

ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station

Dockets: 50-445
50-446

Licenses: NPF-87
NPF-89

During an NRC inspection conducted on June 12 through July 20, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33 recommends written administrative procedures for procedure adherence and for operation of the safety-related auxiliary feedwater system. Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures appropriate to the circumstances.

Regulatory Guide 1.33 endorses American National Standard N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." Standard N18.7, Section 2.1, states that the definitions are applicable to this Standard, and defines for "shall" and "should" that the word "shall" is used to denote a requirement and the word "should" is used to denote a recommendation. Section 5.2.2, requires that procedures shall be followed and the requirements for use of procedures shall be prescribed in writing.

Administrative Procedure STA-202, "Administrative Control of CPSES Nuclear Production Procedures," Revision 24, Section 4.1.4.6 of Attachment 8.B, requires that "shall" is used for absolute requirements and that "should" is used to indicate firm Comanche Peak Steam Electric Station management expectations where deviation would be a departure from the norm and would require supervisor concurrence.

Contrary to the above,

- (1) On June 14, 1995, written procedures established for the operation and maintenance of the safety-related auxiliary feedwater system, Work Order 1-95-088724, were not followed in that the operator opened Valves IMS-0711 and -0712 sooner than specified. As a result, steam was admitted to the Unit 1 safety-related auxiliary feedwater turbine before prerequisite maintenance checks and valve alignments were complete.

- (2) On June 21, 1995, written procedures appropriate to the circumstances for the operation and maintenance of the safety-related auxiliary feedwater system were not established and implemented. The operator used portions of System Operating Procedure SOP-304B, "Auxiliary Feedwater System," Revision 2, and Operations Test Procedure OPT-206B, Revision 5, to operate the auxiliary feedwater system, and the procedure steps were not consistent. The operator did not perform Step 5.1.2.B of Procedure SOP-304B to lower the auxiliary feedwater pump turbine speed control to 0 percent output. This resulted in operation of the turbine at a higher steam flow rate than expected.
- 3) As of July 20, 1995, Station Administrative Procedure STA-606, "Work Requests and Work Orders," Revision 22, prescribing the use of maintenance procedures, did not establish the requirement that procedures be followed. Section 6.6.4 stated that the responsible work organization "should" perform work in accordance with the instructions instead of "shall" perform work in accordance with the instruction.

This is a Severity Level IV violation (Supplement I) (445/9513-01; 446/9513-01).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the Comanche Peak Steam Electric Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it 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.

Dated at Arlington, Texas
this 1st day of September 1995