

APPENDIX A

NOTICE OF VIOLATION

TU Electric  
Comanche Peak Steam Electric Station, Unit 1

Docket No.: 50-445  
Operating License: NPF-87

During an NRC inspection conducted April 26 through June 6, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. CPSES Technical Specification 6.8.1 states, in part, 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, Appendix A, paragraphs 1.c and 1.h recommended that administrative procedures be developed for procedure adherence and temporary change method, log entries, record retention, and procedure review, respectively. Paragraph 9.a recommends that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

1. Operations department Procedure OJA-407, "Guidance on the Use of Procedures," Revision 3, requires shift supervisor or unit supervisor permission before any operations procedure step could be marked as not applicable.

Contrary to the above, on May 8, 1992, a reactor operator marked the prerequisite step to Procedure OPT-446A, "Solid state Protection Train B Actuation," Revision 3, as not applicable without obtaining shift supervisor or unit supervisor permission. Subsequently, the shift supervisor determined that the step was required and it was completed satisfactorily.

2. Operations Procedure OWI-104, "Operations Department Logkeeping and Equipment Instructions," Revision 9, required that abnormal conditions and out-of-specification readings should be circled in red and the following information should be included in the comment section: (1) the reason for the condition or reading, (2) the corrective action performed or attempted, (3) the results of the corrective action; and (4) the time and person notified.

Contrary to the above, a review of completed auxiliary operator log readings for the auxiliary and fuel buildings, for the period April 21 through May 2, 1992, identified several instances where abnormal readings were not identified in accordance with Procedure IWO-104.

3. Procedure INC-7717A, "Channel Calibration N16 Power Monitor Module Protection IV, Channel 0440," Revision 1, Step 11.1.1.1 required

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PDR ADDCK 05000445  
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that, "In rear of 'Cabinet 10 N-16 Power Protection IV,' open N16 High Voltage Power Supply breaker, 'CB2'."

Contrary to the above, on May 8, 1992, at approximately 11 p.m. (CST), during the performance of Procedure INC-7717A, Step 11.1.1.1, the I&C technicians entered the back of Cabinet 10 at Power Protection Channel II and opened the associated N-16 high voltage power supply Breaker CB2. This resulted in a loss of power to Power Protection Channel II.

4. Administrative Procedure STA-606, "Work Requests and Work Orders," Revision 17, paragraph 6.6.3.20 required that the field work request tag or sticker be removed at the completion of the work. Paragraph 6.6.3.22a required that the shift supervisor be notified of fire protection systems/equipment that have been returned to service.

Contrary to the above, field work request tags were not removed from safety-related equipment following completion of field work. These included field Work Request Tags 101420, 103297, 101421, 101433, 122419, 123351 and 127336. On April 27 it was identified that Fire Impairment 92-X-196, for turbine building rollup Door T102-J was active with the door locked open, although Work Request 124524 (Work Order No. 92-1749), page 7, documented that on March 27, 1992, Fire Impairment 92-X-196 had been cleared and the door closed and locked.

This is a Severity Level IV violation. (Supplement 1) (445/9214-01)

- B. CPSES Technical Specification 4.0.4 states, in part, that entry into an Operational Mode or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval.

Technical Specification Requirement 4.3.1.1 states, in part, that "Each reactor trip system instrumentation channel and interlock and automatic trip logic shall be demonstrated OPERABLE by the performance of the Reactor Trip System Instrumentation Surveillance Requirements specified in Table 4.3-1." Table 4.3-1, Reactor Trip System Instrumentation Surveillance Requirement, Functional Unit 2.b Power Range, Neutron Flux Low Setpoint," required that the analog channel operability test (ACOT) be performed for the applicable modes (Modes 1 [below P-10] and 2) if not completed within the past 31 days." Surveillance Procedure INC-7375A, "ACOT CH CAL Neutron Flux PWR RN Chann N41," Revision 7, implemented this TS requirement for Modes 1 and 2.

Contrary to the above, a reactor startup was commenced on May 9, 1992, (Mode 3 to 2) without having met the surveillance requirement specified

in TS 4.3.1.1, Table 4.3-1.2.b, for the power range neutron flux low power setpoint. Surveillance Procedure INC-7375A was last performed on January 9, 1992, for the power range neutron flux Channel 41 low setpoint. This resulted in the surveillance requirement being exceeded by 90 days.

This is a Severity Level IV violation. (Supplement I) (445/9214-02)

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, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice. Because of the similarity of this Notice with the violations identified in NRC Inspection Report 50-445/92-20; 50-446/92-20 (EA 92-107), you are requested to address these violations as part of your response to the Notice issued for that report. 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. If an adequate reply is not received within the time specified in the Notice for Inspection Report 50-445/92-20; 50-446/92-20, an Order or Demand for Information may be issued as to 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 7th day of July 1991