

APR 23 1992

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

TU Electric  
ATTN: W. J. Lahill, Jr., Group Vice President  
Nuclear Engineering and Operations  
Skyway Tower  
400 North Olive Street, Lock Box 81  
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-445/92-08; 50-446/92-08 (NOTICE OF VIOLATION)

This refers to the inspection conducted by Messrs. D. N. Graves, R. M. Latta, V. G. Gaddy, and C. J. Paulk during the period February 2 through March 21, 1992, of activities authorized for the Comanche Peak Steam Electric Station, Units 1 and 2. At the conclusion of the inspection, the findings were discussed with you and those members of your staff identified in the enclosed report.

Areas examined during the inspection included plant status, followup on corrective actions for violations, followup on licensee actions on construction deficiencies, routine plant tours, preoperational test program implementation verification, fuel receipt and storage, and corrective actions.

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). This first violation is of concern because plant valves were damaged as a result of unauthorized work practices. The second violation is of concern because of the inattention to detail and poor coordination between work groups. The second violation is particularly troubling since, under different circumstances, an adverse safety impact on personnel and/or Unit 1 operations may have resulted.

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.

Strengths identified during this inspection period included the implementation of the completions overview function in the quality assurance organization,

|                |           |             |           |             |           |
|----------------|-----------|-------------|-----------|-------------|-----------|
| *RIV:SRI:DRP/B | *RI:DRP/B | *RE:DRS/PSS | *PE:DRP/B | *C:DRS/PSS  | *C:DRP/B  |
| DNGraves:ww    | RMLatta   | CJPauk      | CEJohnson | TFWesterman | LAYandell |
| 4/ /92         | 4/ /92    | 4/ /92      | 4/21/92   | 4/ /92      | 4/ /92    |

|         |         |
|---------|---------|
| DD:DRP  | D:DRP   |
| TPGwynn | ABBeach |
| 4/ /92  | 4/23/92 |

\*previously concurred

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which is an indication of your commitment to quality. Additionally, the coordination and communication among the various departments (construction, engineering, quality control, startup, and operations) were excellent during the performance of various observed testing activities. The performance of the ASME quality control inspectors during the secondary and reactor coolant system hydrostatic tests was also excellent.

The inspectors noted that the limited time period between preoperational test issuance and commencement of testing activities allowed little time for NRC review of the approved procedures. You are encouraged to provide copies of the approved test procedures to NRC in sufficient time to allow for review of the test procedures prior to the commencement of testing. Also noted was the untimely completion of corrective action associated with a TU Evaluation form generated as a result of a previous noncited violation.

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

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

*Original Signed By:*

A. B. BEACH

A. Bill Beach, Director  
Division of Reactor Projects

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report  
50-445/92-08; 50-446/92-08

cc w/enclosures:

TU Electric  
ATTN: Roger D. Walker, Manager  
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TU Electric

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Texas Department of Labor & Standards  
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Boiler Division  
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Honorable Dale McPherson  
County Judge  
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~~bcc to DMB (IE01)~~

TU Electric

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bcc distrib. by RIV:  
R. D. Martin  
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Section Chief (DRP/B)  
DRSS-RPEPS  
MIS System  
RIV Files

Resident Inspector (2)  
DRS  
Project Engineer (DRP/B)  
Lisa Shea, RM/ALF  
RSTS Operator  
DRS

C. Pzulk  
T. Westerman

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