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Ref. # 10CFR2.201

September 8, 1992

William J. Cahill, Jr.  
Group Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
NRC INSPECTION REPORT NOS. 50-445/92-23 AND 50-446/92-23  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated August 7, 1992, concerning the inspection conducted by the NRC staff during the period June 22 through June 25, 1992. These inspections covered activities authorized by NRC Operating License NFP-87 and Construction Permit CPPR-127. Attached to the August 7, 1992, letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

By: J. S. Marshall  
J. S. Marshall  
Generic Licensing Manager

LRW/tg

Attachment

c - Mr. J. L. Milhoar: Region IV  
Resident Inspector, CPSES (2)

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NOTICE OF VIOLATION  
(446/9223-01)

Criterion XII of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, Revision 85, require that measures for the control of measuring and test equipment (M&TE) shall be established to assure that procurement, handling, storage, scheduling, and calibration of M&TE and reference standards is in accordance with approved methods. Procedure No. STA-608, "Control of Measuring and Test Equipment," Revision 15 with Procedure Change Notices 1 through 2, paragraph 6.3.3 requires that, when a vendor is used for equipment calibration, that records be provided to the Metrology Laboratory for review and initiation of administrative controls such as equipment tagging.

Contrary to the above, the inspector found on June 24, 1992, that six load cells were in use which were not incorporated into the M&TE Program. Preoperational Test No. 2CP-PT-90-02, Transient Vibration Test during Operational Vibration Tests, identified in Table 9.4 that load cells TR-2-SI-01, 02, 03, 04T, 04B, and 05 had been used on April 12, 1992, which were calibrated by the vendor, Teledyne Engineering Services. However, the records of the calibration of these instruments were not submitted to the Metrology Laboratory for review and initiation of administrative controls for the instruments such as tagging.

RESPONSE TO NOTICE OF VIOLATION  
(446/9223-01)

TU Electric accepts the violation and the requested information follows:

1) Reason for Violation

The load cells were not incorporated into the Measuring and Test Equipment (M&TE) Program because they had been incorrectly classified as permanently installed operating equipment. Therefore, applicable calibration records were not submitted to the Metrology Laboratory for review.

2) Corrective Steps Taken and Results Achieved

Corrective action documents were initiated for Units 1 and 2 to evaluate the condition and assess generic implications. The load cells were entered into the M&TE Program. A project wide review of measuring and test equipment revealed no instances, other than the load cells identified in the inspection report, where calibrated equipment had been misclassified.

3) Corrective Steps Taken to Avoid Further Violations

The definition of M&TE in STA-60<sup>R</sup> has been revised in order to provide further clarification for temporarily installed instrumentation. Applicable CPSES departments have been directed to ensure that equipment meeting the clarified procedural definition of M&TE is included in the program.

4) Date When Full Compliance Will Be Achieved

TU Electric is now in full compliance.