



Log # TXX-88008  
File # 10110  
903.11  
Ref. # 10CFR50.55(e)

William G. Counsil  
Executive Vice President

January 15, 1988

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
CONSUMABLE MATERIALS REPLACEMENT PROGRAM  
SDAR: CP-87-47 (INTERIM REPORT)

Gentlemen:

On July 17, 1987, we verbally notified your Mr. I. Barnes of an apparent inadequacy involving the program for technical approval of replacement consumables. Our latest interim report was logged TXX-6950, dated November 13, 1987. After further evaluation, we have determined that this item is reportable under the provisions of 10CFR50.55(e). The required information follows.

DESCRIPTION OF DEFICIENCY

The specific observation involves the substitution of lubricants manufactured by TEXACO in safety and non-safety related applications. The substitution was accomplished without certification by the equipment manufacturers that the material is acceptable for use, and without approval by the proper technical discipline.

SAFETY IMPLICATIONS

Use of a lubricant that does not meet equipment manufacturer's specifications could lead to the damage and/or failure of the equipment, thus adversely affecting plant operations. Due to the extensive evaluation required to ensure the replacement lubricant is acceptable, we have conservatively concluded that this item is reportable pursuant to 10CFR50.55(e).

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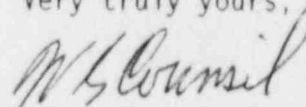
CORRECTIVE ACTIONS

NEO 6.05, "Chemicals/Consumables and Lubricants Control Program," when issued and implemented for site lubrication activities, will provide adequate controls via a lubrication specification and implementing procedures for lubrication activities. Training to the program for lubrication requirements will be required for all personnel associated with these activities.

We are conducting a review to determine which components are lubricated with substituted lubricants. Corrective action will consist of documenting the approval of a substitute lubricant or replacing the substitute lubricant with the manufacturer's specified lubricant for each component. Our review is scheduled to be completed by July 15, 1988. Implementation of NEO 6.05 is also scheduled for July 15, 1988. The approval/removal of substituted lubricants will be completed in conjunction with the Post Construction Hardware Validation Program (PCHVP).

Supporting documentation will be available onsite following completion of the PCHVP.

Very truly yours,



W. G. Council

WJH/mlh

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)