

OCT 10 1991

Docket Nos. 50-445
50-446
License No. NPF-87
Construction Permit No. CPPR-127

TU Electric
ATTN: W. J. Cahill, Jr., Executive
Vice President, Nuclear
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-445/91-41; 50-446/91-41 (NOTICE OF VIOLATION)

This refers to the inspection conducted by Messrs. W. D. Johnson, D. N. Graves, and R. M. Latta during the period August 14 through September 24, 1991. The inspection included a review of activities authorized for the Comanche Peak Steam Electric Station, Units 1 and 2. At the conclusion of the inspection, the findings were discussed with you and those members of your staff identified in the enclosed report.

Areas examined during the inspection included plant status, followup on previous inspection findings, followup on corrective actions for violations, followup on licensee identified 10 CFR Part 50.55(e) deficiencies, followup on licensee event reports, engineered safety feature system walkdown, operational safety verification, onsite followup of events, maintenance observation, surveillance observation, and organization. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observation by the inspectors.

While excellent radiation protection planning and coverage were observed for a transfer of radioactive resin and excellent contamination controls were noted in one instance, two observations indicated a potential weakness in contamination controls. Concerns were also raised about accuracy in documentation of work order steps completed, the completeness of reviews of changes to maintenance procedures, and an operator error which caused an engineered safety feature actuation.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because it included three examples of failure to follow procedures. The most significant of these three examples involved an inadequate clearance which caused a train of a safety-related system to become inoperable. Several levels of review failed to detect an inadequacy in a relatively simple clearance.

*RIV:RI:DRP/B	*SRI:DRP/B	*SRI:DRP/B	*DRP/B	*C:DRP/B	D:DRP
DNGraves:ww	RMLatta	WDJohnson	TReis	DDChamberlain	ABBeach
/ /91	/ /91	/ /91	/ /91	/ /91	10/10/91

*Previously concurred
9110170099 911010
PDR ADOCK 05000445
Q PDR

IEO1
1/1

TU Electric

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You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response to this letter, will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

A. Bill Beach, Director
Division of Reactor Projects

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-445/91-41; 50-446/91-41

cc w/enclosures:

TU Electric
ATTN: Roger D. Walker, Manager
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Juanita Ellis
President - CASE
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Texas Department of Labor & Standards
ATTN: G. R. Bynog, Program Manager/
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Honorable Dale McPherson
County Judge
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bcc: (see next page)

TU Electric

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~~bcc to DMB (IE01)~~

bcc distrib. by RIV:

*R. D. Martin

*DRP

*Section Chief (DRP/B)

*DRSS-RPEPS

*MIS System

*RIV Files

*Resident Inspector (2)

*DRS

*Project Engineer (DRP/B)

Lisa Shea, RM/AF

*RSTS Operator

*w/766