

APPENDIX A
NOTICE OF VIOLATION

TU Electric	Dockets: 50-445/88-17 50-446/88-14
Comanche Peak Steam Electric Station Units 1 and 2, Glen Rose, Texas	Permits: CPPR-126 CPPR-127

During a NRC inspection conducted on March 2 through April 5, 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 (1987), the violation is listed below:

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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Paragraph 1.1 of Brown and Root (B&R) Procedure CP-CPM-6.3, Revision 9, dated February 8, 1982, states, in part, "The Operational Traveler provides sequential instructions on how to perform a task, identifies the required inspection points, and specifies the documentation for these activities."

Paragraph 3.2 of B&R Procedure CP-CPM-6.3, Revision 9, states, in part, "Travelers shall be completely maintained throughout the construction process. Each complete operation requires the signature and date of the person completing the task. This shall be accomplished at the completion of each operation and prior to moving parts or assemblies to the next scheduled operation."

"All identified hold points shall be honored and work shall not proceed beyond that point until acceptance of the hold point is shown by the QA/QC/ANI representative's signature and date opposite the hold point. The results of the QA/QC inspection shall be recorded in the QA/QC Eng column."

Engineering Instruction EEI-21 dated August 20, 1982, provides the following requirements relative to the installation of Namco limit switches:

"3.0 General Instructions

"3.1 Clean threads on both mating surfaces with acetone cleaner

"3.3 Top cover screws shall have a Belleville washer and O-ring.

"3.4 Top covers shall be torqued in a staggered pattern

"3.5 Missing or damaged screws . . . shall be replaced with screws from an approved source.

"4.0 Instructions for Inside Containment Installation

"4.1 . . . 4.2 Bottom cover screws shall be torqued to 20 inch pounds.

"5.0 Instructions for Installation of Limit Switches with E. C. S. A.

"5.1 . . . For all valves which have been designated as requiring E. C. S. A.'s a thread sealant, DOW Corning RTV-734, shall be applied in a band approximately 1/2" wide around the inside perimeters of the limit switch hub and outside threads of the connecting device.

"5.4 Applied torque to limit switch hub shall be a minimum of 60 foot pounds and shall not exceed 70 foot pound."

Contrary to the above:

- a. The engineering instructions in EEI-21 concerning, cleaning, applying thread sealant to electrical conductor seal assemblies (E.C.S.A.s) obtaining new screws, and the torquing of top/bottom covers and switch hubs were not included on travelers for Namco limit switches that were replaced on valves No. 1-HV-4165, 1-HV-4166, 1-HV-4168, and 1-HV-4172.
- b. As required by CP-CPM-6.3, paragraph 3.2, the signature of the craftsman who completed the operation and the date the operation was accomplished was not on the traveler. This occurred because each operation for installing switches on valves No. 1-HV-4165, 1-HV-4166, 1-HV-4168, and 1-HV-4172, was not included in the traveler steps.

- c. As required by CP-CPM-6.3, paragraph 3.2, the hold point for each completed operation was not on each valve traveler. The corresponding inspection reports on these valves (E27124, E27122, E27099, E27103) showed that such hold points were required.

This is a Severity Level IV violation (Supplement II)
(445/8817-V-02; 446/8814-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 29th day of April 1988