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William G. Council
Executive Vice President

June 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
RESPONSE TO INSPECTION REPORT NOS.
50-445/88-27 AND 50-446/88-23

Gentlemen:

TU Electric has reviewed your letter dated May 19, 1988, concerning the inspection conducted by Messrs. C. J. Hale, P. H. Harrell and a NRC consultant during the period April 6 through May 3, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation.

We hereby respond to the Notice of Violation in the attachment to this letter.

Very truly yours,

W. G. Council

By: John W. Beck
John W. Beck
Vice President,
Nuclear Engineering

RDD/grr
Attachment

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

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NOTICE OF VIOLATION
(445/8827-V-01)

Criterion VI of Appendix B to 10 CFR Part 50 as implemented by Section 6, Revision 0, dated February 1, 1988, of TU Electric Quality Assurance Manual (QAM) requires that, "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality." These measures have been established in lower-tier procedures contained in such manuals as: Nuclear Engineering and Operations (NEO), Engineering and Construction (EC), Engineering Department (ECE), Construction Department (ECC), Project Department (ECP), and ASME Administrative Procedure (AAP). The lower-tier procedures prescribe the manner in which these manuals are to be controlled: such as, maintaining assigned controlled manuals in a complete and current condition and removing deleted or superseded pages, procedures, etc., or otherwise noting their status.

Contrary to the above, the following 12 procedure manuals were not controlled in accordance with the QAM or their applicable lower-tier procedure.

1. NEO Manuals

NEO Manual 11 was missing three procedures listed in the Table of Contents (TOC). In addition, two superseded procedures were not properly stamped "superseded" as required by Section 6 of the QAM. NEO Manual 91 was missing one procedure.

2. EC Manuals

EC Manuals 71 and 302 were missing the current TOC for the policy statements. Manual 44 was missing Policy Statement 2 and Manual 72 was missing two procedures.

3. ECC Manuals

ECC Manual 59 was missing the current TOC. Manual 307 was missing both the policy statements, the TOC for the policy statements, and two superseded procedures were not identified as "superseded." Manual 300 was missing five procedures.

4. ECP Manuals

ECP Manual 59 did not include the current TOC, and one procedure was missing.

5. ECE Manuals

ECE Manuals 153 and 208 contained superseded ECE procedures not permitted by Procedure ECE 1.04, Revision 0. In addition, both manuals contained lower-tier technical procedures which should have been removed and destroyed in accordance with instructions provided in TU Electric letter NE-16133. In addition, deleted or replaced procedures were not removed from these manuals as required by ECE 1.04.

6. AAP Manual

AAP Manual A002 was missing one procedure (445/8827-V-01).

RESPONSE TO NOTICE OF VIOLATION
(445/8727-V-01)

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

1. Reason for Violation

This violation resulted from the failure of the manual holders to properly update the subject manuals.

2. Corrective Steps Taken and Results Achieved

Deficiency Report (DR) C-88-03094 has been written to document the failure to control procedure manuals as required by Section 6 of the Quality Assurance Manual.

The procedure manual holders for the manuals identified have been made aware of this violation. The procedure manuals identified have been updated with the exception of the two which were returned to the engineering support group.

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

Memorandum NE-18867 dated April 21, 1988 was issued by the Vice President of Engineering and Construction to engineering and construction procedure manual holders. This memorandum emphasized the need to keep procedure manuals current and provided the most recent Table of Contents for the NEO, EC, ECC, ECE and ECP procedure manuals for review against the assigned manuals.

Quality Assurance surveillances will be performed to monitor the control of project procedure manuals including the types of manuals identified in this violation. The number of manuals surveyed and frequency of surveillance will be in accordance with our existing surveillance program.

4. Date When Full Compliance Will be Achieved

DR C-88-03094 will be dispositioned no later than August 22, 1988.