



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

September 1, 1995

TU Electric
ATTN: C. L. Terry, Group Vice President
Nuclear Production
Energy Plaza
1601 Bryan Street, 12th Floor
Dallas, Texas 75201-3411

SUBJECT: NRC INSPECTION REPORT 50-445/95-13; 50-446/95-13 AND NOTICE OF VIOLATION

This refers to the special inspection conducted by Meses Linda J. Smith and Paula A. Goldberg of this office on June 12 through July 20, 1995. The inspection included a review of activities authorized for your Comanche Peak Steam Electric Station, Units 1 and 2, facility. At the conclusion of the inspection, the findings were discussed with you and those members of your staff identified in the enclosed report. Additional clarifying discussions were held with members of your staff.

This inspection was initiated to review circumstances surrounding the June 11, 1995, failure of your Unit 1 turbine-driven auxiliary feedwater pump to operate on demand. The scope of the inspection was subsequently expanded to include the June 21, 1995, mechanical overspeed trip of your Unit 2 turbine-driven auxiliary feedwater pump during testing. The inspection also reviewed related operation, maintenance, design, testing, and experience review practices. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

One unresolved item was identified concerning the control of condensate in the auxiliary feedwater pump turbine, the steam supply lines, and the steam exhaust lines. The Unit 2 mechanical overspeed trip highlights the importance of ensuring appropriate condensate control for all design base configurations. We understand that you plan to do a detailed review of the control of condensate and its impact on the operability of the turbine-driven auxiliary feedwater pump. We also understand that your formal root-cause analysis of the two events was not completed during the inspection period. Given the safety and risk significance of the turbine-driven auxiliary feedwater pump, a management meeting to discuss this unresolved item and the results of your formal root cause analysis has been scheduled for September 15, 1995, at 9 a.m. in our Arlington, Texas, office.

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Based on the results of this inspection, the NRC has determined that one violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is of concern because: (1) in two cases your operating staff did not appropriately use procedures to control safety-related activities as required by Technical Specification 6.8.1, and (2) the administrative procedure for performing work orders did not distinguish regulatory requirements and commitments from management expectations as required by your upper-tier administrative procedures.

We understand, as discussed in the report exit meeting paragraph, that your staff does not agree that Example 3 in the enclosed Notice is a violation of NRC requirements. Notwithstanding that disagreement, we have issued the violation to underscore the importance of carefully communicating requirements and commitments to site personnel. The procedure, as written, gave the impression that NRC requirements and other licensee commitments were management expectations which could be deviated from with supervisory concurrence. Management emphasis is needed to ensure that requirements are carefully communicated and to instill expectations that plant procedures are to be rigorously adhered to during all phases of operation.

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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

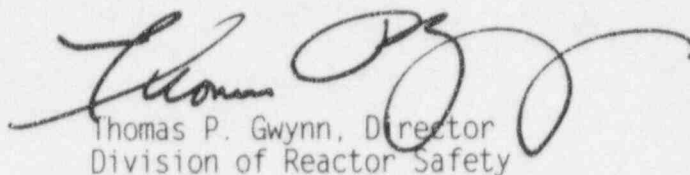
The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

TU Electric

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

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Safety

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
50-445/95-13; 50-446/95-13
w/attachment

cc w/enclosures:

TU Electric
ATTN: Roger D. Walker, Manager of
Regulatory Affairs for Nuclear
Engineering Organization
Energy Plaza
1601 Bryan Street, 12th Floor
Dallas, Texas 75201-3411

Juanita Ellis
President - CASE
1426 South Polk Street
Dallas, Texas 75224

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

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

Jorden, Schulte, and Burchette
ATTN: William A. Burchette, Esq.
Counsel for Tex-La Electric
Cooperative of Texas
1025 Thomas Jefferson St., N.W.
Washington, D.C. 20007

Newman & Holtzinger, P.C.
ATTN: Jack R. Newman, Esq.
1615 L. Street, N.W.
Suite 1000
Washington, D.C. 20036

Texas Department of Licensing & Regulation
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

Office of the Governor
ATTN: Susan Rieff, Director
Environmental Policy
P.O. Box 12428
Austin, Texas 78711

E-Mail report to D. Sullivan (DJS)
E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan
Branch Chief (DRP/B)
MIS System
RIV File
Branch Chief (DRP/TSS)

Resident Inspector (2)
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
DRSS-FIPB
Project Engineer (DRP/B)

DOCUMENT NAME: R:/_CPSES/CP513RP.LJS

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

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