

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station

Docket: 50-446
Construction Permit: CPPR-127

During an NRC inspection conducted August 17-20, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, Revision 85, require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

The following examples of the failure to follow procedures were observed:

1. Procedure CP-SAP-26, "Startup Operating Instructions," Revision 2, paragraph 6.3, requires expired startup operating instructions to be logged out of the index and discarded from control room files.

Contrary to the above, the inspector found on August 17, 1992, that 9 of a sample of 19 startup operating instructions were expired but not logged out and discarded from control room files (i.e., 2-92-RC-SOI-HFT-SOP-101B, expiration date August 10, 1992; 2-92-RH-SOI-HFT-SOP-102B, expiration date August 11, 1992; 2-92-RC-SOI-HFT-SOP-108B, expiration date August 16, 1992; 2-92-SI-04, expiration date April 25, 1992; 2-92-RH-01, expiration date April 25, 1992; 2-92-RH-02, expiration date March 29, 1992; 2-92-RH-04, expiration date February 15, 1992; 2-92-RH-07, expiration date July 6, 1992; and 2-92-RH-08, expiration date July 5, 1992).

2. Procedure ODA-104, "Operations Department Document Control," Revision 7, with Procedure Change Forms 1 through 4, paragraph 6.6.1, requires the control room to maintain such procedures as prerequisite testing procedures.

Contrary to the above, the inspector found on August 18, 1992, that the file of prerequisite testing procedures in the control room: (a) did not contain the current revision of Procedure XCP-ME-7, which was issued July 24, 1992; (b) contained Procedure XCP-ME-10, which had been deleted on August 26, 1991; and (c) did not contain Procedure XCP-ME-17, which was issued May 7, 1992.

3. Procedure CP-SAP-07B, "Preoperational Testing," Revision 1, paragraph 6.3.1, requires the control room to have a copy of approved test procedures.

Contrary to the above, the inspector found on August 18, 1992, that four of a sample of 15 preoperational test procedures in the control room were missing at least one change notice (i.e., Change 1 of PT-07-02, which was issued August 10, 1992; Changes 2 and 3 of PT-39-01, which were issued August 6 and

7, 1992, respectively; Change 6 of PT-74-02, which was issued July 27, 1992; and Change 6 of PT-90-03, which was issued July 20, 1992).

4. Procedure CP-SAP-07B, "Preoperational Testing," Revision 1, paragraph 6.4.6, requires the startup test engineer to take an approved test procedure change to the startup records center for marking of the document as the "Official Test Copy" and distribution of copies.

Contrary to the above, the inspector found on August 19, 1992, that Test Procedure Change 3 to Test Procedure PT-39-01, which was approved on August 7, 1992, had not been taken to the startup records center for marking as the "Official Test Copy" and distribution of copies.

This is a Severity Level V violation (446/9232-01) (Supplement I).

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, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). 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 this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or 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 16th day of September 1992