

ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

During an NRC inspection conducted on February 18 through March 30, 1996, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification 6.8.1 requires the licensee to establish, implement, and maintain procedures covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A requires administrative procedures for component configuration control.

Station Administrative Procedure STA-605, "Clearance and Safety Tagging," Revision 13, dated January 12, 1996, Section 6.11.1, required, in part, that equipment be placed in its required position.

Operations Work Instruction OWI-103, "Locked Component Listings and Deviation Control," Revision 8, dated November 7, 1994, stated, in part, that the shift manager, unit supervisor, and qualified operators ensure that a locked component that is repositioned or unlocked is done so in accordance with the requirements of Operations Department Administration Control 403 (ODA-403). Procedure ODA-403, "Operations Department Locked Component Control," Step 5.4, required, in part, that the shift manager or unit supervisor ensure that any locked component which is repositioned or unlocked is properly logged in the Locked Component Deviation Log.

Contrary to the above, the following four examples of failure to follow component configuration control procedures were identified:

1. On March 28, 1996, during the implementation of Clearance 2-96-00949 in Unit 2, operators closed the operating residual heat removal pump discharge isolation valve causing a partial loss of core decay heat removal flow rather than closing the safety injection pump discharge isolation valve specified on the clearance.
2. On March 28, 1996, during a release of Clearance X-95-1867, technicians and operators opened the wrong drawer in Switchgear 2EA1, Cubicle 3, resulting in an engineered safety features actuation.
3. On February 3, 1996, while implementing a clearance for Work Order 4-96-097125-00 to replace the Unit 1 reactor coolant pump seal water return filter, operators failed to follow System

Operating Procedure SOP-103A, as required by the clearance order, which resulted in the discharge of 450 gallons of reactor coolant to the pressurizer relief tank and the containment sump.

4. On March 15, 1996, the unit supervisor authorized maintenance on the locked open positive displacement/centrifugal charging pump crosstie valve (Valve 2-8341) in Unit 2 without logging a deviation in the locked component deviation log. As a result, the positive displacement pump was operated for 63 minutes with its suction valve only partially open because operators did not recognize that the locked open tag left on the operator for Valve 2-8341 did not represent the actual valve position.

This is a Severity Level IV violation (Supplement I). (50-445/9604-01; 50-446/9604-01)

Pursuant to the provisions of 10 CFR 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, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice of Violation (Notice), within 30 days of the date of the letter transmitting this 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a 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.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if it is necessary to include such information, it should clearly indicate the specific information that should not be placed in the PDR, and provide the legal basis to support the request for withholding the information from the public.

Dated at Arlington, Texas
this 26th day of April 1996