## APPENDIX A

## NOTICE OF VIOLATION

TU Electric Company Docket: S0-446
Comanche Peak Steam Electric Station, Unit 2 Construction Permit: CPPR-127

During an NRC inspection conducted on September 8-10, 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:

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

Procedure 2PP-3.05, "Procedure for Processing of TU Evaluation Forms (TUE) and Conditional Release Requests," Section 4, defines a "Programmatic/Repetitive Condition" as "[a] condition which requires evaluation beyond that required for individual noncomformances or deficiencies. These conditions require a determination of cause, an evaluation of generic implications, corrective action, and preventive action. (Attachment 8.D)"

Procedure 2PP-3.05, Attachment 8.C, contains instruction for the RIO to determine if the "TUE [has] potential impact or impose differences to Unit 1. If yes, enter TE/GNE Form/DM number."

- A. Contrary to the above, the licensee faired to identify, in TUE 92-5633. Revision 1, the multiple loose instrument fittings as a condition that would require evaluations beyond that required for individual nonconformances or deficiencies.
- B. Contrary to the above, the licensee fail d to identify, in TUE S2-5633, Revision 1, a condition that had potential impact to Unit 1.

This is a Severity Level IV violation (446/9233-01) (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, TU Electric Company 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 wny 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 6th day of Cotober 1992