APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report Nos. 50-445/91-64; 50-446/91-64

Operating License No. NPF-87

Construction Permit No. CPPR-127

Licensee: TU Electric Skyway Tower 400 North Olive Street Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: CPSES, Glen Rose, Texas

Inspection Conducted: November 12-15, 1991

Inspector: M. c. Murphy, Reactor Inspector, Test Programs Section Division of Reactor Safety

Approved:

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W. C. Seidle, Chief, Test Programs Section Date Division of Reactor Safety

INSPECTION SUMMARY

INSPECTION CONDUCTED NOVEMBER 12-15, 1991 (REPORT 50-445/91-64)

Areas Inspected: Routine, unannounced inspection of surveillance procedures and records for Unit 1.

Results: Within the areas inspected, no violations or deviations were identified. The licensee has developed and implemented appropriate surveillance test procedures that satisfy all Technical Specification requirements. Frequency requirements for surveillance testing was found to be satisfactorily accomplished. The licensee experienced eleven missed surveillances during the first fuel cycle. These occurrences were all selfidentified and reported through the licensee event report (LER) program. The review of these LERs did not reveal a programmatic weakness but did disclose that acceptable and comprehensive corrective action was taken in each case.

Inspection Conducted November 12-15, 1991 (Report 50-446/91-64)

Areas Inspected: No inspection of Unit 2 was conducted.

Results: Not applicable.

DETAILS

1. PERSONS CONTACTED

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*R. Baker, Licensing Compliance Manager

R. Blankenship, Surveillance Test Coordinator

*M. Blevins, Manager, Nuclear Operations Support

*L. Bradshaw, Secreta.y

*D. Bushcbaum, Supervisor, Compliance

*N. Harris, Senior Licensing Specialist, Site Licensing

*J. LaMarca, Manager, Technical Support

*D. McAfee, Manager, Quality Assurance

*G. Ross, Senior Quality Specialist, Quality Assurance

M. Sunseri, Manager, Performance and Test

*C. Terry, Director, Nuclear Overview

CASE

*O. Thero, Consultant

NRC

*W. Johnson, Senior Resident Inspector

The inspector also interviewed other personnel during the inspection.

*Denotes attendees at the exit meeting held on November 15, 1991.

2. SURVEILLANCE PROCEDURES AND RECORDS (61700)

This inspection was performed to determine that the licensee was conducting surveillance of safety-related systems and components in accordance with approved procedures as required by the Technical Specifications.

The inspector reviewed the licensee's Administrative Procedure STA-702, "Surveillance Program," Revision 9, with an effective date of November 27, 1990. This procedure establishes the general requirements for the surveillance program used at Comanche Peak. The procedure controls the surveillance requirements specified in Section 4 of the Technical Specifications, the Technical Requirements Manual, and the Inservice Testing Program Plan. The licensee has developed and implemented a Master Surveillance Test List (MSTL). This is a station manual which lists the implementing and trigger procedures that satisfy the test and inspection requirements of the surveillance program.

The inspector reviewed ^revision 17, dated December 14, 1990, of the MSTL and identified a list of surveillance tests to the licensee from this manual for review. This request was for at least the last two completed data packages

for the identified tests. These packages related to the areas of reactivity control and power distribution, instrumentation, the reactor coolant system, emergency core cooling system, containment systems, plant and electrical power systems and the inservice testing program.

Review of the test data packages and associated procedures determined that the tests are in conformance with Technical Specification requirements. The completed tests were reviewed as required by the licensee's administrative procedure. The tests were performed within the time frequencies specified and appropriate action was taken for any item failing acceptance criteria.

The inspector selected two test conductors and reviewed their qualifications with the manager, performance and test. The individuals met the licensee's standards for education and experience as committed to under ANSI N18.1.

In NRC Inspection Report 50-445/91-58, 50-446/91-58, the inspector was informed that there had been six missed surveillances during the first fuel cycle. During this inspection the inspector reviewed the LERs associated with missed surveillances during the first fuel cycle and determined there were eleven reported events. This review also included the review of One Form FX91-1475, dated November 14, 1991, that reported a missed surveillance, which occurred during this refueling outage. The review determined that there was no apparent programmatic weakness since the root causes and contributing factors were widely disparate. The licensee's reviews, identification of root causes and contributing factors, and corrective actions appeared thorough and comprehensive. Future performance will determine the effectiveness. LERs reviewed were: 90-005, 90-010, 90-015, 90-024, 90-026, 90-034, 90-040, 90-044, 91-003, 91-007, and 91-017.

3. EXIT MEETING

The inspection scope and findings were summarized in an exit meeting on November 15, 1991, with the personnel identified in paragraph 1 of the report. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.