U. S. NUCLEAR REGULATORY COMMISSION

OFFICE OF SPECIAL PROJECTS

NRC Inspection Report: 50-445/88-06 Permit: CPPR-126

Docket: 50-445 Category: A2

Construction Permit
Expiration Date:
Unit 1: August 1, 1988

Applicant: TU Electric
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES), Unit 1

Inspection At: Comanche Peak Site, Glen Rose, Texas

Inspection Conducted: January 6 through February 2, 1988

Inspector: S P Burris 2/8/88
S. P. Burris, Senior Resident Inspector, Preoperational Test Program — Date

Reviewed by: J. S. Wiebe 2/8/88
J. S. Wiebe, Lead Project Inspector — Date

Inspection Summary

Inspection Conducted: January 6 through February 2, 1988 (Report 50-445/88-06)

Areas Inspected: Unannounced resident safety inspection including (1) preoperational testing; and (2) Plant Tours.

Results: Within the areas inspected, no violations or deviations were identified. The licensee is actively involved in resolving the outstanding issues in their preoperational testing program for Unit 1. Additionally, the program controls are being reviewed to provide a more structured and useable format for the upcoming testing programs.

DETAILS

1. Persons Contacted

*J. C. Aldridge, Engineering Assurance (EA), Stone & Webster Engineering Corporation (SWEC)
*R. P. Baker, EA Regulatory Compliance Manager, TU Electric
*J. L. Barker, Manager, EA, TU Electric
*D. P. Barry, Manager, ESG, SWEC
*D. N. Bize, EA Regulatory Compliance Supervisor, TU Electric
*M. R. Blevins, Manager, Technical Support, TU Electric
*J. T. Conly, Lead Licensing Engineer, SWEC
*J. C. Finneran, CPE-PSE, TU Electric
*K. M. Fitzgerald, HVAC Program Manager, Ebasco
*P. E. Halstead,Manager, Quality Control (QC), TU Electric
*T. L. Heatherly, EA Regulatory Compliance Engineer, TU Electric
*C. R. Hooten, CPE-Civil Engineering Unit Manager, TU Electric
*J. J. Kelley, Manager, Plant Operations, TU Electric
*O. W. Lowe, Director of Engineering, TU Electric
*F. W. Madden, Mechanical Engineering Manager, TU Electric
*D. M. McAfee, Manager, Quality Assurance (QA), TU Electric
*D. E. Noss, QA Issue Interface Coordinator, TU Electric
*E. Odar, Project Engineering Manager, Ebasco
*M. D. Palmer, Plant Evaluation, Nuclear Operations, TU Electric
*B. L. Ramsey, Project Manager Civil/Structural, TU Electric
*D. M. Reynerson, Director of Construction, TU Electric
*M. J. Riggs, Plant Evaluation Manager, Operations, TU Electric

*A. B. Scott, Vice President, Nuclear Operations, TU Electric
*C. E. Scott, Manager, Startup, TU Electric
*J. C. Smith, Plant Operations Staff, TU Electric
*M. R. Steelman, CPRT, TU Electric
*P. B. Stevens, Manager, Electrical Engineering, TU Electric
*J. F. Streeter, Director, QA, TU Electric
*C. L. Terry, Unit 1 Project Manager, TU Electric
*R. D. Walker, Manager of Nuclear Licensing, TU Electric

The NRC inspector also interviewed other applicant employees during this inspection period.

*Denotes personnel present at the February 2, 1988, exit interview.

2. Preoperational Testing (70301)

The inspector reviewed the status of the licensees preoperational test program with the Manager of Startup and his supervisors. At this time, the startup organization is in the process of developing a preoperational test review matrix program. This program will review all previously performed preoperational tests for Unit 1 to ensure that:

- the proper functioning of instrumentation and controls, interlocks, and protective devices whose function or premature actuation may jeopardize system or equipment operation have been tested.

- system prerequisites were accomplished in accordance with the applicable regulation and FSAR commitments.

- preoperational tests were conducted using acceptable test methods and all tests were performed and verified by qualified test personnel as delineated in the licensee's administrative procedures.

- acceptance criteria for each test had been accomplished in accordance with FSAR commitments and the applicable standards.

- system operation had been reviewed and found acceptable in accordance with the applicable requirements and design basis documents.

The licensee committed to reperform all previously performed Unit 1 preoperational tests to verify that each meet the previously identified items except where it can be amply demonstrated that a specific test need not be repeated or an alternative test method is warranted.

The licensee further agreed to provide the results of their review and copies of all preoperational test procedures which will be reperformed prior to the actual test date. The inspector informed the licensee that the NRC expects to receive the test procedures for review in accordance with the guidance outlined in Regulatory Guide 1.68, "Initial Test Programs for Water Cooled Nuclear Power Plants."

The inspector will continue to follow completion of these identified tasks during future inspection periods.

The inspector reviewed the licensees Startup Administrative Procedures Manual (SAPM) to verify that testing would be conducted in accordance with an approved program which:

- outlined in detail the preoperational test program organization of personnel and responsibilities for each of the identified positions.

- identified and controlled procedures for testing.

- outlined a method for the acceptance or rejection of test criteria.

- controlled the identification and resolution of system deficiencies and test descrepancies found before, during and after testing.

- provided guidance on establishing and maintaining test review groups for the preoperational test activities.

During this review, the inspector noted that the licensee had proposed and implemented changes to their SAPM. These changes included changing the chairmanship of the Joint Test Group (JTG) and development of a Test Department Administrative Manual. As identified in the current commitments in the FSAR, the JTG is chaired by the Manager, Plant Operations; however, the licensee has indicated that the Manager, Startup will be the chairman of the JTG. The licensee is in the process of incorporating both the administrative procedures for initial startup and startup administrative procedures into one usable administrative program. The licensee feels that these changes will be necessary to accomplish the goals of the preoperational test program and initial test startup program requirements. The licensee has committed to incorporate these changes into the FSAR in Amendment 69 of the FSAR. The inspector informed licensee management that the NRC would review these changes as delineated in FSAR Amendment 69 when it is issued for review. This will be identified as an open item (445/8806-O-01).

No violations or deviations were identified in the areas inspected.

3. Plant Tours (71302)

The NRC inspector performed frequent tours of Unit 1 facility, common plant areas, and other owner controlled areas during this inspection period. The inspector conducted these tours to verify that the licensees administrative controls governing general housekeeping activities and general cleanliness of the overall facility were being implemented. Verification of specific activities included:

- housekeeping activities were being accomplished in accordance with site approved procedures.

- areas requiring special cleaning requirements were maintained in accordance with the special orders.

- hazardous material was controlled in approved containers and stored in the appropriate location.

During a tour on January 11, 1988, the inspector noticed that a chain link barrier around the Remote Shutdown Panel (RSP) did not totally encompass the back of the panel, and left a small passage to the front of the panel. The inspector

questioned site personnel as to the security requirements involved in controlling access to and from the panel board.

Discussions with security personnel revealed that the room in which the panel is located will be controlled by room access requirements when the licensee's security plan is implemented. The chain link fence is an operations administratively controlled barrier to prevent causal, routine personnel contact with the control board. The chain link access door is locked and will alarm in the control room upon unauthorized entry. Key control is maintained by the on-shift operations personnel.

4. Open Items

Open items are matters which have been discussed with the applicant, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or applicant or both. Open items identified during the inspection are discussed in paragraph 2.

5. Exit Interview (30703)

On January 29, 1988, R. F. Warnick, H. H. Livermore and J. S. Wiebe met with L. D. Nace and A. B. Scott to discuss January inspection findings and the following items of interest:

a. Random errors by Ebasco and Impell during walkdowns documented in recent inspection reports were discussed in meetings with TU Electric and the contractors on January 28. The error rate was reported by TU Electric to be consistent with reinspection programs conducted at other nuclear plants.

b. Handling of the HVAC gasket material nonconforming condition report has progressed satisfactorily since the stop work was issued.

c. TU Electric has committed to provide a supplemental response to Inspection Report 50-445/8704; 50-446/8704.

d. The program for resolution of ASME issues is progressing satisfactorily.

e. NCRs are being generated faster than they are being closed out. The NRC will be monitoring TU Electric's progress over the next several months.

f. The NRC thinks the responses to SDAR-CP-83-08 and Inspection Report 50-445/8434; 50-446/8413 need to be supplemented. A meeting to discuss the NRC's views will be held the first week in February.

g. Response to NRC Compliance Bulletin 87-02 was lacking in detail.

h. The TU Electric stop work in the HVAC area was considered to be very responsive.

An exit interview was conducted on February 2, 1988, with the applicant's representatives identified in paragraph 1 of this report. No written material was provided to the licensee by the resident inspectors during this reporting period. The licensee did not identify as proprietary any of the materials provided to or reviewed by the resident inspectors during this inspection. During this interview, the NRC inspectors summarized the scope of the inspection.