TU ELECTRIC

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File # 10130
IR 50-445/89-64
IR 50-446/89-64
Ref. # 10CFR2.201

W. J. Cahill
Executive Vice President

October 26, 1989

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/89-64; 50-446/89-64
RESPONSE TO NOTICE OF VIOLATION & NOTICE OF DEVIATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 26, 1989, concerning the inspection conducted by Mr. R. Latta and other NRC consultants during the period August 2 through September 5, 1989. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to the NRC's letter were a Notice of Violation and a Notice of Deviation.

TU Electric hereby responds to the Notice of Violation in Attachment A and to the Notice of Deviation in Attachment B to this letter.

Sincerely,

William J. Cahill, Jr.

DAR/WJH/yxs
Attachments

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)

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NOTICE OF VIOLATION
(445/8964-V-01)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 1, of the TU Electric Quality Assurance Manual, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Contrary to the above, on August 21, 1989, the NRC inspector observed that a QC hold point had been bypassed prior to welding of the replacement tray fittings as specified in the applicable work package T140EDA42-01.

RESPONSE TO NOTICE OF VIOLATION
(445/8964-V-01)

TU Electric accepts the alleged violation and the requested information follows:

1. Reason for Violation

   The bypassed hold point identified by the NRC inspector resulted from errors by the craft persons involved. Based upon discussion with the craft electrician responsible for lifting and protecting the cables, the craft foreman believed that QC inspection of lifted cables had been performed. The foreman then assigned the work package to the craft welder and this individual did not verify that the inspection had been performed prior to welding.

   To determine the extent of errors involving bypassed hold points, Monthly Integrated Performance Analysis reports containing the evaluation of deficiency data trended from March to August 1989 were reviewed. These reports are developed in accordance with the TU Electric QA procedure, "Quality Assurance Trend System." The review found that in May 1989, TU Electric identified a need for action to resolve a repetitive condition involving bypassed hold points. In response to this repetitive condition, TU Electric initiated corrective measures including supervisory and craft retraining, improvements in the work process (i.e., multi-discipline involvement), and improved documentation techniques for specifying hold points. Trend reports compiled and issued subsequent to these actions indicated that the corrective measures taken have been effective, and that few instances similar to that identified by the NRC inspector have occurred.

2. Corrective Steps Taken and Results Achieved

A Nonconformance Report (NCR) was written on August 23, 1989, to document the bypassed hold point. The hold point was established to obtain QC inspection of cable lifting and protection prior to welding of replacement tray fittings on cable tray T140EDA42. This NCR has been dispositioned "use-as-is" based on verification that no cable damage resulted from the welding operations.

3. Corrective Steps Taken to Avoid Further Violations

The craft electrician, the craft welder, and the craft foreman responsible for this bypassed hold point have been counseled regarding their performance in this instance. Copies of the employee "Conference Reports" are contained in the employees' personnel files. In addition, the Electrical Craft Manager has issued a memorandum to all electrical craft employees (including electrical craft welders) reemphasizing the need to observe hold points established on work documents. To assure common understanding of this memorandum, additional training of electrical craft personnel has been conducted.

It should be noted that the few hold points bypassed following the corrective measures taken in June, 1989, have been "in-process" type hold points similar to the item identified by the NRC inspector. Upon work completion, construction and quality procedures require that the work documents be reviewed to verify satisfactory completion, including the results of required inspections. Deficiencies identified through this review are documented in accordance with procedure requirements and resolved prior to final acceptance of the work package. The review of completed work documents is described in the TU Electric construction procedure, "Construction Documentation Preparation, Control and Review," and the TU Electric quality procedure, "Review of Work Process Control Documents."

4. Date of Full Compliance

Based upon the additional training of Electrical Department personnel and the ongoing work document reviews described above, full compliance has been achieved.

NOTICE OF DEVIATION
(445/8964-D-02)

As stated in TU Electric's letter TXX-88294, dated March 25, 1988, the applicant committed to the replacement of the nonqualified Class 1E, Unit 1 diesel generator wattmeters with qualified components prior to Unit 1 hot functional testing.

Contrary to the above, the subject wattmeters were installed after Unit 1 hot functional testing. This failure to adequately implement the corrective actions specified in the reference letter is identified as a deviation.

RESPONSE TO NOTICE OF DEVIATION
(445/8964-D-02)

TU Electric accepts the alleged deviation and the requested information follows:

1. Reason for Deviation

   In TXX-88294, dated March 25, 1988, TU Electric committed to replace the Unit 1 diesel generator wattmeters with Class 1E certified wattmeters prior to Unit 1 Hot Functional Testing. This commitment was entered into the Licensing Commitment Resolution (LCR) database with a due date of December 28, 1988, which, at that time, was the scheduled start of Hot Functional Testing.

   In the fall of 1988, when the new consolidated Commitment Tracking System (CTS) was developed to expand TU Electric's ability to track and monitor project commitments, the data in the LCR database was manually transcribed and entered into the new CTS database by the Nuclear Licensing Department. The commitment regarding the wattmeter installation was incorrectly entered with a completion milestone of "Fuel Load" rather than "Hot Functional Testing."

   Neither the organization responsible for this commitment nor the Nuclear Licensing Department detected this error. As a result, TU Electric failed to recognize that the wattmeter replacement was required prior to Hot Functional Testing and the work was not completed.

2. Corrective Steps Taken and Results Achieved

The wattmeters were installed shortly after Hot Functional Testing. Upon discovering that a commitment had not been completed on schedule, an evaluation was made as to safety significance. A letter (TXX-89509 dated July 21, 1989) was then issued to inform the NRC of the missed due date and of the fact that the late installation of the wattmeters was not safety significant.

3. Corrective Steps Taken to Avoid Further Occurrences

The organization responsible for the wattmeter installation has assigned adequate resources to track and close open commitments.

In addition, independent of this event, in April 1989, TU Electric initiated a series of steps to enhance the management and use of the CTS and to upgrade the quality of the CTS database. This corrective action is still in progress.

Corrective steps include:

- Executive Management has issued a letter to user organizations reinforcing the importance of the CTS as a management tool to "increase the confidence in the completion of, and compliance with regulatory commitments."

- Corporate and departmental procedures regarding the use of the CTS have been enhanced to improve the effectiveness of the system.

- Training has been conducted for management and user organizations regarding objectives and use of the CTS.

- A review of the CTS database is in progress. This review is designed to locate and correct inaccuracies.

4. Date for Completion of Corrective Action

For those actions not identified as complete above, the corrective action described in this response will be completed prior to fuel load.