



Log # TXX-88473
File # 10110
917
Ref. # 10CFR50.55(e)

June 8, 1988

William G. Counsil
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. 50-445 AND 50-446
CONTROL OF DESIGN MODIFICATIONS
SDAR: CP-87-10 (FINAL REPORT)

Gentlemen:

On May 11, 1987 we verbally notified your Mr. I. Barnes of a deficiency involving control of design modifications for systems transferred to operations. Our last interim report, logged TXX-88291, was submitted on March 3, 1988. A written report was due on June 1, 1988. On June 1, 1988, we verbally requested and received an extension from your Mr. R. F. Warnick until June 8, 1988. We have conservatively deemed this issue reportable under the provisions of 10CFR50.55(e). The required information follows.

DESCRIPTION

Prior to October, 1986, document and design control programs for design modifications were inadequate for systems which had been transferred to the operating staff. Specifically, prior to the implementation of the procedure NEO 3.03, "Preparation, Review & Disposition of Plant Design Modifications," design modifications were implemented by Engineering Change Notices (ECNs), Field Change Requests (FCRs) and sketches. Modifications documented in this manner were maintained and indexed in logs under the control of separate operations groups and were not routinely or systematically cross-referenced between the groups or the document control database maintained by engineering.

This deficiency is the result of inadequate procedures governing the ECN, FCR and sketch processes. These procedures did not require a central log for design changes or other assurances that applicable documents reflect the current design. This issue is limited to design modifications for systems "turned-over" prior to October 31, 1986.

Safety Implications

This issue represents a deficiency in design and document control which has required extensive evaluation. Had the conditions remained uncorrected, subsequent review, system maintenance, and operations could have been compromised. In lieu of evaluating the various documents in order to identify a specific condition adverse to the safety of plant operations, we have conservatively deemed this issue reportable under the provisions of 10CFR50.55(e).

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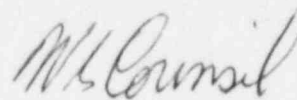
Corrective Actions

As prescribed in the site-initiated Corrective Action Request (CAR) issued to document this deficiency, the improperly controlled documents have been indexed and entered into the project design change database (referenced to the applicable design document with the exception of seven (7) non-safety changes).

Further deficiencies of this nature will be precluded by the implementation of NEO 3.03.

Records supporting our actions will be available for your inspectors review on June 30, 1988.

Very truly yours,



W. G. Council

DAR/amb

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