

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

APR 3 1992

TU Electric
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Nuclear Engineering and Operations
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400 North Olive Street, L.B. 81
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Gentlemen:

SUBJECT: INITIAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT

This forwards the initial SALP Report (50-445/92-99; 50-446/92-99) for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The SALP Board met on March 4-5, 1992, to evaluate CPSES performance for the period February 3, 1991, through February 1, 1992. The SALP board evaluated Unit 1 performance based on the normal operational SALP functional areas. The board's evaluation of Unit 2 performance was based on the construction SALP functional areas appropriately modified to reflect the unique status of Unit 2. The performance analyses and resulting evaluations are documented in the enclosed initial SALP report.

In accordance with NRC policy, I have reviewed the SALP Board's assessment and concur with their ratings as discussed below:

Unit 1

- Performance in the functional area of Plant Operations was rated Category 2, which represents a decline from the previous rating of Category 2 with an improving trend. Excellent operational programs have been implemented and strong management support was evident. Operators demonstrated excellent ability to respond to transients. However, the performance rating declined primarily due to a number of errors in system configuration control and personnel errors resulting in reactor trips, engineered safety feature actuations, and other plant transients. We acknowledge that you have initiated corrective actions in this area and strongly encourage that you carry this effort through to ensure effectiveness of the actions and adequate root cause determination.
- Performance in the functional area of Radiological Controls was rated Category 1, compared to a previous rating of 2. The increased performance rating was attributed primarily to the excellent performance of the radiation protection department during two outages in this assessment.

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| DD:DRS DDChamberlain 4/3/92 | DD:DRS JPJaudon 4/3/92 | DD:DRP TPGwynn 4/5/92 | D:DRP ABBeach 4/5/92 | DRP JMMontgomery 4/3/92 | DRP RDMartin 4/3/92 | |

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period as well as routine operations. Strong management involvement continued to be evident, and the staffing and training of the department was considered a strength.

- ° Performance in the functional area of Maintenance/Surveillance was rated Category 2. The maintenance area was considered good with excellent programs, involved management, and knowledgeable craftsmen, although there were several instances of inattention to detail during maintenance activities. Improved maintenance in the balance-of-plant was noteworthy, and technical support of maintenance activities was excellent. The surveillance area was noted for having a strong program and staff, but the previous SALP board concerns regarding missed surveillances and errors during the conduct of surveillance tests had not been effectively addressed and corrected.
- ° Performance in the functional area of Emergency Preparedness was rated Category 1. The emergency preparedness program and its implementation continued to improve this assessment period with no weaknesses identified by NRC during the annual emergency exercise. Excellent management support and a proactive approach to the resolution of issues was evident.
- ° Performance in the functional area of Security was rated Category 1. The security program continued in the excellent manner described in the previous SALP Report. Security systems were viewed as state-of-the art, and the security force was considered professional and dedicated. The Regulatory Effectiveness Review noted several strengths in the program and confirmed that safeguards measures did not adversely affect the safe operation of the plant.
- ° Performance in the functional area of Engineering/Technical Support was rated Category 1, an increase from the previous rating of Category 2. Strong management commitment to training and the improved success rate on initial operator license examinations was noted this assessment period. An excellent system engineering group was identified as a strength. Well managed, comprehensive programs for motor-operated valves, preventing loss of decay heat removal, and fire protection and prevention also contributed to the improved rating in this area.
- ° Performance in the functional area of Safety Assessment/Quality Verification was rated Category 1, an increase from the previous rating of Category 2, with an improving trend. This rating was based on strong management involvement in the quality assurance and self-assessment functions. The corrective action program utilizing the Operations Notification and Evaluation form was identified as a strength, although in some cases, corrective actions needed to be more effectively implemented. The programs for incorporating industry experience and performing risk assessments of outage activities were considered noteworthy. Licensing submittals continued to require additional detail in the safety analysis, as was also noted as a concern in the previous SALP report.

Unit 2

- ° Performance in the functional area of Construction Activities was rated Category 1. Management oversight has been excellent since construction activities were reinitiated in January 1991. Excellent coordination between construction, engineering, startup, and quality organizations resulted in consistently high quality performance. A multidisciplinary Configuration Management Inspection determined that design and construction activities were being accomplished in accordance with design requirements. The construction training program was considered superior. The quarterly construction status meetings held with the NRC have been beneficial, and it is recommended that they continue.
- ° Performance in the functional area of Engineering/Technical Support was rated Category 1. The engineering and technical support organizations were viewed as a strength, and an aggressive approach to problem solving was noted. The strong program identified on Unit 1 for motor-operated valves was evident on Unit 2 as well. The program for design basis documentation was considered thorough and extensive. Your ability to integrate multiple architect/engineering firms into a unified work group with good coordination and communication is to be commended.
- ° Performance in the functional area of Safety Assessment/Quality Verification was rated Category 1. An excellent program exists for the identification, documentation, and correction of nonconforming or deficient conditions. Excellent preparation went into completed FSAR change packages. The program for handling external information was viewed as a strength. Your Integrated Design Assessment and Construction Assessment Team efforts were further indications of superior management oversight of construction.
- ° Performance in the functional area of Preoperational Testing was rated Category 2. The general implementation and execution of turnover and testing activities were good. However, notable weaknesses in the preparation and review of preoperational test procedures were identified and extensive corrective actions were necessary. Test activities were well controlled and personnel were found to be knowledgeable of test requirements and procedures. A close working relationship between construction and startup was seen as a positive factor in the successful implementation of the preoperational test program.

Overall, performance at Comanche Peak was excellent, with numerous strengths and some weaknesses in specific areas noted. Strong management oversight and involvement was a common thread through all functional areas. Strong programs to control activities were evident in all functional areas, but weaknesses in implementation at the working level were noted in the operations and surveillance areas and in the development of preoperational test procedures. Well qualified staffs were found in all areas, and the performance level of system engineers and maintenance craftsmen was considered high. Most areas of concern from the previous SALP report, such as initial operator licensing,

plant labeling, secondary plant condition, self-identification of problem areas, and root cause analyses were addressed and either fully corrected or much improved.

Areas requiring additional management attention include the root cause determination and correction of operator performance errors, the elimination of missed and improperly performed surveillance tests, the upgraded preoperational test preparation and review process, the implementation of corrective actions and the level of detail in licensing submittals.

On the basis of the SALP Board's assessment and the consideration of Unit 2 activities for 1992, the length of the SALP period will be approximately 12 months. Accordingly, the next SALP period will be from February 2, 1992, to February 6, 1993.

A management meeting has been scheduled with you and your staff at the CPSES training building auditorium on April 21, 1992, at 9 a.m. to review the results of the SALP Board. Within 20 days of this management meeting, you may provide comments on and amplification of, as appropriate, the initial SALP report.

Your written comments, a summary of our meeting, and the results of my consideration of your comments will be issued as an appendix to the enclosed initial SALP report and will constitute the final SALP report.

Sincerely,

Original signed by
John M. Montgomery

Robert D. Martin
Regional Administrator

Enclosure:
Appendix - Initial SALP Report
50-445/92-99; 50-446/92-99

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Commissioner Curtiss (MS: 16-G-15)

Commissioner Remick (MS: 16-G-15)

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II. SUMMARY OF RESULTS

A. Overview

During this assessment period, the licensee completed its first fuel cycle and refueling outage for Unit 1. Construction of Unit 2, which resumed in January 1991, was nearly completed during this assessment period. Several systems were turned over to the startup organization and preoperational testing on selected systems and components was initiated.

Unit 1

Licensee performance in plant operations during the first operational cycle and subsequent refueling was generally considered good despite several operational events. Strong management involvement in support of operations was evident. Direct observation of performance indicated the licensee was able to perform complex evolutions in a safe, coordinated, and controlled manner. Programs and procedures which support operations were considered strong. Performance was diminished by personnel errors, which led to reactor trips, engineered safety features actuations, safety-related equipment damage, plant transients and safety system misalignments. The radiological protection program was a noted strength, particularly the support and oversight provided during two outages as well as routine operations, which enabled the licensee to maintain personnel exposures below established goals. Performance in the area of maintenance was considered good but weaknesses were identified with respect to inattention to detail during maintenance activities. Strengths were identified with respect to maintenance training, craft knowledge, and welding activities. The surveillance test and calibration programs were found to be generally effective with strengths noted in their implementation, but the licensee continued to experience missed and improperly performed surveillances. The licensee's implementation of the emergency preparedness program was superior, and no weaknesses were identified by NRC during the most recent annual exercise. Similarly, the licensee's security program was considered exceptional. The program had excellent management support, equipment was state-of-the-art, and the security force was found to be well trained, professional, and dedicated. Engineering and Technical Support for operations was excellent, with particular strengths noted in the programs developed for system engineering, preventing loss of decay heat removal, maintenance of motor-operated valves, and fire protection and prevention. Safety Assessment and Quality Verification programs were notably strong with only isolated exceptions. Licensing submittals continued to require additional detail in the safety analysis as was also noted as a concern in the previous SALP report.

Unit 2

Licensee performance since the reinitiation of construction in January 1991 has been excellent, with extensive management and quality oversight observed. Construction activities were managed in a superior manner, and the coordination between the construction, engineering, startup, and quality organizations has been excellent. The initial training program to indoctrinate construction personnel was considered a strength. Control of

1. INTRODUCTION

The Systematic Assessment of Licensee Performance (SALP) is an integrated staff effort to collect available observations and data on a periodic basis and to evaluate licensee performance based upon this information. The program is supplemental to normal regulatory processes used to ensure compliance with NRC rules and regulations. It is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources and to provide meaningful feedback to licensee's management regarding the NRC's assessment of their facility's performance in each functional area.

An NRC SALP Board, composed of the staff members listed below, met March 4-5, 1992, to review the observations and data on performance and to assess licensee performance in accordance with Chapter NRC-0516, "Systematic Assessment of Licensee Performance."

This report is the NRC's assessment of the licensee's safety performance at Comanche Peak Steam Electric Station (CPSES) for the period February 3, 1991, through February 1, 1992.

The SALP Board for Comanche Peak Steam Electric Station was composed of:

Chairman

T. P. Gwynn, Deputy Director, Division of Reactor Projects (DRP), Region IV

Members

D. D. Chamberlain, Deputy Director, Division of Reactor Safety (DRS), Region IV

J. P. Jaudon, Deputy Director, Division of Radiation Safety and Safeguards (DRSS), Region IV

S. C. Black, Director, Project Directorate IV-2, Office of Nuclear Reactor Regulation (NRR)

W. L. Forney, Deputy Director, DRP, Region III

L. A. Yandell, Chief, Project Section B, DRP, Region IV

W. D. Johnson, Senior Resident Inspector, Unit 1, DRP, Region IV

D. N. Graves, Senior Resident Inspector, Unit 2, DRP, Region IV

T. A. Bergman, Acting Project Manager, Unit 1, NRR

M. B. Fields, Project Manager, Unit 2, NRR

The following Region IV personnel also participated in the SALP Board meeting:

J. M. Montgomery, Deputy Regional Administrator

T. Reis, Project Engineer, DRP

C. E. Johnson, Project Engineer, DRP

R. M. Latta, Resident Inspector, Unit 2, DRP

G. E. Werner, Resident Inspector (Trainee), Unit 1, DRP

B. Murray, Chief, Facilities Inspection Program Section, DRSS

J. E. Gagliardo, Chief, Test Programs Section, DRS

T. F. Stetka, Chief, Operational Programs Section, DRS

I. Barnes, Chief, Materials and Quality Programs Section, DRS

J. L. Pellet, Chief, Operator Licensing Section, DRS

C. J. Paulk, Reactor Inspector, DRS

A. B. Earnest, Physical Security Specialist, DRSS

L. T. Ricketson, Senior Radiation Specialist, DRSS

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