

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Dockets: 50-445/88-12
50-446/88-10

Comanche Peak Steam Electric Station
Units 1 and 2, Glen Rose, Texas

Permits: CPPR-126
CPPR-127

During an NRC inspection conducted on February 3 through March 1, 1988, a violation of NRC requirements was identified. In accordance with the "general Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Paragraph 6.3.4.7, "Affected Licensing Documents," of TU Electric Procedure ECE 5.01-03/R1 dated December 1, 1987, states, in part, "Design changes may affect the text, tables, figures, charts, and/or drawings of one or more sections of a licensing document and may affect more than a single document. The Responsible Engineer shall thoroughly review all related licensing documents to identify potential conflicts. For a design change that affects the Final Safety Analysis Report (FSAR), an FSAR change request shall be prepared in accordance with Reference 3.9 and shall reference the DCA."

TU Electric response (R130.36) to NRC staff question (Q130.36) of FSAR Volume XVI states, in part, "Elevation 830' 0" - seven block walls were evaluated. Two were removed and replaced with seismic Category II Gypsum walls; two were modified to prevent a seismic interaction with ductwork and, three were found to be acceptable based on no seismic interaction with safety-related equipment."

Contrary to the above, the responsible engineer did not "thoroughly review all related licensing documents to identify potential conflicts." For example, Design Change Authorization (DCA) 23040, Revision 3, conflicts with the FSAR statement, ". . . two walls were modified to prevent a seismic interaction with ductwork," in that the DCA states, "no modifications required to masonry wall between Room 136 and 137; except for west wall of Room 139. For technical

justification see pages 3, 4, and 5." As a result, Block 15 (Does Design Change Affect a Licensing Document) was marked no and no FSAR change request was prepared.

This is a Severity Level IV violation (Supplement II)
(445/8812-V-01; 446/8810-V-01.)

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, DC, 20555, with a copy to the Office of Special Projects, Comanche Peak Project Division, Inspection Programs, within 30 days of the date of the letter transmitting this 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 if admitted, (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. If an adequate reply is not received within the time specified in this Notice, and order may be issued to show cause 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.

FOR THE NUCLEAR REGULATORY COMMISSION

RF Warnick

Dated at Comanche Peak Site
this 17th day of March 1988