

TEXAS UTILITIES GENERATING COMPANY
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MICHAEL D. SPENCE
PRESIDENT

October 8, 1984

Mr. Darrell G. Eisenhut, Director
Division of Licensing, NRR
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Comanche Peak Steam Electric Station, Units 1 and 2
NRC Dockets: 50-445 and 50-446

Program Plan and Issue-Specific Action Plans in Response
to the Request for Additional Information by the NRC Staff
Technical Review Team

REFERENCE: September 18, 1984, letter (Mr. Eisenhut to Mr. Spence)

Dear Mr. Eisenhut:

Texas Utilities Electric Company (TUEC) has received and reviewed your letter of September 18, 1984, which forwards a request for additional information concerning matters under review by the NRC staff Technical Review Team (TRT). Our understanding and review of these issues has been enhanced both by the information provided at the meeting in Bethesda on September 18, 1984, and by additional clarification provided by the TRT to members of my staff.

Subsequent to the September 18, 1984, meeting, I established the Comanche Peak Response Team (CPRT) which is responsible for developing and implementing our Program Plan to assess and resolve, in a detailed and thorough manner, the issues identified by the TRT.

As an integral part of the CPRT, I established a Senior Review Team (SRT), reporting directly to me, which is responsible for reviewing and approving the Program Plan, the Issue-Specific Action Plans, the Action Plan Results Reports and the Collective Significance Evaluation Report. The SRT is also responsible for providing advice and counsel to the CPRT Program Manager and for monitoring the adequacy of the implementation of the Issue-Specific Action Plans.

The CPRT Program Manager is responsible for the development and implementation of the Program Plan and the Issue-Specific Action Plans, for the development of the Action Plan Results Reports, for the performance of the Collective

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Significance Evaluation, for the implementation of corrective actions for identified deficiencies, and for the identification and implementation of actions to preclude recurrence of similar deficiencies. Review Team Leaders and Issue Coordinators have been assigned to assist the Program Manager.

The personnel assignments to the CPRT program reflect the importance that TUEC places on its successful conduct and completion.

The CPRT has developed a Program Plan that provides the framework and overall direction for the development and implementation of activities to respond to the TRT's request for additional information and to disposition the associated issues. The CPRT has also developed individual Action Plans for each of the specific issues identified to TUEC by the TRT to date. The Program Plan and the Issue-Specific Action Plans have been reviewed and approved by the CPRT Senior Review Team.

A copy of the CPRT Program Plan, which includes the Issue-Specific Action Plans as an Appendix, is enclosed for NRC Staff review and comment. We are proceeding with the implementation of the Action Plans, but will revise them appropriately and expeditiously to consider NRC staff comments.

As evidenced by the Program Plan and the Issue-Specific Action Plans, we are committed to performing a detailed and thorough assessment of the issues identified by the TRT. Although the enclosure sets forth the details of our program and plans, we wish to highlight the following specific items:

A. SCOPE

The Program Plan has been developed to parallel the Review Team approach used by the TRT. Accordingly, the Program Plan will also be followed in the development of responses to requests for additional information in the areas of mechanical, QA/QC, and protective coatings. Issue-Specific Action Plans will be prepared for additional TRT questions when they are provided to us.

B. EXPANDED REVIEWS

TUEC recognizes that the NRC used sampling techniques in the performance of the TRT review. Therefore, where appropriate, we have expanded the scope of our review to ensure that the issues identified by the TRT are fully explored.

C. ROOT CAUSE AND GENERIC IMPLICATIONS

To the maximum extent practicable, potential generic implications are considered in the initial development of the Issue-Specific Action Plans. You should note that in the Action Plans for several of the TRT issues, we have already identified potential generic implications and actions to address them. As we proceed with the implementation of the Action Plans

and the identification of the root cause of identified deficiencies, we will continue to evaluate the potential for generic implications. The SRT is responsible for reviewing and approving the root cause determinations, the evaluation of the potential for generic implications and the actions to address generic implications. Such activities and determinations will be made for each issue as soon as possible.

D. COLLECTIVE SIGNIFICANCE

A collective significance evaluation will be performed to determine whether the existence of multiple, apparently isolated or minor deficiencies indicates the existence of a common shortcoming in the programs and procedures applicable to the CPSES project. The collective significance evaluation will focus on the integrated impact of the identified deficiencies on the CPSES project. We will place particular emphasis on the identification of "lessons learned" as they apply to CPSES Units 1 and 2.

E. CORRECTIVE ACTION

Appropriate corrective actions will be defined and implemented for all identified deficiencies, including those resulting from the review of generic implications.

F. PREVENTING FUTURE OCCURRENCES

The Program Plan requires identification of actions to prevent future occurrences for each identified deficiency, including those resulting from the review of generic implications. Furthermore, the collective significance review will identify actions to prevent future occurrences that could result from a failure to consider the programmatic "lessons learned" from this effort.

G. PERSONNEL QUALIFICATIONS

The Program Plan identifies the criteria used for selecting personnel for developing and implementing the Issue-Specific Action Plans. These requirements are in addition to our existing project requirements with which the assigned personnel also comply. To the extent practicable, the personnel assigned to detailed review and inspections tasks are different from those who performed or reviewed the original work.

H. REPORTING AND RECORDS

We will prepare individual Action Plan Results for each issue. These will be integrated into the CPRT Final Program Results Report. Interim program reports may also be prepared, as appropriate. Records will be maintained in auditable form sufficient to enable the NRC Staff to evaluate the implementation and results of the program.

I. SCHEDULE

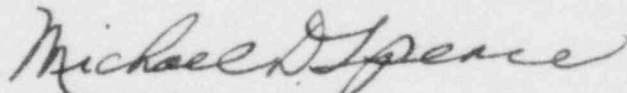
Each Issue-Specific Action Plan addresses the current implementation status and, where possible, the projected schedule for completion of the plan. In several cases, certain aspects (or phases) of the Action Plan implementation must be completed before the final scope of review and the associated implementation schedule can be determined. As additional information becomes available regarding projected completion schedules for individual Action Plans, it will be provided to the NRC staff.

Texas Utilities Electric Company is committed to a thorough and complete review of the issues identified by the TRT. A satisfactory resolution of these issues which potentially affect the safe operation of the Comanche Peak units takes precedence over schedule concerns.

We will be in a position to provide you a projected schedule for the completion of the entire CPRT program after we receive additional questions from the TRT and have developed suitable action plans for them. At that time we also intend to perform an evaluation to confirm that a safety basis exists to support authorization for fuel loading and precritical testing at Comanche Peak Unit 1 prior to the completion of the entire CPRT Program. TUEC will inform the NRC Staff of the results of this evaluation.

As indicated above, we are proceeding with the implementation of the Issue-Specific Action Plans for the TRT issues identified to us to date. We welcome your comments on the enclosed Program Plan and the associated Issue-Specific Action Plans and look forward to receiving the results of the TRT review of the remaining three areas as soon as possible.

Sincerely,


Michael D. Spence

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Enclosure