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IR 88-46
IR 88-44
Ref. # 10CFR2.201

William G. Council
Executive Vice President

September 6, 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
RESPONSE TO NRC INSPECTION REPORT NOS.
50-445/88-46 AND 50-446/88-44

Gentlemen:

TU Electric has reviewed your letter dated July 22, 1988, concerning the inspection conducted by Mr. P. Stanish and other NRC consultants during the period June 8 through July 6, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation.

On August 16, 1988, per a telephone conversation with Mr. R. F. Warnick, we requested and received an extension for NOV Item A (445/8846-V-01; 446/8844-V-01) until September 6, 1988.

We hereby respond to Item A (445/8846-V-01; 446/8844-V-01) to the Notice of Violation in the attachment to this letter.

Very truly yours,

A handwritten signature in dark ink that reads 'W. G. Council'.
W. G. Council

RDD/mlh
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)

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NOTICE OF VIOLATION
(445/8846-V-01; 446/8844-V-01)

- A. Criterion V of Appendix B to 10CFR50, as implemented by Section 5.0, Revision 0, of the TU Electric Quality Assurance Manual requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings appropriate to the circumstances in order to provide assurance that those activities have been satisfactorily accomplished.

Contrary to the above, due to an error resulting from Revision 3 of MMI-904, "Steam Generator Manway Removal and Replacement," paragraph 5.3.10 specifies installation torquing requirements which deviate from the NSSS vendors recommendations. MMI-904, Revision 3, requires a three-step torquing sequence (125, 300, 450 ft./lbs), removal of one bolt at a time for lubrication, then reinstallation of the bolt and torquing to 300 ft./lbs. After all the bolts are lubricated and torqued to 300 ft./lbs, all bolts are to be retorqued to 450 ft./lbs. Westinghouse Technical Bulletin NSID-TB-87-01 requires the same three-step torquing sequence; then removal, relubrication, and retorquing of each bolt to 450 ft./lbs. Common industry practice is to discard and replace a flexatactic gasket after one compression cycle has been experienced. The error in Revision 3 of MMI-904 resulted in quality control acceptance of the torquing of high pressure flanged connections on Unit 2 steam generators which may result in the connections not performing their intended safety related function (445/8846-V-01; 446/8844-V-01).

RESPONSE TO NOTICE OF VIOLATION
(445/8846-V-01; 446/8844-V-01)

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

1. Reason for Violation

MMI-904, R2, "Steam Generator Manway Removal and Replacement," was issued on October 20, 1986. This instruction listed a lower torque value and a final torque value (two increments) associated with manway installation in Step 5.3.9. Following this step, each bolt was to have been removed, lubricated, and retorqued to the second increment, which was the same as the final torque value per Step 5.3.10.

Westinghouse Technical Bulletin NSID-TB-87-01 was issued on January 20, 1987. The bulletin recommended using three torque values (i.e., lower, intermediate, and final) instead of two and lowering the torque values to help prevent thread galling. MMI-904, R3 was issued on September 8, 1987, incorporating the torquing recommendations outlined in NSID-TB-87-01. The wording of Step 5.3.10, which required torquing to the second incremental value (the final value in Rev. 2), was not changed in Rev. 3. Due to the addition by Rev. 3 of an intermediate torque value in Step 5.3.9, Step 5.3.10 was then incorrect.

NOTICE OF VIOLATION
(445/8846-V-01; 446/8844-V-01)

Based on discussion with the instruction preparer, it is our belief that the failure to change the wording in Step 5.3.10 was inadvertent and the error was overlooked during the review by the Mechanical Maintenance Supervisor.

Based on a review of data concerning quality findings, compiled for the past ten months by the Quality Services Trending group, there is no evidence of any finding in the maintenance area that documents a failure to correctly translate technical requirements into a procedure. We have, therefore, concluded that this occurrence was an isolated event with no apparent generic implications.

2. Corrective Steps Taken and Results Achieved

On June 27, 1988, when it became apparent that a problem existed with MMI-904, Rev. 3, the following actions were taken by the Results Engineer:

- o Procedure Change Notice, PCN-MMI-904-R3-2, was written on June 27, 1988, to correct Step 5.3.10. The procedure change was approved on June 29 and became effective on July 8, 1988.
- o Deficiency Report No. P-88-03387 was issued on June 28, 1988, to document deficient Step 5.3.10. The DR was subsequently dispositioned to require correction of Step 5.3.10.
- o Nonconformance Report No. 88-10921 was issued on June 28, 1988, to document the indeterminate Steam Generator manway cover.
- o An investigation verified that MMI-904, Rev. 3, was not used to perform work on the Unit 1 Steam Generator primary or secondary manway covers, or the Unit 2 primary manway covers.

The Nonconformance Report has been dispositioned to require that the final torquing steps for the Unit 2 Steam Generator secondary manway cover be repeated.

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

Although we believe that this occurrence was an isolated event without generic implications, additional actions were taken to assure the adequacy of Nuclear Operations Maintenance Department procedures.

Procedure STA-202, Rev. 17, "Administrative Control of Nuclear Operations Procedures," was revised on August 1, 1988, to provide guidelines for a technical review of Nuclear Operations procedures. In accordance with that procedure, MDA-201, Rev. 8, "Maintenance Department Procedures," was revised to provide for a procedure writer's checklist to be used by technical reviewers. The checklist includes instructions to assure that the procedure is technically adequate, that adequate direction is provided from section to section, and that reference to other documents is correct, accurate and current. These actions will reduce the probability that further deficiencies of this nature might occur.

NOTICE OF VIOLATION
(445/8846-V-01; 446/8844-V-01)

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.