

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER, DALLAS, TEXAS 75201-3050

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

December 21, 1982
TXX-3603

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

Docket No. 50-446

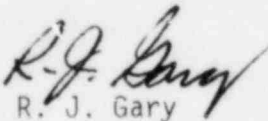
COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NO. 82-11
FILE NO.: 10130

Dear Mr. Madsen:

We have reviewed your letter dated November 24, 1982 on the inspection conducted by Mr. L. D. Gilbert of activities authorized by NRC Construction Permit CPPR-127 for Comanche Peak Unit 2. 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 enclosed information to be responsive to the Inspector's finding. If you have any questions, please advise.

Very truly yours,


R. J. Gary

RJG:aq

Enclosures

cc: NRC REGION IV - (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Generating Company
Comanche Peak Unit 2

Docket: 50-446/82-11
Permit: CPPR-127

Based on the results of an NRC inspection conducted during the period November 1 and 3-5, 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 Follow Procedure

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

Brown & Root, Inc., Procedure QI-QAP-8.1-15, Revision 0, requires that the receiving inspection shall verify that documentation requirements are met and the material has been tested in accordance with the purchase order.

Contrary to the above:

On November 5, 1982, the NRC inspector determined that the certification documents required by purchase orders for liquid penetrant examination materials had been accepted by receiving inspection in which batch numbers had been altered on the following seven batch numbers: 81L0701, 82B035, 81L008, 82C068, 82D055, 82B085, and 78G089; and the material type on the certification for Batch Numbers 81L008 and 79J083 differed from that specified in the purchase order and recorded on the receiving inspection report.

CORRECTIVE ACTION TAKEN AND THE RESULTS ACHIEVED:

All material certifications for liquid penetrant examination materials used on CPSES have been reviewed by NDE Quality Engineering; Material certifications for batch numbers 81L071, 82B035, 81L008, 82C068, 82D055, 82B085, and 78G089, which had been altered by the supplier to correspond to actual material shipped, have been replaced by original batch certifications from the material manufacturer; and documentation has been received from the material manufacturer to resolve the question of material type and acceptability for batch numbers 81L008 and 79J083.

Material certifications, issued by the material manufacturer, for all liquid penetrant examination material used on CPSES are in the Site QA Records Vault, and have been determined acceptable for site use by the Level III NDE Quality Engineer.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A separate Quality Instruction, QI-QAP-8.1-19, has been issued to specifically address and clarify the requirements for receipt inspection of liquid penetrant examination materials, and Receiving QC Inspectors have been trained in its contents.

Additionally, all future procurement of liquid penetrant examination materials will be directly from the material manufacturer.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All corrective actions have been completed and CPSES is currently in full compliance with the requirements referenced in the subject violation.