

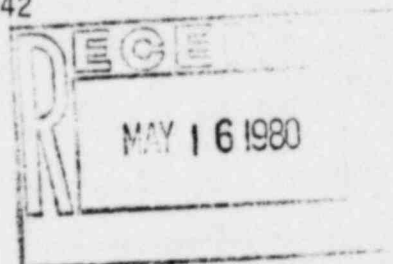
TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

May 14, 1980
TXX-3142

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 18, 1980 on the inspection conducted by your Resident Inspector, Mr. R. G. Taylor, of activities authorized by NRC Construction Permits No. CPPR-126 and 127 for the Comanche Peak facility. 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,

for *BR Clements*
R. J. Gary

Attachment
RJG:df

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APPENDIX A

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during March 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permits No. CPPR-126 and 127 as indicated below:

Failure to Follow Procedures for Reporting and Repair of Damaged Electrical Cable

10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Brown and Root Procedure 35-1195-EEI-13, "Repair of Electrical Cable Jacket," requires that damaged cable shall be reported to Electrical Engineering by the craft or by QC via a Field Deficiency Report and requires that damaged jackets on control type cable be repaired using Okonite No. 35 Jacketing Tape in accordance with Okonite Drawing No. D-5715 when the damage involves penetration through the jacket.

Contrary to the above:

The Resident Reactor Inspection (RRI) learned of a Safety Train A control cable that had been damaged during pulling of the cable through the buried conduit system from the primary power plant building to the Service Water Intake Building. The cable was pulled back on or about March 28, 1980, and it was verified by the RRI that the damage had been sustained, the jacket was penetrated, and the repair was made with standard vinyl electrical tape rather than Okonite No. 35 and not in the method required by Okonite Drawing No. D-5715. The original damage and initial repair were not reported via a Field Deficiency Report.

This is an infraction.

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Corrective Steps Which Have Been Taken and Results Achieved

The subject cable was pulled back during an investigation of the reported damage to the cable jacket. This cable, as well as others damaged during the pull back operation, will be replaced with new cables.

Corrective Steps Which Have Been Taken to Avoid Further Noncompliance

Special Construction Management/Supervisory Seminars were held with electrical construction personnel through the Foreman level. These sessions, which lasted approximately four hours, stressed the importance of procedure compliance in general and the proper method of cable repair, specifically.

Date of Full Compliance

The new cables are scheduled for installation during the month of June 1980. The seminars were held April 5, 1980.