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Ref. # 10CFR2.201

William J. Cahill, Jr.  
Executive Vice President

February 7, 1990

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

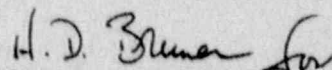
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445  
NRC INSPECTION REPORT NOS. 50-445/8986; 50-446/8986  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated January 12, 1990, concerning the inspection conducted by Messrs. W. D. Johnson, S. D. Bitter, M. E. Murphy, R. V. Azua, H. F. Bundy, and an NRC consultant during the period of December 6, 1989 through January 6, 1990. 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.

DAR/grr  
Attachment

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)  
Mr. J. H. Wilson, OSP-NRC

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Notice of Violation  
(445/8986-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.

Station Administration Procedure (STA) 602, "Temporary Modifications," Section 6.1.1, states that temporary modifications shall be required for temporary changes to plant systems/components turned over to Startup or Plant Operations which do not conform with approved drawings or specifications and are not accomplished in accordance with approved procedures, design modifications, or as part of a maintenance activity.

Contrary to the above, on December 21 and 22, 1989, the inspector found the following modifications installed on systems which had been turned over to Operations without having been processed as design changes or documented and evaluated as temporary modifications:

- o Valve 1AF-135 had an elbow, two pipe nipples, and a reducer attached downstream.
- o Valve 1AF-208 had a union and a pipe nipple attached downstream.
- o Valve 1CT-114 had tubing, a tee, two valves and a pipe nipple attached downstream.
- o Valve 1CC-028 had a ball valve, two reducers, a pipe nipple and a hose connection attached downstream.

Response to Notice of Violation  
(445/8986-V-01)

TU Electric accepts the violation and the requested information follows.

1. Reason for Violation

Connections cited in this violation were installed by station personnel before and after system turnover, and were not identified by system walkdown engineers, because neither considered the installations to constitute temporary modifications. This occurred because sufficient procedural guidance had not been established for what constitutes a temporary modification.

In addition to the above, during the inspection period NRC Inspectors raised questions concerning ventilation dampers to the Main Steam/Feedwater and Auxiliary Boiler areas that were documented in the Station Log as being blocked to protect equipment against the extremely low temperatures experienced at one point in December, and dampers that were blocked to the Unit 1 Diesel Generator rooms that were identified by yellow caution tags. It was determined that the actions taken to block and subsequently restore the dampers should have been conducted under the temporary modification process. Although the actions were documented, Operations personnel did not realize that they should have been governed by the temporary modification process.

During the NRC Exit Meeting on January 2, 1990, and in the body of the ensuing inspection report, the inspector stated that this violation and a previous violation (445/8972-V-01) were similar. The violation cited in Inspection Report 50-445/8972 identified the failure to review and approve a Startup Temporary Modification that remained installed after turnover to Operations. The temporary modification was logged incorrectly as a Unit 2 temporary modification, even though it was installed on the Unit 1 interface. In addition, it was not recognized that the modification should have been part of the Unit 1 turnover. TU Electric agrees that both violations pertain to the Temporary Modification process but also recognizes that they have different root causes and corrective actions.

## 2. Corrective Steps Taken and Results Achieved

The unauthorized temporary modifications identified by the NRC were documented on a "ONE" form. Disposition of the "ONE" form reflects the corrective and preventive actions outlined below.

Operations personnel conducted a walkdown of the plant to identify other undocumented temporary modifications. The walkdown identified several dozen connections to systems, most of which were simple connections, such as hose clamps, Chicago fittings, etc. used to attach drains or hoses.

The procedure for controlling temporary modifications was revised, with engineering's concurrence, to authorize simple connections to valves and piping on a generic basis. Connections not within the clarified provisions of the temporary modification procedure were either removed or, in a few cases, individually approved as temporary modifications. Since the blocked dampers had been restored, no immediate corrective steps were needed. As a result of the walkdown and the demonstrated adequacy of the procedure in areas other than simple connections to valves and piping, TU Electric believes that temporary modifications of other equipment are being properly documented.



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

The procedure controlling temporary modifications was revised to provide definitive guidance concerning the criteria for attachments or appurtenances that constitute temporary modifications.

In addition to the semiannual walkdowns required by the temporary modification procedure, a new engineering instruction for system and area walkdowns was issued on January 2, 1990. This new instruction is based in part on INPO Good Practices. This instruction specifically directs that system walkdown engineers observe whether temporary modifications are installed as required, and identify any unauthorized temporary modifications.

Finally, the Manager, Operations held discussions with Shift Supervisors to increase their awareness that actions taken to mitigate equipment damage in extreme temperatures may constitute temporary modifications. This discussion also included the plant walkdown findings of unauthorized hose connections. Operating crews were later similarly briefed by their supervisors.

To reinforce the requirement that temporary modifications be identified and documented in accordance with the temporary modification procedure, the Plant Manager has issued a directive to all supervisors and managers who conduct activities in the power block. The directive discusses this violation and emphasizes the procedure controls and actions taken to prevent its recurrence.

4. Date of Full Compliance

Full compliance has been achieved.