



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

JUN - 9 1992

Docket Nos. 50-445
50-446
License No. NPF-87
Construction Permit No. CPPR-127
EA 92-107

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, Lock Box 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-445/92-20; 50-446/92-20

This refers to the special team inspection conducted by Messrs. W. D. Johnson, T. Reis, S. L. McCrory, and G. E. Werner of this office on May 15 - 29, 1992. The inspection included a review of activities authorized for your Comanche Peak Steam Electric Station, Units 1 and 2, facility. At the conclusion of the inspection, the findings were discussed with you and those personnel identified in the enclosed report.

This special inspection was conducted to review the circumstances surrounding a finding by the senior resident inspector on May 12, 1992, that the component cooling water system had been improperly aligned and that, as a result, the Unit 1 spent fuel pool had been without cooling for a period of about 17 hours without the knowledge of the plant operators.

Areas examined during this inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, seven apparent violations, some with multiple examples, were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1992).

Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

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Q PDR

JEH

These violations result in several areas of concern. The first involves the failure of operators to follow system operating procedures when aligning systems and the failure to stop and request supervisory assistance when problems were encountered. These errors demonstrated poor communications, a lack of teamwork on the part of the shift operators, and a lack of supervisory involvement. Corrective actions for similar problems in past events and for weaknesses identified in an NRC administered requalification examination were apparently ineffective to prevent recurrence. Failing to ensure that independent verification is properly performed and failure to comply with or revise special instructions on a clearance report were also identified.

The second area of concern involves the use of the Unit 2 component cooling water system to support a safety related function on Unit 1 without performing the required safety evaluation. This usage pointed out a weakness in the programs established to control the interfaces between Units 1 and 2.

The third area of concern involves an inadequate operations impact assessment of a design modification which resulted in the failure to properly revise the affected procedures and the failure to train licensed and nonlicensed operators on the design modifications and system operating procedure changes.

The fourth area of concern involves the lack of effective management oversight for the repair and return to service of a spent fuel pool cooling pump which indicates that safety related equipment which is not included in Technical Specifications may not be receiving the appropriate level of management attention.

And finally, several potentially confusing errors were noted in system operating procedures. These errors and the insertion of an unapproved version of a change to an alarm response procedure in the control room procedure binder cause concern about the adequacy of technical reviews of operating procedures.

An enforcement conference to discuss these apparent violations has been scheduled for 1 p.m. on June 22, 1992 in our Region IV office in Arlington, Texas. As discussed at the exit meeting on May 29, 1992, the presence at the enforcement conference of the three involved operators is requested. The purposes of this conference are to discuss the apparent violations, their causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide you the opportunity to present your proposed corrective actions; and to discuss any other information that will help us determine the appropriate enforcement action in accordance with the Enforcement Policy. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

During the exit meeting held on May 29, 1992, you discussed several commitments to prompt corrective actions. Our understanding of those commitments is summarized in paragraph 9 of the enclosed inspection report. Please inform me promptly if our statement of your commitments is in error.

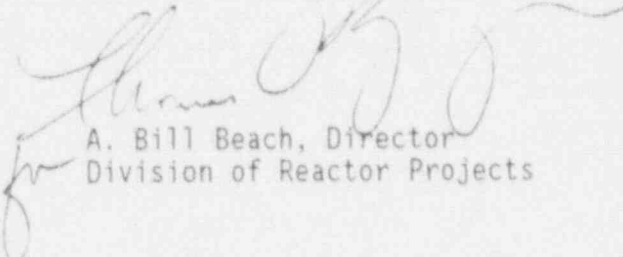
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In accordance with 10 CFR Part 2.790 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure, will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director
Division of Reactor Projects

Enclosure:
Appendix - NRC Inspection Report
50-445/92-20; 50-446/92-20
w/attachments

cc w/enclosure:
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NRC Inspection Report 50-445/92-20; 50-446/92-20

bcc to DMB - IE14

bcc distrib. by RIV:

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