

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Docket: 50-445/89-71

Comanche Peak Steam Electric Station
Unit 1, Glen Rose, Texas

Permit: CPPR-126

During an NRC inspection conducted on October 4 through November 7, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50 as implemented by Section 5.0 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.

Paragraph 9.3.1 of TU Electric's Specification 2323-MS-38H, Revision 2, requires that "Thermo-lag 330-1 (site prefabricated sections) dry film thickness shall be 1/2 inch to 3/4 inch."

Contrary to the above, the required dimensional inspections to insure a minimum dry film thickness of 1/2-inch minimum to 3/4-inch maximum were inadequately performed in that deficient site-fabricated thermolag was inspected, accepted, and issued to construction by the applicant's Quality Control (QC) organization.

This is a Severity Level IV violation (Supplement II) (445/8971-V-01).

- B. Criterion XVI of Appendix B to 10 CFR Part 50 as implemented by Section 16 of the TU Electric Quality Assurance Manual requires that in the case of significant conditions adverse to quality, the identification and corrective measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, the applicant's response to the reportable deficiency documented as SDAR CP-89-025, involving defective site-fabricated thermolag, was determined to be inadequate. Specifically, the generic implications associated with a QC program which failed to detect a significant deficiency were not adequately addressed and the response did not provide adequate assurance that the cause of this condition

was properly determined and corrected. The response did not address the broadness issue: in what other areas or disciplines had QC issued potential defective material?

This is a Severity Level IV violation (Supplement II) (445/8971-V-02).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC, 20555, with a copy to the Assistant Director for Inspection Programs, Comanche Peak Project Division, Office of Nuclear Reactor Regulation, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

RF Warnick

Dated at Comanche Peak Site
this 1st day of December 1989