### TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY EXECUTIVE VICE PRESIDENT AND GENERAL MANAGER

> August 2, 1982 TXX-3554

Mr. G. L. Madsen, Chief Reactor Project Branch 1 U. S. Nuclear Regulatory Commission Office of Inspection & Enforcement 611 Ryan Plaza Dr., Suite 1000 Arlington, Texas 76012

Docket No. 50-445

COMANCHE PEAK STEAM ELECTRIC STATION RESPONSE TO NRC NOTICE OF VIOLATION INSPECTION REPORT NO. 82-11 FILE NO: 10130

Dear Mr. Madsen:

We have reviewed your letter dated July 7, 1982, on the inspection conducted by Mr. R. G. Taylor of activities authorized by NRC Construction Permit CPPR-126 for Comanche Peak Unit 1. We have responded to the finding listed in Appendix A of that letter.

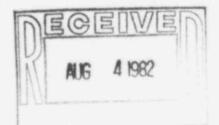
To aid in the understanding of our response, we have repeated the requirement and your finding followed by our corrective action.

We feel the attached information to be responsive to the Inspector's finding. If you have any questions, please advise.

Very truly yours,

RJG:bs

Attachments



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### APPENDIX A

## Notice of Violation

Texas Utilities Generating Company Comanche Peak, Unit 1 Docket: 50-445/82-11 CPPR-126

Based on the results of an NRC inspection conducted during June 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified.

# Failure to Perform Inspections of Installation Activities Related to Unit 1 Containment Polar Crane.

Criterion X of Appendix B to 10 CFR Part 50 requires that inspections of activities affecting quality shall be established and executed by or for the organizations performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Texas Utilities Generating Company Quality Assurance Plan, or (sic) the Comanche Peak Steam Electric Station, in Section 10.0, states "Examinations, tests, and inspections are performed at specific stages in the manufacturing, fabrication and installation activities to ensure that the items meet the applicable specification, code and regulatory requirements."

Contrary to the above:

The Senior Resident Inspector (Construction) has determined through interviews with craft labor supervision and the Comanche Peak Project Engineer for Civil/Structural activities that no inspections of the fabrication or installation of certain shims specified by Design Change Authorization 9872, dated March 30, 1981, and drawing SK-82032, revision 0, were performed. The shims specified by the Design Change Authorization and the drawing referenced above form a portion of the seismic restraint system for the containment polar crane.

This is a Severity Level IV Violation (Supplement II.D)

#### Corrective Action

The subject shims will be removed and replaced with material verified and documented by QC. This work will be accomplished in accordance with an Operation Traveler. NRC Inspection Report 82-11 TXX-3554 Page 3

1.0.0

### Preventative Action

This work was performed without QC inspection because no QC installation interface had been established procedurally. All safety-related activities performed by the Rigging Department are now accomplished with Operation Travelers. Procedure CP-CPM 6.3 requires that the travelers be routed through QA before the work activities begin. The use of the traveler will permit the establishment of the necessary QC interfaces.

### Compliance Date

The shims will be removed and replaced consistent with the construction schedule.