

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station (CPSES)

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

During an NRC inspection conducted on May 29 through July 9, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

- A. CPSES Technical Specification 6.8.1 states, in part, that written procedures shall 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, paragraph 9.e, recommends that general procedures for the control of maintenance, repair, replacement, and modification should be prepared before reactor operation is begun.

Administrative Procedure STA-606, Revision 21, "Work Requests and Work Orders," Section 6.2.16, states that, upon the voiding of an Action Request, the work request tags should be removed from the component as appropriate. Section 6.3.2 states that, upon the voiding of a Work Order, the work request tags should be removed from the component as appropriate. Section 6.6.4.20 states that field work request tags should be removed at the completion of work.

Administrative Procedure STA-202, Revision 23, "Administrative Control of CPSES Nuclear Engineering and Operations Procedures," Section 4.1.4.6, states that the use of the term "should" in procedural steps indicates a firm CPSES management expectation that the step be performed and that any deviation is a departure from the norm and requires supervisory concurrence.

Contrary to the above, field work request tags were not removed from safety-related equipment following the voiding of action requests or work orders or the completion of work, and supervisory concurrence was not obtained for deviations from Procedure STA-606. As a result, the inspector identified three examples where the failure to appropriately remove work request tags presented a barrier to the identification of necessary work on safety-related equipment.

This is a Severity Level IV violation (Supplement 1)
(445/9415-01; 446/9415-01).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy

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to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *4th* day of *August* 1994