

APPENDIX A
NOTICE OF VIOLATION

TU Electric

Dockets: 50-445/88-46
50-446/88-44

Comanche Peak Steam Electric Station
Units 1 and 2, Glen Rose, Texas

Permits: CPPR-126
CPPR-127

During an NRC inspection conducted on June 8 through July 6, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR 50, as implemented by Section 5.0, Revision 0, of the TU Electric Quality Assurance Manual requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings appropriate to the circumstances in order to provide assurance that those activities have been satisfactorily accomplished.

Contrary to the above, due to an error resulting from Revision 3 of MMI-904, "Steam Generator Manway Removal and Replacement," paragraph 5.3.10 specifies installation torquing requirements which deviate from the NSSS vendors recommendations. MMI-904, Revision 3, requires a three-step torquing sequence (125, 300, 450 ft./lbs), removal of one bolt at a time for lubrication, then reinstallation of the bolt and torquing to 300 ft./lbs. After all the bolts are lubricated and torqued to 300 ft./lbs., all bolts are to be retorqued to 45 ft./lbs. Westinghouse Technical Bulletin NSID-TB-87-01 require the same three-step torquing sequence; then removal, relubrication, and retorquing of each bolt to 450 ft./lbs. Common industry practice is to discard and replace a flexatallc gasket after one compression cycle has been experienced. The error in Revision 3 of MMI-904 resulted in quality control acceptance of the torquing of high pressure flanged connections on Unit 2 steam generators which may result in the connections not performing their intended safety related function.

This is a Severity Level II violation (Supplement II)
(445/8846-V-01; 446/8844-V-01).

- B. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric Quality Assurance Plan, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Specification 2323-SS-16B, "Structural Steel/Miscellaneous Steel," Appendix B, Section III, paragraph 4.5.1 states, in part, "Verify the acceptability of the support in accordance with the design document, along with all drawing sections, plans, elevation and views."

Procedure NQA 3.09-10.01, "Requirements for Visual Weld Inspection," which governs weld inspections for conduit supports, paragraph 6.3.3.3.2.i states, in part, "The length and location of welds shall be as specified on the detail drawing"

Contrary to the above, on support IN-C04G31220-51, the design drawing locates this support 4' - 1" south of the centerline of column No. 3703. The NRC inspector measured the location to be 3' - 8" south of this column. Also, on this support, the drawing requires two flare bevel groove welds and two 1/4" fillet welds between a section of 3" x 3" structural tubing and the existing structural framing at each end of the tube steel. However, the NRC inspector's review revealed that the 1/4" fillet welds were missing at each end of the tubing and this condition was not noted during the final QC inspection.

This is a Severity Level IV violation (Supplement II) (445/8846-V-02).

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, DC, 20555, with a copy to the Assistant Director for Inspection Programs, Comanche Peak Project Division, Office of Special Projects, within 30 days of the date of the letter transmitting this 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 if admitted, (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 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.

FOR THE NUCLEAR REGULATORY COMMISSION

RF Warnick

Dated at Comanche Peak Site
this 22nd day of July 1988