

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/92-32
50-446/92-32

Operating License: NPF-87

Construction Permit: CPPR-127

Licensee: TU Electric
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

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

Inspection At: Glen Rose, Texas

Inspection Conducted: August 17-20, 1992

Inspector: W. M. McNeill, Reactor Inspector, Materials and Quality Programs
Section, Division of Reactor Safety

Approved: J. Barnes 9-15-92
I. Barnes, Chief, Materials and Quality Programs Date
Section, Division of Reactor Safety

Inspection Summary

Areas Inspected: Routine, announced inspection of the quality assurance program for document control and records pertaining to preoperational testing of Unit 2. No inspections were performed of the Unit 1 facility.

Results:

- The licensee was found to have established a satisfactory quality assurance program for document control during performance of preoperational testing. A violation was, however, identified in regard to observed instances where program requirements for administrative control of test procedures and startup operating instructions were not being implemented (paragraph 1.3).
- In general, the review of the program for records indicated that the requirements were well defined and effectively implemented (paragraph 2.3).

Summary of Inspection Findings:

- Violation 446/9232-01 was opened (paragraph 1.2).

Attachments:

- Attachment 1 - Persons Contacted and Exit Meeting
- Attachment 2 - Documents Reviewed

DETAILS

1 QUALITY ASSURANCE PROGRAM FOR DOCUMENT CONTROL (35742)

The objective of this inspection was to ascertain whether the licensee had developed a quality assurance (QA) program for document control that was in conformance with regulatory requirements, commitments in the Final Safety Analysis Report, and applicable industry guides and standards.

1.1 Program

The licensee's QA program for document control was ascertained to be defined in the procedures listed in Attachment 2 to this report. Review of the program by the inspector indicated that the document control activities were satisfactorily defined and consistent with the Final Safety Analysis Report, ANSI N18.7-1976, and Regulatory Guide 1.33, Revision 2. The program required that once equipment and systems were turned over from construction to startup in accordance with Procedure CP-SAP-03B, startup's document control activities included acceptance testing procedures, preoperational test procedures, prerequisite testing procedures, and startup operating instructions (SOIs). Acceptance testing was the balance of plant (nonsafety-related) system testing. Preoperational testing was that safety-related testing done for approval of turnover of systems from startup to operations. Prerequisite testing was component testing done prior to the system testing. SOIs were temporary procedures with a maximum life of 60 days. Preoperational and prerequisite test procedures were controlled (i.e., issued) by the startup records center. Both types of test procedure were approved by the manager of startup, with preoperational test procedures also being approved by the joint test group. SOIs were controlled (i.e., issued) by the control room, and approved by operations, the test group supervisor, and the shift supervisor.

1.2 Implementation

The inspector ascertained that a total of 95 SOIs had been issued, with 58 of the SOIs pertaining to hot functional testing. The inspector verified that a sample of 19 SOIs (see Attachment 2) were indexed and the original SOI retained in the control room. The inspector also verified that the approval of the procedures and changes was in accordance with the established requirements. On August 17, 1992, the inspector noted that nine expired SOIs were still indexed and on file in the control room (see Attachment 2 for identity of SOIs expiring prior to August 17, 1992). Procedure CP-SAP-26, paragraph 6.3, requires expired SOIs to be logged out of the index and discarded. The failure to follow procedure requirements is a violation of 10 CFR Part 50, Appendix B, Criterion V (446/9232-01). The licensee issued TU Evaluation (TUE) Form 92-6067 dated August 18, 1992, in regard to this problem.

On August 18, 1992, the inspector reviewed the file containing the control room copies of the prerequisite test procedures that had been issued, and verified that the file contained a current table of contents. It was noted

during this review, however, that the file: (a) did not contain the current revision (i.e., Revision 7) of Procedure XCP-ME-7 (Roll Filter Functional Test), which had been issued July 24, 1992; (b) still contained Procedure XCP-ME-10, which had been deleted August 26, 1991; and (c) did not contain Revision 0 of Procedure XCP-ME-17 (Venting and Filling of Plant Instrumentation), which had been issued on May 7, 1992. Procedure ODA-104, paragraph 6.6.1, requires the control room to maintain such procedures on file. The failure to follow procedure requirements is an additional example of Violation 446/9232-01 noted above. The licensee identified this problem on TUE Form 92-6070 dated August 18, 1992.

On August 18, 1992, the inspector selected a sample of 20 preoperational test procedures (see Attachment 2) in order to verify that the latest revision and the latest applicable test procedure changes were on file in the control room. Five of the sample could not be verified because the testing had been completed and the procedures removed from control room. It was ascertained from this review that the following test procedure changes were not on file in the control room: (a) Test Procedure Change 1 of PT-07-02 (control room temperature survey) on correction of the prerequisite temperature range requirements, which was issued August 10, 1992; (b) Test Procedure Changes 2 and 3 of PT-39-01 (diesel generator room heat ventilation and air conditioning) on correction of typographical errors and correction of a fan number, which were approved August 6 and 7, 1992, respectively; (c) Test Procedure Change 6 of PT-74-02 (incore thermal couple and resistance temperature detector cross calibration) on correction of a cable number, which was issued July 27, 1992; and (d) Test Procedure Change 6 of PT-90-03 (hot functional test piping thermal expansion) on the addition of dimensional recording requirements, which was issued July 20, 1992. Procedure CP-SAP-07B, paragraph 6.3.1, requires the control room to have a copy of approved test procedures. The failure to follow procedure requirements is an additional example of Violation 446/9232-01 noted above. The licensee initiated TUE Form 92-6071 on August 18, 1992, to address this problem.

The startup records center status information for these same procedures was also compared by the inspector against the startup test engineer's original copies. It was ascertained from this review that Test Procedure Change 3 of PT-39-01 existed on correction of a fan number, but was not on file in the startup records center. Procedure CP-SAP-07B, paragraph 6.4.6, requires the startup test engineer to submit approved test procedure changes to the startup records center for the stamping of such as the original and for the distribution of copies. The failure to follow procedure requirements is an additional example of Violation 446/9232-01 noted above. The licensee initiated Startup Deficiency Report 2783 on August 19, 1992, to address this problem.

The licensee corrected the examples of procedural noncompliance that were identified by the inspector prior to the end of the inspection. The manager of operations also made a commitment on August 20, 1992, to detail a person temporarily to the control room to address the problems identified in the three TUE forms.

1.3 Conclusions

In general, the review of the program for document controls indicated that such activities were satisfactorily defined and consistent with the Final Safety Analysis Report, ANSI N18.7-1976, and Regulatory Guide 1.33, Revision 2. One violation was identified in regard to the failure of personnel to follow program requirements for administrative control of procedures. Within a sample of 19 SOIs, 9 were found to be still indexed and on file, although they were expired. Within the population of 33 prerequisite test procedures, 3 were found not be controlled in that one was not the current revision, one had been deleted but not removed, and one was newly issued but not on file. Within a sample of 15 preoperational test procedures, at least one change notice was missing from 4 of the test procedures. It was additionally noted that a preoperational test procedure change had not been processed through the startup records center.

2 QUALITY ASSURANCE PROGRAM FOR RECORDS (35748)

The objective of this inspection was to ascertain whether the licensee had developed a quality assurance program relating to the control of records that was in conformance with regulatory requirements, commitments in the Final Safety Analysis and applicable industry guides and standards.

2.1 Program

The inspector reviewed the program requirements for control of records during startup, which were contained in the procedures identified in Attachment 2 to this report. It was found from this review that the program was well defined and consistent with the Final Safety Analysis Report, ANSI N45.2.9-1979, and Regulatory Guide 1.88, Revision 2. The records that are generated by startup consist of prerequisite and preoperational test results. After performance of a preoperational test, the results are reviewed and approved by the joint test group and the startup manager. After performance of a prerequisite test, the results are reviewed and approved by a Level III startup test engineer. Before a preoperational test is performed, the startup engineer develops and completes a matrix which becomes part of the test record package and also identifies all of the required prerequisite tests necessary for the preoperational test.

2.2 Implementation

At the time of this inspection, only three preoperational tests had been through the records process for turn over to operations. PT-55-01, "RCS Cold Hydro," had been reviewed and approved by the joint test group and was selected by the inspector for review. Approximately 20 preoperational test packages had been readied for submittal to the joint test group for approval. The inspector reviewed a sample of 20 prerequisite test records associated with selected preoperational tests (see Attachment 2 for the identification of the specific prerequisite tests). The prerequisite test records were filed separately from the preoperational test records. The preoperational and

prerequisite test records reviewed were observed to have received the required reviews and approvals.

The facility used for the temporary storage of startup and preoperational test records was found to have a controlled access and fire protection. The filing system for retrieval and accountability of records appeared to be effective.

2.3 Conclusions

In general, the review of the program for records indicated that the requirements were well defined and effectively implemented. The program and its implementation were fully consistent with the requirements established in the Final Safety Analysis Report, ANSI N45.2.9-1979, and Regulatory Guide 1.88, Revision 2.

ATTACHMENT 1

1 PERSONS CONTACTED

1.1 TU Electric

S. Bone, Startup Testing Engineer
*H. Bruner, Senior Vice President Nuclear Engineering and Operations
*W. Cahill, Group Vice President
*R. Daly, Startup Manager
*J. Donahue, Manager, Operations
C. Fazio, Startup Test Engineer
R. Gamble, Startup Test Engineer
*J. Greene, Licensing Engineer
*S. Harrison, Deputy Project Manager
K. Hasten, Field Supervisor
K. Hawkins, Startup Test Engineer
*T. Hope, Unit 2 Licensing Manager
*N. Hottel, Quality Testing Supervisor
*J. Hovchen, Assistant Project Manager
S. Kelly, Data Entry Analyst
K. McCubbins, Startup Test Engineer
J. Molnar, Field Supervisor
G. Ondriska, Program Test Group Supervisor
*S. Palmer, Stipulation Manager
*D. Pendleton, Regulatory Services Manager
B. Phipps, Startup Test Engineer
K. Scherich, Unit Supervisor
*A. Scott, Vice President Nuclear Operations
*R. Spence, Construction Quality Control Manager
D. Taylor, Records Clerk
S. Trickovic, Startup Test Engineer
*R. Walker, Manager of Regulatory Affairs
*C. Wells, Consultant
G. Wysocki, Startup Test Engineer

1.2 Citizens Association for Sound Energy

*O. Thero, Consultant

1.3 NRC Personnel

*D. Graves, Senior Resident Inspector

*Denotes personnel that attended the exit meeting. In addition to the personnel listed above, the inspector contacted other personnel during this inspection period.

2 EXIT MEETING

An exit meeting was conducted on August 20, 1992. During this meeting, the inspector reviewed the scope and findings of this report. The licensee did not identify as proprietary, any information provided to, or reviewed by the inspector.

ATTACHMENT 2

1 PROGRAM PROCEDURES REVIEWED

Chapter 17.1 of the Final Safety Analysis Report, Revision 85

NEO Policy Statement No. 104, "Document Control and Records Management,"
Revision 0

CPSES Quality Assurance Manual, Revision 5

Unit 2 Procedure Applicability Matrix, Revision 7

CP-SAP-7A, "Prerequisite Test Instruction/Procedure Preparation, Conduct,
Review and Approval," Revision 1

CP-SAP-07B, "Preoperational Testing," Revision 1

CP-SAP-26, "Startup Operating Instructions," Revision 2

STA-302, "Station Records," Revision 15

STA-303, "Control of Station Record Storage Facilities," Revision 1

STA-306, "Document Control," Revision 18

ODA-104, "Operations Department Document Control," Revision 7 with Procedure
Change Forms 1 through 4

2 PROCEDURE SAMPLE

2.1 SOIs/Expiration Date

2-92-RC-SOI-HFT-SOP-101B/August 10, 1992

2-92-RH-SOI-HFT-SOP-102B (Revision 1)/August 11, 1992

2-92-CS-SOI-HFT-SOP-104B/August 19, 1992

2-92-VD-SOI-HFT-RWS-108/August 27, 1992

2-92-RC-SOI-HFT-SOP-108B (Revision 1)/August 16, 1992

2-92-SI-SOI-HFT-SOP-201B (Revision 1)/August 17, 1992

2-92-SOI-HFT-ABN-101/September 23, 1992

2-92-EOP-SOI-HFT-OPT-108B/September 26, 1992

2-92-OPT-102B/August 31, 1992

2-92-RP-01/August 22, 1992

2-92-SI-04/April 25, 1992

2-92-SI-05/September 4, 1992

2-92-SI-06/September 4, 1992
2-92-RH-01/April 25, 1992
2-92-RH-02/March 29, 1992
2-92-RH-04/February 15, 1992
2-92-RH-07 (Revision 1)/July 6, 1992
2-92-RH-08/July 5, 1992
2-92-RH-10/October 6, 1992

2.2 Prerequisite Test Procedures/Effective Date/Description

XCP-ME-07/July 24, 1992, "Roll Filter Functional Test," Revision 7
XCP-ME-10/August 26, 1991 (Deleted)
XCP-ME-17/May 7, 1992, "Venting and Filling of Plant Instrumentation,"
Revision 0

2.3 Preoperational Test/Description

PT-02-01A, Revision 1 with Test Procedure Change (TPC) 1, "118 VAC Class 1E
Inverters"
PT-02-02C, Revision 1 with TPCs 1-8, "118 VAC Elar Inverters"
PT-02-14, Revision 0, "Plant Electrical Survey Test During HFT"
PT-07-02, Revision 1 with TPCs 1-3, "Control Room Temperature Survey"
PT-14-03, Revision 1, "Loss of Instrument Air"
PT-30-01A, Revision 1, "Diesel Generator Test Train A"
PT-34-05, Revision 0 with TPCs 1-5, "Steam Generator Narrow Range Level
Verification"
PT-36-01, Revision 1, "Safeguards Building Ventilation"
PT-39-01, Revision 1 with TPCs 1-3, "Diesel Generator Room HVAC"
PT-44-C1, Revision 1 with TPCs 1-4, "Steam Generator Blowdown and Cleanup"
PT-47-01, Revision 0, "Spent Fuel Pool Cleaning"
PT-49-04, Revision 0 with TPC 1, "Boron Thermal Regeneration System"
PT-59-02, Revision 0 with TPCs 1-14, "Process Sampling System"

PT-64-02, Revision 1, "Reactor Protection System Operational Checks"
PT-65-01, Revision 1, "Containment Atmosphere & Hydrogen Monitoring"
PT-71-01, Revision 0, "AC Essential Lighting"
PT-71-04, Revision 0, "Emergency DC Lighting"
PT-74-02, Revision 0 with TPCs 1-7, "Incore T/C & RTD Cross Calibrations"
PT-78-01, Revision 1, "ERF Computer Input Verification"
PT-90-03, Revision 0 with TPCs 1-7, "HFT Piping Thermal Expansion Test"

3 RECORDS SAMPLE

Prerequisite Test/Tag Number/Date

EE-08/2-8245/May 6, 1992
EE-08/2-8890A/February 18, 1992
EE-08/2-LS-0229/February 22, 1992
EE-10/2-FCV-0610/February 17, 1992
EE-11/2-8149C/March 1, 1992
EE-11/2-8155/February 28, 1992
EE-11/2-8877B/February 14, 1992
EE-11/2-8964/January 27, 1992
EE-11/2-FCV-0121/February 26, 1992
EE-11/2-HCV-0182/February 22, 1992
EE-11/2-LCV-0112A/February 3, 1992
EE-12/2-ALB-5A-1.6A/February 28, 1992
EE-12/2-ALB-5A-2.2C/February 18, 1992
EE-20/2-8809B/October 2, 1991
EE-20/2-8812B/October 2, 1991
ICA-105/2-FIS-0611/September 24, 1991
ICA-105/2-FIS-0162/October 18, 1991
ICA-105/2-HCV-0128/November 22, 1991

ICI-4663B/2-FT-0111/February 23, 1992

ICN-7880B/2-LT-0932/January 8, 1992