



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 R-AN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JAN 22 1993

Docket Nos. 50-445
50-446
License No. NPF-87
Construction Permit No. CPPR-127

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: MANAGEMENT MEETING ON THE COMANCHE PEAK STEAM ELECTRIC STATION
TEMPORARY MODIFICATION PROGRAM

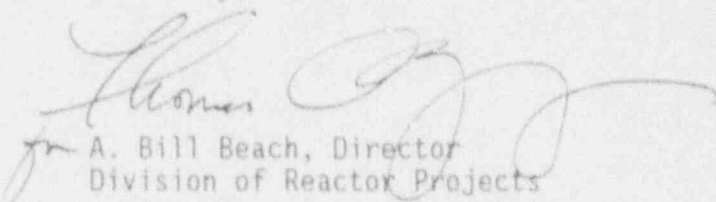
This refers to the management meeting, open to public observation, conducted at TU Electric's request in the Region IV office on January 15, 1993, pertaining to the Comanche Peak Steam Electric Station (CPSES) temporary modification program and its implementation. This meeting was attended by those on the attached Attendance List.

The subjects discussed are described in the enclosed Meeting Summary. Your presentation was beneficial and has provided a better understanding of the temporary modification program and its implementation on CPSES, Units 1 and 2.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,


A. Bill Beach, Director
Division of Reactor Projects

Enclosure:
Meeting Summary w/attachments

cc: (see next page)

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PDR ADOCK 05000445
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TU Electric

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cc w/enclosure:

TU Electric

ATTN: Roger D. Walker, Manager of
Regulatory Affairs for Nuclear
Engineering Organization

Skyway Tower

400 North Olive Street, L.B. 81

Dallas, Texas 75201

Juanita Ellis

President - CASE

1426 South Polk Street

Dallas, Texas 75224

GDS Associates, Inc.

Suite 720

1850 Parkway Place

Marietta, Georgia 30067-8237

TU Electric

Bethesda Licensing

3 Metro Center, Suite 610

Bethesda, Maryland 20814

Jorden, Schulte, and Burchette

ATTN: William A. Burchette, Esq.

Counsel for Tex-La Electric

Cooperative of Texas

1025 Thomas Jefferson St., N.W.

Washington, D.C. 20007

Newman & Holtzinger, P.C.

ATTN: Jack R. Newman, Esq.

1615 L. Street, N.W.

Suite 1000

Washington, D.C. 20036

Texas Department of Licensing & Regulation

ATTN: G. R. Bynog, Program Manager/

Chief Inspector

Boiler Division

P.O. Box 12157, Capitol Station

Austin, Texas 78711

Honorable Dale McPherson

County Judge

P.O. Box 851

Glen Rose, Texas 76043

TU Electric

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Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

Owen L. Thero, President
Quality Technology Company
Lakeview Mobile Home Park, Lot 35
4793 E. Loop 820 South
Fort Worth, Texas 76119

TU Electric

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JAN 22 1993

bcc to DMB (IE45)

bcc distrib. by RIV:

J. L. Milhoan

DRP

Lisa Shea, RM/ALF, MS: MNBB 4503

DRSS-FIPS

Project Engineer (DRP/B)

DRS

Resident Inspector (2)

Section Chief (DRP/B)

MIS System

RIV File

Section Chief (DRP/TSS)

290041

MEETING SUMMARY

Licensee: TU Electric
Facility: Comanche Peak Steam Electric Station, Units 1 and 2 (CPSES)
License Nos.: NPF-87
Docket Nos.: 50-445 and 50-446
Subject: MANAGEMENT MEETING ON TEMPORARY MODIFICATION PROGRAM

On January 15, 1993, in the Region IV office, representatives of TU Electric made a presentation pertaining to the temporary modification program at CPSES. This presentation included: (1) a review of the temporary modification issues from an historical perspective, management actions during this period, and interim improvements; (2) a discussion of the task team evaluation, including methodology, findings, causes and corrective actions, generic implications, and conclusions; (3) a review of CPSES overview activities, previous evaluations, and future actions; and (4) closing remarks by TU Electric management.

The licensee responded to several questions by NRC staff, and the meeting was concluded with closing remarks by the Regional Administrator.

This meeting was open to public observation.

Attachments:

1. Attendance List
2. Licensee Presentation (NRC distribution only)

ATTENDANCE LIST

Attendance at the management meeting between HL&P and NRC on January 13, 1993, in the Region IV office:

TU Electric

W. Cahill, Jr., Group Vice President - Nuclear
J. Kelley, Vice President - Nuclear Operations
M. Blevins, Director of Overview
R. Walker, Manager of Regulatory Affairs for Nuclear Engineering Organization
W. Guldmond, Independent Safety Engineering Group (ISEG) Manager
J. Marca, Engineering Outage Coordinator
D. Fiorelli, Public Information
S. Palmer, Stipulation Manager

NRC

J. Milhoan, Regional Administrator
A. Beach, Director, Division of Reactor Projects (DRP)
T. Gwynn, Deputy Director, DRP
L. Yandell, Chief, Project Section B, DRP
W. Jones, Senior Resident Inspector, Project Section B, DRP
T. Westerman, Chief, Engineering Section, Division of Reactor Safety (DRS)
T. Stetka, Chief, Maintenance Section, DRS
D. Graves, Senior Resident Inspector, Project Section B, DRP (via telephone)

Others

G. Edgar, Newman & Holtzinger, Attorneys for TU Electric
B. Brink, Citizens for Fair Utility Regulation
C. Brink, Citizens for Fair Utility Regulation
A. Baker, Fort Worth Star-Telegram
R. Loftis, Dallas Morning News
O. Thero, Citizens Association for Sound Energy
E. Tomlinson, former Brown & Root employee
E. Burnam, Fort Worth Audubon Conservation
L. Burnam, North Texas Director, Texas Citizens Action

TU Electric

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JAN 22 1993

bcc to DMB (IE45)

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J. L. Milhoan

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RIV: C:DRP/B	DD:DRP	D:DRP		
LAYandell/df	TPGwynn	ABBeach		
1/21/93	1/21/93	1/22/93		

**NRC/TU ELECTRIC
MANAGEMENT MEETING
ON
TEMPORARY MODIFICATIONS**

JANUARY 15, 1993

AGENDA

- o INTRODUCTION - J. J. KELLEY, JR.
- o TASK TEAM EVALUATION - J. J. LAMARCA
- o OVERVIEW ACTIVITIES - M. R. BLEVINS

BACKGROUND

- o TEMPORARY MODIFICATION (TM) RELATED ISSUES WERE IDENTIFIED PRIOR TO UNIT 1 SECOND REFUELING OUTAGE
 - PLANT INCIDENT REPORT (PIR) 91-555 INITIATED
 - INDEPENDENT SAFETY ENGINEERING GROUP (ISEG) SURVEILLANCE IN JULY 1992
 - TREND IN CONFIGURATION MANAGEMENT ISSUES IDENTIFIED
 - UNIT 2 STARTUP TM ISSUES
- o ACTIONS TAKEN OR INITIATED TO ADDRESS ISSUES
- o ISSUES DURING UNIT 1 SECOND REFUELING OUTAGE
- o MANAGEMENT ACTIONS TAKEN DURING SECOND REFUELING OUTAGE
 - WALKDOWN OF TM TAGS
 - ENGINEERING CREWS TRAINED ON EACH SHIFT ON SELF CHECKING
 - RE-IMPACTED TRAIN A
 - MANAGEMENT EMPHASIS ON FIELD IMPLEMENTATION/PERSONAL CHECKING

BACKGROUND (CONT'D)

- DECISION TO ESTABLISH TASK TEAM
- o INTERIM IMPROVEMENTS
 - DEDICATED TM COORDINATOR
 - DAILY REPORTS TO OPERATIONS ON VITAL STATION DRAWINGS AFFECTED BY TMs
 - SHIFTLY REVIEWS OF VITAL STATION DRAWINGS AFFECTED BY TMs IN CONTROL ROOM AND CLEARANCE PROCESSING CENTER
 - DAILY REVIEW OF VITAL STATION DRAWINGS AFFECTED BY TMs IN THE WORK CONTROL CENTER
 - SORC APPROVAL PRIOR TO TM IMPLEMENTATION
 - ENGINEERING TECHNICAL REVIEW OF TMs
 - ADDITIONAL VERIFICATION OF TM IMPLEMENTATION
 - OPERATIONS SUPPORT REVIEW OF TMs PRIOR TO SHIFT SUPERVISOR "INSTALLATION COMPLETE" SIGNATURE
 - TM COORDINATOR REVIEW OF TM PACKAGES FOR ADMINISTRATIVE COMPLIANCE

BACKGROUND (CONT'D)

- OPERATIONS EVALUATION OF TM IMPACT ON ALL "ACCEPTED" AND "PREPARED" CLEARANCES PRIOR TO SHIFT SUPERVISOR AUTHORIZATION FOR INSTALLATION
- OPERATIONS EVALUATION OF "ACCEPTED" CLEARANCES FOR IMPACT BY INSTALLED TMs (COMPLETE)

EXECUTIVE SUMMARY

- o TEMPORARY MODIFICATIONS ARE A NECESSARY TOOL TO AVOID UNNECESSARY PLANT TRANSIENTS
- o PROBLEMS DISCOVERED WITH TEMPORARY MODIFICATIONS TO DATE HAVE NOT HAD A NUCLEAR SAFETY IMPACT
- o PROBLEMS DISCOVERED WITH TEMPORARY MODIFICATIONS TO DATE HAVE RESULTED IN A SMALL NUMBER OF PERSONNEL/INDUSTRIAL SAFETY NEAR MISS ISSUES
- o OUTAGE-RELATED EMERGENT PROBLEM RESPONSE TIMELINESS
- o CORRECTIVE ACTIONS FOR PREVIOUSLY IDENTIFIED PROBLEMS APPEARED EFFECTIVE
- o FOLLOWUP ON EFFECTIVENESS OF CORRECTIVE ACTION
- o POTENTIAL PROCESS CAPABILITY LIMITATIONS RELATIVE TO OUTAGE WORK LOAD EVALUATION
- o INTERIM ACTIONS ARE IN PLACE WHICH ASSURE THE INTEGRITY OF THE PROCESS FOR BOTH UNIT 1 AND UNIT 2 UNTIL FINAL ACTIONS CAN BE COMPLETED

TASK TEAM EVALUATION

- o PURPOSE
- o METHODOLOGY
- o FINDINGS
- o CAUSES OF ISSUES
- o CORRECTIVE ACTIONS
- o GENERIC IMPLICATIONS
- o EVALUATION OF PRIOR CORRECTIVE ACTIONS

PURPOSE

- o TO EVALUATE COLLECTIVE SIGNIFICANCE OF TM - RELATED ISSUES SINCE 12/03/89 FOR UNITS 1 AND 2

METHODOLOGY

- o FOR UNIT 1, IDENTIFY SPECIFIC ISSUES RELATED TO TM
- o GROUP ISSUES INTO CATEGORIES
- o IDENTIFY CAUSES OF COLLECTIVE ISSUES
- o REVIEW UNIT 2 CORRECTIVE ACTIONS FOR LESSONS LEARNED
- o MAKE CORRECTIVE ACTION RECOMMENDATIONS FOR THE CAUSES
- o IDENTIFY POSSIBLE GENERIC IMPLICATIONS OF ISSUES AND RECOMMEND RESOLUTIONS

TASK TEAM FINDINGS

- o TM PROGRAM NECESSARY TO RESPOND TO EMERGENT ISSUES AND AVOID PLANT TRANSIENTS
- o OVERALL TM PROGRAM AS IMPLEMENTED HAS SUPPORTED CONTINUED SAFE PLANT OPERATION
 - BLIND FLANGE INSTALLED ON CONTAINMENT PURGE LINE
 - AUXILIARY COOLING FOR ROD CONTROL CABINETS
 - SOLID STATE PROTECTION SYSTEM INADVERTENT ACTUATION
 - UNIT 2 NUISANCE ALARMS REMOVED
 - AC INPUT TO INVERTERS REMOVED

TASK TEAM FINDINGS (CONT'D)

o IDENTIFIED ISSUES

- IN SOME CASES VITAL STATION DRAWINGS IN THE CONTROL ROOM, WORK CONTROL CENTER, AND CLEARANCE PROCESSING CENTER DID NOT REFLECT TMs
- INSTANCES OF INCOMPATIBILITIES BETWEEN TMs AND CLEARANCES
- SOME TECHNICAL REVIEW ISSUES
- SOME TM TAGS MISSING/LACKING IN CONTENT
- MISCELLANEOUS ADMINISTRATIVE ERRORS

CAUSES OF ISSUES

- o SHORTCOMINGS IN DRAWING CONTROL PROCESSES FOR TMs
- o INSUFFICIENT VERIFICATION OF COMPATIBILITY OF ACTIVITIES INVOLVING TMs
- o TECHNICAL REVIEW INSUFFICIENT
- o INCONSISTENT UNDERSTANDING OF EXPECTATIONS REGARDING TAGGING REQUIREMENTS
- o LACK OF PROCEDURE SPECIFICITY AND PERSONNEL UNDERSTANDING

CORRECTIVE ACTIONS

- o DRAWING CONTROL PROCESS FOR TMs
 - ENHANCE METHODOLOGY FOR POSTING TMs AGAINST DRAWINGS
- o VERIFICATION OF COMPATIBILITY OF ACTIVITIES INVOLVING TMs
 - IMPROVE COORDINATION AND SCHEDULING OF TMs PRIOR TO THE OUTAGE
 - REDETERMINE IMPACT OF TMs AND CLEARANCES AT ISSUANCE
 - INVESTIGATE TOOLS TO FACILITATE REVIEWS AND TRAIN PERSONNEL
- o TECHNICAL REVIEW
 - PERFORM ADDITIONAL ENGINEERING REVIEW
- o UNDERSTANDING EXPECTATIONS REGARDING TAGGING REQUIREMENTS
 - USE CAUTION TAGS ON TEMPORARY POWER SUPPLIES AND OTHER LOCATIONS AS NECESSARY

CORRECTIVE ACTIONS (CONT'D)

- o LACK OF PROCEDURE SPECIFICITY AND PERSONNEL UNDERSTANDING
 - ENHANCE PROCEDURES AND TRAIN PERSONNEL

GENERIC IMPLICATIONS

- o OTHER PROGRAMS FUNCTIONING ACCEPTABLY UNDER NORMAL CONDITIONS MAY EXPERIENCE PROBLEMS WHEN ACTIVITY LEVEL CHANGES SIGNIFICANTLY
 - IDENTIFY PROGRAMS SUSCEPTIBLE TO LARGE VARIATIONS IN ACTIVITY
 - PROACTIVELY INITIATE MONITORING OR CHANGES WHEN CHALLENGES ARE ANTICIPATED
- o OTHER PROGRAMS MAY HAVE UNIDENTIFIED COMPATIBILITY INTERACTIONS
 - IDENTIFY SUBJECT PROGRAMS AND ESTABLISH INTERACTION CONTROLS
- o OTHER DESIGN CHANGE PROCESSES MAY HAVE SIMILAR PROBLEMS
 - TASK TEAM REVIEW TO BE CONDUCTED

TEAM EVALUATION OF PRIOR CORRECTIVE ACTIONS

- o REVIEWED CLOSED TM ONE FORMS WITH IMPLEMENTED CORRECTIVE ACTIONS
- o CORRECTIVE ACTIONS APPEARED SUFFICIENT TO CORRECT SPECIFIC DEFICIENCIES
- o PIR 91-555 RESULTED IN SOME BROAD CORRECTIVE ACTIONS BUT ROOT CAUSE REVIEW REMAINS OPEN

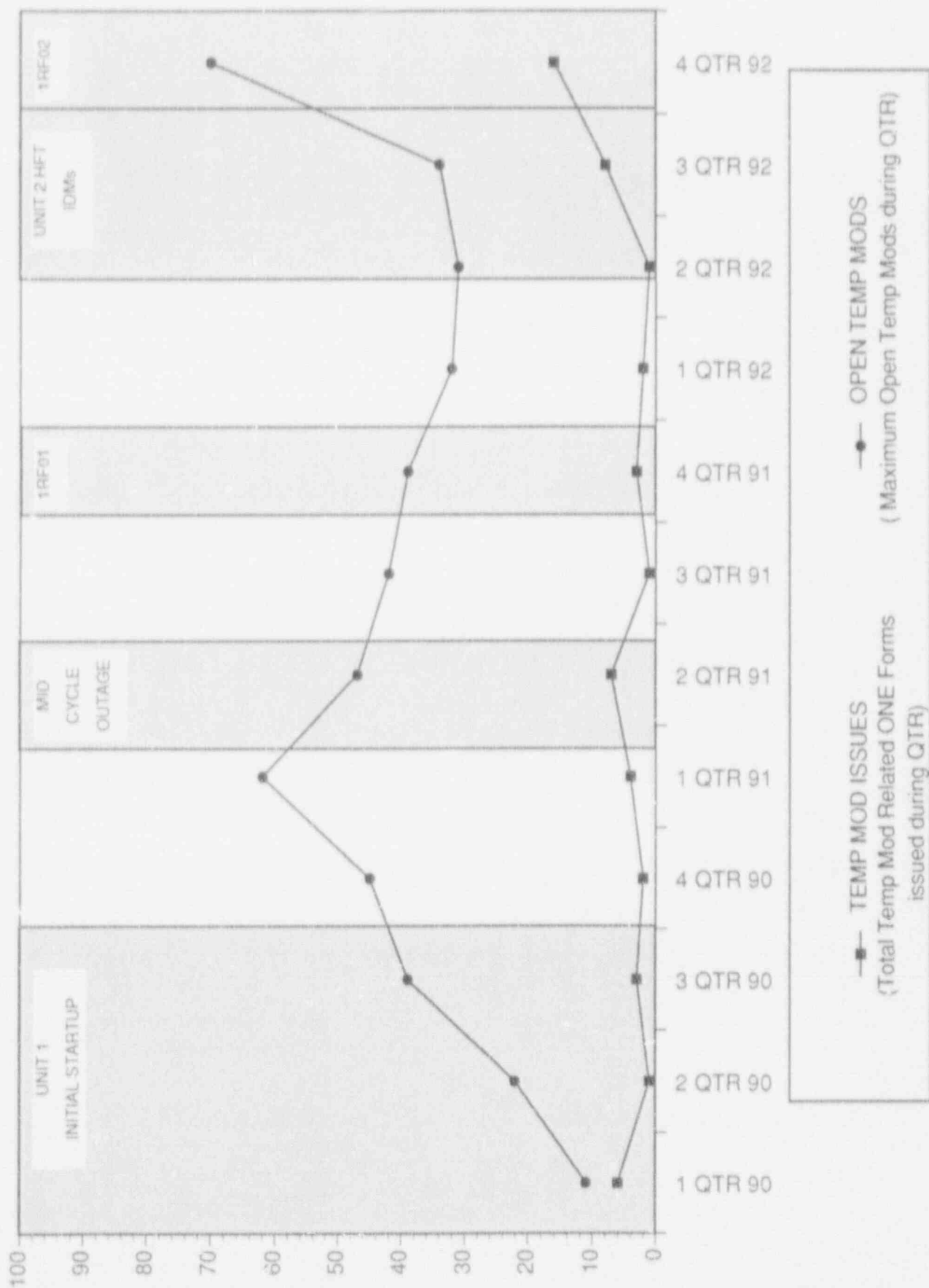
TASK TEAM CONCLUSIONS

- o TU ELECTRIC IDENTIFIED AND RECOGNIZED PROBLEMS WITH TMs
- o SPECIFIC DEFICIENCIES ADDRESSED
- o INTERIM ACTIONS TAKEN
- o TASK TEAM EVALUATIONS
- o BROADER ISSUES IDENTIFIED
- o UNIT 2 CORRECTIVE ACTIONS ARE ADDRESSED IN THE RECOMMENDED CORRECTIVE ACTIONS
- o CORRECTIVE ACTIONS TO BE TAKEN FOR ISSUES AND GENERIC IMPLICATIONS

OVERVIEW ACTIVITIES

- o HISTORICAL REVIEW
- o EVALUATION OF PREVIOUS OVERVIEW
ACTIVITIES/ACTIONS
- o FUTURE ACTIONS

TEMPORARY MODIFICATION HISTORY



HISTORICAL REVIEW

- o RELATIVELY CONSISTENT PERFORMANCE UNTIL MID-CYCLE OUTAGE
- o APRIL 1991 PIR 91-555 INITIATED BY ISEG TO ADDRESS MID-CYCLE OUTAGE PROBLEMS, PLANT PERFORMANCE OPERATIONS REPORT (PPOR) WEAKNESS IDENTIFIED
- o JUNE 1991 QA AUDIT SHOWS SATISFACTORY PROGRAM IMPLEMENTATION
- o FIVE ADDITIONAL ISEG SURVEILLANCES IN 1991 IDENTIFIED MISCELLANEOUS PROBLEMS
- o RATE OF PROBLEMS DROPS UNTIL JUST PRIOR TO RF02
- o JULY 1992 ISEG SURVEILLANCE IDENTIFIED FOUR ONE FORM CONDITIONS, PPOR WEAKNESS IDENTIFIED
- o FOLLOWUP MEETINGS WITH OPERATIONS AND PLANT ENGINEERING RESULTS IN OPERATIONS REVIEW OF DRAWINGS
- o WHILE AUGUST 1992 ISEG FOLLOWUP INDICATED SOME CONTINUING PROBLEMS, PROGRESS AND MANAGEMENT ATTENTION EVIDENT, NO ONE FORM CONDITIONS IDENTIFIED

HISTORICAL REVIEW
(CONT'D)

- o SORC AND ORC DISCUSSIONS OF ISSUES AND NEEDED ACTIONS
- o OCTOBER 1992 QUALITY ASSURANCE DEFICIENCY ISSUED
- o NOVEMBER 1992 ANALYSIS OF REPETITIVE CONDITION (ARC) ISSUED
- o INITIAL AND FOLLOWUP REVIEWS OF UNIT 2 TMs DURING READINESS ASSESSMENT YIELD SATISFACTORY RESULTS EXCEPT FOR ONE DRAWING POSTING PROBLEM

EVALUATION OF PREVIOUS OVERVIEW
ACTIVITIES/ACTIONS

- o OVERVIEW HAS ROUTINELY PROVIDED OVERVIEW OF
TM/PROGRAM ACTIVITIES
- o DEPARTURES FROM "NORMAL" PERFORMANCE HAVE BEEN
IDENTIFIED AND ACTION INITIATED, INCLUDING
MANAGEMENT NOTIFICATION
- o PRIOR FOLLOWUP ACTIVITIES HAVE GENERALLY
INDICATED SATISFACTORY OR IMPROVING PERFORMANCE
- o MORE FOLLOWUP BY OVERVIEW MAY HAVE RESOLVED
ISSUES EARLIER
- o OVERVIEW ACTIVITIES SHOULD REFLECT OUTAGE
PROGRAM ACTIVITY AND RESOURCE SHIFTS AS WELL AS
INDIVIDUAL ACTIVITIES
 - REDIRECT SURVEILLANCE ACTIVITIES
 - IDENTIFY SPECIAL TREND SUBJECTS

FUTURE ACTIONS

- o CONTINUE TRENDING OF TM ISSUES UNTIL STABLE SATISFACTORY PERFORMANCE OBTAINED
- o PERFORM EFFECTIVENESS EVALUATION OF PROJECT CORRECTIVE ACTIONS FOR TM ISSUES
- o EXAMINE SAMPLE OF PLANNED TMs FOR COMPATIBILITY WITH EXPECTED PLANT CONDITIONS/ACTIVITIES
- o COORDINATE REEVALUATION OF OPEN ONE FORMS, PLANT INCIDENTS, AND INDUSTRY OPERATING EXPERIENCE REPORTS OVER SIX MONTHS OLD TO ASSURE APPROPRIATE PRIORITIZATION
- o INSTITUTE REVIEWS OF OVERVIEW FINDINGS OPEN > 90 DAYS WITH RESULTS REPORT TO SENIOR MANAGEMENT
- o ADJUST OVERVIEW OUTAGE PLANNING TO ADDRESS ANTICIPATED PROGRAM ACTIVITY AND RESOURCE SHIFTS
- o REEMPHASIZE EVALUATION OF CORRECTIVE ACTION EFFECTIVENESS AS PART OF OVERVIEW ACTIVITIES