

ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric  
Comanche Peak Steam Electric Station

Dockets: 50-445  
50-446

Licenses: NPF-87  
NPF-89

During an NRC inspection conducted on September 15, 1995, through January 23, 1996, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

Technical Specification 6.5.3.c states that proposed changes or modifications to plant nuclear safety-related structures, system, and components shall be reviewed as designated by the chief engineer.

Procedure ECE 5.01-03, "Design Change Notices and Related Process Documentation," dated March 16, 1992, which was approved by the chief engineer, instructs the responsible engineer to complete the design change notice using the instructions in Attachment 8.A. Attachment 8.A. states, "Enter the engineering basis for the technical acceptability of the design change."

Procedure ECE 5.01-03 also states, "A 10 CFR 50.59 review shall be performed prior to issuance of the DCN. This review shall be performed in accordance with STA-707."

Procedure STA-707, "10 CFR 50.59 Reviews," dated April 3, 1991, states, ". . . a qualified preparer shall perform and document an evaluation using Form STA-707-2. The purpose of the evaluation is to determine if the proposed activity involves an unreviewed safety question . . . The preparer shall complete a separate written response to each of the questions on Form STA-707-2. Each response shall include sufficient discussion to support the conclusion reached for each question."

Contrary to the above, Form STA-707-2 associated with Design Change Notice DCN 4082, dated May 7, 1992, did not include a sufficient discussion to support the conclusion reached from each question. Design Change Notice DCN 4082 involved a design change to eliminate a high condensate level alarm associated with the Unit 1 turbine-driven auxiliary feedwater pump high-pressure steam line. Specifically, the response to Question 3 on Form STA-707-2 was incorrect in that it inappropriately concluded that the drain function was not required during all operating modes. As a result, a condensate level alarm was not available to warn operators of steam trap degradations, which were determined to have contributed to a spurious trip of the Unit 2 turbine-driven auxiliary feedwater pump during testing on June 25, 1995, and had the potential to affect the operability of the pump during normal operations.

This is a Severity Level IV violation (Supplement I)(445/9525-01;  
446/9525-01).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence is already adequately addressed on the docket in this NRC inspection report. However, TU Electric (Licensee) is required to respond to the provisions of 10 CFR 2.201 if the description therein does not accurately reflect the licensee's corrective actions or position. In that case, or if the licensee chooses to respond, clearly mark the response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC resident inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Dated at Arlington, Texas  
this 6th day of February 1996