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April 29, 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) UNIT 2
DOCKET NO. 50-446
NRC INSPECTION REPORT NOS. 50-445/91-07; 50-446/91-07
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated April 1, 1991, concerning the inspection conducted by Mr. R. M. Latta and others during the period February 1 through March 12, 1991. This inspection covered activities authorized by NRC Construction Permit CPPR-127 for CPSES Unit 2. Attached to the April 1, 1991, letter was a Notice of Violation.

The NRC's letter expressed concern about the enclosed Notice of Violation because it involved the programmatic aspects of the Unit 2 corrective action program which are fundamental to the appropriate identification and resolution of potentially significant conditions adverse to quality.

TU Electric believes that overall, the Unit 2 program, which is based in large part on the TU Evaluation (TUE) process, is functioning as intended and is in compliance with regulatory requirements. This belief is based on the positive results of program trending, Quality Accountability Program (QAP) feedback and actions, and ongoing performance-based statistics. TU Electric also believes that overall, the Unit 2 procedures developed to identify and correct conditions adverse to quality are adequate. However, based on the causes identified in the attachment, inconsistent implementation of the procedures was identified.

TU Electric management has and will continue to monitor the overall adequacy of the Unit 2 program for identifying and correcting conditions adverse to quality. In addition to the actions described in the attachment, the QAP which constitutes a significant portion of the management monitoring process, in part, has focused on the threshold for identifying and resolving

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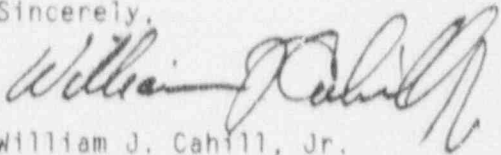
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potentially significant conditions adverse to quality. The QAP will continue to focus on this area until TU Electric management is satisfied that a conservative threshold is consistently maintained.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,



William J. Cahill, Jr.

TLH/bm
Attachment

c - Mr. R. D. Martin, Region IV
Mr. M. B. Fields, NRR
Resident Inspectors, CPSES (2)

NOTICE OF VIOLATION

446/9107-01

Criterion XVI of Appendix B to 10 CFR Part 50, as implemented by Section 16.0 of the TU Electric Quality Assurance Manual, requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. Furthermore, for significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and that adequate corrective actions to preclude repetition are taken.

Comanche Peak Steam Electric Station, Unit 2, Procedure 2PP-3.05, Revision 1, "Procedure for Processing of TU Evaluation Forms (TUE) and Conditional Release Requests (CRRs)," Section 6.1.2.e, requires that a TUE form and Attachment 8.D shall be initiated when a condition is identified which requires a determination of cause, an evaluation of generic implications, corrective actions, and preventive actions.

Contrary to the above, the resolution of three TUE forms were inadequate in that they failed to determine the cause, generic implications, and/or required corrective and preventive actions as noted below:

1. TUE Form 90-163, dated November 7, 199[0], failed to address the cause and corrective actions for a programmatic deficiency where previously identified nonconforming material was released to the field for installation.
2. TUE Form 91-337, dated January 9, 1991, failed to address the cause and corrective actions for an unauthorized work activity for base metal repair for safety-related piping.
3. TUE Form 90-172, dated November 12, 1990, failed to address all corrective actions for required weld repair of the fuel transfer tube including an evaluation of reportability.

Response to Notice of Violation

446/9107-01

TU Electric accepts the violation and the requested information follows.

1. Reason for the Violation

TU Electric's review of the TUE forms identified in the Notice of Violation resulted in the identification of the causes discussed below.

- Some Unit 2 Project personnel did not appropriately understand the programs (i.e., the Quality Accountability, Programmatic/Repetitive and Reportability Programs) developed to satisfy requirements for evaluating TUE form conditions considered to be other than routine in nature.

- Engineering personnel, while providing adequate technical solutions to explicit TUE form conditions related to hardware, did not always evaluate, or cause others to evaluate personnel or program related conditions.
- Some Engineering personnel did not fully understand the 10CFR50.55(e) reporting criteria or their relationship to 10CFR50 Appendix B Criterion XVI.
- Engineers did not, in all cases, provide enough detail in TUE form dispositions to explain the reasoning for significance and reportability determinations or the methodology used to resolve technical issues.
- Quality Control and Engineering Assurance personnel responsible for conducting Quality Accountability Program (QAP) meetings, which evaluate significant TUE forms for cause and adequacy of corrective actions, had not fully discussed with appropriate personnel the varying levels of significant conditions that can be identified and the expected input to QAP meetings. Some confusion existed between the various departments as to who could identify TUE forms for QAP meeting review.

2. Corrective Steps Taken and Results Achieved

Each of the TUE forms identified in the NRC inspection report were evaluated for proper disposition, thoroughness, and potential reportability. Two of the conditions documented on the TUE forms have been upgraded to a programmatic/repetitive status because of generic hardware implications or because of additional personnel-related occurrences (TUE forms 90-163 and 91-337, respectively). The other TUE form (90-172) was revised and remains open for work completion. None of the conditions on these TUE forms represented a reportable condition pursuant to 10CFR50.55(e) or 10CFR21. However, the evaluation did result in the identification of the causes listed in Section 1 above and prompted the actions described below.

An immediate review of the TUE and reportability program procedures was performed by Unit 2 Engineering Assurance and Unit 2 Licensing to assure that the procedures provided adequate user guidance relative to 10CFR50 Appendix B Criterion XVI, 10CFR50.55(e) and 10CFR21. As a result, one minor change was made to the TUE process procedure. The change consisted of rephrasing the "Potential Safety Significance" block on the TUE form to "Potentially Reportable" to be consistent with the instructions in the body of the procedure. No other changes were deemed necessary to the procedures. However, this review and the evaluation of the TUE forms in question did indicate the need for training.

Project Management directed that training be conducted immediately for Lead Discipline Engineers (LDE), the personnel responsible for review of TUE forms and for potential reportability determinations, to emphasize and supplement procedural and management requirements. The LDE training covered a number of topics including the relationship between 10CFR50 Appendix B Criterion XVI and the reporting requirements of 10CFR50.55(e) and 10CFR21; the need for resolving both the technical condition described on the TUE form and, as necessary, the personnel or program related conditions; the need to more fully document nonconformance dispositions; the differences in procedural provisions for evaluating routine, significant and reportable conditions; a detailed explanation of the Quality Accountability Program function and feedback mechanisms; and a discussion of previous TUE forms in order to provide examples of the expected threshold for identifying conditions as significant and/or reportable. This training was completed on February 27, 1991.

In addition, Construction Quality Assurance is presently performing an audit of the nonconformance process. One of the audit checklist items requires an evaluation of the process for identifying and evaluating significant TUE forms. This audit report will be issued by June 10, 1991.

3. Corrective Steps Which Will Be Taken To Avoid Further Violations

In order to assess the effectiveness of the training described above, the Unit 2 Engineering Assurance Manager has begun reviewing dispositioned TUE forms. This review is intended to judge TUE form disposition adequacy, disposition narrative content, significance/reportability determinations and the need for TUE form input into the Engineering QAP. Results of this process are provided to the Engineering Manager and fed into the Engineering QAP meetings. This review has indicated that the quality of TUE disposition documentation has improved and that items of significance are being resolved appropriately. Periodic review of TUE forms via the Engineering QAP meetings will continue to assure that proper levels of documentation are maintained and that the significance threshold stays consistent with the Engineering Manager's expectation.

The Manager of Quality Control (QC) has and will continue to conduct QAP meetings for the QC, Construction, and Procurement organizations to communicate and pursue the causes of selected deficient hardware, deficient programs and personnel errors. During the past three months a greater number of TUE form conditions, considered to be of a lesser significance when compared to those of the past, have been evaluated in the QAP meetings, indicating that the Project as a whole has lowered the threshold for identifying TUE form conditions as significant. The QC Manager will continue to monitor this process to provide additional assurance that the desired consistency and conservatism is maintained.

The concepts provided in the Lead Engineers training sessions will be incorporated into the Engineering Socialization Training as well as Refresher TUE Process Training. These training courses will be modified and initiated by June 15, 1991.

In addition to the above actions, the Notice of Violation and content of this response were discussed during the QC and Engineering QAP meetings and during the Startup and Operations staff meetings.

4. Date When Full Compliance Will be Achieved

TU Electric is in full compliance.