

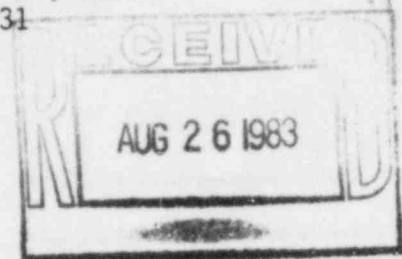
TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER DALLAS, TEXAS 75201-3050

R. J. GARY  
EXECUTIVE VICE PRESIDENT  
AND GENERAL MANAGER

August 24, 1983

TXX-4031



Mr. G. L. Madsen, Chief  
Reactor Project Branch 1  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76012

Docket Nos.: 50-445  
50-446

COMANCHE PEAK STEAM ELECTRIC STATION  
RESPONSE TO NRC NOTICE OF VIOLATION  
INSPECTION REPORT NO. 83-23, FINDING NO. 2  
FILE NO.: 10130

Dear Mr. Madsen:

We have reviewed your letter dated July 27, 1983 on the Special Fuel Building inspection of activities authorized by NRC Construction Permit CPPR-126 for Comanche Peak, Unit 1. The enclosed report is provided as our response to Finding No. 2 contained in Appendix A of that letter. This letter will also serve to document our telephone conversation with T. F. Westerman on August 23, 1983, wherein we requested an extension of the due date for responding to Finding No. 1 of Appendix A. An extension of two weeks, until September 1, 1983 was granted.

To aid in the understanding of our response, we have repeated the requirement and Finding No. 2 followed by our corrective action. We feel the enclosed information to be responsive to the Inspector's finding. If you have any questions, please advise.

Very truly yours,

RJG:ln  
Enclosures

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

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

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APPENDIX A  
NOTICE OF VIOLATION

Texas Utilities Generating Company  
Comanche Peak Steam Electric Station, Unit 1

Docket No. 50-445/83-23  
License No. CPPR-126

Based on the results of an NRC inspection conducted during the period of May 23 through June 10, 1983 and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) published in the Federal Register Notice (47CFR9987) dated March 9, 1982, the following violations were identified.

1. As stated in the cover letter, a response to this item will be provided no later than September 1, 1983.

2. Instructions

10CFR50, Appendix B, Criterion V states that, "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." The Final Safety Analysis Report, Section 17.1.5 states that, "appropriate requirements have been established in the TUGCO/TUSI Quality Assurance Program to assure that quality-related activities for CPSES are accomplished in accordance with such documents; and that approved acceptance criteria are met."

Contrary to the above, procedures for the installation and inspection of the "NPSI" seismic sway strut jam nuts do not appear adequate to insure snugness as required by QI-QP-11.1-28, Revision 20, and as evidenced by the finding of five loose jam nuts on the following large bore ASME pipe supports:

SF-X-011-019-F43K  
CC-X-040-004-F43K  
SF-X-024-010-F43R  
SF-X-002-018-F43R  
SF-X-006-027-F53R

This is a Severity Level IV Violation. (Supplement II.e) (445/8323-02).

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The five loose jam nuts on the large bore ASME pipe supports identified were reworked and verified by QC to be "snug tight" per QI-QAP-11.1-28, paragraph G.3.1.1.(c).

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER NONCOMPLIANCE

Inspection checklists as implemented by procedure CP-QAP-12.1 have been revised to add specific inspection criteria relative to "snug tight" conditions of sway-strut jam nuts. These checklists are utilized by QC to verify the correctness and integrity of installation of systems prior to N-5 Certification.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The checklists were revised immediately after identification of the nonconforming condition. Procedure CP-QAP-12.1 was formally approved August 3, 1983.