

**TU**ELECTRIC

Log # TXX-96502  
File # 10130  
IR 96-11  
Ref. # 10CFR2.201

November 8, 1996

**C. Lance Terry**  
Group Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-445 and 50-446  
NRC INSPECTION REPORT NOS. 50-445/96-11 and 50-446/96-11  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated October 28, 1996, pertaining to the inspections conducted by Messrs. A. Gody, Jr., P. Gage, and H. A. Freeman on August 18 through September 28, 1996. Attached to the report was a Notice of Violation.

Via Attachment 1 TU Electric hereby responds to the Notice of Violation (446/9611-01). Should you have any comments or require additional information, please do not hesitate to contact Obaid Bhatti at (817)-897-5839 to coordinate this effort.

Sincerely,

C. L. Terry

By: J. J. Kelley, Jr.  
J. J. Kelley, Jr.  
Vice President, Nuclear  
Engineering and Support

OB:ob  
Attachment

cc: Mr. L. J. Callan, Region IV  
Mr. J. I. Tapia, Region IV  
Resident Inspectors

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REPLY TO THE NOTICE OF VIOLATION

RESTATEMENT OF THE VIOLATION  
(446/9611-01)

Technical Specification 6.8.1 requires the licensee to establish, implement, and maintain procedures covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1 978. Appendix A recommends administrative procedures for component configuration control.

Station Administrative Procedure STA-605, "Clearance and Safety Tagging," Revision 1 3, provided the methodology for equipment status and configuration control and defined a danger tag as a device used to prohibit changing the designated position or condition of the component on which they are attached.

Danger Tag 2-96-02507-0036 designated that the Unit 2 Feedwater Pump 2A Seal Injection Filter 2-02 inlet isolation valve (Valve 2FW-0509) be in the "close" position.

Contrary to the above, on September 23, 1 996, Valve 2FW-0509 was found in the open position with Danger Tag 2-96-02507-0036 attached to it.

RESPONSE TO THE VIOLATION  
(446/9611-01)

TU Electric accepts the violation and the requested information follows:

1. Reason for Violation

The following event description was gathered via interviews with cognizant personnel involved with subject violation event.

On September 23, 1996, Control Room personnel received a call from a maintenance mechanic. The mechanic indicated that the Seal Injection Filter 2-02 Isolation valve 2FW-0509 had been found mispositioned in the open position. The Control Room Staff immediately dispatched an Auxiliary Operator (AO) to verify proper alignment. The AO reported to the Control Room that the valve was partially open. Control room directed the AO to manipulate the valve to a fully open position and than close it, as required by the clearance.

Operation's management interviewed the operators who initially were involved with the lineup of the system. The independent verifier who verified the final lineup was also interviewed. The results of these interviews concluded that the initial valve lineup was proper. Based on this conclusion it was deemed that incidental bumping or

inadvertent action by some unrelated maintenance activity being performed in close proximity to this valve was the most probable cause for the mispositioning of this valve.

2. Corrective Steps Taken and Results Achieved

Immediate corrective action was to align the mispositioned valve properly i.e., in its required 'closed' position. A Operation Notification and Evaluation Form (ONE Form) was initiated to document the erroneous valve position.

3. Corrective Actions Taken to Preclude Recurrence

Management's expectation with respect to self verification was reemphasized to cognizant operators. Maintenance management repeatedly promulgates to maintenance personnel, the need to protect equipment and notify operation's department when a specific issue (such as this) is discovered for immediate resolution. TU Electric believes that existing practices should minimize recurrence.

4. Date of Full Compliance

TU Electric is in full compliance.

5. Additional Information

Based on the interviews with the operators and the immediate causal determination, TU Electric believes that the initial dispositioned category for the ONE Form as "Manager's Trend System" was appropriate. Additionally, we believe a STA-605 violation did not result in a mispositioned valve. This belief is based on the conclusion of additional root cause evaluation which yielded similar results, that incidental bumping or inadvertent action on or around the valve most likely caused the partial mispositioning of the valve, and that the initial valve position was correct. With respect to incidental damage or mispositioning of equipment, a review of ONE Form trending data did not reveal any significant matters of concerns i.e., not pervasive. The event was deemed to be an isolated event. As stated in Section 3 above, TU Electric management regularly promulgates to its personnel, the need to protect equipment and notify operation's department when a specific issue (such as this) is discovered for immediate resolution.

Regarding the significance of this event; the subject valve is one of two energy isolation points in series isolated for the work in progress. TU Electric has concluded that, the inadvertent mispositioning of this valve did not impact the health or safety of general public or safe operation of CPSES.