APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station, Units 1 and 2

Dockets: 50-445/85-13
50-445/85-09
Permits: CPPR-126
CPPR-127

During an NRC inspection conducted on August 23 through September 30, 1985, five violations of NRC requirements were identified. The violations involved inspection failure to record a required pipe support dimension, inadequate provisions for control of deleterious materials, inadequate protection of installed components, incomplete and missing conduit identification, and unauthorized breaking of an accepted flange joint. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO Quality Assurance Program (QAP), Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Site Procedure QI-QAP-11.1-28 states that the Quality Control Inspector shall assign a number to each dimensional attribute identified as a specific dimension and shall record the actual measurements on this inspection report.

Contrary to the above, no number was assigned and no measurement result was recorded on the QC inspection report for the wall-to-pipe centerline dimension shown on pipe support drawing AF-2-006-412-533A. When this dimension was independently checked by NRC, it was found to be 13½-inches when the drawing showed it to be 11¼-inches.

This is a Severity Level V violation (Supplement II) (446/8509-V-01).

B. Criterion XIII of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 13.0, Revision 1, dated July 31, 1984, requires that measures be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

Section 2.17 of Gibbs and Hill Piping Erection Specification 2323-MS-100, Revision 8, dated July 5, 1984, defines the actions to be taken to limit contamination of reactor coolant equipment surfaces; e.g., prohibition of low melting point metals and their compounds, prohibition of use of

instruments containing mercury, and restriction of halide content of products such as machining coolants, seals, and plug materials.

Contrary to the above, implementing site procedures do not address prohibition of use of instruments containing mercury, do not provide necessary craft guidance for contamination control, or include provisions to assure that procured consumables are in compliance with specification requirements.

This is a Severity Level IV violation (Supplement II) (446/8509-V-02).

C. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Brown & Root Procedure MCP-10, paragraph 3.6, Revision 9, dated July 2, 1985, requires that items stored in place shall merit additional protection if construction work threatens the integrity of equipment and includes a prohibition in regard to placing work platforms or scaffolds on permanent plant installations, such as a pipe, tray hangers, etc., without written engineering authorization.

Contrary to the above:

1. On September 25, 1985, the NRC inspector observed in Room 16 (854 feet elevation) a wooden two by four which was laid across 3/4-inch pipe RC-2-095-501R-2 to serve as a work platform, but there was no evidence to indicate that engineering had authorized this temporary platform.

2. On September 24, 1985, the NRC inspector observed at the 905 feet elevation that welding had taken place above the reactor pressurizer and associated piping without adequately protecting the equipment, as evidenced by the presence of weld spatter on weld no. 42 in 6-inch line RC-2-096-2501R-1.

   This is a Severity Level IV violation (Supplement II) (446/8509-V-03).

D. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and

shall be accomplished in accordance with these instructions, procedures, or drawings.

Paragraph 3.1.1, subparagraphs b and c, of TUGCO Procedure QI-QP-11.3-8, Revision 0, issue date July 7, 1978, "Identification and Color-Coding Inspections," require that conduit designation shall be applied with black ink or paint and that identification of conduit be verified at both sides of all walls and slabs through which conduit passes.

Paragraph 3.1.1, subparagraph b, of TUGCO Procedure QI-QP-11.2-23.7, Revision 1, issue date January 5, 1980, "Verify Conduit Identifications," similarly requires that conduit be identified on both sides of all walls and slabs through which conduit passes. Subparagraph c. of this paragraph states, in part, "Groups of embedded conduits which are flush with the surface of walls, floors and manholes shall be identified on the surface or the wall, floor, or manhole by attaching an identification template near the conduit bank. . . ."

Contrary to the above, the following examples of incomplete and missing conduit identifications were noted in the Unit 1 lower cable spread room, auxiliary building, and safeguards building:

1. Two conduits attached to embedded conduit wall sleeve TSW-A-020 were not identified on the identification template and one conduit which was identified on the template as being present did not, in fact, exist.

2. Two banks of embedded conduit wall sleeves below sleeve TSW-A-023 had no form of identification.

3. At tray section T14GCDH27, there were four floor sleeves which were not identified by either identification template or conduit marking.

4. At tray section T24WAEF, there were two floor sleeves with an incomplete identification template; i.e., the template contained only the letters TFS.

5. Below battery pack CPI-ELBPSG-187 (Circuit ESB7-11), there were two floor sleeves which were not identified.

6. At a tray section above junction box JB1A-1332, the embedded conduit wall sleeves were not identified by either identification template or marking.

7. Three of five floor sleeves at tray section T220ABA41 were unmarked.

8. Four floor sleeves at tray section T120ABB23 were unmarked.

9. Conduits attached to embedded conduit wall sleeve TSW-A-030 were not identified on the identification template which was present.

This is a Severity Level IV violation (Supplement II) (445/8513-V-01).

E. Criterion V of Appendix B to 10 CFR Part 50, as implemented by TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Paragraph 3.5.2.1 in Revision 7 of Brown & Root Procedure CP-CPM 6.9E states, in part, "When it becomes necessary to break an inspected flanged joint for any reason, QA/QC Building Superintendent shall be notified by the responsible craft foreman. This notification will be by the foreman completing an IRN (Item Removal Notice) in accordance with CPM 6.10. . . ."

Paragraph 3.11 states, in part, "Flanged pipe joints shall be tightened sufficiently to prevent leakage."

Contrary to the above, flange no. 6 in Unit 2 piping system BRP-SW-2-018, which was installed, inspected and accepted using Construction Operation Traveler No. MP-82-4117-0400 dated April 20, 1982, was observed in a broken condition as evidenced by loose nuts on 4 of the 12 studs, thus impairing its ability to sufficiently prevent leakage. Further, there were no available IRNs authorizing any activity which would require the breaking of this flanged joint.

This is a Severity Level IV violation. (Supplement II) (446/8509-V-04).

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted; (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated in Arlington, Texas,
this 24th day of December, 1985