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April 13, 1988

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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
7300 SYSTEM PC CARDS
SDAR: CP-88-27 (FINAL REPORT)

Gentlemen:

On March 14, 1988, we verbally notified your Mr. R. F. Warnick, of an issue which we deemed reportable under the provisions of 10CFR50.55(e), concerning the quality code downgrade of Westinghouse 7300 System printed circuit (PC) cards. The required information follows.

Description

Westinghouse 7300 System printed circuit (PC) cards utilized in the Reactor Protection System had been downgraded from quality code Class "A" to quality code Class "C". Failure to adequately maintain the quality code of the subject PC cards allowed them to be purchased, handled, stored and repaired in a manner not suitable for Class 1E applications.

The cause of this deficiency was the improper evaluation of the equipment qualification criteria for the Westinghouse 7300 system PC cards which resulted in the downgrading of the QA requirements from Q-Code "A" to Q-Code "C".

Safety Implications

A malfunction of the subject PC cards could cause failure of the Reactor Protection System to perform its designed function. This constitutes a significant deficiency in final design that, had it remained uncorrected, could have adversely affected the safety of plant operations.

This SDAR is limited to the quality class downgrade of Westinghouse 7300 PC cards and associated spare parts. Programmatic procurement issues, including the evaluation and downgrading of QA requirements for spare parts, have been addressed by the generation and revision of procedures under CAR-86-002, and SDAR-CP-87-07.

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Corrective Action

Corrective action to establish the acceptability of the subject printed circuit cards will be as follows:

1. Identify the 7300 system cabinets for which Q-Code "A" requirements are applicable.
2. Determine the qualified life for printed circuit cards which are installed in the cabinets identified in Item 1 above.
3. Identify, by serial number, the printed circuit cards installed in the cabinets identified in Item 1 above which do not meet the equipment qualification requirements due to:
 - a. inadequate procurement documents,
 - b. inability to readily develop history to show traceability to adequate procurement documents,
 - c. rework under the I&C rework program, or
 - d. expiration of qualified life.
4. Replace the printed circuit cards identified in Item 3 above with qualified replacement cards.
5. Evaluate the acceptability of the plug-in calibration components and replace those components on printed circuit cards installed in cabinets identified in Item 1 above which do not meet the equipment qualification requirements.

Replacement of the subject PC cards will be accomplished in conjunction with ongoing I&C preventive/corrective maintenance activities. All subject PC card replacements will be accomplished prior to March 1, 1989, for Unit 1 and prior to fuel load for Unit 2.

The generation and revision of procedures, as a result of corrective action under CAR-86-002, have established the requirement that any deviation from approved design shall be processed in accordance with the Design Change Authorization (DCA) program. The requirement that the subject PC cards and associated spare parts must be purchased, handled and maintained consistent with the requirements of IE applications will preclude a similar occurrence for these cards.

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This is our final report on this issue.

Very truly yours,

W. G. Council

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c-Mr. R. D. Martin, Region IV
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