



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN 11 1997

Mr. C. L. Terry
TU Electric
Group Vice President, Nuclear
ATTN: Regulatory Affairs Department
P.O. Box 1002
Glen Rose, Texas 76043

SUBJECT: NRC INSPECTION REPORT 50-445/97-12; 50-446/97-12 AND NOTICE OF VIOLATION

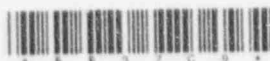
Dear Mr. Terry:

An NRC inspection was conducted April 21 through May 2, 1997, at your Comanche Peak Steam Electric Station, Units 1 and 2 reactor facilities. The enclosed report presents the scope and results of that inspection. The final results of this inspection were discussed with Mr. T. Hope and members of your staff on June 11, 1997.

The inspection evaluated the status of your corrective action and self-assessment programs. These programs were functioning well and were adequately supporting the safe operation of the plant. However, four violations were identified as discussed below.

The first violation involved the failure to report required information in a licensee event report, as required by 10 CFR 50.73. The report did not contain information relevant to past occurrences of the slow closure of a main feedwater isolation valve. The violation is of concern because the failure to provide this information resulted in an incomplete portrayal of the safety implications of the event. During the inspection, you stated an objection to this violation based on your interpretation of the reporting requirements of NUREG 1022, "Licensee Event Report System." As discussed in Section O3.1 of the inspection report, we have concluded that the omitted information was clearly within the scope of the intent of the existing regulations.

The second violation involved four examples of the failure to identify conditions adverse to quality in your corrective action system; and one example of the failure to correct the root cause of a significance condition. This violation was of concern because the omissions were indicative of an inattention to detail on the part of several plant groups and the failure to implement generally-expected corrective action practices. Specifically, your staff did not initiate operations, notifications, and evaluation forms for identified discrepancies and your corrective actions failed to consider the missed opportunities to identify the inoperability of a feedwater isolation valve.



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The third violation involved the failure to perform safety evaluations for configuration changes that involved changes to drawings in the Final Safety Analysis Report. During the inspection, you stated an objection to this violation, in that, you believed that previous NRC inspections had accepted this practice. As discussed in Section E2.4 of the attached inspection report, we have concluded that our previous inspection activities did not remove the regulatory requirement to evaluate changes which affect the Final Safety Analysis Report.

The fourth violation involved the failure to adequately control the installation of temporary leaded shielding to plant structures. This resulted from an inadequate procedure used to install the leaded shielding.

These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the enclosed report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

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

Sincerely,



for Arthur T. Howell III, Director
Division of Reactor Safety

Docket Nos.: 50-445; 50-446
License Nos.: NPF-87; NPF-89

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
50-445/97-12; 50-446/97-12

TU Electric

-3-

cc w/enclosures:
Mr. Roger D. Walker
TU Electric
Regulatory Affairs Manager
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Glen Rose, Texas 76043

Juanita Ellis
President - CASE
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Morgan, Lewis & Bockius
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Washington, D.C. 20036

G. R. Bynog, Program Manager/
Chief Inspector
Texas Department of Licensing & Regulation
Boiler Division
P.O. Box 12157, Capitol Station
Austin, Texas 78711

Honorable Dale McPherson
County Judge
P.O. Box 851
Glen Rose, Texas 76043

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

John Howard, Director
Environmental and Natural Resources Policy
Office of the Governor
P.O. Box 12428
Austin, Texas 78711

E-Mail report to T. Boyce (THB)
E-Mail report to NRR Event Tracking System (IPAS)
E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator	Resident Inspector (2)
DRP Director	DRS-PSB
Branch Chief (DRP/A)	MIS System
Project Engineer (DRP/A)	RIV File
Branch Chief (DRP/TSS)	

DRS AI 97-G-

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05/29/97	05/27/97	05/14/97	05/14/97	05/19/97	05/18/97	

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