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Ref. # 10CFR2.201

William G. Council  
Executive Vice President

May 31, 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.  
50-445/88-17 AND 50-446/88-14

Gentlemen:

TU Electric has reviewed your letter dated April 29, 1988, concerning the inspection conducted by Mr. H. S. Phillips during the period March 2 through April 5, 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/grr  
Attachment

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

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8806100018 880531  
PDR ADOCK 05000445  
Q DCD

400 North Olive Street LB 81 Dallas, Texas 75201

NOTICE OF VIOLATION  
(445/8817-V-02; 446/8814-V-02)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, of the TU Electric Quality Assurance Plan 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."

Paragraph 1.1 of Brown & Root (B&R) Procedure CP-CPM-6.3, Revision 9, dated February 8, 1982, states, in part, "The Operational Traveler provides sequential instructions on how to perform a task, identifies the required inspection points, and specifies the documentation for these activities."

Paragraph 3.2 of B&R Procedure CP-CPM-6.3, Revision 9, states, in part, "Travelers shall be completely maintained throughout the construction process. Each complete operation requires the signature and date of the person completing the task. This shall be accomplished at the completion of each operation and prior to moving parts or assemblies to the next scheduled operation."

"All identified hold points shall be honored and work shall not proceed beyond that point until acceptance of the hold point is shown by the QA/QC/ANI representative's signature and date opposite the hold point. The results of the QA/QC inspection shall be recorded in the QA/QC Eng column."

Engineering Instruction EEI-21 dated August 20, 1982, provides the following requirements relative to the installation of Namco limit switches:

"3.0 General Instructions

"3.1 Clean threads on both mating surfaces with acetone cleaner ....

"3.3 Top cover screws shall have a Belleville washer and O-ring.

"3.4 Top covers shall be torqued in a staggered pattern ....

"3.5 Missing or damaged screws ... shall be replaced with screws from an approved source.

"4.0 Instructions for Inside Containment Installation

"4.1 ... 4.2 Bottom cover screws shall be torqued to 20 inch pounds.

"5.0 Instructions for Installation of Limit Switches with E.C.S.A.

"5.1 ... For all valves which have been designated as requiring E.C.S.A.'s a thread sealant, DOW Corning RTV-734, shall be applied in a band approximately 1/2" wide around the inside perimeters of the limit switch hub and outside threads of the connecting device.

"5.4 Applied torque to limit switch hub shall be a minimum of 60 foot pounds and shall not exceed 70 foot pound."

Contrary to the above:

- a. The engineering instructions in EEI-21 concerning, cleaning, applying thread sealant to electrical conductor seal assemblies (E.C.S.A.s) obtaining new screws, and the torquing of top/bottom covers and switch hubs were not included on travelers for Namco limit switches that were replaced on valves No. 1-HV-4165, 1-HV-4166, 1-HV-4168, and 1-HV-4172.
- b. As required by CP-CPM-6.3, paragraph 3.2, the signature of the craftsman who completed the operation and the date the operation was accomplished was not on the traveler. This occurred because each operation for installing switches on valves No. 1-HV-4165, 1-HV-4166, 1-HV-4168, and 1-HV-4172, was not included in the traveler steps.
- c. As required by CP-CPM-6.3, paragraph 3.2, the hold point for each completed operation was not on each valve traveler. The corresponding inspection reports on these valves (E27124, E27122, E27099, E27103) showed that such hold points were required (445/8817-V-02; 446/8814-V-02).

RESPONSE TO NOTICE OF VIOLATION  
445/8817-V-02; 446/8814-V-02

TU Electric disagrees with the stated violation for the reasons that follow:

General

The replacement of limit switches on valves 1-HV-4165, -4166, -4168, and -4172 in 1982 was conducted as part of a program to replace limit switches within the scope of IEB 79-28. Teams of electrical craft personnel were assembled and instructed in the detailed requirements of switch installation as specified by the vendor. These requirements were later incorporated into EEI-21, "Installation Requirements for NAMCO Limit Switches." A standardized traveler was developed and was issued for each valve that was to have its associated limit switches replaced, including those valves identified in the Notice of Violation. These travelers provided a mechanism for work authorization and tracking, a general sequence of operations, and along with completed QC Inspection Reports, provided for verification of completed work. The standardized travelers also provided instructions for ancillary operations such as withdrawal of new limit switches from stores, removal of existing limit switches, reuse of mounting hardware, and disposition of removed limit switches.

The procedure governing traveler preparation at the time the switches were replaced CP-CPM-6.3, "Preparation, Approval, and Control of Operation Travelers," contained general requirements involving traveler content and imposed these requirements on an "as needed" basis. Since the electrical craft personnel had received detailed instruction on the installation of new limit switches and were performing the installations repeatedly, they were able to properly perform the limit switch installations without having the

requirements of EEI-21 specifically noted in the travelers. Additionally, the requirements contained in EEI-21 were verified by QC inspectors per instruction QI-QP-11.3-47, "Verify Installation of Limit Switches," which was developed specifically for replacement of NAMCO limit switches. QI-QP-11.3-47 provided a detailed QC Inspection Report form for documenting the requirements contained in EEI-21. The completed QC Inspection Reports are included in the subject traveler packages.

As described above, the subject limit switches were installed in accordance with the requirements contained in EEI-21. Compliance with these requirements is adequately documented.

In March 1988 procedure CP-CPM-6.3 was replaced with new procedures governing the preparation of construction travelers. The new procedures provide more definitive requirements concerning traveler content. Although we consider CP-CPM-6.3 to have been adequate in specifying that travelers contain information "as required" to properly perform the given task, the new procedures provide more consistency in the type of information and level of detail contained on travelers.

We regret that our representatives which accompanied your inspectors during this inspection were previously not aware of the specialized training described above and did not convey this information to the NRC Inspector prior to the Exit Meeting of April 5, 1988.

#### Response to Specific Items in the Notice of Violation

##### Notice of Violation, Part a

The Notice of Violation states that TU Electric failed to comply with the requirements of procedure CP-CPM-6.3 revision 9, Paragraph 1.1. This paragraph is titled "Purpose" and contains statements concerning the overall objectives of the procedure rather than detailed requirements. Paragraph 2.2.1 of the procedure states, "General information normally included on the operation traveler is as follows: . . . Operation description, methods, procedures (instructions) by number and revision and other information as required to successfully complete the operation in accordance with applicable requirements." (emphasis added). Since the personnel performing the limit switch replacements had been instructed on the installation requirements, and since the QC Inspection Reports provided for detailed verification of the installation requirements, we believe that the subject travelers contained the information necessary to successfully complete the operation in accordance with applicable requirements.

##### Notice of Violation, Part b

The Notice of Violation states that TU Electric failed to comply with the requirements of procedure CP-CPM-6.3 revision 9, paragraph 3.2 which states, "Travelers shall be completely maintained throughout the construction process. Each complete operation requires the signature and date of the person completing the task. This shall be accomplished at the completion of each operation and prior to moving parts or assemblies to the next scheduled operation." The Notice of Violation states that this could not be accomplished because there were tasks that were not specified on the traveler.

TU Electric disagrees with this statement since the subject travelers did contain steps for reterminating conductors and reinstalling the cover and gasket that were signed off as required. It was judged to be not necessary to specify sub-steps such as sealing and torquing ECSAs, and torquing cover screws on the travelers since the craft had been instructed on these operations and QC inspectors verified satisfactory performance of the operations per QI-QP-11.3-47.

Notice of Violation, Part c

The Notice of Violation states that TU Electric failed to comply with the requirements of CP-CPM-6.3 revision 9, paragraph 3.2 which states that, "All identified hold points shall be honored and work shall not proceed beyond that point until acceptance of the hold point is shown by the QA/QC/ANI representative's signature and date opposite the hold point. The results of the QA/QC inspection shall be recorded in the QA/QC Eng column." The Notice of Violation states that the subject travelers failed to comply with these requirements in that the hold point for each completed operation was not on each valve traveler. However, the quoted requirements from CP-CPM-6.3 govern the signing of hold points during performance of the work activity rather than defining what hold points the traveler should contain. Since all QC inspection points on the subject travelers and all QC inspection points on the associated QC Inspection Reports were signed as required, the provisions of CP-CPM-6.3 were satisfied. Regarding the statement that the travelers did not contain sufficient inspection points, TU Electric does not consider it necessary to provide identical and redundant inspection points on both the traveler and on the associated QC Inspection Report. The inspection points on the traveler provided for verification of major steps (e.g. termination complete) while the inspection points on the QC Inspection Report provided for verification of detailed operations within the major steps (e.g. torquing of terminal screws). The inspection points provided by the traveler and QC Inspection Report fully document satisfactory completion of limit switch replacement.