



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 27, 1992

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

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

Gentlemen:

SUBJECT: COMANCHE PEAK CONFIGURATION MANAGEMENT INSPECTION
(50-445/91-202; 50-446/91-201)

We are forwarding the report of the configuration management inspection (CMI) conducted by the U.S. Nuclear Regulatory Commission (NRC) staff from November 18 through December 13, 1991. The activities involved are authorized by NRC Operating License NPF-87 and Construction Permit CFP-127 for the Comanche Peak Steam Electric Station, Units 1 and 2, respectively. At the conclusion of the inspection, the team discussed the findings with you and members of your staff.

The inspection team examined both design and construction attributes and reviewed Unit 2 as-built components, systems, and structures to assess the adequacy of the design control program and ensure proper translation of design requirements. The team focused on the residual heat removal (RHR) system and power distribution systems for alternating current (ac) and direct current (dc). The team also assessed the adequacy of your self-assessment initiatives.

The team determined that the plant was staffed with competent, knowledgeable personnel who executed their duties in a professional manner and appeared capable of designing, constructing, and testing Comanche Peak Unit 2 in a satisfactory manner. However, the team identified the following deficiencies: (1) multiple examples of failures to verify or check the adequacy of design, (2) component cooling water (CCW) instrument air lines incorrectly run, (3) failure to follow procedures during construction activities, (4) failure to maintain adequate control of pipe supports during system flushing, and (5) an example of improperly installing Hilti bolt impermeable material. Although some deficiencies had implications for the operating unit, the affected Unit 1 equipment was determined operable after analysis.

The team identified a number of field discrepancies. Although these discrepancies were unrelated and did not seem indicative of programmatic

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trends, unlike punchlist items, they had not been previously identified. When the items were brought to the attention of the licensee, you often indicated that there were followup programs in place to find such discrepancies. This late in the program, we are concerned about your heavy reliance on room and system turnover programs to detect and correct plant deficiencies. Scheduling pressures could affect the quality of work if detection and correction of deficiencies are deferred to the end of construction.

The team was concerned with the number of examples of failure to verify or check the adequacy of the design (see Deficiency 50-445/91-202-01 and 50-446/91-201-01). Although none of the examples found by the team were individually safety significant, when viewed collectively they may be indicative of a more pervasive weakness. We therefore request that you review this matter and advise us as to what, if any, additional corrective actions are planned.

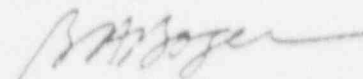
The team also noted several strengths, including the utility's prompt response to new generic issues and the positive results of the "Team Plus" program. The availability of detailed engineering guidelines for pipe stress and pipe support analysis and scaling calculations, the consistency of operating procedures with design-basis assumptions, and the effective integration of the site contractor organization were all considered strengths.

The Executive Summary provides an overview of the inspection and the inspection report and the appendices provide a more detailed explanation of the inspection effort and related findings.

You are requested to respond to this office within 60 days to inform us of the action taken related to deficiency 50-445/91-202-01, 50-446/91-201-01 and both unresolved items identified in the enclosed inspection report. The NRC Region IV office will issue any enforcement action that may result from this inspection.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosures will be placed in the NRC Public Document Room. Should you have any questions concerning this inspection, please contact me or Mr. J. D. Wilcox, Jr. (301-504-2965) of this office.

Sincerely,



Bruce A. Buger, Director
Division of Reactor Projects,
III/IV/V
Office of Nuclear Reactor Regulation

Enclosure: Inspection Report 50-445/91-202;
50-446/91-201

cc w/enc1.1 - See next page

Mr. W. J. Cahill, Jr.
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Comanche Peak, Unit 1 and 2

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Mr. W. J. Cahill, Jr.

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