TU ELECTRIC

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IR 50-446/89-84
Ref. # 10CFR2.201

January 19, 1990

William J. Cahill, Jr.
Executive Vice President

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. 50-445/89-84; 50-446/89-84
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated December 21, 1989, concerning the inspection conducted by Mr. R. M. Latta and NRC consultants during the period November 8 through December 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 was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

WJH/bjh
Attachment

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

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NOTICE OF VIOLATION
(445/8984-V-01)

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 3.2.2.1 of Electrical Installation Specification 2323-ES-100, Revision 6, requires that cable support systems shall be installed in accordance with the engineer's drawings and Appendix N of this specification.

Contrary to the above, the NRC inspector observed a cable grip which was improperly suspended from the end of electrical penetration assembly E-76 module located inside the isolation tank for the containment spray motor operated valve 1-HV-4782. The improperly suspended cable grip bail was located at the module polymer seal which could have damaged the penetration seal and/or the Kapton insulted wires associated with the penetration. The observed cable support configuration was contrary to the requirements of the applicable Design Change Authorization 59365, Revision 1.

RESPONSE TO NOTICE OF VIOLATION
(445/8984-V-01)

TU Electric accepts the violation and the requested information follows.

1. Reason for the Violation

   A review of records indicates the subject cable grip was initially installed in December 1987, removed in January 1988, and reinstalled in March 1988. The records review also indicates that the cable grip bail was properly located at the completion of both the initial installation and subsequent reinstallation. TU Electric has been unable to conclusively determine how the cable grip became mislocated. However, the configuration of this cable grip installation is such that the cable grip bail could be relocated without being disassembled. It is possible that the cable grip bail may have been relocated during other work activities in the area.

2. Corrective Steps Taken and Results Achieved

   The Kapton insulation on the associated wires was inspected by QC and evaluated by engineering for damage. No damage was identified. TU Electric does not consider that mislocation of the cable grip bail could damage the electrical penetration.

The cable grip bail has been properly located per a Work Order.

A review was conducted to identify other cable grip installations where the cable grip bail can be relocated without the cable grip being disassembled. An additional three such installations were identified. These three installations were examined by engineering personnel and all three cable grip bails were found to be properly located.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

The cable grip installation identified in the NOV and the three other similar installations are all located inside valve isolation tanks. These tanks are located inside locked rooms which have been turned over to Nuclear Operations. Entry into the valve isolation tanks requires a confined space entry permit and a specific work order. As a result, the level of work activity in these tanks is much less than during the construction phase. TU Electric considers that these conditions provide adequate assurance that unauthorized relocation of the cable grips will not occur in the future. Additionally, protective wraps have been installed over the Kapton insulated conductors.

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.