



Log # TXX-88220
File # 10130
IR 87-30
IR 87-22
Ref. # 10CFR2.201

February 16, 1988

William G. Counsil
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-445/87-30 AND 50-446/87-22

Gentlemen:

We have reviewed your letter dated December 16, 1987, concerning the inspection conducted by Mr. P. C. Wagner during the period from November 4 through December 1, 1987. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter was a Notice of Violation.

On January 12, 1988, per a telephone conversation with Mr. R. F. Warnick, we requested and received an extension as follows: Item B (445/8730-V-07) extended until February 15, 1988.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

W. G. Counsil

W. G. Counsil

By:

D. R. Woodlan
D. R. Woodlan
Supervisor,
Docket Licensing

RDD/ck

Attachment

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

8802190022 880216
PDR ADUCK 05000445
Q DCD

th Olive Street LB#1 Dallas, Texas 75201

ISO 1/1

NOTICE OF VIOLATION
ITEM B (445/8730-V-07)

- B. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric QAP dated July 31, 1984, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Paragraph 2.1.3. of TNE Procedure TNE-DC-7, Revision 16, dated February 14, 1986, "Preparation and Review of Design Drawings," requires that completed drawings shall be checked for accuracy and compliance. Paragraph 2.1.4 also requires an engineering review for technical accuracy upon completion of the drafting/design check.

Contrary to the above, drawings were not appropriately reviewed/checked for accuracy as evidenced by the differences which existed between the two sets of electrical schematic drawings for the emergency diesel generator control panels. Examples of these differences were most evident in the circuitry for solenoids 6A and 6B and relay contact numbers and arrangements (i.e., RX/1B and 10X) on Drawings 09-500-76001, Sheet 3 and TNE-E1-0067, Sheet 96 (445/8730-V-07).

RESPONSE TO NOTICE OF VIOLATION
ITEM B (445/8730-V-07)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

Sheet 96 of Drawing TNE-E1-0067 was prepared by our engineering contractor and issued in 1984. Sheet 96 of the TNE drawing was intended to be a replacement for Sheet 3 of the vendor (Delaval) supplied drawing 09-500-76001. Sheet 3 of the vendor drawing was the only sheet of that drawing replaced by a TNE drawing. Since Sheet 3 of the vendor drawing was to be replaced it was not kept current. However, except for the period from October 1986 to October 1987, Sheet 3 of the vendor drawing was kept as an active drawing even though it was not kept current.

2. Corrective Steps Taken and Results Achieved

We have conducted a detailed comparison of Sheet 3 of the vendor drawing and Sheet 96 of the TNE drawing. This comparison determined that discrepancies between the two sheets, including those described in the Notice of Violation, are accounted for by engineering changes and Design Change Authorizations (DCAs) that were incorporated in the original issue of Sheet 96 of the TNE drawing, or DCAs that are currently outstanding against Sheet 96 of the TNE drawing. The results of the comparison provide assurance that Sheet 96 of the TNE drawing has been kept current and accurate.

As part of diesel generator functional testing, a point to point wiring verification was performed on the diesel generator control panel. This verification was performed using Sheet 96 of the TNE drawing. This indicates that the failure to keep Sheet 3 of the vendor drawing current did not result in any hardware discrepancies.

Sheet 3 of the vendor drawing will be made inactive. There are ten additional vendor drawings associated with the diesel generator control circuitry that may not have been kept current because of replacement TNE drawings. These ten drawings will also be reviewed and dispositioned as appropriate. A Vice Presidential directive was issued July 17, 1986, stating that where design and vendor documents conflict, the design document takes precedence. This directive provides assurance that the TNE drawings will take precedence while the vendor drawings are being reviewed. Note that "TNE", as a drawing designator, is being replaced by the "ECE" designator. New documents are designated as "ECE", but the "TNE" designator will remain effective for previously issued drawings unless subsequently revised for technical reasons.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

We have determined that there are other vendor drawings that have equivalent TNE drawings and that may not have been kept current with all design changes. Examples of such drawings are the Westinghouse elementary wiring drawings and the Westinghouse fluid system flow diagrams. Deficiency Report (DR) C-88-00872 has been written to provide corrective action for this condition.

Our procedure for drawing control is being revised and renumbered. The new procedure ECE-5.05, "Preparation, Review and Approval of Design Drawings," will contain measures to assure that vendor drawings are voided if replacement ECE drawings are issued.

4. Date When Full Compliance Will be Achieved

Sheet 3 of the vendor drawing will be made inactive no later than April 15, 1988.

The review and dispositioning of the ten additional diesel generator control vendor drawings will be completed no later than May 15, 1988.

ECE-5.05 will be issued no later than April 15, 1988.

DR C-88-00872 will be dispositioned no later than June 15, 1988.