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TU ELECTRIC

March 26, 1992

William J. Cahill, Jr.
 Group Vice President

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
 DOCKET NO. 50-445
 NRC INSPECTION REPORT NOS. 50-445/92-04; 50-446/92-04
 RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated February 25, 1992, concerning the inspection conducted by the NRC staff during the period January 21-24 and February 10-11, 1992. This inspection covered activities authorized by NRC Operating License NPF-87 and Construction Permit CPPR-127. Attached to the February 25, 1992, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation (445/9204-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

JET/ :
 Attachments

c - Mr. R. D. Martin, Region IV
 Mr. L. A. Yandeli, Region IV
 Mr. T. A. Bergman, NRR
 Resident Inspectors, CPSES (2)

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JET/

Notice of Violation
(445/9204-01)

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description require that activities affecting quality be accomplished in accordance with procedures. ASME Code Section XI, Appendix III-4430 and the Procedure TX-ISI-207, "Ultrasonic Examination of Similar and Dissimilar Metal Welds in Austenitic Stainless Steel Piping Systems for Comanche Peak Units No. 1 & 2," Revision 0 with Field Change Notice Nos. 1 through 3, paragraph 6.2.1 require that ultrasonic examination be conducted in both circumferential directions for reflectors transverse to the weld seam.

Contrary to the above, the inservice ultrasonic examination performed on October 22, 1991, of Weld No. 1 on Sketch TBX-1-4103 of the safety injection system was not conducted in both circumferential directions for transverse reflectors.

Response to Notice of Violation
(445/9204-01)

TU Electric accepts the violation and the requested information follows:

1) Reason for Violation

The reason for the violation is personnel error. As noted above, the procedures in use properly defined the requirements for the performance of this examination as specified in ASME Section XI. Contributing to this situation was the failure of the individuals responsible for reviewing the documentation for the examination to identify that the documentation was incomplete.

2) Corrective Steps Taken and Results Achieved

An Operations Notification and Evaluation (ONE) Form FX-92-155 was issued to document the examination of weld TBX-1-4103-1 as incomplete with a re-examination to be performed during the second refueling outage. A review of the preservice inspection data for the ultrasonic examination revealed no indication of defects, which provides confidence of weld integrity for continued operation. Additionally, there has been no abnormal system operation that would have degraded or challenged this weld beyond the considerations in the design basis. The required inspection interval for this weld is once every ten years.

Data sheets for examinations performed during the first refueling outage were reviewed by a TU Electric Level III inspector to assure all incomplete examinations were documented on limitation sheets. This review revealed no additional, improperly documented, incomplete examinations; therefore we have concluded the deficiency noted in the violation is an isolated occurrence. Administrative deficiencies noted while performing this review have been documented by issuance of a ONE form.

Additionally, independent of the review performed by the TU Electric Level III inspector, a surface defect, identified during the outage, was observed which was improperly accepted. Specifically, the defect was incorrectly determined to be acceptable through the application of an inappropriate ASME Section XI table by the reviewer. The misapplication of the table was identified during the preparation of the ASME Section XI summary report. The issue has been documented on a ONE form and the defect has been evaluated as acceptable as allowed by ASME Section XI.

3) Corrective Actions Taken to Preclude Recurrence

The responsible organizations shall be notified of the circumstances leading to this violation and directed to discuss this situation with the appropriate personnel.

4) Date When Full Compliance Will Be Achieved

Full compliance with all corrective actions shall be achieved prior to the end of the second refueling outage.