U. S. NUCLEAR REGULATORY COMMISSION

OFFICE OF SPECIAL PROJECTS

NRC Inspection Report: 50-445/88-73 Permits: CPPR-126 CPPR-127 50-446/88-69

Dockets: 50-445 50-446

Category: A2

Construction Permit Expiration Dates: Unit 1: Extension roquest submitted. Unit 2: Extension request submitted.

Applicant: TU Electric Skyway Tower 400 North Olive Street Lock Box 81 Dallas, Texas 75201

Comanche Peak Steam Electric Station (C2SES), Facility Name: Units 1 & 2

Inspection At: Comanche Peak Site, Glen Rose, Texas Inspection Conducted: October 5 through November 1, 1988

Inspector:

Phillips, Senior Resident Inspector S.

Construction

11- 3-88 Date

Reviewed by:

Hawermare, Lead Senior Inspector Date

8811070237 881103 PDR ADOCK 05000445

Inspection Summary:

Inspection Conducted: October 5 through November 1, 1988 (Report 50-445/88-73; 50-446/88-69)

<u>Areas Inspected</u>: Unannounced, resident safety inspection of applicant's actions on previous inspection findings, action on 50.55(e) deficiencies, action on NRC Bulletins, and general plant inspection.

Results: Within the areas inspected, no violations, deviations, or unresolved/open items were identified. The NRC inspector observed two positive points; that is, all bulletins, open items, and 50.55(e) packages submitted were complete and the NRC inspector closed all of these items. Also, the TU Electric group (responsible for evaluating industry notices) audited evaluations performed prior to 1986 to determing if the evaluations were adequate. This was a very good solf evaluation (see paragraph 2).

.

DETAILS

1. Persons Contacted

*R. W. Ackley, Jr., Director, CECO *R. P. Baker, Licensing Compliance Manager, TU Electric *J. L. Barker, Manager, Engineering Assurance, TU Electric *D. P. Barry, Manager, ESG, SWEC *J. W. Beck, Vice President, Nuclear Engineering, TU Electric *M. R. Blevins, Manager, Technical Support, TU Electric *H. D. Bruner, Senior Vice President, TU Electric *W. J. Cahill, Consultant, TU Electric *J. T. Conly, APE-Licensing, SWEC *G. G. Davis, Nuclear Operations Inspection Report Item Coordinator, TU Electric *R. D. Delano, Licensing Engineer, TU Electric *D. E. Deviney, Deputy Director, Quality Assurance (QA), TU Electric *G. L. Edgar, Attorney, Newman and Holtzinger *G. E. Grabruck, QA, Impell *W. G. Guldemond, Executive Assistant, TU Electric *P. E. Halstead, Manager, Quality Control (QC), TU Electric *T. L. Heatherly, Licensing Compliance Engineer, TU Electric *C. B. Hogg, Engineering Manager, Bechtel *R. T. Jenkins, Manager, Mechanical Engineering, TU Electric *J. J. Kelley, Manager, Plant Operations, TU Electric *O. W. Lowe, Director of Engineering, TU Electric *F. W. Madden, Mechanical Engineering Manager, TU Electric *G. M. McGrath, TS/SP Manager, Startup, TU Electric *J. C. Miller, Site Manager, TENERA *J. W. Muffett, Manager of Civil Engineering, TU Electric *L. D. Nace, Vice President, Engineering & Construction, TU Electric *E. F. Ottney, Representative, CASE *S. S. Palmer, Project Manager, TU Electric *J. D. Redding, Executive Assistant, TU Electric *D. M. Reynerson, Director of Construction, TU Electric *M. J. Riggs, Plant Evaluation Manager, Operations, TU Electric *J. C. Smith, Plant Operations Staff, TU Electric *P. B. Stevens, Manager, Electrical Engineering, TU Electric *J. F. Streeter, Director, 2A, TU Electric *C. L. Terry, Unit 1 Proje t Manager, TU Electric *T. G. Tyler, Director of Projects, TU Electric *J. R. Waters, Licensing Compliance Engineer, TU Electric

The NRC inspector also interviewed other applicant employees during this inspectio, period.

*Denotes personnel present at the November 1, 1988, exit meeting.

2. Applicant Action on Previous Inspection Findings (92701)

(Closed) Open Item (445/8834-O-O2; 446/8430-O-O2): NRC questioned the adequacy of evaluations of industry notices. The NRC inspector found the evaluation of an NRC Information Notice and one Institute of Nuclear Power Operation Bulletin inadequate concerning Plasite coating plugging cooling systems. As a result, the NRC questioned other industry notice evaluations.

TU Electric voluntarily committed to reevaluate other industry notices received prior to 1986 to determine if: (1) the main concern was addressed, (2) related concerns were addressed, (3) documentation was sufficient to support technical conclusions, and (4) documentation is legible. The group that evaluates industry operation experience reports (IOERs) rereviewed and reevaluated 392 IOERs with 312 remaining. The results were: (1) main concern not addressed, 7.9%; (2) related concern not addressed, 3.8%; (3) documentation not sufficient, 16.6%; and (4) no cases where documents were illegible.

The NRC inspector found that Procedures NEO 2.29 and STA-507 control the review and assessment of industry operating experience. Concerning the open item above, a self-initiated review/evaluation of industry notices was performed and the review emphasized the acceptability of plant hardware. This effort was both comprehensive and effective. The NRC is convinced that the present reevaluations should identify any significant deficiencies and if identified they will be reported to the NRC. This item is closed.

- 3. Action on 10 CFR Part 50.55(e) Deficiencies Identified by the Applicant (92700)
 - a. (Closed) Construction Deficiency (SDAR CP-87-08): This deficiency concerned the accuracy of calibrations using pneumatic dead weight testers and dead weight testers (pressure type). Rockwell International letter 87MT0305 dated March 1987 notified TU Electric that the TR-50 tester's accuracy is 0.1%, not 0.03%.

The NRC inspector reviewed TU Electric's file, SDAR CP-87-08 for Units 1 and 2. The file contained about 20 correspondence and corrective action documents which describe the identification, evaluation, notification, and reporting to NRC and corrective action concerning the subject deficiency. Based on this review the inspector determined that the deficiency was properly identified, evaluated, corrected, and the NRC was notified as required. Two key documents, Problem Report 87-416 and Corrective Action Report 87-053, demonstrated that corrective action was adequate. The testers used in calibrating equipment and any tests were identified. The test results were not adversely affected and this was demonstrated by either adding the inaccuracy to recorded data or determining if the calibration was within the specified calibration range. The deficiency was not safety significant. This item is closed.

b. (Closed) Construction Deficiency (SDAR CP-87-31): This deficiency concerned the air pressure regulator on DeLaval diesel generators which supplies control air to the engine control panel. DeLaval Report 140, a 10 CFR Part 21 notification, advised TU Electric of defects in the dripwell gasket seating surfaces that could cause a loss of control air and in turn could cause a loss of starting air pressure.

The NRC inspector reviewed TU Electric's file, SDAR CP-87-31 for Units 1 and 2. The file contained correspondence and evaluation documents which describe the identification, evaluation, and notification to NRC. Based on this review, the inspector determined that the deficiency was properly identified, evaluated, and that the NRC was notified.

The NRC inspector agrees with the TU Electric evaluation which determined that this item is not reportable. The pressure regulators were received at Comanche Peak in 1979 (Reference CP-34. Receiving Reports (RIR) 8827 and 12209). The defective regulators were manufactured in 1986. Three spare regulators were received in 1983 (TSN 174980-8, 661-70226, RIR-83-0385). Since no defective components that were manufactured in 1986 were received at the site, this matter did not apply to this site.

Inspection of NRC Bulletin 78-10 (92700)

(Closed) NRC Bulletin 78-10, "Bergen-Paterson Hydraulic Shock Suppressor Accumulator Spring Coils": Broken accumulator springs in early models were in several operating plants. The failures were caused by carbon steel rusting. Bergen-Paterson recommended replacement with carbon steel coated with teflon or stainless steel coils.

TU Electric's file contained eight documents which showed that this bulletin was properly addressed. Two documents, Westinghouse letter GTN-29847 and Comanche Peak Specification 2323-MS-46A, Revision 7, showed that only mechanical snubbers, not hydraulic snubbers manufactured by Bergen Paterson, were used at Comanche Peak. Since no Bergen-Paterson snubbers were used, no problem, as described in the bulletin, existed. This item is closed.

5. <u>General Plant Inspections (42051, 50073, 50090, 51053, 51063, 52053, 64053)</u>

At various times during the inspection period, the NRC inspector conducted independent and planned inspections of the Unit 1 reactor containment, safeguards, auxiliary, electrical control, and diesel generator buildings. All accessible rooms in these buildings were inspected to observe current work activities with respect to major safety-related equipment, electrical cable/trays, mechanical components, piping, welding, coatings, Hilti bolts, and removal of debris from seismic gap between buildings. The housekeeping, storage, and handling conditions inside these buildings and various outside storage areas were also inspected. One item concerning fire protection is discussed in more detail in the following paragraph.

The NRC inspector had observed the installation of the new tanks and underground piping for fire protection during the past several months. It is nearing completion and should provide a more maintenance free and reliable system. On October 21, 1988, the NRC inspector was in the plant and heard an announcement of a fire and the call for the fire brigade to assemble. The inspector went to the area of the fire and observed the fire brigade actions. Three or four security personnel controlled the crowd. Two electric'ans had previously de-energized the power to the lighting distribution panel. The brigade was on hand and was well supervised. The control room shift supervisor was at the scene. The NRC observed that a delay occurred in getting inside the panel because no one had the proper tool incessary to gain entry. One remark was overhead relative to not having the appropriate electrical drawings. In this case, it was no problem because the smoking ceased after de-energizing the power; however, TU Electric should critique this to assure no problem exists. The NRC inspector informed the Senior Resident Inspector of Operations, who will include this matter under an existing open item.

No violations or deviations were identified.

6. Exit Meeting (30703)

An exit meeting was conducted November 1, 1988, with the applicant's representatives identified in paragraph 1 of this report. No written material was provided to the applicant by the inspector during this reporting period. The applicant did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection. During this meeting, the NRC inspector summarized the scope and findings of the inspection.