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IR 50-446/89-60
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 (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NO. 50-445/89-60; 50-446/89-60
RESPONSE TO NOTICE OF VIOLATION AND ACTION ITEMS

Gentlemen:

TU Electric has reviewed the NRC's letter dated November 22, 1989, concerning the equipment qualification (EQ) inspection conducted by Mr. G. T. Hubbard and other NRC representatives on August 7-11, 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 (445/8960-V-02). TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

In addition, the NRC requested that TU Electric notify the NRC of our concurrence with certain actions items described in the inspection report. TU Electric will provide a response to this request under separate correspondence by January 2, 1990.

Sincerely,

William J. Cahill, Jr.

William J. Cahill, Jr.

By: *Roger D. Walker*
Roger D. Walker
Manager, Nuclear Licensing

VPC/smp
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)
Assistant Director for Inspection Programs,
Comanche Peak Project Division,
Office of Special Projects

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NOTICE OF VIOLATION
(445/8960-V-02)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revisior 3, of the TU Electric Quality Assurance Plan (QAP) states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Electrical Erection Specification 2323-ES-100, Revision 6 requires that bolted electric "V" splices made with Okonite tape should be constructed such that the T-95 insulating tape and T-35 jacketing tape are applied continuously from one cable, over the bolted connection and continuing onto the second conductor following the "V" configuration.

Contrary to the above, the tape splices in Limitorque motor valve operator Number 1-8808C were not installed in accordance with the above requirements. In these splices, the T-35 jacketing tape was applied by wrapping the tape around both conductors at the same time, therefore not providing a smooth surface on one conductor, over the bolted connection, and then along the second conductor.

RESPONSE TO NOTICE OF VIOLATION
(445/8960-V-02)

TU Electric accepts the violation and the requested information follows:

1. Reason for the Violation

The taped splices in Limitorque motor valve operator Number 1-8808C were not installed in accordance with the requirements of Electrical Erection Specification 2323-ES-100, Revision 6 due to personnel errors in that the installation and inspection instructions, for the Okonite T-35 jacketing tape, were not correctly interpreted and implemented.

2. Corrective Steps Taken and Results Achieved

A review of the installation records and design documents was performed by engineering personnel to identify equipment containing Okonite taped splices. Approximately 150 locations were identified by this review. Engineering personnel examined the splices at these locations to verify compliance with specification ES-100. As a result of the field examination, 20 locations (including those previously identified by the NRC inspector) were found to contain Okonite splice configurations similar to those found during the NRC inspection. These deficiencies were documented on nonconformance reports (NCR's). Of these 20 locations, 11 contained Okonite taped splices that were subject to either high energy line breaks, loss of coolant accidents or main steam line breaks. These splices were reworked to conform to specified and qualified configurations. The remaining 9 locations were not subject to these types of environments and were acceptable for use as installed. The NCR dispositions have been implemented and the NCR's closed.

3. Corrective Steps Taken to Avoid Further Violations

As an enhancement to specification ES-100, a revision has been issued by a Design Change Authorization (DCA) to clarify and clearly convey the Okonite T-35 jacketing tape installation and inspection requirements. Appropriate installation and QC inspection personnel have been made aware of this requirement through training and/or supervisory instructions.

TU Electric believes that these actions are sufficient to avoid future violations.

4. Date of Compliance

CPSES is currently in full compliance.