



Log # TXX-88792  
File # 10118

November 30, 1988

William G. Council  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION  
DOCKET NOS. 50-445 AND 50-446  
ENFORCEMENT ACTION (EA) 86-09,  
APPENDIX A, ITEM I.C.1

REF: 1) TU Electric Letter TXX-4946 from W. G. Council to J. M. Taylor,  
dated August 4, 1986

Gentlemen:

Reference (1) provided our response to EA 86-09, Appendix A, Item I.C.1. In that response we stated that we had analyzed ISAP 1.a.2 results and concluded that the inspections performed by two of the individuals identified in Corrective Action Request (CAR) 050 did not require reinspection. We also indicated that the actions taken in response to CAR-050 would resolve questions regarding the performance of the two remaining inspectors.

However, during the CAR closure verification process, sufficient justification for the conclusion to exclude one of the two inspectors items from reinspection could not be clearly recreated. CAR-050 was subsequently revised and reinspections of items accepted by this individual have been performed. CAR-050 was closed on March 31, 1988 after verification that required reinspections were completed.

Our attached response to Appendix A, Item I.C.1 has been revised as indicated by revision bars in the right margin to reflect the additional inspections performed.

Very truly yours,

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

JLR/mlh  
Attachment

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

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PDR ADOCK 05000445  
Q PDC

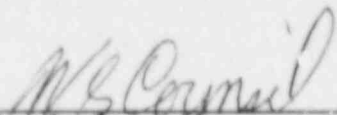
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THE STATE OF TEXAS :

COUNTY OF DALLAS :

There personally appeared before me W. G. Council, being duly sworn, did state that he is an Executive Vice President of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Enforcement Action (EA 86-09); that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
W. G. Council  
Executive Vice President

Subscribed and sworn to before me, a Notary Public in and for Texas, on this 30<sup>th</sup> day of November, 1988.

SEAL

  
\_\_\_\_\_  
Notary Public

My commission expires 3/21, 1988.

ALLEGED VIOLATION - APPENDIX A. ITEM I.C.1

10 CFR Part 50, Appendix B, Criterion X requires, in part, that a program for inspection of activities affecting quality be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Texas Utilities Generating Company (TUGCO) Procedure QI-QP-11.3-28 Rev. 21 "Class 1E Cable Terminations," paragraph 3.1.c states that "All Class 1E and associated cable splices and terminations that utilize splice connectors shall be witnessed."

Contrary to the above, the TRT reviewed twelve quality control inspection reports for butt splices of 600 volt control and instrument connections and found three incidents where the applicant's quality control inspector failed to witness the splice as required in paragraph 3.1 of procedure QI-QP-11.3-28.

TUEC RESPONSE

(1) Admission or Denial of Alleged Violation:

We admit the violation.

(2) Reason for Violation:

The reason for the violation appears to be isolated examples of failure to implement the inspection requirements of QI-QP-11.3-28.

(3) Corrective Steps Taken and Results Achieved:

We have developed a plan to ensure that all required inspections were performed as required, and that all butt splices have been properly identified on the appropriate design drawing. The scope and methodology of verification that all splices are properly inspected is described in ISAP I.a.2. Methods used to assure that similar conditions of procedural noncompliance do not exist are described in ISAP VII.c.

The reinspection results for ISAP I.a.2 resulted in issuance of Corrective Action Request (CAR) 050 to address apparent substandard inspector performance of four inspectors. We analyzed the inspection results and concluded that one of the four individuals (none of whom remain in QC) did not require further reinspection. This decision was based on the nature and number of the discrepancies identified in ISAP I.a.2, i.e. few discrepancies attributable to inspector performance. The inspections of the remaining three individuals required reinspection.

Eighty percent of one of the individual's work was reinspected as part of ISAP I.d.1 and no safety significant discrepancies were identified. We plan no further corrective action for this individual's inspections since over 99.6 percent of all recreatable attributes reinspected were satisfactory and no safety significant deficiencies were noted.

All of the recreatable termination inspections were inspected for one other individual. These inspections revealed that greater than 97% of all attributes inspected were satisfactory and no safety significant deficiencies were noted. We plan no further corrective action for this individual.

All the recreatable termination inspections for the other inspector were reinspected. Although no safety significant deficiencies were identified by this reinspection, the number of deficiencies identified caused the reinspection effort to be expanded to include all remaining accessible/recreatable safety-related items accepted by this inspector. Items which were not recreatable or accessible for reinspection were documented on nonconformance reports for evaluation of potential deficiencies. Deficiencies identified through these reinspections were documented on nonconformance reports for corrective action and safety significance evaluation. Since all safety-related items accepted by this inspector have been reinspected or identified on nonconformance reports for evaluation, we plan no further corrective action for this individual.

4) Corrective Steps to Avoid Recurrence:

All electrical QC personnel have been retrained in the requirements of QI-QP-11.3-28.

The Inspection Surveillance Group was established in early 1985 to perform an overinspection of items accepted by QC inspection personnel. This is performed on a sampling basis by attribute by inspector, and thereby establishes a confidence level that a QC inspection is occurring as required by procedure.

This issue is addressed in ISAP I.a.2 which includes verification of splices.

The training and certification program was revised on August 19, 1985, to include a field proficiency examination as a final prerequisite to certification. The field proficiency demonstration is designed to demonstrate capability in specific inspection tasks and is administered by the appropriate Level III Quality Engineer. This ensures not only proper understanding of procedural requirements, but also ability to physically implement those requirements in an inspection environment.

(5) Date When in Full Compliance:

Compliance was achieved by completion of the activities described in CAR-050 which was closed on March 31, 1988.