

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Dockets: 50-445/88-71
50-446/88-67

Comanche Peak Steam Electric Station
Units 1 and 2, Glen Rose, Texas

Permits: CPPK-126
CPPR-127

During an NRC inspection conducted on October 5 through November 1, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 0 of the TU Electric Quality Assurance Manual states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, Post Construction Hardware Validation Program (PCHVP) Procedures Field Verification Method (FVM)-081 and FVM-090 do not provide documented instructions appropriate for performing technical dispositions of inaccessible attributes exempted from reinspection by Design Change Authorization (DCA) 58252. Furthermore, the "use-as-is" disposition assigned to Non-conformance Report (NCR) 87-02743 and other similar NCRs, may not be applicable for the affected components because the technical justification is dependent on a future evaluation.

This is a Severity Level IV violation (Supplement II)
(445/8871-V-04).

- B. Criterion X of Appendix B to 10 CFR Part 50, as implemented by Section 10.0, Revision 0, of the TU Electric Quality Assurance Manual, states, in part, "A program for inspection of activities affecting quality shall be established and executed . . . to verify conformance with the documented

instructions, procedures, and drawings for accomplishing the activity."

QAP 12.1, Attachment 7.12, requires that the inspector ensure that spring hangers have proper thread engagement.

Contrary to the above, on spring hanger SI-1-336-001-S22s, the inspector indicated that there was adequate thread engagement; however, no documentation exists to indicate how this was verified and there is no sight hole in the load coupling of the spring to permit observation of the thread engagement.

This is a Severity Level IV violation (Supplement II) (445/8871-V-02).

- C. Criterion III of Appendix B to 10 CFR Part 50, as implemented by Section 3.0, Revision 0 of the TU Electric Quality Assurance Manual, states, in part, "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components"

Paragraph 6.3.c of ECE-5.19, Revision 2, states, in part, "The RE (Responsible Engineer) assigned to perform the review of the vendor document shall ensure that the following items are considered as appropriate or applicable:

- "o The material, equipment, document, Service, or process is in compliance with CPSES design requirements"

Contrary to the above, the NPSI size SRF-08 sway strut used with an SPC-08-100 pipe clamp used on support SW-1-132-039-A43R does not provide the clearance necessary to accommodate the amount of angular misalignment necessary for maximum movement during operation.

This is a Severity Level IV violation (Supplement II) (445/8371-V-03).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC, 20555, with a copy to the Assistant Director for Inspection Programs, Comanche Peak Project Division, Office of Special Projects, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

RF Warnick

Dated at Comanche Peak Site
this 18th day of November 1988