



TUELECTRIC

Log # TXX-95258
File # 10130
IR 95-13
Ref. # 10CFR2.201

October 2, 1995

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U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

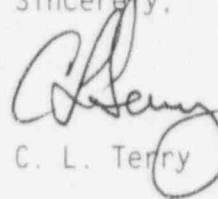
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/95-13; 50-446/95-13
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 1, 1995, concerning the special inspection conducted by the NRC staff during the period of June 12 through July 20, 1995. Attached to the September 1, 1995 letter was a Notice of Violation (NOV).

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,

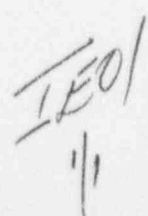


C. L. Terry

GLM/glm
Attachment

cc: Mr. L. J. Callan, Region IV
Mr. D. F. Kirsch, Region IV
Resident Inspectors, CPSES

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PDR ADOCK 05000445
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**NOTICE OF VIOLATION
(445(6)/9513-01)**

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33 recommends written administrative procedures for procedure adherence and for operation of the safety-related auxiliary feedwater system. Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures appropriate to the circumstances.

Regulatory Guide 1.33 endorses American National Standard N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants". Standard N18.7, Section 2.1, states that the definitions are applicable to this Standard, and defines for "shall" and "should" that the word "shall" is used to denote a requirement and the word "should" is used to denote a recommendation. Section 5.2.2 requires that procedures shall be followed and the requirements for use of procedures shall be prescribed in writing.

Administrative Procedure STA-202, "Administrative Control of CPSES Nuclear Production Procedures," Revision 24, Section 4.1.4.6 of Attachment 8.B, requires that "shall" is used for absolute requirements and that "should" is used to indicate firm Comanche Peak Steam Electric Station management expectations where deviation would be a departure from the norm and would require supervisor concurrence.

Contrary to the above,

- (1) On June 14, 1995, written procedures established for the operation and maintenance of the safety-related auxiliary feedwater system, Work Order 1-95-088724, were not followed in that the operator opened valves 1MS-0711 and -0712 sooner than specified. As a result, steam was admitted to the Unit 1 safety-related auxiliary feedwater turbine before prerequisite maintenance checks and valve alignments were complete.
- (2) On June 21, 1995, written procedures appropriate to the circumstances for the operation and maintenance of the safety-related auxiliary feedwater system were not established and implemented. The operator used portions of System Operating Procedure SOP-304B, "Auxiliary Feedwater System", Revision 2, and Operations Test Procedure OPT-206B, Revision 5, to operate the auxiliary feedwater system, and the procedure steps were not consistent. The operator did not perform Step 5.1.2.B of Procedure SOP-304B to lower the auxiliary feedwater pump turbine speed control to 0 percent output. This resulted in operation of the turbine at a higher steam flow rate than expected.

- (3) As of July 20, 1995, Station Administrative Procedure STA-606, "Work Requests and Work Orders", Revision 22, prescribing the use of maintenance procedures, did not establish the requirement that procedures be followed. Section 6.6.4 stated that the responsible work organization "should" perform work in accordance with the instructions instead of "shall" perform work in accordance with the instruction.

RESPONSE TO THE NOTICE OF VIOLATION

TU Electric accepts the violation and the requested information follows:

EXAMPLE 1

1. Reason for Violation

TU Electric believes that valves 1MS-0711 and 1MS-0712 were opened prior to the completion of other specified prerequisite steps because of insufficient attention to detail by the operator involved in the performance of the work order steps.

2. Corrective Steps Taken and Results Achieved

A deficiency document was issued and the operator involved in the performance of the work order steps was counseled in the importance of practicing self-verification techniques and the importance of understanding in-process evolutions.

3. Corrective Steps That Will be Taken to Preclude Recurrence

A Lessons Learned was issued to ensure that all Operations personnel are aware of this event. Because this event occurred during a shift turnover, the expectation to limit evolutions performed during turnover and to provide appropriate supervisory oversight during the conduct of all evolutions was conveyed to Unit Supervisors. The procedures associated with this evolution were enhanced to provide more clarification during future test performance. TU Electric's review indicates that this was an isolated occurrence, and no generic implications existed.

4. Date of Full Compliance

TU Electric is in full compliance.

EXAMPLE 2

1. Reason for Violation

TU Electric believes that the conduct of the performance verification test which resulted in the speed controller not being set to the normal 0% output as required by Operations procedure SOP-304B was caused by the Unit Supervisor's failure to follow Operations procedure ODA-407.

To address a concern about AFW system noise, Engineering provided a troubleshooting plan to test the pump. The on shift crew reviewed the plan and marked up SOP-304B, "Auxiliary Feedwater System" to prewarm the steam lines and OPT-206B, "AFW System", to start and run the pump. Step 5.1.2.B of SOP-304B directed the operator to lower the speed controller to 0%. However, contrary to SOP-304B, the speed controller was required to be at 100% to meet the initial conditions of OPT-206B. To resolve this conflict and provide better configuration control, the operators chose not to lower the speed controller during the warmup run, as required by step 5.1.2.B of SOP-304B, and the step was N/A'd and approved by the Unit Supervisor.

Section 6.3.4 of ODA-407 allows procedure steps to be N/A'd, with proper approval and documentation, if the step does not apply to the scope or conditions under which the activity is being performed. The Unit Supervisor involved in this event erroneously determined that lowering the speed controller as required by step 5.1.2.B of procedure SOP-304B was not applicable to the scope or conditions under which the activity was being performed, and that the 100% setting required as an initial condition of OPT-206B was the correct setting for the test.

2. Corrective Steps Taken and Results Achieved

A deficiency document was issued and the Unit Supervisor involved in this event was counseled in the importance of complying with ODA-407 and the use of N/A. The performance verification test was successfully completed after implementing one time procedure changes.

3. Corrective Steps That Will be Taken to Preclude Recurrence

All Shift Managers were informed of this event and the expectation was conveyed that if the intent of Operations procedures cannot be met, or if apparent procedure conflicts exist, one time procedure changes should be issued. Each shift received training on this event and the importance of procedure usage and compliance during Turbine

Driven Auxiliary Feedwater pump maintenance and testing. Changes were made to Operations procedures, where required, to ensure that this event would not recur during future operation of equipment following maintenance.

4. Date of Full Compliance

TU Electric is in full compliance.

EXAMPLE 3

1. Reason for Violation

TU Electric agrees that the use of the words "should" and "shall" in procedure STA-606, "Work Requests and Work Orders", is not consistent with the intent of procedure STA-202, "Administrative Control of CPSES Nuclear Production Procedures" and corrective and preventive actions are being taken as outlined below.

TU Electric does not believe that CPSES personnel have failed to meet regulatory requirements or commitments because of the use of the word "should" instead of "shall", and existing procedures are expected to be followed. TU Electric management has continually stressed to all CPSES personnel the need for rigorous procedural adherence during all phases of plant operation. This message has continuously been communicated by supervisors via direct communication and site letters up to and including the Group Vice President-Nuclear Production.

In addition, TU Electric's procedural use of the word "should" exceeds the definition provided in ANSI N18.7-1976. The ANSI standard defines the word "should" as a recommendation and TU Electric procedure STA-202 defines the word "should" as used to indicate firm CPSES management expectations.

Based on the above, TU Electric believes that CPSES procedures are followed and the requirements of CPSES procedures have been prescribed in writing per Regulatory Guide 1.33 and ANSI N18.7-1976.

2. Corrective Steps Taken and Results Achieved

Procedure STA-606 has been revised as necessary to more clearly communicate regulatory requirements and commitments to CPSES personnel.

3. Corrective Steps Taken to Preclude Recurrence

A sample of CPSES procedures will be reviewed to verify that the use of "should" and "shall" is consistent with the procedural guidance of STA-202. A letter will be issued to all CPSES personnel to provide a refresher on procedural requirements, including specific guidance and expectations on the use and meaning of the words "should", "shall", and "may" in procedures.

4. Date of Full Compliance

TU Electric is in full compliance.