

APPENDIX
U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Report No. 50-445/82-02

Docket No. 50-445

Category: A2

Licensee: Texas Utilities Generating Company
2001 Bryan Tower
Dallas, Texas 75201

Facility Name: Comanche Peak, Unit 1

Inspection At: Comanche Peak Steam Electric Station

Inspection Conducted: January 1-February 28, 1982

Inspector: S.H. Johnson 3/19/82
FOR D. L. Kelley, Senior Resident Reactor Inspector Date

Approved: S.H. Johnson 3/19/82
FOR T. F. Westerman, Chief Date
Reactor Project Section A

Inspection Summary

Inspection Conducted During the Period of January 1-February 28, 1982
(Report 50-445/82-02)

Areas Inspected: Routine, announced inspection by the Senior Resident Reactor Inspector (Operations), including: (1) Quality Assurance for the Preoperational Test Program; (2) Preoperational Test Program; (3) Plant Tours; and (4) Preoperational Test Procedure Review. The inspection involved 153 inspector-hours by one NRC inspector.

Results: Within the areas inspected, no violations or deviations were identified.

Details

1. Persons Contacted

- *B. R. Clements, Vice President, Nuclear
- *J. C. Kuykendall, Manager, Nuclear Operations
- *R. E. Camp, Lead Startup Engineer (EDS)
- *D. E. Deviney, Operations QA Supervisor
- *G. L. Kunkle, Startup QA Supervisor
- *H. A. Lancaster, Startup QA Specialist
- *R. A. Jones, Manager, Plant Operations
- R. B. Seidel, Operations Supervisor
- R. E. Kahler, Supervisor, Engineering and Administration
- A. Vega, Supervisor, Quality Assurance Services

The SRRI also interviewed other applicant employees during the inspection period.

*Denotes those persons attending the final exit interview on February 28, 1982.

2. Preoperational Test Program Quality Assurance

The inspector reviewed the applicant's Quality Assurance Plan to ascertain the following:

- a. That the plan will provide controls over conduct of preoperational testing and related activities.
- b. That the plan is consistent with FSAR commitments.
- c. That the plan has been implemented.
- d. That authorities and responsibilities have been established.
- e. That requirements for inspection frequencies, procedures, and check-lists have been established.
- f. That methods for identification of deficiencies and methods of corrective actions have been defined.
- g. That a system of audits has been defined.
- h. That the personnel involved in the QA program have received the required training.

The inspector concluded that the applicant's program generally meets the above requirements, but the plan and procedures showed discrepancies and/or weaknesses in the following areas: a, e, and g, above. These areas and the program were discussed with applicant representatives. The NRC inspector was informed by the licensee that the program and

procedures are undergoing a complete revision. It is the NRC inspector's understanding that the program and procedures when revised will fully address those areas where concerns were identified. Until such time as the revision is complete and has been reviewed, this item will be considered unresolved. (8202-01)

No violations or deviations were identified.

3. Preoperational Test Program

The inspector has reviewed the applicant's "Startup Administrative Procedures Manual" to verify the following:

- a. That personnel are familiar with the description and importance of the preoperational test program.
- b. That the program meets commitments of the FSAR and the conclusions of the Safety Evaluation Report.
- c. That test procedures are developed using the latest approved information.
- d. That methods exist to ensure that the latest revised supporting procedures, drawings, and system changes have been incorporated into the test package just prior to test performance.
- e. That provisions for deviation from test procedures have been implemented.
- f. That procedures for evaluation and approval of test results have been implemented.

The inspector reviewed Chapter 14 of the FSAR, "Initial Test Program," to determine the scope and commitments for the preoperational test program and the following implementing procedures:

<u>Procedure Number</u>	<u>Revision</u>	<u>Title</u>
CP-SAP-1	5	Startup Administrative Procedures Manual
CP-SAP-2	2	Startup Program Organization and Responsibilities
CP-SAP-3	9	Custody Transfer of Station Components
CP-SAP-4	5	Custody Transfer Tagging
CP-SAP-5	3	Safety Tagging Procedure

<u>Procedure Number</u>	<u>Revision</u>	<u>Title</u>
CP-SAP-6	6	Control of Work on Station Components After Release from Construction to TUGCO
CP-SAP-7	3	Format and Content Requirements for Test Instructions/Procedures
CP-SAP-8	1	Review, Approval and Revision of Test Instructions/Procedures
CP-SAP-9	4	Electrical Test Record Drawing Control
CP-SAP-10	1	Startup Program Quality Assurance/Quality Control
CP-SAP-11	2	Review, Approval and Retention of Test Results
CP-SAP-12	0	Deviations to Test Instructions/Procedures
CP-SAP-13	2	Temporary System Modifications
CP-SAP-14	7	Design Change Processing
CP-SAP-15	4	Request and Documentation of Vendor Startup Assistance
CP-SAP-16	4	Test Deficiency Processing
CP-SAP-17	0	Review of Reactor Operating/Startup Experiences
CP-SAP-18	2	Control of System/Component Problems
CP-SAP-19	3	Personnel/Indoctrination Qualifications
CP-SAP-20	1	Guidelines for System Walkdown Inspections

It should be noted that CP-SAP-10, Revision 1, "Startup Program Quality Assurance/Quality Control," is being revised and will be reviewed in conjunction with the review and resolution of the unresolved item (8202-01) in paragraph 2 of this report.

No violations or deviations were identified in this area.

4. Plant Tours

The inspector conducted several plant tours for familiarization and inspection of housekeeping activities.

No violations or deviations were identified.

5. Preoperational Test Procedure Review

The following preoperational tests were reviewed in draft form:

ICP-PT-58-1, "Residual Heat Removal System"
ICP-PT-48-1, "Containment Spray System"

This review was made to determine if the following had been addressed:

- a. Management Review;
- b. Format clearly defines testing to be performed;
- c. Test objectives are clearly stated;
- d. Prerequisites are identified;
- e. Special conditions (if any) are specified;
- f. Acceptance criteria are identified and requirements are specified for comparison of results with the acceptance criteria;
- g. Source of acceptance criteria is identified;
- h. Initial test conditions are specified;
- i. Reference to appropriate FSAR sections, drawings, specifications, and codes are included;
- j. Step by step instructions of sufficient detail are included to ensure that conduct of the test will result in valid conclusions;
- k. Provisions for documenting that required steps have been performed and space for recording data are included;
- l. Temporary circuit changes, installation of jumpers, and restoration after testing is properly documented;
- m. Independent verification of critical steps or parameters is addressed.

No violations or deviations were identified during this review.

The NRC inspector will review selected approved procedures prior to the conduct of the preoperational tests.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. One such item was disclosed during the inspection and is discussed in paragraph 2.

7. Exit Interview

The inspector held several exit interviews during the inspection period to apprise the applicant of the inspection findings. A final exit interview to review the scope and findings of the inspection was held on February 26, 1982, with the licensee representatives identified in paragraph 1.

