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Ref. # 10CFR2.201

William J. Cahill, Jr.
Executive Vice President

December 21, 1989

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
BUCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NO. 50-445/89-38, 50-446/89-38
REVISED RESPONSE TO NOTICE OF VIOLATION
445/8938-V-04, ITEM A

REF: TU Electric letter TXX-89730, from W. J. Cahill to USNRC,
dated October 16, 1989.

Gentlemen:

The referenced letter provided TU Electric's response to Notice of Violation (NOV) Item A (445/8938-V-04). A revised response is attached. In this revised response, TU Electric clarifies the referenced letter and provides follow-up to a telephone conversation with Messrs. H. Kerch and M. Runyan of the NRC on November 21, 1989. The subject violation identified that a procedural deficiency had resulted in an ultrasonic geometric reflector not being recorded. In the referenced letter, TU Electric stated that the procedure was revised to clearly require that geometric reflector sources be recorded. This revised procedure was used for Unit 2 PSI examinations and will be used for the Unit 1 and 2 ISI examinations. In addition, TU Electric stated that an FSAR revision would be submitted to indicate that Unit 1 geometric reflectors would be recorded during the Unit 1 ISI program.

Relief Request B-13, documented in CPSES SSER 12, Appendix S, Paragraph 3.3, dated October 1985, provided relief from recording geometric reflectors during the Unit 1 PSI. Data from ultrasonic reflectors interpreted as flaws, however, would be recorded. The NRC inspector was not made aware of this relief request during the inspection. Since this was an approved exception to Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition, which has already been docketed, revising the CPSES FSAR is unnecessary. In addition, TU Electric has implemented the site procedure revision which clearly requires that the appropriate data, including geometric reflectors, will be recorded as the Unit 1 ISI program is implemented.

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The data that will be gathered for Unit 1 ISI will include welds within the system boundaries as set forth by the ASME Code. The edition of the Code to be utilized for Unit 1 ISI (1986) does not require examination of the portion of the Safety Injection System containing weld TBX-2-2523 Number 7. Therefore, TU Electric has elected not to examine this weld.

Revision bars in the right margin indicate the changed portions of TU Electric's attached revised response.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: *Ross D. Walker*

R. D. Walker
Manager, Nuclear Licensing

DAR/
Attachment

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

NOTICE OF VIOLATION ITEM A
(445/8938-V-04)

10CFR50, Appendix B, Criterion IX requires that special processes such as nondestructive testing be accomplished using qualified procedures in accordance with applicable codes. Comanche Peak's FSAR and site ultrasonic procedure ISI-206, Revision 0, state that preservice examinations will be performed in accordance with the ASME Boiler and Pressure Vessel Code Section XI, 1980 edition. ASME Section XI, paragraph IWA[-]2232 requires for the examination of welds that "reflectors that produce a response greater than 50% of reference level shall be recorded."

Contrary to the above, a review of site procedure ISI-206, Revision 0, disclosed that the procedure has a less stringent recording requirement than that required by ASME Section XI. Furthermore, an NRC ultrasonic examination of weld TBX-2-2523, Number 7, an ASME Class 2 weld in the safety injection system, identified an ultrasonic reflector that produced a response greater than 50% of DAC, and as a consequence of the inadequate procedure, this reflector had not been recorded nor dispositioned in accordance with ASME Section XI requirements.

RESPONSE TO NOTICE OF VIOLATION ITEM A
(445/8938-V-04)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The intent of the ASME Section XI Preservice Inspection (PSI) requirement concerning geometric reflector recordings is to establish a baseline record of geometric reflectors for reference during Inservice Inspection (ISI). Without this baseline, ultrasonic reflectors detected during ISI would be assumed to be service induced defects unless shown to be a geometric reflector. Procedure ISI-206, Revision 0, did not clearly require that geometric reflectors be recorded. As a result, the geometric reflectors, including those observed on weld TBX-2-2523 Number 7, were not recorded during Unit 1 PSI.

2. Corrective Steps Taken and the Results Achieved.

An independent testing firm ultrasonically tested weld TBX-2-2523 Number 7 and confirmed the NRC inspector's finding that this weld did have geometric indications that were required to be recorded.

Procedure ISI-206 was revised in 1987 to clearly require that geometric reflector sources be recorded. The revised procedure was used for Unit 2 PSI examinations. The procedure that will be used for the Unit 1 ISI examinations will also require that geometric reflector sources be recorded. This revision provides assurance that the required baseline data will be recorded as the Unit 1 ISI program is implemented.

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

The current review process for ISI procedures provides an additional review by a TU Electric NDE Level III which was not required for Procedure ISI-206, Revision 0. This additional review provides increased assurance of compliance with ASME Code requirements.

4. Date When Compliance Will be Achieved

Full compliance has been achieved.