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Executive Vice President

December 18, 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
RESPONSE TO CONCERN REGARDING CLARITY OF
TEST PACKAGES

Gentlemen:

TU Electric has reviewed the NRC's letter dated November 20, 1989, concerning the inspection conducted by Messrs. M. E. Murphy and R. V. Azua during the period October 16 through 27, 1989. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Although no violation or deviations were identified in the NRC's letter, a concern was expressed regarding the clarity of test data packages.

This concern resulted during the NRC's inspection of the test data package ICP-PT-37-01 SFT Rev. 1, "Auxiliary Feedwater (AFW) System". It was determined that the test results package did not seem to fully support the final test conclusions. Although discussions with the engineer associated with this test provided adequate explanation to resolve the inspector's specific questions, the NRC inspectors were still concerned that this package and other packages may lack information that would support the final test conclusions.

TU Electric hereby responds to this concern by taking the following actions:

1. ACTIONS TAKEN TO CLARIFY THE AFW TEST DATA PACKAGE

Subsequent to the inspection conducted by Messrs. M. E. Murphy and R. V. Azua, supplemental information was added to ICP-PT-37-01 Rev. 1, "Auxiliary Feedwater" Data Package. This information clarifies the test data package and allows a full understanding of the test results.

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2. ACTIONS TAKEN TO IDENTIFY AND CLARIFY ANY OTHER TEST DATA PACKAGES,
AND DISCUSSION REGARDING ADEQUACY OF THE JOINT TEST GROUP REVIEW

In August 1989, TU Electric identified some administrative deficiencies in test results packages. These shortcomings, although minor in nature, made review of data packages difficult. For example, some log entries were not fully self-explanatory and required some searching through the test packages by the reviewers to obtain a clear picture of the sequence of events. In other examples, Test Deficiency Report (TDR) numbers were not noted next to the applicable test steps thus making it difficult to quickly recognize deficiencies until further on in the test package where TDRs were filed.

As a result of these types of difficulties, a corrective action program was initiated. An independent review group was formed by the Startup Manager to review all test results packages. This group was comprised of senior qualified test personnel from recently licensed plants. The reviews were conducted utilizing a comprehensive checklist of Startup Program Administrative Requirements. Deficiencies identified were documented on TDRs, dispositioned as appropriate and retained as official records of the test program.

This program has significantly enhanced the quality of test results packages, particularly in the area of historical clarity and continuity.

It is important to point out that this review also demonstrated the soundness of the technical evaluation of test results packages by the Joint Test Group. In each case, the corrective action review process confirmed that the Joint Test Group was correct in concluding that approved test results packages demonstrated satisfactory system performance in accordance with design requirements, as prescribed by test procedure acceptance criteria.


This self-initiated additional review provides confidence, beyond the audits and surveillances performed by Quality Assurance, that the test program data package results are adequate to provide documentation and justification of the test program completion.

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3. ADDITIONAL CORRECTIVE ACTION REGARDING UNIT 2 ACTIVITIES

Prior to resuming Unit 2 testing, training will be conducted to emphasize the importance of clarity and continuity of test package information. This training will focus on the administrative requirements of compiling test data during Startup and will also provide guidance in maintaining thorough test logs. TU Electric believes that this corrective action will enhance the quality of test results packages during the Unit 2 Test Program.

Sincerely,


William J. Cahill, Jr.

RSB/smp

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