

MAR 31 1992

Docket Nos. 50-445  
50-446  
License No. NPF-87  
Construction Permit No. CPPR-127

TU Electric  
ATTN: W. J. Cahill, Jr., Group Vice President  
Nuclear Engineering and Operations  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-445/91-202; 50-446/91-201 (NOTICE OF VIOLATION)

This refers to the configuration management team inspection conducted by the Special Inspection Branch at the Comanche Peak Steam Electric Station during the period November 18 through December 13, 1991. This inspection, which was discussed at an exit interview meeting with Comanche Peak Steam Electric Station officials on December 13, 1991, disclosed several deficiencies that were subsequently reviewed by the Region IV staff for enforcement action, as appropriate.

On the basis of this review, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). Five violations were identified. None of the violations found were individually safety significant and were not considered to be programmatic in nature.

The first violation pertained to several examples of the failure to implement adequate design control measures. This violation is of concern because the number of examples indicates a lack of rigorous control of the design control process. The second violation pertained to the incorrect installation of certain instrument air lines for the Trains A and B uninterruptible power supply air conditioning systems. This violation is of concern because of the potential to trap moisture or debris in the air lines, which could cause plugging and possible failure of the valves to operate as designed.

The third violation pertained to several examples of failure to follow procedures. This violation is of concern because these examples indicate a lack of attention to detail. The fourth violation pertained to temporary supports not installed to maintain an unsupported pipe span within limitations. This violation is of concern because of the potential for damage to the system, based on improperly supporting the system during flushing activities. The fifth violation pertained to the failure to take adequate corrective action for

\*RIV:DRP/B  
CEJohnson;df  
3/ /92

\*C:DRP/B  
LAYandell  
3/ /92

DP:DRP  
TPGwynn  
3/21/92

B:DRP  
ABBeach  
3/31/92

\*previously concurred

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PDR ADOCK 05000445  
G PDR

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JEOI

a condition adverse to quality relating to Hilti bolts. This violation is of concern because of the potential corrosive degradation of Hilti bolts over a period of time with intrusion of water.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR Part 2.730 of the NRC's "Rules of Practice," a copy of this letter and its enclosures, and your response to this letter, will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:  
Thomas P. Gwynn

A. Bill Beach, Director  
Division of Reactor Projects

Enclosure:  
Appendix - Notice of Violation

cc w/enclosure:  
TU Electric  
ATTN: Roger D. Walker, Manager  
Nuclear Licensing  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

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1426 South Polk Street  
Dallas, Texas 75224

GDS Associates, Inc.  
Suite 720  
1850 Parkway Place  
Marietta, Georgia 30067-8237

TU Electric

-3-

TU Electric  
Bethesda Licensing  
3 Metro Center, Suite 610  
Bethesda, Maryland 20814

Jorden, Schulte, and Burchette  
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Counsel for Tex-La Electric  
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Newman & Holtzinger, P.C.  
ATTN: Jack R. Newman, Esq.  
1615 L. Street, N.W.  
Suite 1000  
Washington, D.C. 20036

Texas Department of Labor & Standards  
ATTN: G. R. Bynog, Program Manager/  
Chief Inspector  
Boiler Division  
P.O. Box 12157, Capitol Station  
Austin, Texas 78711

Honorable Dale McPherson  
County Judge  
P.O. Box 851  
Glen Rose, Texas 76043

Texas Radiation Control Program Director  
1100 West 49th Street  
Austin, Texas 78756

Owen L. Thero, President  
Quality Technology Company  
Lakeview Mobile Home Park, Lot 35  
4793 E. Loop 820 South  
Fort Worth, Texas 76119

bcc to DMB (IE01)

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R. D. Martin  
DRP  
Section Chief (DRP/B)  
DRSS-RPEPS  
MIS System  
RIV Files  
M. Virgilio, NRR  
J. D. Wilcox, NRR  
E. Imbro, NRR

Resident Inspector (2)  
DRS  
Project Engineer (DRP/B)  
Lisa Shea, RM/ALF  
RSTS Operator  
B. Boger, NRR  
S. Black, NRR  
B. Gramm, NRR  
B. Holian, NRR

TU Electric

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