



TU ELECTRIC

Log # TXX-88477
File # 10130
IR 85-18
IR 85-15
Ref. # 10CFR2.201

May 31, 1988

William G. Council
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-467 AND 50-446
REVISED RESPONSE TO NOTICE OF VIOLATION 445/8518-V-15

- REF: 1) TUGCO letter TXX-4848 from W. G. Council to E. H. Johnson dated July 9, 1986
- 2) TUGCO letter TXX-6134 from W. G. Council to E. H. Johnson dated December 12, 1986
- 3) TU Electric letter TXX-6386 from W. G. Council to USNRC dated April 10, 1987
- 4) TU Electric letter TXX-6545 from W. G. Council to USNRC dated June 25, 1987
- 5) TU Electric letter TXX-6692 from W. G. Council to USNRC dated August 31, 1987
- 6) TU Electric letter TXX-88030 from W. G. Council to USNRC dated January 15, 1988

Gentlemen:

Reference 1) provided our response to Notice of Violation (NOV) 445/8518-V-15. This NOV concerned a failure to provide adequate design interface control. The example given in the NOV was a Design Change Authorization (DCA) modifying a specification that prohibited contact between instrument tubing and galvanized surfaces. The DCA stated that an engineering walkdown would be performed to identify any discrepant conditions, but at the time the NOV was issued the walkdown had not been conducted.

The design interface control concern of this NOV has been corrected. Although the DCA cited as an example has been revised and a walkdown has been performed, the issue of zinc embrittlement of stainless steel tubing has not been fully resolved and additional actions may be required. The issue of zinc embrittlement of instrument tubing has been identified to the NRC as potentially reportable per 10CFR50.55(e) via Significant Deficiency Analysis Report (SDAR) CP-86-19. As indicated by references 2) through 5) the extended evaluation of this issue has required several date extensions and revisions of our NOV response.

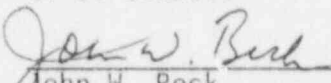
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Since the issue of zinc embrittlement is not specifically applicable to the design interface control issue, our response is being revised to reference the above noted SDAR for resolution of the hardware issue. This change should eliminate the need for future revisions to the NOV response. Other aspects of the response are also being revised to better address the violation. The changed portions of the text are denoted by revision bars in the right margin.

Very truly yours,

W. G. Council

By: 
John W. Beck
Vice President,
Nuclear Engineering

RSB/amb
Attachment

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

NOTICE OF VIOLATION
ITEM C (445/8518-V-15)

- C. Criterion III of Appendix B to 10 CFR Part 50, as implemented by Section 3.0, Revision 4, dated November 20, 1985, of the TUGCO QAP, states, in part, "Measures shall be established for the identification and control of design interfaces and for coordination among participating design organizations. These measures shall include the establishment of procedures among participating design organizations for the review, approval, release, distribution, and revision of documents involving design interfaces. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design"

Contrary to the above, design change control procedures did not provide for necessary review by and coordination among design interfaces with respect to performance of actions required by design change authorization (DCA) statements/justifications. For example, DCA 13,023 dated April 20, 1982, replaced a general prohibition in G&H Specification 2323-MS-625 of contact of instrument tubing with galvanized surfaces with only a prohibition for tubing contact where redundant counterparts are routed through the same fire zone. The DCA engineering justification was based on performance of a damage study walkdown of safety-related tubing in fire zones and accomplishment of required corrective actions. Engineering damage study walkdown procedures did not, however, require such a walkdown to be performed and the required DCA actions were not accomplished.

RESPONSE TO ITEM C

1. Reason for Violation

Inadequate interface control and coordination at the time the DCA was written was the reason for the violation. Informal communication between discipline leads was not adequately followed up to ensure procedures were written to address the concern. Design review of the DCA was performed by Gibbs & Hill in New York without verification of the adequacy of site procedures to ensure that the requirements of the DCA were met.

2. Corrective Action Taken

The statement pertaining to the walkdown in DCA 13023, Rev. 1 was for information and did not provide the basis for the engineering justification. DCA 13023 has been revised and the statement pertaining to the walkdown has been deleted. The issue of zinc embrittlement of stainless steel tubing is still being evaluated and additional actions may be required. The issue has been reported to the NRC pursuant to 10CFR50.55(e). Our resolution of this issue will be reported via SDAR CP-86-19.

A review of installation specifications and associated DCAs was conducted to determine if there were other instances where action by the damage study group (now designated as the Systems Interaction Program) was required. One additional instance was identified and resolved.

3. Action to Prevent Recurrence

Our program for control of design changes is no longer administered by Gibbs and Hill. The current program is controlled by our ECE series of procedures. These procedures provide detailed guidance for determining if interdisciplinary review (IDR) is required and provide for a formal documented review when IDR is required. This provides assurance that DCAs are reviewed by other affected organizations (such as the System Interaction Program) when required, so that additional actions required to implement the DCA can be initiated. Although the specifics of the procedures may change as they are modified to improve or enhance the overall program, TU Electric will continue to meet its basic commitment of having a proper design control program that adequately addresses design interfaces.

4. Date of Full Compliance

Full compliance has been achieved.