ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station

Docket Nos.: 50-445
50-446
License Nos.: NPF-87
NPF-89

During an NRC inspection conducted on September 29 through November 9, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

> Technical Specification 4.0.5 requires that inservice testing of ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a. Section XI, Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants," requires that valve testing be performed in accordance with the requirements stated in ASME/ANSI OM, Part 10.
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> Paragraph 4.3.1 of Part 10 states, in part, that safety and relief valves shall meet the inservice test requirements of Part 1. ASME/ANSI OM, Part 1, Paragraph 7.3, "Periodic Testing," states, in part, that no maintenance, adjustment, disassembly, or other activity which could affect "as found" set pressure or seat tightness data is permitted prior to testing.
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> Contrary to the above, a procedure change dated September 30, 1996, to Procedure MSM-G0-0204, Revision 4, required that valves be cycled to remove entrapped air, an activity that could affect the "as found" set pressure. Four Unit 1 relief valves were cycled to remove entrapped air, prior to "as found" testing, using licensee Procedure MSM-G0-0204 during the Unit 1 refueling outage as follows:
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> (1) the containment sump to Containment Spray Pump 1-02/1-04 suction isolation valve bonnet relief valve on October 9, 1996
> (2) the containment ventilation chilled water return header outside containment relief valve on October 16, 1996
> (3) the demineralized water/reactor makeup water outside containment building relief valve on October 17, 1996
> (4) the reactor makeup water to Pressurizer Relief Tank 1-01 outside containment building relief valve on October 18, 1996
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> This is a Severity Level IV violation (Supplement I) (50-445/9612-03).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a

copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 27th day of December 1996