



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

October 24, 2000

EA-00-213

Mr. C. L. Terry
TXU Electric
Senior Vice President & Principal Nuclear Officer
ATTN: Regulatory Affairs Department
P.O. Box 1002
Glen Rose, Texas 76043

SUBJECT: RESPONSE TO FINDINGS ISSUED IN INSPECTION REPORT NO.
50-445/00-03; 50-446/00-03

Dear Mr. Terry:

This is in reference to your letter dated July 26, 2000, in which TXU Electric, Comanche Peak Steam Electric Station, appealed (denied) the NRC's characterization of the significance of the two "Green" findings in NRC Inspection Report 50-445/00-03 and 50-446/00-03, dated June 19, 2000. The two "Green" findings, which pertain to the Public Radiation Safety Cornerstone, included a non-cited violation of Technical Specification 5.5.1 and a problem identification and resolution cross-cutting issue. The non-cited violation involved two instances of failing to perform source checks on the primary plant ventilation noble gas release rate monitors prior to initiating gaseous batch releases from the Unit 1 and Unit 2 volume control tanks. The problem identification and resolution issue involved both incomplete corrective actions, as well as, inadequate implementation of the specified corrective actions to prevent a second occurrence.

Our characterization of these findings was made on the basis of the screening guidance (Group 1 questions) detailed in NRC Inspection Manual Chapter 0610*, "Power Reactor Inspection Reports" (draft April 2000), which was in effect at the time of the inspection. As a result of our review of the information you provided, we continue to maintain our position that the failure to perform source checks of the applicable effluent radiation monitors prior to initiating non-routine releases from the station's volume control tanks on two separate occasions had the credible potential to impact safety, and they were not isolated cases. Accordingly, both findings were appropriately characterized as "Green."

Subsequent to the identification and documentation of these two "Green" findings, some changes were made to the NRC's Revised Reactor Oversight Process Group 1 questions, as noted in the October 6, 2000, revision of NRC Inspection Manual Chapter 0610*. In the future, any potential findings will be evaluated using this revised guidance.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the

Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Should you have any questions regarding this letter, we will be pleased to discuss them with you.

Sincerely,

/RA/

Arthur T. Howell III, Director
Division of Reactor Safety

Docket Nos.: 50-445
50-446

License Nos.: NPF-87
NPF-89

cc:

Roger D. Walker
TXU Electric
Regulatory Affairs Manager
P.O. Box 1002
Glen Rose, Texas 76043

Juanita Ellis
President - CASE
1426 South Polk Street
Dallas, Texas 75224

George L. Edgar, Esq.
Morgan, Lewis & Bockius
1800 M. Street, NW
Washington, D.C. 20036

G. R. Bynog, Program Manager/
Chief Inspector
Texas Department of Licensing & Regulation
Boiler Division
P.O. Box 12157, Capitol Station
Austin, Texas 78711

TXU Electric

-3-

County Judge
P.O. Box 851
Glen Rose, Texas 76043

Chief, Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, Texas 78756-3189

John L. Howard, Director
Environmental and Natural Resources Policy
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-3189

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