

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Comanche Peak Steam Electric Station, Unit 2

Docket No.: 50-446

Operating License: NPF-87

Construction Permit No.: CPPR-127

During an NRC inspection conducted August 2 through September 12, 1992, violations 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, as implemented by Section 5 of the TU Electric Quality Assurance Manual, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions"

- (1) Contrary to the above, on June 29, 1992, it was determined that a blank flange had been left installed in a lubricating oil branch header in the No. 2-02 emergency diesel generator which resulted in significant engine damage. The documents controlling the work activities associated with the engine at the time, Flush Plan 2FP-3000-07 and Construction Work Document M2-0215-76958, were inadequate in ensuring that a condition adverse to quality did not occur.
- (2) Operations Department Administrative Procedure ODA-410, "System Status Control," Revision 4, Step 6.1.3, states, in part, that components in positions other than that specified in the system status file will have documentation of the position in the procedure controlling the activity, a clearance report, unit log, or shift turnover sheet.

Contrary to the above, on September 3, 1992, the Residual Heat Removal Pump 2-02 discharge valve, 2-8724B, was found closed when it's position as specified by the system status file would have been open. No documentation or justification for the valve being out-of-position could be determined.

This is a Severity Level IV violation. (Supplement II) (446/9234-01)

Pursuant to the provisions of 10 CFR Part 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 *5th* day of *October* 1992