

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station, Unit 2

Docket: 50-446
License: NPF-89

During an NRC inspection conducted on May 30 through July 10, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. Comanche Peak Steam Electric Station Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A to Regulatory Guide 1.33, paragraph 9a, requires that maintenance that can affect the performance of safety-related equipment be properly performed in accordance with written procedures and documented instructions.

Section 6.1.8 of Procedure ECE 5.01-03, "Design Change Notices and Related Process Documentation," Revision 4, requires that any change to a Design Change Authorization undergo an engineering review and justification.

Contrary to the above, on June 16, 1993, the inspectors identified that the installation of the packing gland follower for Auxiliary Feedwater Pump 2-01 was not in accordance with the Design Change Authorization contained within maintenance work order instructions for the pump packing replacement. The pump was released for operation by a mechanical maintenance manager without the required engineering review and justification.

This is a Severity Level IV violation (Supplement 1) (446/9326-01).

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, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, 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 a Demand for Information may be issued to show cause 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 day of 1993