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**C. Lance Terry**  
Group Vice President

November 10, 1995

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
NRC INSPECTION REPORT NOS. 50-445/95-11; 50-446/95-11.

Gentlemen:

TU Electric has reviewed the NRC letter dated July 26, 1995. The subject letter provides the results of the routine resident inspection report conducted by Mr. A. T. Gody, Jr., and other inspectors from May 07 through July 17, 1995 at the Comanche Peak Steam Electric Station, Units 1 and 2. The cover letter of the Inspection Report identified a NRC concern which stated: "We are concerned regarding the number of equipment failures, some of which were significant and represent deficiencies in plant material condition, that occurred during this inspection period. These equipment failures are particularly disturbing because they showed evidence of existence of poorly managed troubleshooting activities and ineffective root cause evaluations in more than one case. We urge you to evaluate your performance in these areas and to effect the needed improvements."

TU Electric has taken these concerns seriously. In response to the concerns raised by the subject inspection, TU Electric has performed an evaluation of the site response to equipment failures in general which included the events noted in the inspection report. The aforementioned evaluation concluded that the personnel responsible for the Containment Spray pump 1-04 bearing and the inverter IV1C2 troubleshooting activities performed their investigations of the respective equipment performance problems in accordance with the applicable program requirements. It should be noted that the evaluation did recommend that some improvements in the troubleshooting process should be implemented.

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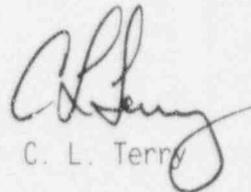
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Although the examples noted in the inspection report represent a departure from TU Electric management's expectations, TU Electric does not believe that they represent poorly managed troubleshooting activities or ineffective root cause evaluations. The recent NRC inspection of TU Electric's Self-Assessment and Corrective Action Program (IR-445/446-95-18), as stated in the exit meeting on September 7, 1995 found the program sound with broad reviews conducted by knowledgeable personnel.

Notwithstanding, TU Electric has taken these issues and other anomalies which potentially relate to less than adequate management expectations seriously, and is continuing to evaluate possible improvements. The details of the root cause analysis, the corrective and preventive actions and the NOD evaluation are available at the site for your review. Please do not hesitate to contact me, or Douglas Snow at (817) 897-8448 to coordinate any additional information you may need to facilitate closure of these issues.

Sincerely,



C. L. Terry

DWS/dws  
Attachment

cc: Mr. L. J. Callan, Region IV  
Mr. W. D. Johnson, Region IV  
Resident Inspectors, CPSES