

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER * 400 NORTH OLIVE STREET, L.B. 81 * DALLAS, TEXAS 75201

BILLY R. CLEMENTS
VIC* PRESIDENT, NUCLEAR OPERATIONS

August 17, 1984
TXX-4253

AUG 17 1984

Mr. Richard L. Bangart, Director
Region IV Comanche Peak Task Force
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Docket Nos.: 50-445
50-446

Comanche Peak Steam Electric Station
Response to NRC Notices Of Violations
Inspection Report No. 84-21
File No.: 10130

Dear Mr. Bangart:

We have reviewed your letter dated July 18, 1984 on the inspection conducted by the Office of Inspection and Enforcement and by Mr. W. F. Smith regarding Comanche Peak, Unit 1. We have responded to the findings listed in the Appendix of that letter.

To aid in the understanding of our response, we have repeated the requirements and your findings, followed by our corrective actions. We feel the enclosed information to be responsive to the Inspector's findings. If you have any questions, please advise.

Very truly yours,

for *Richard A. Kahler*
Billy R. Clements

BRC:msc

c: NRC Region IV - (0+1)

Director, Inspection & Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station

Docket: 50-445/84-21
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of June 14-16, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR-8583, dated March 8, 1984, the following violations were identified:

1. Criterion V of Appendix B to 10 CFR 50 states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Contrary to the above, on June 16, 1984, an operator proceeded to partially open Station Service Water Chlorination Valve XSW-042 in violation of Step 5.4.1.6 of System Operating Procedure SOP-501A (Rev. 0), "Station Service Water System," which requires XSW-036 to be opened. The operation was aborted and the valve restored to the shut position only after the NRC inspector pointed out the procedure violation. Subsequently, it was determined that the procedure was in error, thus was changed accordingly and the operation resumed by opening Valve XSW-042.

This is a Severity Level IV Violation. (Supplement II-D) (445/8421-01)

Discussion

The subject violation occurred during conduct of a preoperational test. The CPSES Final Safety Analysis Report (FSAR) requires trial use of plant operating procedures during the startup test program. The following is an excerpt from the CPSES FSAR, Section 14.2.9:

14.2.9 TRIAL USE OF PLANT OPERATING AND EMERGENCY PROCEDURES

The plant operating emergency and surveillance procedures will be use-tested during the test program and will also be used in the development of preoperational and initial startup procedures to the extent practical. The trial use of operating procedures serves to familiarize operating personnel with systems and plant operation during the testing phase and also serves to assure the adequacy of the procedures under actual or simulated operating conditions before plant operation begins.

Prior to fuel load, draft operating procedures may be utilized for equipment operation and may be informally altered to meet special test considerations.

Although the use of draft operating procedures and their informal alteration is allowed by the FSAR, CPSES has chosen to use approved procedures to support testing activities in order to provide a controlled mechanism for documenting procedure deficiencies and changes. That mechanism is the temporary change process.

The operator involved was using System Operating Procedure SOP-501A, Rev. 0, to chlorinate the Station Service Water inlet. The procedure required the operation of the chlorination inlet valve, XSW-036. The chlorination inlet valve is routinely operated and operators are familiar with its location and use. The operator opened the proper valve. However, the valve was tagged XSW-042 instead of XSW-036 due to renumbering between Revisions CP-1 and CP-2 of the flow diagram. Because the procedure was in trial use as required by the FSAR, it had not yet been revised to reflect the valve number change. Therefore, even though the correct valve was operated, a violation of the procedure occurred in that the valve tagged XSW-042 was operated when the procedure called for the operation of valve XSW-036. It should be noted that the operator consulted with the System Test Engineer prior to operating the valve to ensure that the operation supported the test in progress.

Corrective Action

The on-duty Shift Supervisor initiated Deficiency Report 84-054 which was reviewed by the Operations Quality Assurance Supervisor. The Deficiency Report documented the violation of the procedure. Final disposition of the deficiency was completed on July 5, 1984, and documented appropriate retraining of the operator involved.

Preventive Action

The operator has been reminded of the need to follow approved operating procedures when performing operating evolutions. In addition, he has completed retraining involving procedures STA-205, "Temporary Changes to Procedures", and SOP-501A, "Station Service Water System".

Furthermore, the Operations Supervisor met with each shift operating crew, including Supervisors, Reactor Operators and Auxiliary Operators to review this incident and to emphasize the proper use and adherence to approved procedures.

Also, Special Order 1-50-84-003 specifies that all safety related operating activities will be carried out in accordance with approved procedures. This Special Order is reviewed by the Shift Supervisor at each shift change.

Date of Full Compliance

Corrective and preventive actions have been completed.

2. Criterion XI of Appendix B to 10 CFR 50 states in part, ". . . the test program shall include, as appropriate, proof test prior to installation, preoperational tests, and operational tests during nuclear power plant or fuel reprocessing plant operation of structures, systems, and components. Test procedures shall include provisions for assuring that all prerequisites for the given test have been met, . . ."

- a. Contrary to the above, during the performance of the Diesel Generator Control Circuit Functional and Start Test, ICP-PT-29-02 RT-1, the NRC inspector noted that there was no prerequisite in the test procedure to provide for station service air so that Step 7.1.6.7 can be performed to operate the barring device, which requires service air to function.

This became apparent to the NRC inspector when he noticed the service air piping was not connected to the barring device. In lieu of service air, the STE utilized temporary air from a portable air compressor, which is not addressed by the procedure.

- b. Contrary to the above, the station service water flow balancing test procedure, ICP-PT-04-01, had no prerequisite requirement to ensure the flow gages used during Step 7.8 (Flow Adjustment) were properly filled and vented. Failure to fill and vent these detectors just prior to flow adjustment can cause erroneous flow gage indications. This can place the flow data in question. As a result, during conduct of Step 7.8 of the test, the service water flow gage for containment spray was pegged high with no flow. It was evident that the gage was malfunctioning due to air binding or other mechanical problem.

This is a Severity Level IV Violation. (Supplement II-E) (445/8421-02)

Discussion

- 2a. As identified in the finding above, it is acknowledged that one primary support system (Service Air) was not specified as a prerequisite requirement for conduct of the test. The purpose of the test section noted was to demonstrate barring device operation in the "Maintenance Mode," therefore an air supply was required. As no prerequisite existed requiring a specified air supply, the System Test Engineer noted in the test log that a temporary air compressor would be used to perform the step. At that time, two deficient conditions existed: 1) the service air prerequisite was overlooked during the original procedure review and approval, and 2) the STE failed to properly document the addition of the required air supply in accordance with Startup Administrative Procedure CP-SAP-12. The proposed corrective action below will address these two deficient conditions, since the operability of the barring device was satisfactorily demonstrated as required in ICP-PT-29-01 RT-1, Step 7.1.6.7.
- 2b. Test Section 7.8 began June 16, 1984 at 0853. After establishing conditions required to perform the flow balance, (Steps 7.8.1 through 7.8.5) the balancing commenced at 1330. At 1500, the test chronological

log notes that all components were aligned and the subject flow indicator would not respond. TUGCo I&C personnel arrived to check the instrument at 1540. After attempting to fill and vent the instrument, it was ascertained that a three-way valve manifold was clogged. At 1615, the test was terminated with no data taken. On June 18, 1984, at 1950, the test section was resumed with a log entry stating that the I&C personnel placed the flow indicator in service after unclogging the three-valve manifold. Test steps 7.8.1 through 7.8.5 were reperformed and the balance was satisfactorily demonstrated at 2150.

Since the Service Water System was in service for a significant length of time prior to conduct of the preoperational test, and the test procedure was not used for initial filling, venting and placing the system into operation, it was not deemed necessary to verify instrument filling and venting as a prerequisite to LCP-PT-04-01. As indicated above, the erratic instrument was identified and the problem corrected prior to repeating the applicable test steps and recording the required test data. Therefore, the test procedure and results are satisfactory.

Corrective Action

No retests are required to correct the deficiencies described above. The diesel generator cognizant System Test Engineer will be counseled on proper utilization of Startup Administrative Procedure requirements when procedural problems are identified.

Preventive Action

Each organization responsible for review of preoperational test procedures has been instructed to ensure that test prerequisites receive a comprehensive review to ensure system readiness to test and correct component configuration to assure validity of the test results. All Startup personnel responsible for authorizing and performing preoperational tests have been instructed to perform a comprehensive review of test prerequisites prior to authorization of the tests to be performed.

Since preoperational test procedures are not typically used for system filling, venting and initial operation, we do not require that each preoperational test contain prerequisites for verifying proper filling and venting of the system or instrumentation. However, for cases when preoperational test procedures are used to provide instructions for system filling, venting, etc., Startup Administrative Procedure CP-SAP-7 will be revised to ensure that instructions are also provided for instrumentation filling and venting prior to test data acquisition.

Date of Full Compliance

Corrective and Preventive Actions will be completed by August 15, 1984.