

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric
Station, Unit 1

Docket: 50-445/84-22
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of May 19, 1984, through July 21, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

A. Failure to Maintain a Positive Pressure on Electrical Penetrations

10 CFR Part 50, Appendix B, Criterion V requires that, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Alarm Procedure X-ALB-13B has been established in accordance with Criterion V and requires specific actions to be taken when the Unit 1 electrical penetration low nitrogen pressure alarm is received.

Contrary to the above, on June 19, 1984, the NRC inspector observed that Alarm 2.6 (which monitors Unit 1 electrical penetration nitrogen pressure) was in an alarm condition and determined that the actions required by Alarm Procedure X-ALB-13B had not been performed.

This is a Severity Level V Violation. (Supplement II) (445/8422-01)

B. Failure to Notify the NRC as Required by 10 CFR Part 50.55(e)

10 CFR Part 50.55(e)(1) requires that, "The construction holder of the permit shall notify the Commission of each deficiency found in design and construction, which, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents:

"A significant deficiency in construction of or significant damage to a structure, system, or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function."

10 CFR Part 50.55(e)(2) requires that, "The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Regional Office of each reportable deficiency."

Contrary to the above, between February and May of 1983 the licensee identified a common failure of three out of four of the Unit 1 safety-related inverters that necessitated a modification to the ferroresonant output transformer in each of the inverters, but the failures were not reported to the NRC until February of 1984.

This is a Severity Level IV Violation. (Supplement II) (445/8422-02)

C. Failure to Obtain Work Authorization to Break Brand Industrial Services, Inc., (BISCO) Seals and Reflect Actual "As-Built" Configuration on Drawing SG-873-108T-1

10 CFR Part 50, Appendix B, Criterion V requires that, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Texas Utilities Generating Company (TUGCO) Quality Assurance (QA) Plan, Section 5.0, Revision 2, dated May 21, 1981, requires that construction activities be performed in accordance with documented and prescribed instructions, procedures, and/or drawings.

Contrary to the above, on July 14, 1984, the NRC inspector visually inspected and determined that fire rated penetration seals had initially been properly installed by BISCO, but had subsequently been removed by unknown construction personnel who did not process a penetration seal removal request (PSRR) as required by Brown & Root, Inc. (B&R) Procedure CP-CPM-6.10, Revision 11, dated, February 16, 1984. Specifically, Internal Work Release 0217RA and "As-Built" Drawing SG-873-108T-1 show authorized rework and actual configuration on the referenced drawing; however, Seal Trace 5003 had subsequently been broken and damaged when additional cable was run through this seal. No PSRR was processed and the "as-built" drawing showed the seal as completed.

This is a Severity Level IV Violation. (Supplement II) (445/8422-03)

D. Failure to Document the "As-Built" Configuration

10 CFR Part 50, Appendix B, Criterion X requires that the inspection program of activities affecting quality shall be established and conducted in a manner to verify conformance with the documented instructions, procedures, and drawings.

TUGCO QA Plan, Section 10.0 requires that inspections verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Procedure QI-QAP 11.1-28, Revision 25, paragraph 3.3.1.1, dated June 11, 1984, delineates and requires that Class 1, 2, and 3 component supports be installed and inspected to assure that base plates are installed within $\pm 1/4$ ".

Contrary to the above, on July 14, 1984, the NRC inspector visually inspected and measured Seismic Mechanical Shock Suppressor SI-1-071-002-S32K which is a part of the safety injection system. Specifically, nine dimensions on the support plate were found to be $1/2$ " to $1-5/16$ " out-of-tolerance.

This is a Severity Level IV Violation. (Supplement II) (445/8422-05)

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Electric Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: October 11, 1984