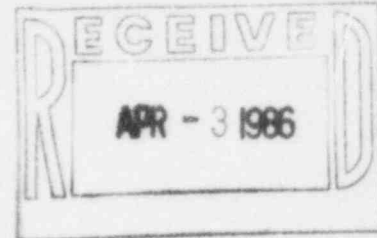


Log # TXX-4740  
File # 10130  
IR 85-13✓  
IR 85-09

**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

April 3, 1986

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT



Mr. Eric H. Johnson, Director  
Division of Reactor Safety and Projects  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC NOTICE OF DEVIATION  
INSPECTION REPORT NOS.: 50-445/85-13 AND 50-446/85-09

Dear Mr. Johnson:

Attached to this letter is a supplemental response to items B and C of the Notice of Deviation transmitted with your letter of December 24, 1985. This supplemental response completes the partial response provided with our letter of February 21, 1986, (TXX-4694).

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

JWA/arm  
Attachments

c - Region IV (Original + 1 copy)  
Director, Inspection and Enforcement (15 copies)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Mr. V. S. Noonan  
Mr. D. L. Kelley

8606020135 860528  
PDR ADOCK 05000445  
Q PDR

IC-060/86

## Supplement

### Response to Notice of Deviation Item B (445/8513-D-02)

#### 1. Reason for the Violation

The seven specific examples cited in this item indicated a failure to comply with Paragraph 5.2 of CPP-088 "Preparation of Verification Packages" which requires the following:

"On receipt of the Verification Package from the preparer, the QA/QC Lead Discipline Engineer reviews it for completeness and accuracy, and approves it... The lead also reviews the checklist included in the package for accuracy and suitability to the designated sample,..."

These failures to comply with procedural requirements were cited by the NRC and confirmed by ERC.

ERC reviewed the seven packages identified by the NRC and determined that they were returned to the Lead Engineer, corrected, reissued to the ERC inspectors, and the reinspections completed. Insufficient attention was being paid to preparation of certain inspection packages before release to inspection.

#### 2. Corrective Steps Which Have Been Taken and Results Achieved

The population engineers have been reinstructed in the procedural requirements for package preparation contained in Section 5.2 of CPP-008.

No corrective action is planned for the noted packages since the investigation indicates that the errors and omissions identified were caught by inspection and corrected by engineering.

#### 3. Corrective Steps Which Will Be Taken to Avoid Further Deviations

The CPRT Senior Review Team (SRT) suspended Quality of Construction (QOC) ISAP VII.c reinspection activities on January 8, 1986. In response to this, ERC issued CAR-016. CAR-016 includes the following activities:

- o review of all Quality Instructions (QIs) used in ISAP's VII-c and VII.b.3 for completeness and consistency,
- o overinspection of some previously completed reinspections,
- o implementation of an overinspection group and,
- o a review of the package preparation process.

This last activity will provide information on how often package preparation errors have been made. This activity will be completed by late April, 1986.

Depending on the results of this activity, additional packages may be reviewed for errors induced during the preparation process and/or additional engineer training on the provisions of CPP-088 Section 5.2 may be required.

4. Date of Full Compliance

April 30, 1986

Supplement

Response to Notice of Deviation  
Item C (Did not have deviation number assigned)

1. Reason for Deviation

Reinspection confirmed the existence of the holes. A notation in the remarks column of the checklist should have been made by the inspector during the inspection on 9/11/85.

2. Corrective Steps Which Have Been Taken and Results Achieved

An out of scope observation No. 126 was written by the inspector on 9/19/85. The CPSES Project is resolving the out of scope observation.

The failure to note the out of scope observation in the remarks column of the checklist was thoroughly discussed with the inspector.

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

As part of CAR-016 described in the response to Notice of Deviation 445/85/13-D-02, a number of completed reinspections will be repeated by the recently instituted ERC overinspection group. The reinspections will include a review for blatant out of scope observations. Depending on the findings of these ongoing overinspections, additional reinspections and/or inspector training on documenting out of scope observations may be required.

4. Date of Full Compliance

April 30, 1986