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Ref. # 10CFR2.201

William G. Council
Executive Vice President

May 16, 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
INSPECTION REPORT NOS. 50-445/86-26; 50-446/86-22
REVISED RESPONSE TO NOTICE OF VIOLATION
(NOV) ITEM A (445/8626-V-02)

REF: TU Electric Letter TXX-7120 from W. G. Council
to NRC dated December 31, 1987

Gentlemen:

The referenced letter provided our revised response to Notice of Violation Item A (445/8626-V-02). In that response we stated that the Unit 1 walkdown for pulling aids per CPE-SWEC-FVM-EE/ME/IC/CS-90 would be completed in order to correct this finding. As a result of activities completed in December 1987 and other installation practices, the walkdowns need not be performed for this issue. Our response to Notice of Violation 445/8626-V-02 is hereby revised to reflect these changes and to update the status of our revision to specification 2323-ES-100.

Where revised responses are provided, the revised sections are denoted by a revision bar in the right margin.

Very truly yours,

W. G. Council

By: John W. Beck
John W. Beck
Vice President,
Nuclear Engineering

RDD/grr

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

8805240417 880516
PDR ADOCK 05000445
R DCD

North Olive Street LB 81 Dallas, Texas 75201

JE01
1/1

NOTICE OF VIOLATION
ITEM A (445/8626-V-02)

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO Quality Assurance Plan (QAP), Section 5.0, Revision 3, dated July 31, 1984, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Paragraph 3.1.2.e of TUGCO Procedure QI-QP-11.3-40, Revision 14, dated January 9, 1984, states, in part, "Verify that ... all cable pulling aids have been removed (i.e., fish tape, tape rope, etc.)."

Paragraph 3.1.1.2.c of the above procedure, Revision 18, dated May 18, 1984, states, "Verify that ... pulling aids (i.e., rollers, fish tape, tag rope) have been removed from raceway."

Contrary to the above, TUGCO inspectors performing post construction inspections failed to identify cable pulling ropes remaining in Class 1E conduit C12018896 and Class 1E cable tray T130ACG57 located in the Unit 1 reactor building and auxiliary building, respectively (445/8626-V-02).

REVISED RESPONSE TO ITEM A
(445/8626-V-02)

TU Electric accepts the alleged violation and the requested information follows:

1. Reason for Violation

Regarding cable tray T130ACG57, construction procedures controlling cable pulling activities performed subsequent to QC acceptance of raceway systems did not require QC reverification of pulling aid removal.

Regarding conduit C12018896, Revision 14 of QI-QP-11.3-40 in effect at the time of post construction inspection required QC inspectors to identify visible pulling aids but did not require the removal of junction box, pull box or conduit covers to verify that pulling aids had been removed.

2. Corrective Steps Taken and Results Achieved

Nonconformance Report (NCR) E-86-1038835 and Construction Deficiency Report (CDR) 87-4746EC (previously NCR E-86-103981) were issued to address pull ropes in conduit C12018896 and cable tray T130ACG57, respectively. Both documents have been dispositioned "rework" by directing the removal of the pull ropes. NCR E-86-1038835 has been closed.

Corrective Action Request (CAR) 87-59 has been initiated which will address the generic implications of this violation and will define appropriate corrective actions.

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

On July 24, 1987, Procedure EEI-7, "Cable Pulling," was revised to require removal of all pulling aids (pull ropes, fish tape, etc.) after cable pulls into covered cable trays or conduit are completed. After further evaluation it was determined that, with certain restrictions, it is acceptable to leave pull ropes in conduit runs. On October 28, 1987, Design Change Authorization (DCA) 58763, Rev. 0 to 2323-ES-100 was issued providing this allowance and detailing the restrictions.

A DCA to revise 2323-ES-100 has been issued which emphasizes that pull ropes are to be left in conduits only when their removal may result in damage to adjacent cables.

Quality Instruction QI-QP-11.3-40, "Post Construction Inspection of Electrical Equipment and Raceways," has been deleted. In process inspections for pulling aids are performed in accordance with procedures NQA-3.09-3.02, "Electrical Raceway-Cable Tray," and NQA-3.09-3.03, "Electrical/Raceway Conduit Procedure." These procedures provide inspection criteria commensurate with the requirements contained in Specification 2323-ES-100.

On November 6, 1987, the Director of Construction issued a directive requiring that all visible metal fish tapes be removed from Unit 1 and Unit 2 raceways, or if removal was not feasible an NCR was to be written. This action was reported complete on December 18, 1987. The completion of this activity and inspection attributes which require that conduits be free of foreign debris prior to the installation of electrical penetration seals completes our corrective action for this finding.

4. Date When Full Compliance Will be Achieved

Full compliance has been achieved.