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September 25, 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. 50-445/92-25 AND 50-446/92 '5
 RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated August 27, 1992, concerning the inspection conducted by the NRC staff during the period June 14 through August 1, 1992. This inspection covered activities authorized by NRC Operating License NFP-87 and Construction Permit CPPR-127. Attached to the August 27, 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.

William J. Cahill, Jr.

By: *Roger D. Walker*
 Roger D. Walker
 Manager of Regulatory Affairs
 for NEO

280088

GLM/bm
 Attachment

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NOTICE OF VIOLATION
(446/9225-01)

Criterion V of Appendix B to 10 CFR Part 50 as implemented by Section 5 of the TU Electric Quality Assurance Manual, states, in part, "Activities affecting quality shall be prescribed by procedures and shall be accomplished in accordance with these procedures."

Operations Department Administrative Procedure ODA-410, "System Status Control," Revision 4, Step 6.1.8, requires, in part, that lineups which are incomplete or have unresolved discrepancies should not be placed in the system status file until completed with all discrepancies resolved. Step 6.1.9 requires, in part, that the discrepancy resolutions be clearly identified on the lineup and initialed and dated by the unit/shift supervisor.

Contrary to the above, on July 14, 1992, the inspector noted that the instrument air system valve and switch lineup was performed and, while still incomplete, was reviewed, signed as complete, and placed in the system status file. The integrated plant operating instruction was signed as having the instrument air system lined up for plant operations.

RESPONSE TO NOTICE OF VIOLATION
(446/9225-01)

TU Electric accepts the violation and the requested information follows:

(1) Reason for Violation

TU Electric performed a comprehensive review of the applicable documents and interviewed cognizant personnel. It was concluded by this review that the cause for this violation was a lack of attention to detail, by Unit 2 Operations personnel, in dispositioning the valve lineup discrepancies along with a lack of familiarity, by Unit 2 Operations personnel, with maintaining the Startup Operating Instructions (SOIs).

(2) Corrective Steps Taken and Results Achieved

The instrument air system valve lineup was immediately reperformed to confirm the exact configuration and no valves were found to be mispositioned. However, additional valves were discovered which were not listed in the Systems Operating Procedure (SOP).

Another lineup (including the additional valves) was performed and again, no mispositioned valves were discovered. A review of the twenty-nine SOPs required to support plant heatup was performed prior to exceeding the 200 degrees F plateau and no mispositioned or "additional" valves were identified.

A review of the twenty-nine SOPs required to support Hot Functional Testing (HFT) was performed prior to exceeding the 350 degrees F plateau and no mispositioned or "additional" valves were identified.

(3) Corrective Steps Taken to Avoid Further Violations

Operations Standing Order 92-0035 has been issued to provide additional guidance to ODA-407 "Guideline on Use of Procedures" and ODA-410 "System Status Control". Specifically, this standing order provides examples of difficulties experienced during implementation of SOPs and SOIs used to align Unit 2 systems for HFT. The standing order also offers solutions to these examples and provides a focal point for initiating changes to procedures. Reviews of the administrative controls delineated in ODA-407 and ODA-410 have been completed and procedural enhancements are being implemented. The need for increased attention to detail, both in the field and with documentation, has been emphasized to Operations personnel by Operations management.

(4) Date When Full Compliance Will be Achieved

Full compliance will be achieved by October 29, 1992.