



Log # TXX-88652  
File # 10130  
IR 87-27  
IR 87-20  
Ref. # 10CFR2.201

William G. Council  
Executive Vice President

September 1, 1988

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  
REVISED RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-445/87-27 AND 50-446/87-20, ITEM 3

REF.: TU Electric Letter TXX-88192 from W. G. Council  
to NRC dated February 1, 1988.

Gentlemen:

The referenced letter provided our response to a Notice of Violation (NOV) attached to your letter dated December 31, 1987. In our response to Item 3 of the NOV, we stated that a review and update of all specifications associated with safety related systems, structures, and components was being performed, and that this review and update would be completed no later than September 1, 1988. Although this review was not being conducted in response to the subject violation, it was included as part of our Corrective Action Program (CAP). We have completed the review and update of the installation specifications. The procurement specifications and/or vendor documentation have been reviewed to provide assurance that purchased and installed safety related equipment complies with the Design Basis Document design criteria and licensing commitments. Specification revisions were initiated as required. These reviews were completed as part of the CAP design validation.

In addition, we have conducted a review of all safety related motor specifications to assure there are no deficiencies similar to those identified in the subject violation. Our attached revised response to the NOV is hereby submitted to reflect the above described changes in our corrective action. The changed portions of the text are indicated by revision bars in the right margin.

Very truly yours,

W.G. Council

W. G. Council

by: D. R. Woodlan  
D. R. Woodlan  
Manager, Docket Licensing

8809070555 880901  
PDR ADDCK 05000445  
G PNU

RDD/mlh  
Attachment

c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)  
400 North Olive Street LB 81 Dallas, Texas 75201

LEO  
1/1

NOTICE OF VIOLATION  
ITEM 3

3. Criterion III of Appendix B to 10 CFR 50 Part 50, as implemented by Section 3.0, Revision 4, dated November 20, 1985, of the TU Electric Quality Assurance Plan requires that measures be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions and that design control measures provide for verifying or checking the adequacy of design, such as by the performance of design reviews.

Contrary to the above, the applicant failed to assure that design requirements were correctly translated into specifications, drawings, procedures, and instructions in that the rotational direction of the AFW pump/motor combination was not clearly and consistently described. For example, the motor specification attached to GH letter 6639, dated January 29, 1976, shows that Westinghouse proposed a clockwise rotation as viewed from coupling end. Pump bid package Specification 2323-MS-7 specified counter clockwise from the outboard end. While Revision 1 of pump Specification 2323-MS-7 attached to TU Electric Purchase Order CP-0007 dated May 2, 1975, specified counter clockwise rotation without identifying from which end of the pump.

REVISED RESPONSE TO NOTICE OF VIOLATION  
ITEM 3

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The specifications for the motor driven Auxiliary Feedwater (AFW) pumps and motors did not clearly specify the direction of rotation.

2. Corrective Steps Taken and Results Achieved

Design Change Authorizations (DCA)-62373 and -62374 have been issued to change Specifications 2323-ES-1D, "Electrical Motors," and 2323-MS-7, "Auxiliary Feedwater Pumps," respectively. These DCAs change the specifications to clearly indicate the direction of motor and pump rotation.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

This violation involved procurement specifications for a pump and motor supplied by two different vendors in which the motor contained a unidirectional cooling fan. A review was performed of all safety related motor procurement specifications to assure that proper rotation was specified for motors that utilized unidirectional fans. No such discrepancies were identified. Additionally, the safety related motors containing unidirectional fans were field checked and verified to have proper fan rotation.

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.