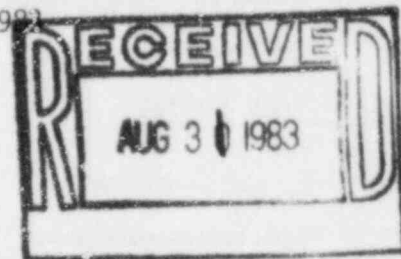


TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER DALLAS, TEXAS 75201-3050

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

August 31, 1983
TXX-4037



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 No.: 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
RESPONSE TO NRC NOTICE OF VIOLATION
INSPECTION REPORT NO. 83-23, FINDING NO. 1
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. Our report logged TXX-4031 dated August 24, 1983 provided the response to Finding No. 2 contained in Appendix A of that letter.

In addition, an extension until September 1, 1983 was granted for responding to Finding No. 1. To aid in the understanding of our response, we have repeated the requirement and Finding No. 1 followed by the conclusions of our review of these items regarding the adequacy of the safety function and the overall actions taken to improve our QA/QC program. We feel the enclosed information to be responsive to the Inspector's finding. If you have any questions, please advise.

Very truly yours,

BR Clement for
R. J. Gary

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: 50-445/83-23
Permit: 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 (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

1. Inspection Program

10 CFR 50, Appendix B, Criterion X states that, "a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity." The Final Safety Analysis Report, Section 17.1.10 states that, "the organization having the responsibility for provision of such items also has the primary responsibility to assure that adequate inspection is done by the supplier."

Contrary to the above, the following examples were identified in which your inspection program did not detect failures to meet final construction requirements:

a. Cable Tray Supports

Cable tray support material for Cable Tray Hangers 1848 and 1979 deviated from final design documents.

b. Conduit Hilti Bolts

Hilti bolt spacing of one bolt at Support 8 for Conduit Run C02012850 deviated from minimum spacing allowed to adjacent abandoned hilti bolt.

c. Large Bore ASME Pipe Supports

(1) Five pipe supports deviated from final design documents as follows: one weld for Support SF-X-002-026-F53R was undersized; dimensions for Supports SF-X-024-010-F43R and SF-X-002-025-F53R deviate from vendor certified drawings; and materials for Supports SF-X-005-015-F43S and SF-X-033-006-F43R deviated from vendor certified drawings.

(2) A broken cotter pin was found on Support SF-X-004-006-43R which had been inspected per QI-QP-11.1-28, Revision 20 for integrity.

d. Small Bore ASME Pipe Supports

Three pipe supports deviated from final design documents as follows: dimension for Support H-CH-X-FB-003-001-3 deviated from final review drawing; shims for Support H-CH-X-FB-003-010-3 were misoriented during the documentation of as built conditions; and the material in Support H-CH-X-FB-004-003-3 deviates from the final review drawing.

This is a Severity Level IV Violation. (Supplement II.e) (445/8323-01)

Conclusions

Our engineering evaluation has concluded that had the aforementioned deviations gone undetected there would be no affect on plant safety.

Improvements of QA/QC Program

Consistent with our engineering evaluation of these items, we have also concluded that no significant QA/QC program improvements are required. Although the basic QA/QC program will remain the same, we have made minor adjustments to inspection procedures and checklists. These adjustments merely provide more detail to existing program requirements.

Documentation regarding our Conclusions and Improvements will be available for your Inspectors review at the CPSES site.

2. As stated in the cover letter, a response to this item was provided in TXX-4031, dated August 24, 1983.