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

July 31, 1998

EA 98-374

Mr. C. L. Terry
TU Electric
Group Vice President, Nuclear
ATTN: Regulatory Affairs Department
P.O. Box 1002
Glen Rose, Texas 76043

SUBJECT: NRC INSPECTION REPORT 50-445/98-10; 50-446/98-10 AND NOTICE OF VIOLATION

Dear Mr. Terry:

An NRC inspection was conducted May 11-15, 1998, at your Comanche Peak Steam Electric Station, Units 1 and 2, reactor facilities. Following the onsite inspection, inoffice inspection was conducted until July 15, 1998, and a telephonic exit meeting was held to provide the inspection findings to you and other members of your staff. During the inspection, the team evaluated your program developed to comply with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," [the Maintenance Rule]. The enclosed report presents the scope and results of that inspection.

The inspection results revealed that you had developed and implemented an overall strong program that generally met the requirements of 10 CFR 50.65; however, the team identified two violations of the Maintenance Rule.

Violation A involved the failure to satisfy the requirements of 10 CFR 50.65(b)(2) by not including the service and circulating water discharge structures, two main transformer pads for each unit, two auxiliary transformer pads for each unit, the startup transformer pad, the 345 kV and 138 kV switch yard relay houses, and the digital rod position indication function in the scope of the Maintenance Rule program. The failure to include the identified structures in the scope of the Maintenance Rule program was a concern because this had the potential to cause unawareness of unacceptable structural conditions. The failure to include the digital rod position indication function in the scope of the Maintenance Rule program was a concern because a primary operator action taken during use of emergency operating procedures is to determine whether control rods are fully inserted and an adequate shutdown margin has been achieved. As such, it is necessary to assure the ability of the rod position indicating system to perform this function through the performance of appropriate preventive maintenance.

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Violation B involved the failure to satisfy the requirements of 10 CFR 50.65(a)(2) by not establishing adequate condition or performance measures for 17 functions identified in 15 systems. We are concerned about this violation because failure to properly establish adequate performance measures could result in unacceptable system performance without detection, relative to preventing or mitigating an accident or transient, thereby, having an adverse impact on safe plant operation.

These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR).

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

Sincerely,

Arthur T. Howell III, Director
Division of Reactor Safety

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

Enclosures:
1. Notice of Violation
2. NRC Inspection Report
   50-445/98-10; 50-446/98-10

cc w/enclosures:
Mr. Roger D. Walker
TU Electric
Regulatory Affairs Manager
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President - CASE
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Morgan, Lewis & Bockius
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Washington, D.C. 20036

G. R. Bynog, Program Manager/
Chief Inspector
Texas Department of Licensing & Regulation
Boiler Division
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Austin, Texas 78711

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

Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

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

E-Mail report to T. Frye (TJF)
E-Mail report to D. Lange (DJL)
E-Mail report to NRR Event Tracking System (IPAS)
E-Mail report to Document Control Desk (DOCDESK)
E-Mail report to Richard Correia (RPC)
E-Mail report to Frank Talbot (FXT)

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator
DRP Director
Branch Chief (DRP/A)
Project Engineer (DRP/A)
Branch Chief (DRP/TSS)
Resident Inspector (2)
DRS-PSB
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*Previously concurred OFFICIAL RECORD COPY

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