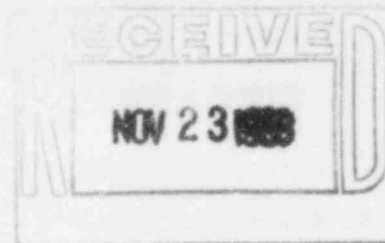


TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER DALLAS, TEXAS 75201-3000



R. J. GARY

EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

November 21, 1983

TXX-4077

Mr. E. H. Johnson, Chief
Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Docket No.: 50-445

COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NO. 83-40
FILE NO.: 10130

Dear Mr. Johnson:

We have reviewed your letter dated October 25, 1983 on the inspection conducted by Mr. D. L. Kelley of activities authorized by NRC Construction Permit (PPR-126) for Comanche Peak, Unit 1. 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 preventive actions. We feel the enclosed information to be responsive to the Inspector's finding. If you have any questions, please advise.

Yours very truly,

RJG/kh

Enclosure

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

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

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APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Generating Company
Comanche Peak Steam Electric Station

Docket: 50-445/83-40
Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of September 1-30, 1983 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 Procedures

Criterion V of Appendix B to 10 CFR 50 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."

This is amplified in the license Station Administration Procedure STA-302, Revision 3, May 1983 which states, in part, "Records generated by outside entities other than TUGCO Operations Group shall be received at the Records Center in accordance with Paragraph 4.6." STA-302 further states, in Section 4.10.4, "All records submitted to the Records Center by entities other than TUGCO Operation shall be accompanied by a transmittal form which shall provide, at a minimum, the date of submittal, who is submitting the records, and the title of the records; each shall be listed by unique identifier before being accepted into the vault." STA-302 also states, in Section 4.6.6, in part, "Records which are moved from a Satellite Records File to the Records Center shall also be transmitted using a Records Transmittal Form'."

Contrary to the above, during the months of July, August, and September of 1983, an estimated 12,000 documents were transmitted from the startup group to the Records Center with incorrectly filled out "Transmittal Forms."

This is a Severity Level V Violation. (Supplement I) (445/8340-8301)

Discussion and Corrective Action

The CPSES Plant Operations organization has thoroughly investigated this Violation to determine its impact on plant safety and the records management system. In addition, it was necessary to determine the extent to which corrective action is required and the appropriate management action to prevent recurrence of a similar condition.

As identified in the Notice of Violation, transmittal forms accompanying documents from the startup group were incorrectly prepared to meet the requirements of Station Administration Procedure, STA-302. Our investigation revealed this practice to be confined to one very specific type of document generated by the one organization/location. The most important element, to our records management system, the "unique identifier," is present on the transmittal forms and indirectly provides Records Center personnel additional

information such as previous location, title and sequence numbers. With only the "unique identifier" shown on a transmittal form, each document can be completely processed in the records management system and is therefore retrievable.

The transmittal form, required by STA-302, is used to verify that the documents received in the Records Center are in agreement with the records that were intended to be transmitted. This was accomplished in that the document "unique identifier" allowed proper accountability, even though the document titles were not consistently entered. There is no indication that this violation, or previous transmittals, has adversely affected the records management system and thus does not affect plant safety.

Preventive Action

To prevent records from being improperly received, Records Center personnel involved with transmittals have been retrained and directed to ensure that their activities are in full compliance with the requirements of STA-302. The startup group has also taken preventive measures to ensure that transmittals are completely filled out and properly reviewed for accuracy before being sent to the Records Center. These measures include administrative direction and retraining in the requirements of STA-302.

All applicable transmittal documents are now complying with the requirements of STA-302.