

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-445/92-33  
50-446/92-33

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 (CPSES), Units 1 and 2

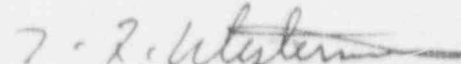
Inspection At: Glen Rose, Texas

Inspection Conducted: September 8-10, 1992

Inspectors: R. B. Vickrey, Reactor Inspector, Plant Systems Section  
Division of Reactor Safety

C. J. Paulk, Reactor Inspector, Plant Systems Section, Division  
of Reactor Safety

Approved:

  
T. F. Westerman, Chief, Plant Systems Section  
Division of Reactor Safety

10-5-92  
Date

Inspection Summary

Inspection Conducted September 8-10, 1992 (Report 50-445/92-33)

Areas Inspected: No inspection of CPSES, Unit 1, was performed.

Inspection Conducted September 8-10, 1992 (Report 50-446/92-33)

Areas Inspected: Routine, unannounced inspection of instrument component and system procedure reviews, work observations, and record reviews for Unit 2.

Results:

- The procedures reviewed were found to provide for the proper installation and protection of instruments. The procedures were as found to provide for the documentation and correction of deficiencies identified during hot functional, preoperational, and startup testing.

- The records reviewed were readily retrievable, legible, and complete.
- A violation for failure to follow procedure relating to the identification of a repetitive condition with potential impact on Unit 1 was identified.

Summary of Inspection Findings:

- IP 52051 was closed (paragraph 2)
- IP 52053 was closed (paragraph 3)
- IP 52055 was closed (paragraph 4)
- Violation 446/9233-01 was opened (paragraph 3)
- Bulletin 90-01 was closed (paragraph 4)

Attachment

- Attachment - Persons Contacted and Exit Meeting

## DETAILS

### 1 PLANT STATUS

During this inspection period, CPSES, Unit 1, was at 100% and CPSES, Unit 2, was under construction, preparing for the structural integrity and integrated leak rate tests.

### 2 INSTRUMENT COMPONENTS AND SYSTEMS - PROCEDURE REVIEW (52051)

During previous NRC inspections, the licensee's procedures for installation of instruments were reviewed by the inspectors. The inspectors concluded that the licensee had developed procedures to ensure proper installation and protection of instruments.

During this inspection, the inspectors reviewed Procedure 2PP-3.05, Revision 2, "Procedure for Processing of TU Evaluation Forms (TUE) and Conditional Release Requests (CRRs)." The inspectors concluded that this procedure, if followed, would provide for the documentation and correction of deficiencies identified during hot functional, preoperational, and startup testing.

This module is considered closed on the basis of this and previous inspections.

### 3 INSTRUMENT COMPONENTS AND SYSTEMS - WORK OBSERVATION (52053)

During previous NRC inspections, the licensee's work performance, work in progress, and completed work were reviewed by the inspectors. The inspectors concluded that the licensee had accomplished work activities relative to safety-related instrument components and systems in accordance with NRC requirements and licensee procedures.

During this inspection, the inspectors review of completed instrument installations identified several instruments with TUE deficiency tags attached. The tags identified loose electrical conduit seal assembly (ECSA) fittings on the instruments. The inspectors requested a copy of TUE 92-5633 to review the details of the deficient conditions identified by the tags. The TUE condition details reflected that as a result of 5 TUE's being generated that document loose fittings on 10 Rosemount ECSA's a walkdown was performed. That walkdown sampled 29 additional ECSA's. Six of those 29 were found to have loose fittings where the street ells attach to the transmitter housings. The TUE disposition was to repair the 6 deficient components in accordance with the details provided in DCA-102468. As a result of the inspectors review of the TUE, the inspectors were concerned with the number of loose fittings and whether the licensee was adequately addressing the situation.

The inspectors met with licensee personnel to discuss their concerns with the apparent dispositions of TUE 92-5633. During this meeting, the inspectors

expressed a concern that in light of the number of loose fittings identified that:

- The TUE disposition did not address a walkdown of all Rosemount ECSA's;
- Block number 10C of the TUE did not indicate the condition identified as a programmatic/repetitive condition; and
- Block Number 15 of the TUE was marked N/A for potential unit 1 impact.

Procedure 2PP-3.05, Section 6.3.3, stated that the "Responsible Inspection Organization (RIO) . . . completes blocks 10 and 11 in accordance with Attachment 8.C . . . ."

Procedure 2PP-3.05, Attachment 8.C, contained instructions for the RIO or Quality Assurance to indicate in Block 10C of the TUE if "[t]he condition identified is considered a programmatic/repetitive condition as defined in Section 4 and Attachment 8.D . . . ."

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

Procedure 2PP-3.05, Attachment 8.D, stated that an example of a repetitive condition would be the "[r]ecurrence of nonconformances or deficiencies in excess of normal or predictable limits."

Although the licensee understood the basis for the inspectors' concerns, the licensee was unable to provide a formal basis for their previous decisions in these matters.

In response to the above concerns, the inspectors conducted a limited walkdown of ECSA's inside containment to inspect for unidentified loose fittings. During the walkdown, the inspectors found five unidentified loose fittings. Two of the five unidentified loose fittings were previously walked down by the licensee as a part of the aforementioned sample. These two were not among the six loose fittings the licensee had documented from their walkdown. The inspectors provided the licensee with the instrument identification numbers of the five transmitters with the loose fittings.

During a subsequent meeting with the licensee, the inspectors were informed of a special quality accountability meeting. The meeting had been conducted on June 30, 1992, to discuss loose ECSA fittings on Rosemount transmitters as indicated on TUE 92-5633. The inspectors were presented with and reviewed a summary of actions or conclusions resulting from the meeting. The inspectors noted that the summary had a statement to include notification to Unit 1 and did not consider the condition to be a programmatic or repetitive condition since the scope was well defined. The licensee was unable to provide the inspectors with a formal methodology for informing Unit 1 or a good

explanation as to why the number of loose fittings would not constitute an excess of normal or predictable limits and therefore constitute a programmatic/repetitive condition.

Also during this meeting, the inspectors reviewed DCA-102468 and questioned the licensee about whether their alternative repair method, using Devcon Titanium Putty, had been adequately evaluated to maintain the equipment environmental seal qualification. The licensee responded to the inspectors' concerns about whether all questions had been answered as to the environmental qualification of the Devcon Titanium Putty repair method. Since this alternate method of repair had not been actually used the licensee agreed to reevaluate it prior to using it as a method of repair.

The licensee's actions with respect to not identifying the loose fittings as a programmatic/repetitive condition or formally informing Unit 1 are identified as a failure to follow the procedure requirements of 2PP-3.05 (Violation 446/9233-01).

This module is considered closed on the basis of this and previous inspections.

#### 4 INSTRUMENT COMPONENTS AND SYSTEMS - RECORD REVIEW (52055)

During previous NRC inspections, installation records for various instruments were sampled by the inspectors. The inspectors found the records to have been readily retrievable, legible, and complete.

During this inspection, the inspectors also found the records to have been readily retrievable, legible, and complete. The inspectors reviewed the documentation of the repair to transmitters and found them to be in accordance with the licensee's procedures.

On March 9, 1990, the NRC issued Bulletin 90-01, "Loss of Fill-Oil in Transmitter Manufactured by Rosemount." As documented in NRC Inspection Report 50-445/91-33; 50-446/91-33, the licensee had removed the Rosemount transmitters and sent them to be remanufactured or replaced. The inspectors found the transmitters that were remanufactured were stamped with an "A" for identification as stated in the licensee's correspondence. The inspectors also noted that the replacement transmitters were manufactured after July 11, 1989.

This module is considered closed on the basis of this and previous inspections. Bulletin 90-01 is considered closed for Unit 2.

## ATTACHMENT

### 1 PERSONS CONTACTED

#### 1.1 Licensee Personnel

- \*W. Cahill, Group Vice President
- \*E. Gully, Engineer
- \*T. Heatherly, Licensing Engineer
- \*D. McAfee, Manager, Quality Assurance
- \*C. Rau, Unit 2 Plant Manager
- \*L. Walker, Licensing Engineer
- \*J. Wren, Construction Quality Assurance Manager

#### 1.2 Contract Personnel

- \*I. Hughes, Assistant Project Construction Engineer, Brown and Root Construction
- \*E. Magilley, Assistant Manager, Stone and Webster Quality Control
- \*J. Snyder, Startup Engineer, Bechtel
- \*W. Whitley, Assistant Superintendent, Stone and Webster Quality Control

#### 1.3 Case Personnel

- \*O. Thero, Consultant

#### 1.4 NRC Personnel

- \*D. Graves, Senior Resident Inspector, Unit 2
- R. Latta, Resident Inspector, Unit 2

\* Denotes personnel that attended the exit meeting.

### 2 EXIT MEETING

An exit meeting was conducted on September 10, 1992. During this meeting, the inspectors reviewed the scope and findings of the report. The licensee did not identify as proprietary any information provided to, or reviewed by, the inspectors.