

APPENDIX A
NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station
Units 1 and 2

Dockets: 50-445/84-34
50-446/84-13
Permits: CPPK-126
CPPR-127

Based on the results of an NRC inspection conducted during the period of August 26, 1984, through October 20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

A. Failure of Inspection to Identify Nonconformances in Support Installations

10 CFR 50, Appendix B, Criterion X requires that, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Brown and Root (B&R) Procedures QI-QAP-11.1-28, Revision 23, "Fabrication and Installation Inspection of Safety Class Component Supports," Section 2.c of Attachment A, and QI-QAP-11.1-28A, Revision 5, "Installation Inspections of ASME Class 1, 2 and 3 Snubbers," Section 5.7.a, required that to prevent binding within the clamp and/or bracket, snubber shall not be installed with an offset of more than 5 (five) degrees.

Contrary to the above, during an NRC special review team (SRT) inspection conducted between April 3, 1984 and April 13, 1984, the NRC inspector determined that sway strut CC-1-295-005-C53R and mechanical snubber MS-1-151-025-C52k exceeded the five degrees maximum offset angle tolerance specified in Procedures QI-QAP-11.1-28 and QI-QAP-11.1-28A. These two supports had previously been inspected by quality control (QC) inspectors but these nonconformances had not been identified.

This is a Severity Level IV Violation. (Supplement II.D) (445/8434-01)

B. Failure to Notify the NRC as Required by 10 CFR Part 50.55(e)

1. 10 CFR Part 50.55(e)(1) requires that the construction holder of the permit shall notify the Commission of each deficiency found in design and construction, which were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents a significant breakdown in any portion of the quality assurance program conducted in accordance with the requirements of Appendix B to 10 CFR Part 50. 10 CFR Part 50.55(e)(2)

requires that, "The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Regional Office of each reportable deficiency."

Contrary to the above, the following reportable condition was identified and was not reported to the NRC:

Nonconformance report (NCR) M-84-100108, Revision 2, documents a case of a falsified record in that a QC signature on the record was forged. The falsification of a QC record is a deficiency that had it remained uncorrected could have adversely affected the safety of operations of the nuclear plant and which represents a significant breakdown in the inspection portion of the quality assurance program.

2. 10 CFR Part 50.55(e)(1) requires that, "The construction holder of the permit shall notify the Commission of each deficiency found in design and construction, which were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant. A significant deficiency in construction which will require . . . extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function."

10 CFR Part 50.55(e)(2) requires that, "The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Regional Office of each reportable deficiency."

Contrary to the above, the following reportable condition was identified and was not reported to the NRC:

Gibbs and Hill, Inc. letter GTN-55221, documented design errors in the ranges and/or setpoints of several safety-related flow, pressure, and temperature instruments. Design errors in the range or setpoint of safety-related flow instruments are deficiencies that, had these remained uncorrected, could have adversely affected the safe operation of the nuclear plant. This error represents a deficiency of the final design and a breakdown in the quality assurance program.

This is a Severity Level IV Violation. (Supplement II.D)
(445/8434-02)

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Electric Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: DEC 31 1984