

APPENDIX A
NOTICE OF VIOLATION

TU Electric

Dockets: 50-445/88-51
50-446/88-47

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

Permits: CPPR-126
CPPR-127

During a NRC inspection conducted on July 7 through August 2, 1988, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

Criterion VI of Appendix B to 10 CFR 50, as implemented by Section 6.0 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which describe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval"

Paragraph 6.2.2.b of Procedure ECE 5.01-03, Revision 1, entitled "Design Change Authorization" states, in part, "For DCAs originated by engineering, the responsible supervising engineer shall approve the reason for change."

Paragraph 6.6 of Procedure ECE 5.02 states, in part, "Changes to specifications may be accomplished by either DCA or complete revision" Further, paragraph 6.6.3 states, in part, "All revisions to specifications shall undergo the same review and approval process required for original specifications"

Contrary to the above, the following examples were identified by the NRC inspector:

1. On Design Change Authorization (DCA) 74249, Revision 2, the engineer who originated the revision to the DCA also approved the reason for change.

2. Paragraph 6.6.2.j of Procedure ECE 5.02, which details approval requirements for DCAs to specifications, does not require that the DCA undergo the same review and approval process required for original specifications.

This is a Severity Level IV violation (Supplement II)
(445/8851-V-01).

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 19th day of August 1988