



Log # TXX-88678
File # 10130
IR 88-51
IR 88-47
Ref. # 10CFR2.201

William G. Council
Executive Vice President

September 19, 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.
50-445/88-51 AND 50-446/88-47

Gentlemen:

TU Electric has reviewed your letter dated August 19, 1988, concerning the inspection conducted by Mr. H. Livermore and other NRC consultants during the period July 7 through August 2, 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.

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

Very truly yours,

W. G. Council
W. G. Council

RDD/mlh
Attachment

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

8809260123 880919
PDR ADOCK 05000445
G PNU

IE01
|
|

NOTICE OF VIOLATION
(445/8851-V-01)

Criterion VI of Appendix B to 19 CFR 50, as implemented by Section 6.0 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which describe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel . . . Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval . . ."

Paragraph 6.2.2.b of Procedure ECE 5.01-03, Revision 1, entitled "Design Change Authorization" states, in part, "For DCAs originated by engineering, the responsible supervising engineer shall approve the reason for change."

Paragraph 6.6 of Procedure ECE 5.02 states, in part, "Changes to specifications may be accomplished by either DCA or complete revision . . ." Further, paragraph 6.6.3 states, in part, "All revisions to specifications shall undergo the same review and approval process required for original specifications . . ."

Contrary to the above, the following examples were identified by the NRC inspector:

1. On Design Change Authorization (DCA) 74249, Revision 2, the engineer who originated the revision to the DCA also approved the reason for change.
2. Paragraph 6.6.2.j of Procedure ECE 5.02, which details approval requirements for DCAs to specifications, does not require that the DCA undergo the same review and approval process required for original specifications.

RESPONSE TO NOTICE OF VIOLATION
(445/8851-V-01)

TU Electric agrees with the violation in part and the requested information follows:

Example 1

Procedure ECE 5.01-03 "Design Change Authorization" does not specify who can originate a DCA, only that the originator complete up to block 3c of the form by providing sufficient information to facilitate evaluation of the need for a design change. The originator of the DCA is also required to complete block 4 of the form to identify the change originator and the organization represented. The form is then reviewed by the appropriate supervisor and approval of the information contained is documented by signature in block 5. At this point the DCA is essentially a design change request and does not authorize any design change.

NOTICE OF VIOLATION
(445/8851-V-01)

Since the "Reason Change is Required" block of DCA 74249 was approved by the authorized supervising engineer and there are not restrictions prohibiting a supervising engineer from initiating a DCA, TU Electric considers the condition described in example one to be acceptable.

During the course of his inspection, the NRC inspector was apparently not made aware that the individual who originated and approved the DCA was an authorized supervising engineer.

Example 2

1. Reason for Violation

Paragraph 6.6.2 of ECE 5.02 did not include provisions to assure that page replacement DCAs affecting specifications which contain more than one lead engineering contractor's design information be reviewed by each of the lead engineering contractors who approved the specification.

DCAs affecting specifications include both page replacement DCAs and deviation type DCAs. Page replacement DCAs are revisions to specified criteria pending subsequent incorporation through formal specification revision as opposed to DCAs which authorize a deviation from specified criteria but do not revise the specification. Deviation type DCAs only require approval by the affected lead engineering contractor as described in ECE 5.02. Page replacement DCAs require review by each of the lead engineering contractors who approved the specification.

2. Corrective Steps Taken and Results Achieved

Specifications which contain more than one lead engineering contractor's design information will be identified. The page replacement DCAs issued affecting these specifications but not yet incorporated by specification revision will be reviewed to verify the appropriate lead engineering contractor has approved these DCAs. DCAs which have not been approved by the engineering contractor(s) identified by the specification review will be revised or incorporated by specification revision to obtain the required approvals.

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

Procedure ECE 5.02 Revision 1 has been revised by EDCN-03 to include provisions to assure that page replacement DCAs are reviewed and approved by the engineering contractors identified by the specification. With this EDCN, Procedure ECE 5.02 now assures that all revisions to specifications undergo the same review and approval process required for the original specification.

4. Date When Full Compliance Will be Achieved

Compliance will be achieved by completion of the DCA or specification revisions initiated to obtain the required lead engineering contractor approvals. This action will be complete by November 1, 1988.