

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

April 21, 1980
TXX-3129

Mr. W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

Docket Nos. 50-445/80-08
50-446/80-08

COMANCHE PEAK STEAM ELECTRIC STATION
1981-83 2300 MW INSTALLATION
RESPONSE TO NRC
NOTICE OF VIOLATION
INSPECTION REPORT NO. 80-08
DOCKET NOS. 50-445 & 50-446
FILE NO: 10130


Dear Mr. Seidle:

We have reviewed the report dated April 2, 1980 on the inspection activities performed by your resident inspector, Mr. R. G. Taylor, of the activities authorized by NRC Construction Permit No. CPPR-127 for the Comanche Peak facility, Unit No. 2. We have responded to the findings listed in Appendix A of that report.

To aid in the understanding of our response, we have repeated the requirement and your findings followed by our corrective action.

We believe the attached information to be responsive to the Inspector's findings. If you have any questions, please advise.

Very truly yours,


R. J. Gary

Attachment
RJG:df

APPENDIX A

NOTICE OF VIOLATION

Based on the results of an NRC appraisal of your action during the period of December 13, 1979 to present, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permit No. 127 as indicated below:

Failure to Report a Significant Construction Deficiency

10 CFR 50.55(e) (1) states: "If the permit is for construction of a nuclear power plant, the holder of the permit shall notify the Commission of each deficiency found in design and construction, which, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents:

(iii) A significant deficiency in construction of or significant damage to a structure, system, or component which require extensive evaluation, extensive redesign, or extensive repair to meet criteria and bases stated in safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function"

10 CFR 50.55(e) (3) further states: "The holder of a construction permit shall also submit a written report on a reportable deficiency within thirty (30) days to the appropriate NRC Regional Office" "if sufficient information is not available within 30 days, an interim report containing all available information shall be filed, together with a statement as to when a complete report will be filed."

Contrary to the above:

On December 13, 1979, the Permit Holder notified the NRC Resident Reactor Inspection (RRI) that attempts to remove concrete "honeycomb" in certain interior walls of the Unit Two Containment Building had developed into an unexpectedly difficult deficiency. The Permit Holder also informed the RRI that a consultant would be employed to perform a sonic (microseismic) investigation of the walls involved.

On January 17, 1980, the Permit Holder notified the RRI that the sonic investigation was complete and that the Architect/Engineer was evaluating the results along with visual examinations.

Beginning in December 1979, the Permit Holder has performed extensive engineering evaluations either for the purpose of establishing the methods of repair or for evaluating the adequacy of the structure without repair, yet the Permit Holder has failed to furnish the NRC Regional Office with either an interim or final written report on this matter within the time period set forth in 10 CFR 50.55(e).

Corrective Steps Which Have Been Taken and Results Achieved

We have prepared a written report documenting information previously presented to your Resident Inspector verbally. This report is being transmitted under separate letter number TXX-3124, dated April 21, 1980.

Corrective Steps Which Have Been Taken to Avoid Further Noncompliance

We have reviewed requirements for submitting written reports in accordance with 10 CFR 50.55(e) as described in the NRC guidance document as presented to us by your Resident Inspector and as discussed in our meeting on April 8, 1980. This review has resulted in a clarification of reporting requirements which has been discussed with appropriate personnel in our organization to preclude further noncompliance.

Date of Full Compliance

Full compliance is effective as of the date of this report.