

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Docket: 50-445/88-32

Comanche Peak Steam Electric Station  
Unit 1, Glen Rose, Texas

Permit: CPPR-126

During an NRC inspection conducted on April 6 through May 3, 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 (1988), the violation is listed below:

Criterion V of Appendix B to 10 CFR 50, as implemented by Section 5.0, Revision 0 of the TU Electric Quality Assurance Manual (QAM), 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."

Appendix A, Revision 0 of the Unit 1 TU Electric 1987 Quality Assurance Manual defines "use-as-is" as:

"A disposition which may be assigned for a nonconformance when it can be established that the discrepancy shall result in no conditions adverse to safety and that the item under consideration will continue to meet all engineering functional requirements. This disposition requires technical justification by Engineering of the item's acceptability for use."

Nuclear Engineering Organization (NEO) 3.05, Reporting and Control of Nonconformances, Revision 3, paragraph 6.3.3, states, in part, "Engineering shall review the nonconforming condition to determine the appropriate disposition . . . . If the NCR is dispositioned 'Use-as-is,' ensure that the engineering basis for technical acceptability is provided . . . ."

Contrary to the above, nonconformance report (NCR) CM-87-6087, Revision 1, which identifies 9 potentially nonconforming commodity

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clearance violations, with respect to installation of Residual Heat Removal piping and pipe supports, was dispositioned "Use-as-is" by engineering personnel and approved by quality assurance personnel, although the basis for technical acceptability was not provided. Engineering personnel failed to establish that the discrepancies would result in no conditions adverse to safety and that the item would continue to meet all engineering functional requirements.

This is a Severity Level IV violation (Supplement II)  
(445/8832-V-01).

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 20th day of May 1988