

APPENDIX

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station

Docket: 50-445/84-21
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of June 14-16, 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:

1. 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"

Contrary to the above, on June 16, 1984, an operator proceeded to partially open Station Service Water Chlorination Valve XSW-042 in violation of Step 5.4.1.6 of System Operating Procedure SOP-501A (Rev. 0), "Station Service Water System," which requires XSW-036 to be opened. The operation was aborted and the valve restored to the shut position only after the NRC inspector pointed out the procedure violation. Subsequently, it was determined that the procedure was in error, thus was changed accordingly and the operation resumed by opening Valve XSW-042.

This is a Severity Level IV Violation. (Supplement II-D) (445/8421-01)

2. Criterion XI of Appendix B to 10 CFR 50 states in part, ". . . the test program shall include, as appropriate, proof test 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,"
 - a. Contrary to the above, during the performance of the Diesel Generator Control Circuit Functional and Start Test, ICP-PT-29-02 RT-1, the NRC inspector noted that there was no prerequisite in the test procedure to provide for station service air so that Step 7.1.6.7 can be performed to operate the barring device, which requires service air to function. This became apparent to the NRC inspector when he noticed the service air piping was not connected to the barring device. In lieu of service air, the STE utilized temporary air from a portable air compressor, which is not addressed by the procedure.

- b. Contrary to the above, the station service water flow balancing test procedure, ICP-PT-04-01, had no prerequisite requirement to ensure the flow gages used during Step 7.8 (Flow Adjustment) were properly filled and vented. Failure to fill and vent these detectors just prior to flow adjustment can cause erroneous flow gage indications. This can place the flow data in question. As a result, during conduct of Step 7.8 of the test, the service water flow gage for containment spray was pegged high with no flow. It was evident that the gage was malfunctioning due to air binding or other mechanical problem.

This is a Severity Level IV Violation. (Supplement: II-E) (445/8421-02)

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 18, 1984