



Log # TXX-88168
File # 10110
917.1
Ref. # 10CFR50.55(e)

William G. Council
Executive Vice President

February 19, 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
ITEMS PROCURED TO IMPROPER CODE CLASS
SDAR: CP-87-07 (FINAL REPORT)

Gentlemen:

On April 6, 1987, we verbally notified your Mr. C. Hale, of a deficiency involving items procured to improper code class. Our most recent interim report was logged TXX-6436, dated May 6, 1987. We are reporting this issue under the provisions of 10CFR50.55(e). The required information follows.

Description

This deficiency was discovered as a result of investigations conducted for Corrective Action Request (CAR) 86-002.

Nonconformance Reports (NCRs) 86-0043, PE-86-00054, 86-0073 and 86-0021 (Rev. 1) identified relays, terminal blocks and oil level switches which were procured with a Q-code "C" instead of a Q-code "A" as required. The documentation requirements imposed in these instances may not have been sufficient to assure that the quality of the item purchased was equivalent to the quality of the item as provided under the original equipment specification, or as required to maintain equipment qualification.

The cause of this deficiency has been determined to be misinterpretation of the term "identical components" as specified in Regulatory Guide 1.39. Due to the comprehensive procurement engineering review implemented on August 1, 1985, under procedure NOE-204, this deficiency is limited to the procurement of safety related spare parts prior to August 1, 1985.

Safety Implications

Installation of items which were not procured to the required QA code "A" for safety related components could result in inadequate qualification of the affected Class 1E components. As a result of the extensive evaluation required to address the significance of these deficiencies, we have conservatively determined this issue to be reportable under the provisions of 10CFR50.55(e). Therefore, in the event this condition had remained uncorrected, the safe operation of the plant could have been adversely affected.

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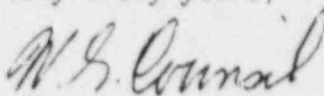
Corrective Action

To prevent recurrence of this deficiency, procedure ECE-6.02-12 (formally NOE-204) has been issued to control the future procurement of spare parts for safety related components.

A spare parts review has been initiated as a means of addressing deficiencies in the spare/replacement parts procurement engineering review process prior to August 1, 1985. This review is being implemented in conjunction with the parts level Q-list development program. In the review, actual requirements imposed upon past purchases of spare/replacement items are compared and reconciled to the Q-list requirements. Where deficiencies are identified, they are documented and resolved in accordance with our established programs for deficiencies and nonconformances.

Corrective actions for both Units 1 & 2 are currently scheduled for completion by September 1, 1988.

Very truly yours,


W. G. Council

DAR/grr

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