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Ref. # 10CFR2.201

William J. Cahill, Jr.
Group Vice President

March 9, 1992

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
NRC INSPECTION REPORT NO. 50-445/91-67; 50-446/91-67
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated February 10, 1992, concerning the inspection conducted by the NRC staff during the period December 9-13, 1991, and January 6-9, 1992. This inspection covered activities authorized by Construction Permit No. CPPR-127. Attached to the February 10, 1992, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation (446/9167-01) in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.
William J. Cahill, Jr.

By: Roger D. Walker
Roger D. Walker
Manager of
Nuclear Licensing

JG/ds
Attachment

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

92-0354

NOTICE OF VIOLATION
(446/9167-01)

During an NRC inspection conducted on December 9-13, 1991, and January 6-9, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be accomplished in accordance with procedures appropriate to the circumstance.

Contrary to the above, eight Unit 2 preoperational test procedures were found to contain numerous format and content errors and were determined to be inadequate and not appropriate to the circumstance for which they were written.

RESPONSE TO NOTICE OF VIOLATION
(446/9167-01)

TU Electric accepts the violation and the requested information follows:

1. Reason for Violation

   Startup management performed a review of numerous approved preoperational test procedures including those identified in NRC Inspection Report No. 50-445/91-67; 50-446/91-67. An evaluation of the errors in format and content led to the following conclusions regarding the reasons for the conditions noted in the Notice of Violation:

   - The Startup Administrative Procedures used to develop, review and approve Preoperational Test Procedures contained insufficient detail.

   - Test Procedure reviewers concentrated on aspects of the procedure pertinent to their scope of responsibility (i.e., design, operation, testability, etc.), but no one assured that all aspects of the procedure were adequate.

   - The Joint Test Group did not consistently assure that comment incorporation was thorough and accurate.

2. Corrective Steps Taken and Results Achieved

- The Manager of Startup placed an administrative hold on all approved Preoperational Test Procedures.

- A review of the two completed Preoperational Tests was performed. The test results were found to be satisfactory.

- Startup personnel involved in test procedure development, review and approval have been counseled regarding the importance of attention to detail in procedure format and content.

- The Manager of Startup has personally counseled members of Joint Test Group regarding the scope of their responsibility, particularly in regard to technical accuracy.

3. Corrective Steps Taken to Preclude Recurrence

Startup Management has initiated a comprehensive corrective action program which includes:

- Issuing a Preoperational Test Procedure Writers and Reviewers Guide. This guide is designed to provide sufficient detail to assure clear and consistent format so as to minimize the potential for errors similar to those identified in the Notice of Violation.

- A review of all Preoperational Test Procedures to assure format conforms to the writer and reviewers guide and to assure technical adequacy.

- A comparison of Unit 2 to Unit 1 Preoperational Test Procedures for technical content.

- A review and revision of Startup Administrative Procedures to clarify the process for development, review and approval of Preoperational Test Procedures.

- The formation of a Test Procedure Review Group within Startup comprised of Senior Startup Engineers with extensive experience developing and implementing preoperational tests. Review by members of this group is designed to assure procedures are technically adequate, consistent in format and flow well for ease of performance.

- Increased Quality Assurance involvement to include a technical surveillance of selected Preoperational Test Procedures.

- A field walkdown of select Preoperational Test Procedures which are complex to assure testability.

4 Date of Full Compliance

The process for development, review and approval of Preoperational Test Procedures is presently in full compliance with this corrective action program. All Unit 2 Preoperational Test Procedures issued for implementation since the December NRC Inspection have been developed and/or will be reviewed and approved in accordance with this corrective action program prior to peformance of the test.

FEB 10 1992

Docket Nos. 50-445
50-446
License No. NPF-87
Construction Permit No. CPPR-127

TU Electric
ATTN: W. J. Cahill, Jr., Executive
Vice President, Nuclear
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-445/91-67; 50-446/91-67 (NOTICE OF VIOLATION)

This refers to the inspection conducted by Messrs. D. L. Kelley, R. B. Vickrey and R. M. Latta of this office on December 9-13, 1991, and January 6-9, 1992. The inspection included a review of activities authorized for your Comanche Peak Steam Electric Station facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

The areas examined during the inspection are identified in the report and included the review of Unit 2 preoperational test procedures and the review of the quality assurance audit of Unit 2 startup activities.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because it indicates an inadequate review of preoperational test procedures for Unit 2.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR Part 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

RIV:TPS*	RI:PSS*	RI:CP**	C:TPS	D:DRS	D:DRP
DLKelley/lb	RBVickrey	RLatta	JEGagliardo	SJCollins	ABBeach
/ /92	/ /92	/ /92	2/3 /92	2/4 /92	2/10 /92

* previously concurred
**concurred via telecon