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# IR 92-33  
Ref. # 10CFR2.201

**TU**ELECTRIC

December 29, 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. 50-445/92-33; 50-446/92-33  
SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION

- REF: 1) TU Electric letter from William J. Cahill, Jr.  
to USNRC logged TXX-92505 dated November 5, 1992
- 2) USNRC letter from A. Bill Beach to William J. Cahill, Jr.  
dated December 22, 1992

Gentlemen:

This is in response to a request for supplemental information submitted by Reference 2. We have reviewed your request and the requested information follows:

- a) Plans and schedule for review of loose Electrical Conduit Seal Assemblies (ECSAs) on Unit 1:

In response to the Notice of Violation (Reference 1), we stated that an assessment of this matter was performed by an independent reviewer, and a report documenting the results of this matter was issued on November 2, 1992. This report stated that a walkdown of all ECSAs outside the containment was conducted on September 11, 1992. A total population of thirty three (33) ECSAs were inspected in Unit 1. There were four (4) cases where configurations similar to Unit 2 were used (i.e., a street-elbow). None of these cases used a locknut but were considered to have the minimum required thread engagement and were adequately tight. Additionally, presence of titanium putty was not observed.

The aforementioned assessment also concluded that the root cause of loose ECSA assemblies was incidental damage resulting from unrelated construction work activities in the area, and was deemed improbable to recur in an operational environment.

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b) Other TUE forms with potential Unit 1 impact:

The assessment report (see (a) above) documents a review of a representative sample of TUEs. This report concluded that verbal communication regarding this issue did occur with cognizant Unit 1 personnel. However, this was not documented as required by 2PP-3.05. This lack of documentation appeared to be an isolated occurrence. TUE form 92-6292 was issued to document this condition. The disposition of this form yielded similar results.

c) Assurance that an appropriate threshold for initiation of a Programmatic/Repetitive TUE form is established and implemented in the future:

The corrective actions for this issue were to: address this concern at the Quality Accountability and the TUE Form committee meetings, to ensure the personnel involved in the review process have a heightened awareness of the need to evaluate TUEs carefully for Programmatic/Repetitive conditions and to ensure that decisions on judgmental issues such as potential reportability, notification of Unit 1 and need for Programmatic/Repetitive TUEs are thoroughly documented when the rationale is not readily apparent. Additionally, these instructions were also distributed to cognizant personnel via a memorandum.

The assessment report and supporting documents are available at CPSES for your review. Should you have any questions or need additional information, please contact Obaid Bhatta at (817) 897-5839.

Sincerely,

*William J. Cahill, Jr.*

William J. Cahill, Jr.

By: *Roger D. Walker*

Roger D. Walker  
Manager of Regulatory  
Affairs for NEO

OB/tg

c - Mr. J. L. Milhoan, Region IV  
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Mr. L. Yandell, Region  
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