TU ELECTRIC

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January 3, 1991

William J. Cahill, Jr.
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445
NRC INSPECTION REPORT NO. 50-445/90-33
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated December 4, 1990, concerning the Unit 1 inspection conducted by the NRC staff during the period September 24 through September 28, 1990 and the October 31, 1990 enforcement conference in the NRC Region IV offices. This inspection covered activities authorized by NRC Facility Operating License NPF-87 for CPSES Unit 1.

Attached to the December 4, 1990 letter was a Notice of Violation. As discussed in the letter, the Notice of Violation deals with the failure to close the personnel air lock inner door equalizing valve. The letter also indicated that other issues discussed at the enforcement conference involving an air lock test failure and the adequacy of the design of the personnel air lock, will be resolved separately and will be the subject of separate correspondence with TU Electric. Accordingly, the attached response only discusses the air lock equalizing valve issue.

Sincerely,

William J. Cahill, Jr.

By: J. S. Marshall
J. S. Marshall
Generic Licensing Manager

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

Notice of Violation
(445/9033-V-01)

Technical Specification Violation

Technical Specification 3.6.1.3 is applicable in Modes 1, 2, 3, and 4, and states, in part, that each containment air lock shall be OPERABLE with both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed. Technical Specification 3.6.1.3 further states, in part, that with the containment air lock inoperable, maintain at least one air lock door closed; restore the inoperable air lock to operable status within 24 hours or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

Contrary to the above, from September 24, 1990, to approximately 6:00 p.m. on September 26, 1990, with Comanche Peak Unit 1 in Mode 1, the Unit 1 containment personnel air lock was in an inoperable condition due to the inner air lock door equalizing valve being in the open position. With the Unit 1 containment personnel air lock in an inoperable condition, at least one air lock door was not maintained closed, in that on September 26, 1990, for approximately 20 minutes, the air lock outer door was opened while the inner door was, in effect, open as a result of the equalizing valve being in the open position. Furthermore, Comanche Peak Unit 1 failed to proceed to hot standby and cold shutdown, even though the inoperable air lock was not restored to operable status within 24 hours (the air lock was functionally inoperable for approximately 50 hours).

Response to Notice of Violation
(445/9033-V-01)

TU Electric accepts the violation and the requested information follows.

1. Reason for the Violation

   The loss of integrity control of the containment personnel air lock occurred during manual operation of the airlock. In manual operation, the automatic and interlocked equalizing valves are not utilized and pressure equalization is accomplished by operating manual equalizing valves. During this manual operation the inner door could not be opened and troubleshooting was initiated with the system engineer's assistance. During troubleshooting the inner door equalizing valve was opened by the system engineer as permitted by a troubleshooting work order. However, the system engineer did not inform the operator that he had opened the equalizing valve. Troubleshooting was interrupted when hydraulic oil splashed in the eyes of the system engineer, requiring the operator and the system engineer to exit the airlock so that the system engineer could flush his eyes. Subsequent to completion of troubleshooting and during final exiting of the personnel air lock, the operator did not close the equalizing valve because it had not been manipulated by him during entry.

Failure to maintain positive control of containment integrity during manual operation of the personnel air lock inner door was a result of insufficient administrative controls applied to the air lock equalizing valves. Specifically, the valves did not contain locking devices and the operating procedure for manual operation of the air lock doors required post-operation valve alignment checks to be performed on the equalizing valves only if manipulated by the operator. As the operator was not aware that the inner equalizing valve had been opened, he did not check its position when exiting the air lock. This lack of sufficient controls permitted the inner door equalizing valve to be inadvertently and unknowingly left open.

2. Corrective Steps Taken and Results Achieved

Upon discovery of the event, during a subsequent entry, the personnel air lock inner door equalizing valve was immediately shut, thereby restoring operability of the air lock and compliance with the Technical Specifications. The existence of the condition was documented in accordance with station procedures and the shift supervisor informed. Walkdowns and reviews of the personnel and emergency air locks were performed to identify any other valves requiring enhanced administrative controls. The personnel air lock inner and outer door equalizing valves and two additional valves in the personnel air lock have been placed under locked valve administrative control. Additionally, the personnel air lock system operating procedure has been revised by the addition of an attachment titled, "Containment Air Lock Integrity Lineup." This attachment requires that appropriate valve checks be made throughout the process of entering or exiting the air lock when utilizing manual operation, and will ensure positive valve control if the evolution is interrupted for any reason.

The operating mechanism for the emergency air lock is an all manual system with built-in interlocks. Defeating these interlocks is administratively controlled and permitted only in Modes 5 and 6 when containment integrity is not required by the Technical Specifications. As a result the additional controls provided for the personnel air lock were considered unnecessary.

The auxiliary operator and system engineer were counseled on this event and the event was discussed with other operators as a "lesson learned."

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

This event will also be included in ongoing operator and system engineer training. Containment penetrations listed in the FSAR will be reviewed to identify other critical valves associated with these penetrations that may need enhanced administrative controls.

4. Date When Full Compliance Will be Achieved

Completion of the review of containment penetrations to identify any other valves requiring enhanced administrative controls and any associated procedure changes will be completed by March 31, 1991.

Current Operation's procedures verify the position of containment penetration non-automatic isolation valves and are performed monthly for components outside the reactor containment and quarterly in cold shutdown for all components inside the reactor containment.

In addition, Operations performs periodic random position verification on safety-related system, and independent position verification following maintenance that can effect the position of safety-related components.