



Log # TXX-88649
File # 10130
IR 88-44
IR 88-40
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.
50-445/88-44 AND 50-446/88-40

Gentlemen:

TU Electric has reviewed your letter dated July 22, 1988, concerning the inspection conducted by Messrs. S. P. Burris and S. D. Bitter 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 (445/8844-V-01) until September 6, 1988.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

A handwritten signature in cursive script 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
(445/8844-V-01)

- A. 10CFR 50, Appendix B, Criterion XVI, requires, in part, that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

The Operations Administrative Control and Quality Assurance Plan, Section 3.9, paragraph 2.0, specifies that conditions adverse to quality be promptly identified and dispositioned. Paragraph 3.0 specifies that measures governing the control of nonconformances and deficiencies be contained in the appropriate procedures manuals as implementing procedures established by the Nuclear Engineering and Operations (NEO) Policies and Procedures Manual.

In the CPSES Station Administration Manual (the appropriate procedures manual), Procedure STA-404 contains the instructions for the use of deficiency reports (DR's) and Procedure STA-405 contains the instructions for use of nonconformance reports (NCR's).

Contrary to the above:

1. Neither a DR nor a NCR was issued to promptly identify and correct discrepancies (a condition adverse to quality) between issued field drawings (associated with setpoints of various protection relays) and actual equipment configuration.
2. Neither a DR nor a NCR was used to promptly identify and correct the root cause of installing an incorrect gasket (a condition adverse to quality) during an overhaul of the steam-driven auxiliary feedwater (AFW) pump.
3. Neither a DR nor a NCR was used to promptly identify and correct the root cause of a missing tag that was required to be attached to the Temporary Modification 85-0573 (a condition adverse to quality).

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

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

1. Reason for Violation

Example 1:

A DR or NCR was not required to identify and correct the discrepancies identified between issued design drawings associated with setpoints of various protective relays and actual equipment configuration because the discrepancies were being procedurally resolved by the Engineering Design Change Authorization (DCA) program in accordance with procedure STA-404, "Control of Deficiencies", and would not prevent a quality-related system, structure or component from performing its intended function.

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Paragraph 6.1.2 of STA-404 states:

"6.1.2 Examples of conditions or actions that would not be documented on a DR include, but are not limited to, the following:

- a. Editorial changes . . .
- b. Errors that are identified and resolved by the Engineering Design Change Authorization (DCA) program that would not prevent a quality-related system, structure or component from performing its intended function are revised by request from the identifying organization. Other DCA's identified with errors are documented by a Deficiency Report."

A review by Nuclear Operations to determine the cause and corrective action for this portion of the Violation has found that although Deficiency Reports were not written, DCA discrepancies are being identified in accordance with Procedure STA-404, "Control of Deficiencies", paragraph 6.1.2.

Example 2

Maintenance personnel should have initiated a corrective action document to identify why the gasket was too thick for its intended application. Further investigation revealed that the vendor had supplied two thicknesses of gasket material under one part number.

Corrective action documentation was not initiated during replacement of the AFW pump casing gasket because proceduralized clearance requirements would have precluded the gasket's use (i.e., the specified clearance could not be met if the issued gasket was installed).

Example 3

A DR was not written to document that Temporary Modification 85-0573 did not have the required tag attached because Operations personnel were unaware that the tag had fallen off. Temporary Modification Log review had been suspended, as procedurally allowed, and no walkdowns were being conducted.

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2. Corrective Steps Taken and Results Achieved

Example 1

As a result of the NRC concern, a Corrective Action Request was initiated by Plant Operations personnel to assess the extent of the issue of DCA's prepared by Comanche Peak Engineering on meter and relay setpoints that were questionable for equipment application. Subsequent reviews by the QA Corrective Action Group to determine if a deficient condition existed, determined with justification that the CAR was not warranted. The Corrective Action Group found that examples of protective relay DCA's in question fall into two categories: enhancements that Maintenance believes would make the relay more practical to set in the field, and setpoints that are physically impossible to be utilized for setting relays. In a subsequent investigation by Comanche Peak Engineering of all identified deficiencies, only one example was found where a vendor manual provided a setting that is physically impossible to be used for setting relays. Engineering initiated DR-C-88-03219 to document this deficiency. Of the DCA's in the hands of Operations that were issued against protective relay settings, none would prevent a quality-related system, structure or component from performing its intended function. As a result of the Corrective Action Group investigation of examples identified by the proposed CAR, issuance of the deficiency reports which were previously discussed with NRC inspectors are not now considered appropriate.

Example 2

Plant Incident Report No. 88-088 and Deficiency Report DRP 88-03124 were written on June 8 and 9, 1988, respectively, to document the deficient Auxiliary Feedwater Pump gasket material. As corrective and preventive action, the DR has directed that PIR-88-088 address causes of the deficiency and establish control measures. PIR-88-088 was dispositioned on August 15, 1988, to reflect a revision to the Ingersoll Rand purchase order that requires a description of the gasket thickness. In addition, an inspection of all gaskets received on the revised Ingersoll Rand purchase order will be required. The PIR investigation verified unsatisfactory gaskets previously issued under this stock number have been scrapped and there are none in the warehouse.

As further corrective action by management to establish a threshold for deficiency reporting, the following actions were taken:

- a) STA-606, "Work Orders", was revised on August 1, 1988 to incorporate cross-reference between anticipated problems encountered while completing work and the generic type of deficiency document which may be required. This cross-reference provides first line supervision with guidance in determining when deficiency documents are required.

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- b) Training on the use of the cross-reference requirements identified in item a) and the proper reporting of deficient items is being performed for Maintenance, I&C and Operations department personnel.

Example 3

The missing tag for Temporary Modification 85-0573 was corrected by closure of the temporary modification on June 16, 1988. To account for other outstanding Temporary Modifications, reviews of the Temporary Modification Log was reinstated to the requirements of OWI-203, "Periodic Review of System Static Control Documentation", on July 29, 1988. In addition, the deficiency was added to Deficiency Report P-88-1417, a generic DR that initiated an investigation surrounding the unauthorized restoration of Temporary Modifications. Existing temporary modifications have been field verified.

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

Analysis of examples cited in the Violation that require corrective action have pointed to the need for a clear, conservative threshold for reporting deficiencies. In daily planning meetings and Station Operations Review Committee meetings, key management and supervising personnel have been instructed to initiate appropriate deficiency paper. It was emphasized that the threshold of initiating deficiency documents has not been adequate to ensure timely resolution of identified problems. To document these instructions, a directive has been issued by the Vice President, Nuclear Operations to all management personnel.

In addition to the action taken in example three, reinstating a review of the Temporary Modification Log, appropriate procedures will be revised to require a verification walkdown of Temporary Modifications, every six months.

4. Date When Full Compliance Will be Achieved

Training on use of the cross-reference in STA-606 that provides guidance for documenting potential problems, will be complete by October 1, 1988.

Appropriate procedures requiring a verification walkdown of systems for outstanding temporary modification will be revised no later than November 15, 1988.