

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

Log # TXX-4367  
File # 10130  
IR 85-11

January 15, 1986

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Mr. Eric H. Johnson, Acting Director  
Division of Reactor Safety and Projects  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 50-446  
RESPONSE TO NRC NOTICE OF DEVIATION  
INSPECTION REPORT NO.: 50-445/85-11

- Ref: 1. NRC letter of October 11, 1985, (R.P. Denise to W.G. Council) concerning the inspection of Mr. T.F. Westerman, et.al. at Comanche Peak during June 22 through August 31, 1985.
2. TUGCO letter of November 11, 1985, (W.G. Council to R.P. Denise, TXX-4619) which provided a partial response to your findings in Reference 1.
3. TUGCO letter of December 17, 1985, (W.G. Council to Eric H. Johnson, TXX-4563) which requested extension of response time for Notice of Deviation in Reference 1 from December 15, 1985, to January 15, 1986.

Dear Mr. Johnson:

This letter completes our response to the findings of the subject inspection report. Reference 1 provided our response to the Notice of Violation contained in your inspection report. The attachment to this transmittal contains our response to the Notice of Deviation in your inspection report.

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To aid in understanding our response, the Notice of Deviation is repeated followed by our response. We consider the enclosed information to be responsive to the deviations that were noted by your inspectors.

Very truly yours,

*W. G. Council*

W. G. Council

By: *J. S. Marshall*

J. S. Marshall  
Licensing Supervisor

JWA/TGT/arm  
Attachment

cc: Region IV (original + 1 copy)

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

Mr. V.S. Noonan  
Mr. D.L. Kelley

## ATTACHMENT

Response to two-part Notice of Deviation in NRC Inspection Report  
50-445/85-11.

### Repeat of Deviations

"During this inspection, it was found that certain of your activities appeared to deviate from commitments made to the NRC. These items and references to the commitments are identified in the enclosed Notice of Deviation. You are requested to respond to these deviations in writing. Your response should be based on the specifics contained in the Notice of Deviation enclosed with this letter. As part of your response to Item A in the Notice of Deviation, please identify all members of the Comanche Peak Response Team (CPRT) and Senior Review Team with previous CPSES involvement, along with the documented evaluation which sets forth the basis for acceptance of their objectivity as defined in Section VII of the CPRT Program Plan."

From fourth paragraph of Reference 1

### Part A of Appendix B Notice of Deviation

"Section VII, "CPRT Objectivity Guidance," of the CPRT Program Plan, Revision 2, states in part, "... all five Review Team Leaders and those assisting the Review Team Leaders in various capacities, including issue coordinators, are experienced nuclear industry consultants who have not been previously involved with the CPSES activities that they are now reviewing. ... While these objectivity criteria are expected to be fully met, any exceptions will be promptly identified by the CPRT and provided to the NRC along with any necessary justification.

Contrary to the above, the issue coordinator for Issue-Specific Action Plans VII.a.1, VII.a.7, VII.a.8, and VII.b.1 (each associated with ASME activities to some degree) was a contract employee to Brown & Root from July 1980 to January 1981 whose duties included at least one Comanche Peak audit of ASME activities; however, this individual was not identified to the NRC with any justification regarding objectivity even though the individual has been in the present position since May 1985 (445/8511-D-02)."

### Response:

The CPRT Program Plan states in Section VIII.B.1 that the Senior Review Team (SRT) is responsible for selection and assignment of CPRT Program Review Team Leaders. Such a selection involves a review of the candidate Review Team Leader's prior work experience for compliance with the CPRT Objectivity criteria. The CPRT Program Plan further states in Section VIII.B.3 that the Review Team Leader is responsible for ensuring that CPRT third-party personnel implementing the action plans are properly trained and meet CPRT program standards for personnel qualifications and objectivity.

The issue coordinator cited in this Notice of deviation completed a CPRT Objectivity Questionnaire in early May 1985. In completing the questionnaire the individual indicated that he had provided audit services to Brown & Root (B&R) through Science Applications Incorporated (SAI) during the period 7/80-1/81. These services consisted of primarily vendor audits for the South Texas Project. However, the coordinator was involved in one four day internal audit of B&R activities at CPSES.

These activities were noted on the objectivity questionnaire. An ERC evaluation of this objectivity questionnaire was made at the time of its completion. The evaluation, in keeping with the responsibilities of a Review Team Leader noted above, concluded that the issue coordinator's participation in the B&R CPSES audit and association with B&R on the South Texas Project did not represent an exception to the CPRT objectivity. Consequently, no CPRT Senior Review Team or NRC notification was provided or deemed appropriate.

Upon the receipt of this Notice of Deviation an onsite ERC QA representative reevaluated the specifics of the Issue Coordinator's involvement with Brown & Root during the 7/80-1/81 time frame. The findings of this reevaluation are as follows:

- 0 Performance of vendor audits for the South Texas Project does not constitute previous involvement in CPSES project activities.
- 0 The issue Coordinator's participation in the B&R internal audit of CPSES activities consisted primarily of follow-up verification of previous audit findings and an audit of the control of special processes area. The Issue Coordinator's CPRT responsibilities are in the areas of material traceability, housekeeping and system cleanliness and fuel pool liner documentation, none of which he reviewed during the B&R CPSES internal audit.

This reevaluation confirmed the original conclusion that the Issue Coordinator satisfies the CPRT objectivity criteria for no previous involvement in the CPSES project activities in question. Consequently, notification of the CPRT SRT or NRC was not required in this instance.

Regarding the specifics of your cover letter transmitting the Notice of deviation, there are no third-party personnel working on CPRT activities who violate the principles of the CPRT objectivity criteria. The completed objectivity criteria forms are a part of the CPRT files. Those for the Senior Review Team, Review Team Leaders and support staff are available in the CPRT central file, while those for third-party members of each review team are a part of each ISAP Working File. These forms are available for NRC audit.

#### Part B of Notice of Deviation

"Paragraph 5.2.4 of Procedure CPP-001, Revision 0, states, in part, 'Incorporated revisions shall be indicated by a side bar in the right hand margin opposite the revision. . . .' Contrary to the above, (1) CPP-016, Revision 1, was issued on August 9, 1985, and of the numerous changes made, five were not indicated by a side bar; (2) CPP-006, Revision 1, and CPP-009, Revision 1, were issued, respectively, on August 9 and August 13, 1985, with numerous changes, but not all changes were indicated by the required side bar; and (3) CPP-010, Revision 1, was issued on August 13, 1985, with none of the changes indicated by the required side bar (445/8511-D-01)."

### Corrective Steps Which Have Been Taken and Results Achieved

- CPP-001 was revised on 9/6/85 eliminating the need to put in side bars where extensive revisions to procedures are made. Where extensive changes are made CPP-001 requires notation of extensive changes on the procedure transmittal document. New procedures and revisions to procedures issued since 9/6/85 are consistent with these revised requirements. This includes CPP-007, -010 and -016 cited by NRC.

### Actions Taken To Prevent Recurrence

The revision of CPP-001 and subsequent retraining to the new requirements of CPP-001 of persons that prepare, review and approve CPPs will prevent recurrence of this problem in the future.