

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station, Units 1 and 2

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

During an NRC inspection conducted February 2 through March 21, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 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."

Maintenance Section of Mechanical Manual Procedure MSM-CO-8801, Revision 3, "Borg-Warner Check Valve Maintenance," Steps 8.2.1.10 and 8.3.1.22, specify the removal of the weld which retains the arm pin in the swing arm prior to removing the swing arm pivot pin.

Contrary to the above, the NRC inspectors determined through the review of Operations Notification Evaluation Form 92-227 and TU Evaluation Form 91-3054, that the arm pins on Valves 1AF-0075, 1AF-0078, 2FW-201, and 2F-202 and other Units 1 and 2 Borg-Warner swing check valves were improperly removed by shearing of the associated arm pins with dynamic force.

This is a Severity Level IV violation. (Supplement II) (445/9208-01; 446/9208-01)

- B. 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."

- (1) Station Administrative Procedure STA-606, "Work Requests and Work Orders," Revision 17, Section 5.5, states, in part, "QC is responsible for reviewing and approving Work Orders."

Station Administrative Procedure STA-606, "Work Requests and Work Orders," Revision 17, Step 6.6.3.9, states, in part, "Perform work in accordance with the instructions and in the sequence listed."

Station Administrative Procedure STA-607, "Housekeeping Control," Revision 12, Step 6.3.3.2, states, in part, "After the system is

opened, if the work group member(s) leaves the area, the pressure boundary opening shall be capped, plugged, or sealed." Attachment 8.A to STA-607 requires that personnel accountability logs be maintained during the activity.

Station Administration Procedure STA-731, "ASME Section XI Repair and Replacement Activities," Revision 3, Step 2.3, states, in part, "On a piping system prior to ASME III N-5 certification, the piping to component connection is under the jurisdiction of ASME Section III and cannot be completed under this section."

Procedure CPSES-P-2018, "Field Fabrication and Erection of Pipe Supports," Revision 0, Step 6.8.1.7, states, in part, "Lumber shall not be used except as shoring or wedges in sleeves." Step 6.8.5.4. state, in part, "Engineering approval is required prior to a modification to existing temporary supports."

Contrary to the above, on February 23, 1992, Valve 2HV-4515 was removed from its installed position utilizing a rigging configuration which was not in conformance with the work document. The pipe openings were not sealed following valve removal and personnel accountability logs were not maintained. The temporary supports originally installed utilized lumber and were removed without engineering approval. Contracted motor operated valve quality control personnel were utilized to witness the disassembly of the valve flange fasteners as opposed to the required ASME quality control personnel and construction personnel performed activities outside the scope of their work document.

- (2) Startup Work Authorization No. 82270 specified maintenance to be performed on Valve 2CS-7048A.

Contrary to the above, on March 17, 1992, construction personnel disassembled and reassembled a Unit 1 valve, 1CS-7048A, when the work document specified a Unit 2 valve, 2CS-7048A.

This is a Severity Level IV violation. (Supplement II) (445/9208-02, 446/9208-02)

Pursuant to the provisions of 10 CFR Part 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in the Notice, an order may be issued to

show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 23rd day of April 1992