

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station

Docket: 50-445
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of May 1-31, 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 Follow Procedures

Criterion V of appendix B to 10 CFR 50 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..."

1. Contrary to the above, during performance of the "A" Train emergency diesel generator auxiliary systems retest, ICP-PT-29-01, RT-1, it was noted that the test was being performed without all the prerequisites being signed off. This is a violation of CP-SAP-21, "Conduct of Testing."
2. Contrary to the above, it was noticed that "Hold Tags" were improperly removed from the "A" Train diesel engine, and the diesel had been run without closing several nonconformance reports, or affixing "conditional release" tags to the diesel, which is in violation of STA-405, R5, "Control of Nonconforming Materials."
3. Contrary to the above, an inspection report relating to implementation of the "A" Train emergency diesel generator Owners' Group inspection of the turbochargers (I.P.-33) contained notations that the dimensions specified could not be taken because "the needed equipment was not available." The letters "N/A" were put on the inspection report instead of revising the applicable inspection plan and the inspection report criteria. This is a violation of QPM-004, "Inspection Report."

This is a Severity Level IV Violation. (Supplement II-D) (445/8418-01)

B. Failure to Provide Adequate Test Prerequisites

Criterion XI of Appendix B to 10 CFR 50 states, in part, ". . . the test program shall include, as appropriate, proof tests prior to installation, preoperational tests, and operational tests during nuclear power plant or fuel reprocessing plant operation of structures, systems, and components. Test procedures shall include provisions for assuring that all prerequisites for the given test have been met"

Contrary to the above, during the performance of the safety injection pump performance retest, ICP-PT-57-01, RT-2, it was observed that one of the prerequisites specified a requirement for the system to be lined up in accordance with SOP-201A, which is the safety injection system operating procedure. This line up will not support the test. Therefore, the prerequisites were not adequate for performance of the test, because a special lineup (not specified) was necessary to support the test.

This is a Severity Level V Violation. (Supplement II-E) (445/8418-02)

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: July 26, 1984