

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station
Units 1 and 2

Dockets: 50-445; 50-446
Licenses: NPF-87; NPF-88

During an NRC inspection conducted on March 15-19 and April 7, 1993, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C, the violations are listed below:

- A. Criterion V, 10 CFR 50, Appendix B, states, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Procedure STA-206, "Review of Vendor Documents and Vendor Technical Manuals," Revision 17, Section 6.2.2, states that the vendor documents (received at the site) are adequately identified and reference specific Comanche Peak Steam Electric Station applications, whenever applicable.

Contrary to the above, the licensee failed to properly identify the applications of Limitorque Maintenance Update 92-02 and, as a result, failed to evaluate the applications of a change to the criteria determining the acceptable tolerance for actuator torque switch repeatability.

This is a Severity Level IV violation (Supplement I)(445;446/9310-04).

- B. Criterion III, 10 CFR 50, Appendix 50, states, in part, that design control measures shall provide for verifying or checking the adequacy of design, including the delineation of acceptance criteria for tests, by individuals or groups other than those who performed the original design.

Criterion V, 10 CFR 50, Appendix B, states, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Procedure MSE-PO-8004, Section 6.8.8, requires that the torque limit for a diagnostic test be adjusted downward by the amount of the "rate of loading" identified in the dynamic test package.

Contrary to the above, the torque limits delineated for a static diagnostic test of Motor-Operated Valve 2-8000A on October 17, 1992, were not adjusted to account for "rate of loading" and acceptance criteria for this test were both calculated and verified by the same individual.

This is a Severity Level IV violation (Supplement I)(445;446/9310-02).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 3rd day of *May* 1993