TU ELECTRIC

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IR 86-15
IR 86-12
Ref. # 10CFR2.201

William G. Counsil
Executive Vice President

October 20, 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
REVISED RESPONSE TO INSPECTION REPORT
NOS. 50-445/86-15 AND 50-446/86-12
NOTICE OF VIOLATION (NOV) ITEM C (446/8612-V-03)

REFERENCE: 1) TU Electric Letter TXX-6466 from W. G. Counsil to NRC dated May 22, 1987
2) TU Electric Letter TXX-6856 from W. G. Counsil to NRC dated October 15, 1987
3) TU Electric Letter TXX-88263 from W. G. Counsil to NRC dated March 1, 1988

Gentlemen:

References (1), (2) and (3) provided our response to Notice of Violation Item C (446/8612-V-03). In reference (1) we stated that all NEMA 4 enclosures (installed and in the warehouse) would be examined to identify those that had been converted from NEMA 12 enclosures. The initial results of this examination indicate that although the administrative requirements of our design control program were not followed, the actual conversion of NEMA 12 to NEMA 4 enclosures was accomplished satisfactorily. Additionally, we have determined that the use of NEMA 12 enclosures indoors (including those in the Reactor Building) is acceptable and a design change is being processed to allow use of either type enclosure for indoor applications. We have also determined that the conversion of NEMA 12 to NEMA 4 enclosures in the warehouse was performed one at a time when requested by construction personnel and that the converted enclosures were not stored in the warehouse. Based on the above we do not consider that further examination of indoor enclosures is necessary. Our response to the subject violation has been revised to reflect these changes.

Our response has also been revised to reflect a change in the procedure number for examination of outdoor enclosures and a new estimated completion date for this examination.

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1/1

Where revised responses are provided, the revised sections are denoted by a revision bar in the right margin.

Very truly yours,

W. G. Counsil

W. G. Counsil

By: J. S. Marshall

J. S. Marshall
Generic Licensing Manager

RDD/mlh
Attachment

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

NOTICE OF VIOLATION
ITEM C (446/8612-V-03)

C. Criterion III of Appendix B to 10 CFR Part 50, as implemented by Section 3.0, Revision 3, dated July 31, 1984 of the TUGCO QAP, requires in part, that measures must be established to assure that applicable regulatory requirements and design basis, as defined in Part 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies, are correctly translated into specifications, drawings, procedures, and instructions. The design control measures must provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. In addition, design changes, including field changes, must be subject to design control measures commensurate with those applied to the original design.

Section 1.6 of Appendix B to Gibbs & Hill (G&H) Specification 2323-ES-100 Revision 2, and Section 3.6.1 of B&R Procedure ECP-19A, Revision 2, both require NEMA Type 4 enclosures in the reactor building.

Contrary to the above, enclosures are installed in the Unit 2 reactor building which have been modified. The modifications occurred with no design control and without verification that the modified enclosures meet the design requirements. (446/8612-V-03)

REVISED RESPONSE TO ITEM C
(446/8612-V-03)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

The violation was caused by improper implementation of a design change by both engineering and construction personnel in that; 1) engineering personnel directed a design change via an NCR and 2) construction personnel accepted the NCR as sufficient authorization to perform work without the design change and subsequent design authorization. At the time the violation occurred, implementation of design changes via NCRs was not permitted by TU Electric's design control program.

The design change which was improperly implemented consisted of a minor fastener alteration to upgrade the NEMA Type 12 electrical enclosure to a NEMA Type 4 for use in the reactor building.

NOTICE OF VIOLATION
ITEM C (446/8612-V-03)

2. Corrective Steps Taken and Results Achieved

Corrective Action Report 87-26 was issued March 27, 1987 to document the improper design change implementation. An examination of indoor NEMA 4 enclosures was initiated to identify the modified enclosures and to evaluate their acceptability. After evaluating approximately 400 modified enclosures it was determined that although the administrative requirements of our design control program were not followed, the actual conversion of NEMA 12 to NEMA 4 enclosures was accomplished satisfactorily. Additionally, we have determined that the indoor use of NEMA 12 enclosures (including those in the Reactor Building) is acceptable and a design change is being processed to allow either type enclosure for indoor applications. We have also determined the conversion of NEMA 12 to NEMA 4 enclosures in the warehouse was performed one at a time when requested by construction personnel and that the converted enclosures were not stored in the warehouse. We do not consider that further examination of indoor enclosures is necessary and have terminated the examination.

The Unit 1 and Common outdoor enclosures will be examined during the performance of our PCHVP engineering walkdowns to ensure they meet NEMA 4 requirements. Instructions for the examination of Unit 2 outdoor enclosures will be issued as required to support Unit 2 fuel load.

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

A new corporate procedure, NEO 3.05, "Reporting and Control of Nonconformances," was made effective December 22, 1986. This procedure allows design changes to be implemented via NCRs, and provides the necessary controls. Training of engineering and construction personnel on NEO 3.05 and/or its implementing procedures has been completed.

4. Date When Full Compliance Will be Achieved

The DCA allowing use of either NEMA 4 or NEMA 12 enclosures will be issued no later than December 15, 1988.

The examination of Unit 1 and Common outdoor enclosures will be completed no later than April 1, 1989. The examination of Unit 2 outdoor enclosures will be completed prior to Unit 2 fuel load.