TU ELECTRIC

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May 3, 1990

W. J. Cahill
Executive Vice President

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 NOS. 50-445/90-10; 50-446/90-10
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated April 10, 1990, concerning the inspection conducted by the NRC staff during the period February 6, 7, and February 26 - March 2, 1990. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to the April 10, 1990, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation, Item B (445/9010-V-02), in the attachment to this letter. As stated in your April 10, 1990, letter, Notice of Violation, Item A (445/9010-V-01) was resolved during the inspection and no written response is required.

Sincerely,

William J. Cahill, Jr.

CBC/daj

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

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NOTICE OF VIOLATION ITEM B
(445/9010-V-02)

Criterion XVI of Appendix B to 10 CFR 50, as implemented by Section 16, Revision 1.0 of the Texas Utilities Electric Company (TU) Quality Assurance Manual, states in part, "Measures shall be established to assure that conditions adverse to quality, such as... deficiencies,... and non-conformance are promptly identified."

Contrary to the above, on or about December 7, 1989, TU received Westinghouse memorandum MED-PCE-8447, dated November 28, 1989, which addressed questions to the licensee's engineering staff regarding the documented compliance of Unit 1 reactor coolant system Loop-4 piping field weld 12-A, to the ASME code requirements for nondestructive testing. As an apparent consequence of a series of omissions, failures, errors and procedural inadequacies; positive identification and correction of failure to radiograph field weld 12-A as required by the ASME code, was not resolved until February 16, 1990.

RESPONSE TO NOTICE OF VIOLATION ITEM B
(445/9010-V-02)

TU Electric accepts the violation and the requested information follows.

1. Reason for the Violation

Westinghouse memorandum MED-PCE-8447 (received by CPSES engineering on December 7, 1989) requested copies of radiographic test (RT) results for weld 12-A. On December 11, 1989 engineering personnel responded that CPSES documents indicated that only visual and dye penetrant inspections were required. The engineering personnel involved did not investigate whether the ASME Code required radiography of the weld.

On Thursday, January 25, 1990, another Westinghouse memorandum, MED-PED-8671, was received by engineering. This memorandum recommended that weld 12-A be radiographed in order to comply with ASME Code requirements. The engineer who received this memorandum had not been involved in responding to the previous memorandum and recognized that a deviation from ASME Code requirements existed. The engineer initiated a site deficiency document (ONE Form) on Monday, January 29, 1990, and made his supervisor aware of the condition. The engineer and his supervisor took no further action.

During the period from January 29, 1990 through February 13, 1990, the ONE Form was dispositioned to perform the required RT and assigned to the ASME QC group to accomplish the disposition. The ASME QC group determined that a Work Request was required to remove insulation to facilitate performance of the RT. ASME QC made several unsuccessful attempts to have a Work Request initiated. Eventually the Technical Support System Engineer was contacted. After verifying that an RT was required by the ASME Code, the System Engineer initiated the required Work Request. However, the Work Request was assigned a "routine" priority. Upon becoming aware of the Work Request, the Manager of Projects recognized the significance of the deficiency and expedited performance of the RT.

TU Electric's review of the above described events has identified the following as causing the failure to promptly identify and correct the lack of ASME required RT.

The engineering personnel who responded to Westinghouse memorandum MED-PCE-8447 did not adequately pursue resolution of the apparent discrepancy between the Westinghouse memorandum and the nondestructive examinations which were specified by the site documents. Site ASME Code engineering personnel were not immediately contacted to determine the applicable ASME Code requirements.

The engineer who initiated the ONE Form and his supervisor did not alert appropriate management personnel when they determined that a deviation from ASME Code requirements existed.

The ONE Form was assigned to a Construction organization, ASME QC, to accomplish the disposition. The system in which the weld was located was in the custody of the Operations Department and therefore a Work Request was required to remove insulation for the RT. As a Construction organization, ASME QC is not under the jurisdiction of Operations procedures and does not issue Work Requests. As a result, several days elapsed before the required Work Request was initiated.

There was no mechanism to assure that the System Engineer was notified of the deficiency in a timely manner. Had the System Engineer been aware of the deficiency earlier he could have expedited initiation of the Work Request.

The priority assigned to the Work Request was not appropriate for the condition. Resolution of this deviation from the ASME Code should have received a higher priority than "routine."

2. Corrective Steps Taken and Results Achieved

An RT of weld 12-A was performed on February 16, 1990. A Plant Incident Evaluation was written to address the generic implications and preventative actions pertaining to the failure to perform an ASME required RT. The corrective actions for this evaluation included a review of documentation which determined that ASME required RT's had been performed on other similar welds.

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

A memorandum has been issued to engineering personnel emphasizing that potential discrepancies involving Codes or Standards should be brought to the attention of the site organizations responsible for implementation of the Codes or Standards.

The engineering personnel who were involved in the response to Westinghouse memorandum MED-PCE-8447 are no longer on site. The engineer who initiated the ONE Form and his supervisor have been made aware of this violation and of the necessity of notifying appropriate CPSES Management personnel when deficiencies requiring urgent action are identified. Additionally, ONE Forms involving engineering are currently reviewed at the Engineering Plan of the Day meetings and by the Engineering Managers to assure that resolution of significant deficiencies is expedited. These reviews will continue until the Engineering Managers have assurance that an adequate level of sensitivity exists regarding deficiencies which require prompt management attention.

A Nuclear Engineering and Operations (NEO) Policy Statement has been issued emphasizing that problems and concerns must be properly documented and communicated to appropriate management. Additionally, the Policy Statement emphasizes that each individual is expected to aggressively seek out problems and pursue them to resolution. Engineering personnel have been trained on this Policy Statement.

A procedure change has been initiated which will assign the Work Control Center the responsibility for initiation of Work Requests which are required to accomplish ONE Form dispositions.

A memorandum has been issued emphasizing that System Engineers are to remain cognizant of open items involving their assigned systems and to assure such items are identified to appropriate management and technical personnel. A database listing the open items affecting plant systems is available for periodic review by System Engineers.

The review of new ONE Forms has been enhanced by the addition of engineering personnel to the review group that assigns ONE Forms to responsible organizations for disposition. This enhancement provides additional assurance that ONE Forms and any resulting Work Requests involving significant technical issues receive a priority commensurate with potential impact on current and planned plant evolutions.

4. Date When Full Compliance Will be Achieved

The procedure change described above will be issued by May 25, 1990.