



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUL 14 1992

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

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. 50-445/92-16; 50-446/92-16 (NOTICE OF VIOLATION)

This refers to the inspection conducted by Messrs. D. N. Graves and R. M. Latta during the period May 3 through June 13, 1992, of activities authorized for the Comanche Peak Steam Electric Station, Units 1 and 2. At the conclusion of the inspection, the findings were discussed with you and those members of your staff identified in the enclosed report and during a June 29, 1992, telephone conversation held by Mr. Larry Yandell and Region IV personnel with Mr. Roger Walker and members of your staff.

Areas examined during the inspection included the evaluation of Unit 2 plant status; followup on previously identified items; licensee action on 10 CFR Part 50.55(e) deficiencies; routine plant tours; preoperational test program implementation verification; Unit 1/Unit 2 interface controls; preoperational test witnessing; and evaluation of aspects of programs pertaining to instrumentation, components, and systems.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation which involved your implementation of the CPSES Physical Security Plan is of concern because it addresses fundamental aspects of the control of licensee designated vehicles inside the protected area. With respect to the violation which involved the issuance of work controls to the field without adequate protection afforded to the individuals performing the work, it is recognized that Unit 2 project management initiated a comprehensive investigation which resulted in the development of extensive corrective actions as described in TU Electric's project letter, CPSES-9218711, dated June 11, 1992. However, this issue is of concern because it involved the programmatic aspects of personnel protection associated with temporarily energized systems and inadvertent damage to installed plant equipment.

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You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

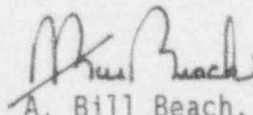
In addition, a weakness was identified in the technical justification for the closure of Industry Operating Experience Report Followup Assessment WTB/89-06, associated with Westinghouse's recommended inspections of TERMI-POINT connections in the solid state protection system. This weakness is of concern because it involves your implementation of corrective actions in response to lessons learned from industry operating experience. Also, the evaluation associated with Reportability Evaluation Form SN-479, dated December 18, 1989, did not reflect an in-depth evaluation of deficiencies in both trains of the solid state protection system's TERMI-POINT connections for both Units 1 and 2. In response to discussions regarding this issue, your staff stated that a review would be done of potentially reportable deficiencies (SNs) from January 1988 through June 1990 for reportability methodology and the implementation of corrective actions. It is our understanding that you will advise us when this activity is complete and provide an opportunity for our staff to review your results.

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

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

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

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-445/92-16; 50-446/92-16

cc: (see next page)

TU Electric

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cc w/enclosures:

TU Electric
ATTN: Roger D. Walker, Manager
Nuclear Licensing
Skyway Tower
400 North Olive Street, L.S. 8
Dallas, Texas 75201

Juanita Ellis
President - CASE
1426 South Polk Street
Dallas, Texas 75224

GDS Associates, Inc.
Suite 720
1850 Parkway Place
Marietta, Georgia 30067-8237

TU Electric
Bethesda Licensing
3 Metro Center, Suite 610
Bethesda, Maryland 20814

Jorden, Schulte, and Burchette
ATTN: William A. Burchette, Esq.
Counsel for Tex-La Electric
Cooperative of Texas
1025 Thomas Jefferson St., N.W.
Washington, D.C. 20007

Newman & Holtzinger, P.C.
ATTN: Jack R. Newman, Esq.
1615 L. Street, N.W.
Suite 1000
Washington, D.C. 20036

Texas Department of Labor & Standards
ATTN: G. R. Bynog, Program Manager/
Chief Inspector
Boiler Division
P.O. Box 12157, Capitol Station
Austin, Texas 78711

Honorable Dale McPherson
County Judge
P.O. Box 851
Glen Rose, Texas 76043

JUL 14 1992

~~bcc to DMB (IE01)~~

bcc distrib. by RIV:

J. L. Milhoan

DRP

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPS

Project Engineer (DRP/B)

DRS

Resident Inspector (2)

Section Chief (DRP/B)

MIS System

RSTS Operator

RIV File

Chief, Technical Support Section

RIV:SRI:DRP/B

DNGraves: *wk*

7/10/92

RI:DRP/B

RMLatt *for*

7/10/92

C:DRP/B

LAYandel *for*

7/10/92

C:DRSS/IPS

BMurray

7/10/92

DD:DRP

TPGwynn

7/10/92

D:DRP

ABBearch

7/14/92

TU Electric

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Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

Owen L. Thero, President
Quality Technology Company
Lakeview Mobile Home Park, Lot 35
4793 E. Loop 820 South
Fort Worth, Texas 76119