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July 10, 1997

C. Lance Terry
Group Vice President

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

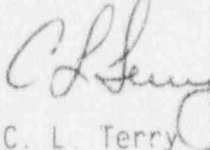
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445 and 50-446
NRC INSPECTION REPORT NOS. 50-445/97-14 and 50-446/97-14
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated June 30, 1997, concerning the inspections conducted by your staff. Attached to the report was a Notice of Violation.

Via Attachment 1 TU Electric hereby responds to the specific Notice of Violation (445/97-14). Should you have any comments or require additional information, please do not hesitate to contact Obaid Bhatta at (254)-897-5839 to coordinate this effort.

Sincerely,


C. L. Terry

OB:ob
Attachment

cc: Mr. E. W. Merschhoff, Region IV
Mr. J. I. Tapia, Region IV
Resident Inspectors

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REPLY TO THE NOTICE OF VIOLATION

RESTATEMENT OF THE VIOLATION
(445; 446/9714-03)

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, Section 8.b.(1)(j), recommends that procedures be written covering Technical Specification surveillance tests for the emergency core cooling system. This requirement is implemented, in part, by Station Administration Manual STA-620, "Containment Entry," Revision 10, which was established to satisfy Technical Specification 4.5.2.c.2, "Emergency Core Cooling System." Procedural Step 6.2.10 required that:

"After work is complete or at least once per shift, the Work Group Supervisor shall perform a visual inspection of the affected area (Refer to Attachment 8.1.1). All trash, clothing or other loose materials shall be secured or removed to prevent transport to the Containment Sump."

Contrary to the above, on May 6, 1997, following completion of work on two job assignments requiring containment entry, the work group supervisor failed to perform a visual inspection of the affected areas.

RESPONSE TO THE VIOLATION
(445; 446/9714-03)

TU Electric accepts the violation, and the response as requested is provided below.

1. Reason for Violation

A review of the procedure STA-620, "Containment Entry," Revision 10, and STA-606, "Control of Maintenance and Work Activities," concluded that there was some ambiguity between the definition of 'Work Group Supervisor' as used in STA-620 and 'Responsible Work Organization (RWO) Supervisor' as defined by STA-606. The definitions from the aforementioned procedures are as follows:

STA-620 § 4.8 defined the Work Group Supervisor as, "[S]upervisor of work group entering containment who is responsible for coordination of Containment entry activities and performing visual inspections of affected areas for loose debris that could be transported to the containment sump."

STA-606 § 4.11 defines the RWO Supervisor as, "[T]he individual designee assigned by the RWO and having responsibility for work activity performance (e.g., a Manager, Supervisor, Team Leader, Craftsman or Technician)."

Additionally, STA-620 § 5.2.5 states that the Work Group Supervisor is, "[R]esponsible for **ENSURING** that visual inspections are performed in affected areas of Containment in accordance with Technical Specification 4.5.2.c.2 and 4.5.3.1.1.c.2 and document on form STA-620-1." (Emphasis added)

Based on the above listed sections of the procedures, the delegation of the visual inspection of the Containment has been a common practice at CPSES. After completion of the inspection the Work Group Supervisor or the individual who performed the inspection signed off the Final Acceptance Signature block. It was concluded that the ambiguity of definition of the 'Supervisor' and the statement in STA-620 § 5.2.5 led to this violation.

2. Corrective Steps Taken and Results Achieved

A ONE Form was issued to document the deficient condition. A walkdown of the containment was performed. This walkdown was witnessed by the NRC inspector. No matters of concerns with respect to the requirements of Technical Specification 4.5.2.c.2 and 4.5.3.1.1.c.2 were noted.

3. Corrective Actions Taken to Preclude Recurrence

STA-620 has been revised to clarify responsibilities and provide a block to indicate who actually performed the visual inspection. Additionally, the definition of the 'Work Group Supervisor' has been revised to RWO Supervisor to correspond with the definition of STA-606.

4. Date of Full Compliance

TU Electric is in full compliance.