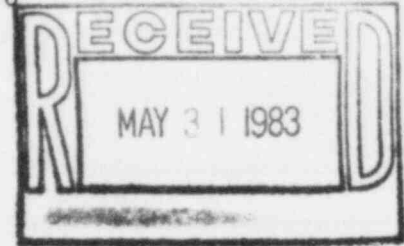


TEXAS UTILITIES GENERATING COMPANY

2001 RYAN TOWER, DALLAS, TEXAS 75201-3050

R. J. GARY  
EXECUTIVE VICE PRESIDENT  
AND GENERAL MANAGER

May 25, 1983  
TXX-3676



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, Texas 76012

Docket No.: 50-445

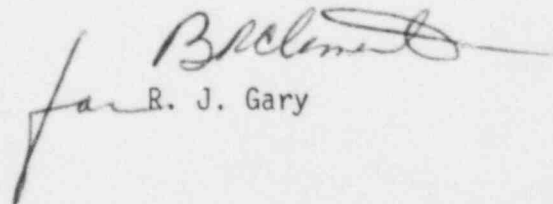
COMANCHE PEAK STEAM ELECTRIC STATION  
RESPONSE TO NRC NOTICE OF VIOLATION  
INSPECTION REPORT NO. 83-08  
FILE NO.: 10130

Dear Mr. Madsen:

We have reviewed your letter dated April 29, 1983 on the inspection conducted by Mr. D. L. Kelley of activities authorized by NRC Construction Permit CPPR-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 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,

  
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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PDR ADOCK 05000445  
Q PDR

APPENDIX ANOTICE OF VIOLATION

Texas Utilities Generating Company  
Comanche Peak Steam Electric Station

Docket: 50-445/83-08  
Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of March 1-31, 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 Review Changes to Approved Procedures

Criterion VI of Appendix B to 10 CFR 50, requires that changes to documents shall be reviewed by the same organizations that performed the original review and approval unless the licensee designates another responsible organization. FSAR Section 17.1.6 requires that the licensee, in his Quality Assurance Program, assure that document changes are reviewed and approved by the same organization performing the original review and approval unless the licensee designates another organization.

Contrary to the above, the Senior Resident Inspector-Operations determined through review of logs, procedures, and discussions with licensee personnel that eight changes to IPO-001A, Rev. 0, were made without the proper review and approval as required.

This is a Severity Level V Violation. (Supplement II.D.)

Discussion

All safety-related procedures at CPSES TUGCO Operations are approved by the Station Operations Review Committee (SORC) and can be changed only by revision or a Temporary Change Form as described in station procedure STA-205. The Violation occurred during preoperational startup test activities which plant personnel support by operating installed equipment.

One purpose of the Startup Test Program is to demonstrate the effectiveness of operating procedures and provide a means for detecting any errors requiring correction prior to normal operations. In addition, operating personnel are afforded the opportunity to work and become familiar with the procedures under non-operating conditions. To enable necessary corrections and adjustments to be made in a timely manner, all Integrated Plant Operating Procedures (IPO's), except IPO-001A, have intentionally been kept in draft form.

The actual preoperational tests are conducted by Startup Test Engineers utilizing approved Preoperational Test Procedures which can be changed, if required, by Test Procedure Deviations described in Startup Administrative Procedure, CP-SAP-12.

Since the draft IPO's are not approved, shift supervisors have been instructed to use them to the maximum extent during preoperational testing to check their accuracy. The shift supervisors are therefore accustomed to changing draft procedures to improve them before final review and approval by the SORC.

As previously stated, the one exception occurred because IPO-001A was approved by the SORC on June 23, 1982, for the sole purpose of supporting Cold Hydro activities. This exception was overlooked by control room personnel who made changes to approved procedure IPO-001A as they would normally change a draft procedure. When the Senior Resident Inspector-Operations informed plant management of this Violation on March 2, 1983, Special SORC Meeting No. 83-04 was called to discuss actions required to correct and prevent its recurrence. The following actions are a result of this meeting:

#### Corrective Action

The Operations Superintendent initiated Deficiency Report, DR-83-023 which was reviewed and issued by the Operations QA Supervisor. The deficiency report documented the fact that IPO-001A, Rev. 0, was changed in noncompliance with STA-205, "Temporary Changes to Procedures." Final disposition to the deficiency was made by the Operations Superintendent on March 8, 1983. The deficiency report now documents that all appropriate changes to IPO-001A, Rev. 0, improving it for use during normal operations, are made in accordance with STA-205.

#### Preventive Action

CPSES Special Order #1-SO-83-005, "Operating Procedures - Use and Changes During Testing," was issued by plant management on March 4, 1983, in accordance with STA-207. The Special Order outlines requirements for the use of operating procedures during preoperational testing that are intended to prevent recurrence of the Violation. These requirements are:

1. Operating procedures (SOP's, IPO's, ALM's, ABN's, STA's, ODA's) are to be used to the maximum extent possible during testing in order to check their accuracy.
2. Changes to operating procedures are to be made only if the change is to correct an error in the procedure, or if the change will improve the procedure for use during normal operation.
3. Changes to approved operating procedures are to be made in accordance with STA-205. Draft procedures may be changed by simply making the change on the procedure.

4. Operating procedures are not to be changed for the sole purpose of testing, or because special conditions exist due to testing.
5. With the exception of valve lineups, operating procedures are not part of the PT data package and do not need to be checked off or signed off. They do need to be used as provided in item 1 above.
6. No marks, changes, checks or sign-offs are to be made on controlled procedures.

Corrective and Preventive Action steps taken to resolve the Violation were completed on March 8, 1983.