



TU ELECTRIC

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March 16, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
NRC INSPECTION REPORT NO. 50-446/92-03
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated February 14, 1992, concerning the Unit 2 inspection conducted by the NRC staff during the period of January 8 through February 1, 1992. This inspection covered activities authorized by NRC Construction Permit No. CPPR-127 for CPSES Unit 2.

Attached to the February 14, 1992 letter was a Notice of Violation. TU Electric's reply to the Notice of Violation is provided in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

LPW/ds
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. H. B. Fields, NRR

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NOTICE OF VIOLATION
(50-446/9203-01)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0 of the TU Electric Quality Assurance Manual, states, in part, "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."

Brown & Root ASME Construction Procedure ACP-14.2, "Handling, Storage and Preservation of Code Materials," Attachment 7.1, states, in part, that Code valves (Level "C" items) shall be stored indoors or the equivalent, with all provisions of Level B requirements, except that heat and temperature control is not required.

Contrary to the above, on January 15, 1992, the inspector observed that the pressurizer spray valves, 2-PCV-455B and 2-PCV-455C, were inadequately stored outside.

RESPONSE TO NOTICE OF VIOLATION
(50-446/9203-01)

TU Electric accepts the violation and the requested information follows:

1. Reason for Violation

During an extensive area cleanup in December 1991, valves 2-PCV-445B and 2-PCV-455C (Pressurizer Spray Valves) were removed from room 160, placed outside on a transport vehicle, protected with a plastic tarpaulin and labeled as "Q" material. The valves remained on the transport vehicle for approximately 4 weeks due to inattention of the personnel involved. During this time "Non-Q" material was also loaded onto the transport vehicle and eventually the "Q" labeling for the Pressurizer Spray Valves was covered over.

The intent of the clean-up effort was to upgrade housekeeping and material storage. However, the responsible supervision and management did not provide adequate instructions concerning how to conduct the clean-up effort. Consequently, the properly stored valves were relocated to an improper area.

2. Corrective Steps Taken and Results Achieved

The valves were relocated to room 160 and placed in correct storage. A TUE form was initiated to inspect, evaluate and assure proper traceability of parts for the valves and actuators. The disposition of the TUE form required replacement of missing or non-traceable parts, rework or replacement of damaged parts, reassembly of the valves and a test to verify functionality of the actuators. The corrective steps will be implemented prior to the completion of Hot Functional Testing.

3. Corrective Steps Taken to Avoid Further Violations

Project Management continues to emphasize material storage and housekeeping activities and will continue frequent plant walkdowns. Since the restart of Unit 2 construction activities, the material storage and housekeeping program has been and will continue to be assessed by the Project Team.

Corrective/Preventative actions resulting from a TUE form issued in December, 1991 to address material storage and housekeeping violations identified by a QA audit include:

- Inductration of responsible Construction personnel concerning material storage and housekeeping concerns via training bulletins.
- The Construction Manager address material storage and housekeeping issues in his staff meetings to maintain awareness and sensitivity.
- Periodic walkdowns of Unit 2 to assess and correct material storage and housekeeping discrepancies.

Two QA surveillances were performed on housekeeping and protection of permanent plant equipment during January 1992. No deficiencies or observations were identified.

In addition, responsible craft supervision has been informed of the deficiency and this Notice of Violation, and were counseled concerning housekeeping and material storage requirements.

4. Date When Full Compliance Will Be Achieved

TU Electric is in full compliance.