APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION REGION IV

Report:	50-445/82-23										
Docket:	50-445	Category: A2									
Licensee:	Texas Utilities Generating Company (TUGCO) 2001 Bryan Tower Dallas, TX 75201										
Facility N	ame: Comanche Peak, Unit 1										
Inspection	At: Comanche Peak, Unit 1										
Inspection	Conducted: October 1-31, 1982										
Inspector:	Dennie L. Kelley, D. L. Kelley, Senior Resident I	Reactor Inspector Date									
Approved:	7. R. Meslering T. F. Westerman, Chief Reactor Project Section A	<u>12/3/82</u> Date									

Inspection Summary

Inspection Conducted during the Period October 1-31, 1982 (NRC Report 50-445/82-23)

Areas Inspected: Routine, announced inspection by the Senior Resident Inspector (Operations), including (1) Preoperational Test Procedure Review; (2) Preoperational Test Performance; (3) Plant Tours; (4) Initial Startup Procedure Review; (5) Other Tests; and (6) Plant Status. The inspection involved 118 inspector-hours by one NRC inspector.

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

DETAILS

1. Persons Contacted

- *J. T. Merritt, Startup Manager
- *J. C. Kuykendall, Manager, Nuclear Operations
- *G. D. Smith, Lead Startup Engineer
- *R. A. Jones, Manager, Plant Operations
- *T. L. Gosdin, Public Information Coordinator
- *H. A. Lancaster, Startup Quality Assurance
- *C. H. Welch, Startup Turnover Surveillance Supervisor

2. Preoperational Test Procedure Review

The NRC inspector reviewed several draft preoperational test procedures. Comments were made where appropriate. The procedures will be reviewed in their final form after approval by the joint test group (JTG). When the preoperational tests are performed, a brief review will be conducted of the latest revisions to note any changes that may affect the test results.

The procedures are reviewed with specific emphasis on the following:

- 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.
- Acceptance criteria are identified and requirements are specified for comparison of results with the acceptance criteria.
- g. Source of acceptance criterion 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.
- Temporary circuit changes, installation of jumpers, and restoration of circuits after testing are properly documented.
- Independent verification of critical steps or parameters is addressed.

During this reporting period, the following draft procedures were reviewed and commented on. The comments made were minor in nature and were in the area of clarification:

1CP-PT-81-05	Containment Upper Auxiliary Crane
1CP-PT-41-04	Vessel Servicing Equipment (Phase 1)
1CP-PT-81-03	Polar Crane
1CP-PT-44-01	Steam Generator Blowdown System Functional
1CP-PT-11-01 Rev. 1	Component Closed Cooling Water
1CP-PT-29-01 Rev. 1	Diesel Generator Auxiliary Systems

No violations or deviations were identified during this review.

3. Preoperational Test Performance

During this reporting period, the applicant performed Preoperational Test 1CP-PT-04-01, Station Service Water. The NRC inspector reviewed the approved procedure prior to the conduct of the test and witnessed several parts of the test during its performance. The witnessing of the test performance was to verify that:

- a. The test was being conducted using the approved procedure,
- b. Changes to the test were accomplished in accordance with the approved procedure, and
- c. The performance of the test was controlled and conducted in such a manner as to yield valid test results.

The test results failed to verify the predicted flow rates. The startup group is stu ving the results to determine the cause of the flow reduction. The NRC inspector will review the results of the study and monitor any retesting. (Open item 8223-01)

4. Plant Tours

During this reporting period, the NRC inspector conducted several inspection tours of Unit 1. In addition to the general housekeeping activities and general cleanliness of the facility, specific attention was given to areas where safety-related equipment is installed and where activities were in progress involving safety-related equipment. These areas were inspected to ensure that:

- Work in progress was being accomplished using approved procedures.
- b. Special precautions for protection of equipment was implemented, where required, and additional cleanliness requirements were being adhered to, where required, for maintenance, flushing, and welding activities.
- c. Installed safety-related equipment and components were being protected and maintained to prevent damage and deterioration.

Also during these tours, the NRC inspector reviewed the control room and shift supervisors log books. Key items noted in the log review were:

- a. Plant status
- b. Changes in plant status
- c. Tests in progress
- d. Documentation of problems which arise during operating shifts

No violations or deviations were identified.

5. Initial Startup Test Procedure Review

The NRC inspector reviewed one draft initial startup test procedure. Comments were made where appropriate. The procedures will be reviewed in their final form after approval by the station operations review committee (SORC). When the preoperational tests are performed, a brief review will be conducted of the latest revision to note any changes that may affect the test results. The procedures are reviewed with specific emphasis on the following:

- 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.
- Acceptance criteria are identified and requirements are specified for comparison of results with the acceptance criteria.
- g. Source of acceptance criterion is identified.
- h. Initial test conditions are specified.
- i. Reference to appropriate FSAR sections, drawings, specifications, and codes are included.
- j. Reactor operating mode and applicable Technical Specifications are identified.
- k. Step-by-step instructions of sufficient detail are included to ensure that conduct of the test will result in valid conclusions.
- 1. Provisions for documenting that required steps have been performed and space for recording data are included.
- m. Temporary circuit changes, installation of jumpers, and restoration of circuits after testing are properly documented.
- n. Technical Specification "Special Testing Exceptions" are listed.
- Independent verification of critical steps or parameters is addressed.

During this reporting period, the following draft procedures were reviewed and commented on. The comments made involved Technical Specification inclusion and format review:

ISU-015A Reactor Trip System Tests

No violations or deviations were identified during this review.

6. Other Tests

During this reporting period, the applicant completed the manufacturer's test on emergency diesel generators number 1 and 2. A technical representative from the TransAmerica DeLeval was present to conduct the tests. The tests included:

- a. Instrumentation checks
- b. Control circuitry checks and adjustments
- c. Air starting checks
- d. No load running checks
- e. Running the diesel generators at 25%, 50%, 75%, 100%, and 110%

The NRC inspector witnessed portions of the testing on both units. The testing revealed no major problems.

No violations or deviations were identified.

7. Plant Status

The following is a status of TUGCO manning levels for operations and plant testing activities as of October 3', 1982.

a. Operations Manning Status

Authorized personnel level (including maintenance, operations, administration, quality assurance, and engineering) - 450

Number presently onboard - 343

b. Plant Testing Status

Total number of Preoperational Tests - i39 Number of Preoperational Tests thru draft - 112 Number of Preoperational Tests approved (JTG) - 35

Total number of acceptance tests - 46 Number of acceptance test thru draft - 41 Number of acceptance test approved - 17

Test completion status

Preoperational Tests - 10 Acceptance Tests - 9

8. Exit Interview

An exit interview was conducted October 29, 1982, with applicant representatives (identified in paragraph 1). During this interview, the NRC inspector reviewed the scope and discussed the inspection findings.

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