

ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station, Unit 1

Docket: 50-445
License: NPF-87

During NRC inspections conducted on February 12 through March 25, 1995, 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. The quality assurance program for Comanche Peak Steam Electric Station (CPSES) requires, in part, that requirements and controls applicable to the operations phase, comply with the requirements of 10 CFR Part 50, Appendix B.

10 CFR Part 50, Appendix B, Criterion IX, requires, in part, that measures shall be established to assure that special processes, including nondestructive testing and welding, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

1. Procedure TX-ISI-208, "Ultrasonic Examination Procedure For Welds In Ferritic Steel Piping Systems," Revision 2, requires surface temperature to be taken at the time of the ultrasonic examination to ensure that the temperature difference between the examination and basic calibration block surfaces do not exceed 25°F.

Contrary to the above, on March 14, 1995, during ultrasonic examinations of Inservice Inspection Item TBX-2-2302-73,74,75 of the feedwater system, the inspector observed that the contractor nondestructive examination technician performing the ultrasonic examinations did not take the surface temperature.

2. Procedure TX-ISI-11, "Liquid Penetrant Examination," Revision 5, paragraph 6.4.1, requires, in part, that developer shall be applied after 5 minutes and no later than 10 minutes after final dry wipe of penetrant removal.

Contrary to the above, on March 14, 1995, during a liquid penetrant examination on Inservice Inspection Item TBX-1-4401-7, of the residual heat removal system, the inspector observed a contractor nondestructive examination technician apply developer after approximately 2-3 minutes after the final dry wipe of penetrant removal from Weld 7.

3. Welding Procedure WLD-106, "ASME/ANSI General Welding Requirements," Revision 1, paragraph 6.8.1, requires, that preheat and interpass temperatures shall be in accordance with the

applicable welding procedure specification and shall be measured with a contact pyrometer or temperature indicating crayon, i.e., "Tempil" stick.

Contrary to the above, on March 21, 1995, during an ASME Code replacement work activity of Valve ICS-8384B of the chemical volume and control system, the inspector observed that a contractor welder in process of making field Welds 6A and 7A did not measure interpass temperatures.

This is a Severity Level IV violation (Supplement I) (445/9506-01).

- B. CPSES Technical Specification 6.8.1 states, in part, that written procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements," Revision 2, February 1978 and written procedures for the fire protection program shall be established, implemented, and maintained.

1. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 9, "Procedures for Performing Maintenance," recommends that general procedures for the control of maintenance, repair, replacement, and modification work be prepared.

Accordingly, Licensee Procedure ODA-308, Revision 5, "LCO [Limiting Condition for Operation] Tracking Program," Section 6.4.2, states, in part, that an active limiting condition for operation action requirement (LCOAR) or an inprogress LCOAR shall be initiated and that the unit supervisor shall ensure appropriate compensatory measures are taken when it is determined that a work order, clearance, etc. impacts the operability of any system which is Technical Specification related.

Corrective Maintenance Work Order 1-94-073961-00, for repair of Technical Specification related heat trace circuits, specified that an LCOAR and an impact review were required prior to the initiation of work.

Contrary to the above, neither an active nor an in-progress LCOAR was initiated, and compensatory measures were not implemented for corrective maintenance being performed on Unit 1 emergency borate piping heat trace Circuit 16 under Work Order 1-94-073961 from December 13, 1994 until February 7, 1995.

2. CPSES Final Safety Analysis Report, Section 13.3B.4, entitled, "Administrative Procedures and Controls," states, that administrative procedures and controls will be established to ensure the reliable performance of fire protection personnel, systems and equipment. Effective measures will be established to control the use and storage of combustibles and ignition sources."

Accordingly, licensee procedure for the "Control of Transient Combustibles, Ignition Sources and Fire Watches," (STA-729, Revision 5) Section 6.4.1.1, states, that a fire watch shall be established when a fire permit is issued. Section 6.3 states that an CPSES fire permit is required when an ignition source is to be used.

Contrary to the above, on March 21, 1995, no fire watch was present during welding on Check Valve ICS-8443, an activity which used an ignition source and which had a fire permit issued.

This is a Severity Level IV violation (Supplement I) (445/9504-01).

Pursuant to the provisions of 10 CFR 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, 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). 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to 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 *21st* day of *April*, 1995