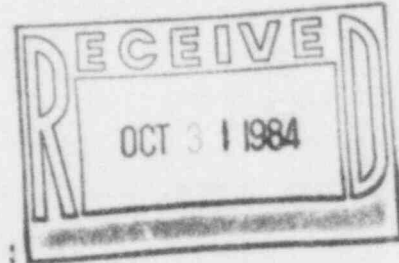
TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER * 400 NORTH OLIVE STREET, L.B. 81 * DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VICE PRESIDENT, NUCLEAR OPERATIONS

October 25, 1984
TXX #4343

Docket No.: 50-445

Mr. Richard L. Bangart, Director
Region IV Comanche Peak Task Force
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Dear Mr. Bangart:

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF DEVIATION
INSPECTION REPORT NO. 84-15

This letter is in regards to our August 24, 1984 response (reference TXX-4287) to the Notice of Deviation contained in Inspection Report 84-15. Since that date the Final Draft of the CPSES Technical Specifications has been issued. A subsequent review of Section 6 of the Final Draft has shown our response to be incomplete and requiring clarification.

To aid in the understanding of our response, we have repeated the Notice of Deviation followed by our response. We feel the enclosed supplemental information to be responsive to the Inspector's findings. If you have any questions, please advise.

Yours truly,

Billy R. Clements

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c: NRC Region IV - (0 + 1 copy)

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

Mr. Vincent S. Noonan

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APPENDIX A

NOTICE OF DEVIATION

Texas Utilities Electric Company
Comanche Peak, Unit 1

Docket: 50-445/84-15
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of March 1 through April 30, 1984, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following deviation was identified:

Deviation From a Commitment to NRC

The FSAR, Page 1 A(B)-14, in response to question Q421.19 commits the licensee to Regulatory Guide 1.33, Revision 2, February, 1978. The Regulatory Guide endorses ANSI N-18.7-1976, as an acceptable method of compliance with the program requirements of Appendix B to 10 CFR 50. The licensee's commitment took no exceptions nor proposed an acceptable alternative to this commitment for the area of safety-related maintenance instructions; thus, all provisions of the Regulatory Guide and ANSI Standard as they pertain to PWR's apply.

In deviation from the above, the licensee has developed a program and specific maintenance instructions that have not been reviewed and approved by the Station Operations Review Committee (445/8415-01).

Corrective and Preventive Steps Taken

Regulatory Guide 1.33 Rev. 2, and its endorsement of ANSI N18.7-1976 does not require the Station Operations Review Committee (SORC) to review all station procedures and instructions. However, the CPSES Technical Specifications (Proof and Review), in Specification 6.5.16, did require SORC review of applicable procedures listed in Appendix A of Regulatory Guide 1.33, Rev. 2. The Final Draft of the Technical Specifications, now issued, requires only Station Administrative Procedures to be reviewed by SORC. Use of the term "procedure" in Section 6 includes instructions as confirmed by discussions with the NRC Section 6 reviewer.

Specification 6.5.3, entitled Technical Review and Control was added which requires the following:

- a. Procedures must be reviewed by a qualified individual/group other than the individual/group which prepared the procedure, but who may be from the same organization.
- b. Procedures other than Station Administrative Procedures shall be approved by the appropriate supervisor as designated in writing by the Manager, Plant Operations.
- c. The Manager, Plant Operations shall approve Administrative Procedures, Security Plan Procedures and Emergency Plan procedures.
- d. Each person responsible for approving procedures shall determine if cross-disciplinary reviews are necessary. If necessary, these reviews must be performed by qualified personnel of the appropriate discipline.

In order to clarify the review, approval, and use of instructions, similar changes have been submitted to the FSAR (Sections 13.5 and 17.2) and the Operations Administrative Control and Quality Assurance Plan (Section 13.1).

Station Procedure STA-209 was issued and establishes the requirements for review and approval of instructions. This procedure requires that departments or sections needing instructions, must first write a procedure which is SORC approved, detailing the format, review, and approval process for those instructions. STA-209 also requires that all safety-related instructions be reviewed by the Operations Quality Assurance Section prior to approval. This review assures that station requirements concerning instructions are being complied with.

Date of Full Compliance

Station Procedure STA-209 was issued January 24, 1984. Changes to Section 13.5 and 17.2 of the CPSES FSAR have been approved by TUGCo and will be included in Amendment 53, scheduled for issue November 5, 1984. The revision to Chapter 13.1 of the Operations Administrative Control and Quality Assurance Plan was issued on October 19, 1984.