

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/92-22; 50-446/92-22

Operating License: NPF-87

Construction Permit: CPPR-127

Licensee: TU Electric
Skylay Tower
406 North Olive Street
Dallas, Texas 75201

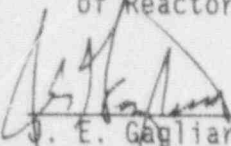
Facility Name: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

Inspection At: CPSES, Glen Rose, Texas

Inspection Conducted: July 27 through August 7, 1992

Inspector: M. E. Murphy, Reactor Inspector, Test Programs Section, Division
of Reactor Safety

Approved: _____


J. E. Gagliardo, Chief, Test Programs Section
Division of Reactor Safety

9/10/92
Date

Inspection Summary

Areas Inspected (Unit 1): Routine, announced inspection of the surveillance testing and calibration control program, and surveillance procedures and records for Unit 1.

Results:

- The requirements for the licensee's surveillance test and calibration control program appeared to be well defined and identified.
- The controls in place for surveillance testing and calibration control appeared to be thorough and comprehensive.
- Scheduling and tracking activities appeared to be in accordance with approved procedures.
- The surveillance test performance appeared to be satisfactory.
- The licensee's history of missed surveillances had been thoroughly reviewed by a licensee task team and the review had produced a comprehensive list of corrective actions that were being implemented.

- Effective implementation of these corrective actions should further strengthen the surveillance test program.

Summary of Inspection Findings:

- Inspection Followup Item 445/9222-01 was opened (paragraph 2).
- Licensee Event Reports 92-010 and 92-017 were reviewed for information and remain open.

Areas Inspected (Unit 2): No inspection of Unit 2 activities was performed.

Attachments:

- Attachment 1 - Persons Contacted and Exit Meeting
- Attachment 2 - Surveillance Tests Reviewed

DETAILS

1 SURVEILLANCE TESTING AND CALIBRATION CONTROL PROGRAM (61725)

The purpose of this inspection was to ensure that the licensee had developed and implemented a sufficiently detailed program to control the performance of surveillance tests and calibrations at CPSES, Unit 1.

The inspector reviewed the licensee's Procedure STA-702, "Surveillance Program," Revision 10, dated February 12, 1992. This procedure details the general requirements for the surveillance program at CPSES. The procedure assigned responsible groups for writing, performing, tracking, and scheduling surveillance testing. Surveillance requirements were identified from four sources: Section 4 of the Technical Specifications, the Technical Requirements Manual, Part 1 of the Offsite Dose Calculation Manual, and the Inservice Testing Program Plan. Specific surveillance tests and their frequencies of performance were contained in the Master Surveillance Test List.

For the purposes of this inspection, review of the calibration control program was limited to the safety-related instrumentation not specifically controlled by the Technical Specifications requirements. The calibration control program was included in the preventive maintenance program and the controls were delineated in Procedure STA-677, "Preventive Maintenance Program," Revision 2, dated July 14, 1992. Responsibility for selection of equipment and components to be included in this program was assigned by this procedure. This procedure delineated calibration frequency and also assigned responsibility for procedure writing, calibration performance and the tracking and trending of calibrations.

Surveillance testing and calibration scheduling was performed using the new PR-ISM (Plant Reliability - An Integrated System for Management) computer program. This computer system was recently initiated and appeared to offer improvements over the previous system.

Each department had an assigned surveillance test coordinator (STC), who was responsible for initiating action to accomplish a scheduled surveillance test. The surveillance test coordinator was responsible for the departmental performance of surveillance tests. The inspector found that the STC position was not addressed in the job descriptions of the individuals assigned this responsibility. The STCs appeared, however, to be aware of their responsibilities, and the completion progress of surveillance testing activities were continuously monitored by the responsible work organization.

The inspector concluded that the surveillance tests and calibration requirements appeared to be well defined and identified. The controls in place for surveillance testing and calibration appeared to be thorough and comprehensive. Scheduling and tracking appeared to be in accordance with the approved procedures.

2 SURVEILLANCE PROCEDURES AND RECORDS (61700)

This inspection was performed to determine that the licensee was conducting surveillance of safety-related systems and components in accordance with approved procedures as required by the Technical Specifications.

The licensee's Procedure STA-702, "Surveillance Program," establishes the general requirements for the surveillance program used at CPSES. In conjunction with this procedure, the licensee had developed and implemented a Master Surveillance Test List (MSTL). This was a station manual, which listed the implementing and trigger procedures that satisfy the test and inspection requirements of the surveillance program.

The inspector reviewed Revision 18 (dated July 7, 1992) of the MSTL and identified a list of surveillance tests for review. The inspector reviewed at least the last two completed data packages for the identified tests. The selected test packages included tests in the areas of reactivity control and power distribution, instrumentation, the reactor coolant system, emergency core cooling system, containment systems, and the plant and electrical power systems. Attachment 2 lists the surveillance test procedures reviewed. The procedures are correlated to the applicable Technical Specification paragraph.

Review of the test data packages and associated procedures determined that the tests were in conformance with Technical Specification requirements. The completed tests were reviewed as required by the licensee's administrative procedure. The tests were performed within the time frequencies specified and appropriate action was taken for any item failing the acceptance criteria.

The inspector reviewed TU Electric QA Audit Report QAA-92-115, dated July 29, 1992. This audit dealt with the review of selected Technical Specification areas for the attributes of the licensee's Technical Specification Assurance Program. The inspector found that Observation QAA-92-115-A from the audit had identified that PR-ISM did not reflect any schedule for the performance of Technical Specification 4.8.4.b. This specification is for "Electrical Equipment Protective Devices - Containment Electrical Penetration Conductors." The audit specifically identified the lack of a scheduled 60-month inspection and preventive maintenance of molded case circuit breakers. This item had been referred to the responsible organization for corrective action. The results of the licensee's evaluation and subsequent actions on this issue is an inspection followup item (445/9222-01) and will be reviewed during a future inspection.

During the first fuel cycle, several occurrences of missed surveillances were identified by the licensee and reported in licensee event reports. These reports were reviewed and discussed in NRC Inspection Report 50-445/91-64. Subsequent to this report the licensee identified and reported four additional missed surveillance events. As a result of the continuing problem of missed surveillances, the licensee formed a "surveillance task team" to review the surveillance test program, identify problems, and recommend corrective actions. On May 9, 1992, a violation of Technical Specifications occurred due to another missed surveillance during a reactor startup. This event was reported in Licensee Event Report 92-010. The licensee's task team was refocused on this specific problem and the completion of the original project

was accelerated. As of the date of this inspection there had been one additional missed surveillance identified as a result of the licensee's task team effort and reported in Licensee Event Report 92-017. The inspector reviewed the "Surveillance Improvement Program Task Team Report," dated June 17, 1992. This report dealt with the specifics of the May 9 violation and also included the results of the task team's generic efforts. The team's efforts were detailed, in depth, and comprehensive. A surveillance improvement action item list was developed by the task team. The corrective actions recommended should strengthen the overall CPSES surveillance test program when fully implemented. The effectiveness of the licensee's efforts will be examined during future inspections of this area.

ATTACHMENT 1

1 PERSONS CONTACTED

TU ELECTRIC

- R. Adams, Supervisor, Instrumentation and Control Engineering
- *R. Baker, Manager, Licensing Compliance
- *O. Bhatti, Licensing Engineer
- *R. Blankenship, Senior Engineer, Compliance
- *D. Buschbaum, Supervisor, Compliance
- G. Davis, Senior Engineer, Compliance
- *J. LaMarca, Manager, Technical Programs
- *M. Reeves, Supervisor, Instrumentation and Control Planning

NRC

- *W. Jones, Senior Resident Inspector

The inspector also interviewed other personnel during the inspection.

*Denotes attendees at the exit meeting held on August 7, 1992.

2 EXIT MEETING

The inspection scope and findings were summarized in an exit meeting on August 7, 1992. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.

ATTACHMENT 2

SURVEILLANCE TEST PROCEDURE

TECHNICAL SPECIFICATION PARAGRAPH

OPT-102A	4.1.1.1.1.b
NUC-205	4.1.1.1.2
OPT-301	4.1.1.2.b
OPT-302	4.2.4.1.a
OPT-102	4.2.5.1
PPT-SI-7110	4.3.1.1.1
GPT-217A	4.3.4.2.a
GPT-102A	4.4.1.1
OPT-104A	4.4.3.2
OPT-102A	4.5.1.1.a
OPT-305	4.5.2.c.1
PPT-SI-8055	4.6.1.3.b.1
PPT-SI-8057	4.6.1.3.c
GPT-206A	4.7.1.2.a
CH-501	4.7.1.4.1
PPT-SI-7301A	4.8.1.1.1.b
MSE-SO-5702	4.8.2.1.d