APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report Nos. 50-445/92-28
50-446/92-28

Operating License No. NPF-87
Construction Permit No. CPPR-127

Licensee: TU Electric
Skyway Tower
400 North Olive Street
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: CPSES, Glen Rose, Texas

Inspection Conducted: July 27-30, 1992

Inspector: W. M. McNeill, Reactor Inspector, Materials and Quality Programs Section, Division of Reactor Safety

Approved: Dwight D. Chamberlain for 8-13-92
I. Barnes, Chief, Materials and Quality Programs Section, Division of Reactor Safety — Date

Inspection Summary

Inspection Conducted July 27-30, 1992 (Report 50-445/92-28)

Areas Inspected: No inspection of CPSES Unit 1 was performed.

Results: Not applicable

Inspection Conducted July 27-30, 1992 (Report 50-446/92-28)

Areas Inspected: Routine, announced inspection of the quality assurance program for design changes and modifications.

Results: Within the area inspected, one noncited violation was identified (paragraph 2.2) pertaining to the failure to fully implement administrative controls of temporary modifications. Otherwise, the review of the quality assurance program for design changes and modifications indicated that such activities were well defined and effectively implemented.

Summary of Inspection Findings:

- A noncited violation was identified (paragraph 2.2).

DETAILS

1. PERSONS CONTACTED

TU ELECTRIC

K. Apple, Unit Supervisor
*R. Braddy, Engineering Manager
*L. Bradshaw, Stipulation Secretary
*W. Cahill, Group Vice President
*E. Gully, Manager Licensing Interface
*T. Heatherly, Licensing Engineer
*N. Hottel, Quality Testing Supervisor
T. Marsh, Manager Operations
H. Marvray, Design Change Control Manager
*D. Pendleton, Regulatory Services Manager
L. Pool, Work Control Clerk
D. Schmidt, Quality Completion Supervisor
*R. Skiba, Licensing Engineer
D. Taylor, Records Clerk
J. Vaux, Startup Test Engineer
*C. Wells, Consultant

Stone & Webster Engineering Corporation

W. Reppa, Assistant Lead Engineer
*R. Spence, Manager Construction Quality Control

Westinghouse Electric Corporation

R. Waters, Site Engineering Manager

CASE

*O. Thero, Consultant

NRC

*D. Graves, Unit 2 Senior Resident Inspector
R. Latta, Unit 2 Resident Inspector

The inspector also interviewed other employees during the inspection.

*Denotes those persons that attended the exit meeting on July 30, 1992.

2. QUALITY ASSURANCE PROGRAM FOR DESIGN CHANGES AND MODIFICATIONS (35744)

The objectives of this inspection were to ascertain whether the licensee had developed and implemented a quality assurance program relating to the control of design changes and modifications that was in conformance with regulatory

requirements, commitments in the Final Safety Analysis Report (FSAR), and industry guides and standards.

2.1 Program

The inspector reviewed the procedures and documents listed in the Attachment. The program for control of design changes and modifications was found from this review to be well defined and consistent with FSAR commitments to ANSI N45.2.11-1974 and ANSI N18.7-1976. The method for initiating a design change was the proposed design change request (PDCR) process. The PDCR process provided for documentation of the reviews, evaluations, and approvals prior to implementation of the change. The procedures identified the organizations responsible for performing design changes; identifying, reviewing, and approving design input requirements; organizational interface requirements; design verification requirements; and final approval of the design documents. These procedures also provided the controls for changes to design documents and the release and distribution of design documents.

During the preoperational testing and operational preparedness phase of the project, the program for processing design changes was the design change authorization (DCA). After system acceptance by operations, design changes were to be processed as design modifications (DMs). At the time of this inspection, only five (sewage treatment, solid waste, cathodic protection, auxiliary steam, and service air) of the 133 systems had been accepted by operations. Field changes which were identified by construction as immediate changes such as a dimensional characteristic, were processed as advanced design change requests (ADCRs). After 45 days, ADCRs were processed as a master control drawing change.

Procedures were found in place to control temporary modifications during preoperational testing. Temporary modifications such as lifting leads and jumpers, if not addressed and controlled in a preoperational test procedure, were required to be documented on a startup temporary modification form and in the temporary modification authorization index maintained in the control room.

2.2 Implementation

The inspector selected a random sample of ten PDCRs (see Attachment) and reviewed the DCAs associated with each PDCR. The inspector found that approximately 200 PDCRs had been issued with the majority (59 percent) having been approved. About a third of the PDCRs had been disapproved and a small proportion (8 percent) had been deferred. The inspector verified that the PDCR board had reviewed and dispositioned the PDCRs. For the DCAs associated with the sampled PDCRs, the inspector verified that the DCAs were properly processed in accordance with procedures. This verification included the disposition by the lead discipline engineer, the project engineer, design verifier, and the interdiscipline reviewers.

The inspector determined that approximately 250 temporary modifications currently existed. Of these, the inspector sampled 32 on July 29, 1992. The temporary modification authorization index entries indicated that the temporary modifications were installed and not yet restored. Four of these Numbers 4577 (temporary power to the battery room ventilation system), 4492 (change set point of reactor coolant pump vibration monitors), 4451 (temporary temperature instrumentation for the reactor coolant system), and 4439 (temporary drain and vent lines to the reactor coolant system) were found to be actually restored and closed on June 9, April 14, April 14, and May 1, 1992, respectively. However, Procedure CP-SAP-13, paragraph 6.5.5 requires after restoration that the date closed be recorded in the temporary modification authorization index. One temporary modification, Number 4805 (temporary installation of tubing for boron injection), although installed on July 1, 1992, was found to not have the original copy in the control room log book of temporary modifications. However, Procedure CP-SAP-13, paragraph 6.4.3.4 requires, after installation of a temporary modification, that the temporary modification form and sheets be placed in the control room log book. An additional sample of 20 temporary modifications, which were found in the startup testing files, were reviewed by the inspector and it was verified that they had the proper status in the control room. The licensee issued a TUE Form 92-5933 on July 30, 1992, to address this loss of administrative control of temporary modifications. The failure to follow procedures is an apparent violation of Criterion V of Appendix B to 10 CFR Part 50. The violation is of minor safety significance and corrective action has been initiated. The violation is not being cited because the criteria specified in Section VII.B.1 of the Enforcement Policy were satisfied.

The inspector reviewed recent quality assurance surveillance reports (QASs 92-021 and 92-077) performed on the DCA and temporary modification activities. It was noted that the surveillance of temporary modifications resulted in a TUE Form 92-5224 for which the corrective action had been completed and the corrective action would not have been expected to identify the above violation regarding failure to follow procedures.

3. EXIT INTERVIEW

The inspector conducted an exit interview on July 30, 1992, with those personnel denoted in paragraph 1, during which the inspector summarized the findings. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.

ATTACHMENT

DOCUMENTS REVIEWED

Chapter 17.1 of the Final Safety Analysis Report, Revision 85

CPSES Quality Assurance Manual, Revision 5

Unit 2 Procedure Applicability Matrix, Revision 7

NEO Policy Statement, "Design Control and Configuration Management," Revision 1

PROCEDURES

2EP-5.02, "Preparation and Maintenance of Specifications," Revision 1 with Procedure Change Notices (PCNs) 1 through 5

2EP-5.05, "Preparation, Approval and Control of Project Drawings," Revision 2 with PCNs 1 through 5

2PP-5.01, "Procedure for Processing of Design Change Authorizations (DCAs)," Revision 0 with PCNs 1 through 12

2PP-5.06, "Advanced Design Change Program," Revision 1 with PCNs 1 through 4

2PP-9.17, "Procedure for Unit 2 Change Control Review Board Program," Revision 1

2PP-9.19, "Proposed Design Change Review Program," Revision 2

CP-SAP-13, "Temporary System Modifications," Revision 13

ECE-5.01, "Design Control Program-General," Revision 1 with Engineering Document Change Notice (EDCN) 1

ECE-5.01-03, "Design Change Notices and Related Process Documentation," Revision 4 with EDCNs 1 and 2

ECE-5.02, "Specifications," Revision 4 with EDCNs 1 through 5

ECE-5.05, "Design Drawings," Revision 3 with EDCN 3

NQA-3.23, "Surveillance Program," Revision 6 with Document Change Notices 1 and 2

STA-602, "Temporary Modifications," Revision 10

STA-716, "Site Modification Process," Revision 8

STA-802, "Acceptance of Station System & Equipment," Revision 10

PDCRs

2-004, "Steam Generator Flow Split"

2-011, "Deletion of Narrow Range RTD/Thermowell Modification for Unit 2"

2-013, "Steam Generator Thermowell Tap Relocation"

2-042, "Extend Vent Lines on CCW"

2-049, "Loose Parts Monitor"

2-053, "Change Circulating Pump Lube Water Piping From Carbon Steel to Stainless Steel"

2-054, "Reactor Coolant Pump Cartridge Seal Upgrade"

2-069, "Westinghouse Thermocouple Cable Connector Replacement"

2-096, "Install Differential Pressure Instruments for MOVs"

2-105, "Add Heater Drain Pump Trip on High Strainer Delta P"

Temporary Modifications

4348	4430	4436	4439	4443
4451	4465	4476	4479	4492
4508	4513	4529	4529	4537
4540	4547	4553	4557	4564
4572	4578	4581	4592	4593
4594	4603	4618	4620	4623
4629	4639	4646	4646	4650
4661	4667	4774	4776	4777
4795	4803	4804	4805	4809
4815	4831	4832	4858	4859
4859-02	4864			