

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVE, SUITE 400

ARLINGTON, TEXAS 76011-8064

Mr. C. L. Terry TU Electric Senior Vice President and Principal Nuclear Officer ATTN: Regulatory Affairs Department P.O. Box 1002 Glen Rose, Texas 76043

SUBJECT: NRC INSPECTION REPORT 50-445/97-18; 50-446/97-18

Dear Mr. Terry:

Thank you for your letter o² December 19, 1997, in response to our letter and Notice of Violation dated November 21, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Seeph I. Tapia, Chief Project Branch A Division of Reactor Projects

Docket Nos.: 50-445; 50-446 License Nos.: NPF-87; NPF-89

cc: Mr. Roger D. Walker TU Electric P-gulatory Affairs Manager 7.J. Box 1002 Glen Rose, Texas 76043

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Texas Radiation Control Program Director 1100 West 49th Street Austin, Trixas 78756

John Howard, Director Environmental and Natural Resources Policy Office of the Governor P.O. Box 12428 Austin, Texas 78711

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Resident Inspector (2) DRS-PSB MIS System RIV File

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Log # TXX-97270 File # 10130 IR 97-18 Ref. # 10CFR2.201

December 19, 1997

C. Lance Terry Group Vice President

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

SPOP

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) DOCKET NO. 50-445 and 50-446 NRC INSPECTION REPORT NUMBERS 50-445/97-18 and 50-446/97-18 RESPONSE TU NOTICE OF VIOLATION

REF :

- TU Electric letter, logged TXX-97208, Licensee Event Report 445/97-006-00 from C. L. Terry to U.S. Nurlear Regulatory Commission dated September 26, 1997
- TU Electric letter, logged TXX-97215, Supplement Licensee Event Report 445/97-006-01 from C L. Terry to U.S. Nuclear Regulatory Commission dated October 18, 1997

Via Attachment 1 TU Electric hereby responds to the Notice of Violation (50-445(446)/9718-03 and 50-445(446)/9718-04). This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

CC to Jo. + Row

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P. O. Box 1002 Glen Rose Texas 760-3

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Should you have any comments or require additional information, please do not hesitate to contact Obaid Bhatty at (254) 897-5839 to coordinate this effort.

Sincerely.

C. L. Terry

Dellunn By:

James J. Kelley, Jr. Vice President of Nuclear Engineering and Support

MJR/OAB/oab Attachment

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cc: Mr. E. W. Merschoff, Region IV Mr. J. I. Tapia, Region IV Resident Inspectors Attachment to TXX-97273 Page 1 of 6

RESPONSE TO THE NOTICE OF VIOLATION

RESTATEMENT OF THE VIOLATION (445(446)/9718-03)

A. 10 CFR Part 50. Appendix B. Criterion V. requires. in part, that activities affecting quality be prescribed by documented instructions of a type appropriate to the circumstances and that the instructions include quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above

- Procedures INC-7841X, "ACOT/CHAN CAL [analog channel operational test/channel calibration] Catalytic Recombiner X-01 Feed Gas Hydrogen and Oxygen Analyzer. CH 1127A." Revision 4, and INC-7845X, "ACOT/CHAN CAL Catalytic Recombiner X-01 Product Gas Hydrogen and Oxygen Analyzer. CH 1128A." Revision 5, were inappropriate to the circumstances in that they failed to include instructions for performing standardization of the detectors prior to performing the surveillance tests. As a consequence, this activity was not consistently performed.
- 2. Procedures PPT-SX-7520A. "Control Room Ventilation Filter Test CPX-VAFUPK-21." Revision 0. and PPT-SX-7522B. "Control Room Ventilation Filter Test CPX-VAFUPK-22." Revision 0. included acceptance criteria which was outside of the design basis. As a consequence, the pressurization unit flow rate was left above the design basis limit on two occasions. Train A was left with a flow rate of 817 cfm from September 11, 1994. until January 12, 1996. Train B was left with a flow rate 817 cfm from July 15, 1996. until August 8, 1997.

RESPONSE TO THE VIOLATION (445: 445/9718-03)

TU Electric accepts the violation, the response as requested is provided below:

1. Reason for Violation

TU Electric believes that the reasons for violation for the two events are:

ACOT/CHAN CAL Catalytic Recombiner Hydrogen and Oxygen Analyzer Procedures

During the September 30, 1997 testing of the feed gas hydrogen and oxygen analyzers for Catalytic Recombiner X-01 of the waste gas holdup system, the NRC inspector noted that although the activity was not part of the procedure, the technicians had "standardized" the detectors prior to performing the surveillance test. In response, a review was conducted of Attachment to TXX-97273 Page 2 of 6

operational and maintenance practices associated with the performance of catalytic recombiner hydrogen and oxygen analyzer ACOT/Channel Calibration surveillance procedures which concluded that the hydrogen analyzer was typically "standardized" prior to performing the ACOTs and then again when the analyzer was placed into service, but without a step in the procedure to do so.

Standardization allows the hydrogen analyzer to determine the detector membrane permeability of the sensors. When out of service, the hydrogen analyzer is typically placed on a dry purge gas. During that time the permeability of the membrane changes. When placed back in service, the sensors are in a high humidity environment and the readings between the feed and product gas sensors may differ. If the readings differ by more than 1 percent, TU Electric performs a standardization. However, this requirement was not proceduralized.

TU Electric's review further concluded that the calibration procedure for the hydrogen analyzer required a significant amount of system knowledge to perform and that the applicable procedures should be revised to include pre-calibration checks and sensor standardization, consistent with current practices and system operating requirements.

Based on the above review. this violation resulted from the common practice of "standardization" of the detectors which was considered to be "tool box" knowledge (not a procedural method) available for use when needed by the performing technician.

Control Room Ventilation Filter Test Procedures

Technical Specification surveillances 4.7.7.1d.(1), 4.7.7.1g and 4.7.7.1h require the Control Room Heating, Ventilating, and Air Conditioning Emergency Pressurization units to pass their respective surveillance acceptance criteria while operating the unit with a flow rate of 800 cfm ±10%. Or August 8, 1997, during the performance of a Train A Control Room emergency pressurization unit test, a calculated intake air flow of 888 cfm was obtained which exceeded the test conditions of 800 ±10% by 8 cfm. A deficiency document was initiated, and the test was subsequently completed satisfactorily following damper adjustments. The technicians performing the test discussed the test initial results with the Shift The individuals questioned the difference between the two flow Manager values in Technical Specifications 4.7.7.1d.(1), 4.7.7.1g and 4.7.7.1h of $800 \pm 10\%$ versus Technical Specification 4.7.7.1j which requires the emergency pressurization unit train be able to maintain a positive pressure of ≥0.125 inches water gauge during the pressurization mode of operation at a makeup flow rate of ≤800 cfm.

The technician and his supervisor performed a review of past work orders to assess whether any "as left" calculated values from the testing for Technical Specification 4.7.7.1d.(1), 4.7.7.1g and 4.7.7.1h exceeded 800 cfm, which would invalidate the Technical Specification 4.7.7.1j makeup flow value of ≤800 cfm. Two occurrences were identified where the "as left" flows exceeded 800 cfm (both calculated at 817 cfm). A new

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deficiency document was initiated on August 28, 1997 to address this condition. Because these "as left" flows invalidated the Technical Specification 4.7.7.1j makeup flow value of ≤800 cfm, this condition was determined to be reportable as a condition outside of Technical Specifications on August 29, 1997.

On September 30, 1997, during a review of this event it was discovered that during the time period that the plant was outside the Technical specification value of 800 cfm on each occasion, the opposite Train was taken out of service for a total of 6 days, 1 hour and 41 minutes.

Because the test configuration is different for the surveillances. the surveillances requiring flows of 800 ±10% and the one requiring flows ≤800 cfm have been typically done at different times. but within the required frequencies. Although the cognizant personnel identified the appropriate acceptance criteria as specified in each of the CPSES Technical Specification surveillances in the implementing test procedures, they did not recognize that the flow rate criteria for both surveillances measures the system flow rate and that the acceptance criterias should not conflict. Specifically, there were no requirements in the procedures to ensure that the "as left" flows from the procedure implementing Technical Specification 4.7.7.1d.(1), 4.7.7.1g and 4.7.7.1h were ≤800 cfm as required by Technical Specification 4.7.7.1j.

In summary. TU Electric believes that the above listed examples are a result of less than comprehensive procedures.

2. Corrective Steps Taken and Results Achieved

ACOT/CHAN CAL Catalytic Recombiner Hydrogen and Oxygen Analyzer Procedures

A ONE Form was issued to document the deficient condition. A review of operational and maintenance practices as well as the ACOT/ Channel Calibration procedures associated with the waste gas analyzers was performed. It was concluded that the applicable procedures should be revised to include pre-calibration checks and sensor standardization. consistent with current practices and system operating requirements. The basic scope and intent of the procedures are unchanged by the revision and there is no impact to the previous calibration/surveillance activities or results.

Control Room Ventilation Filter Test Procedures

Immediate corrective action was taken to adjust (reduce) the air flow to \$800 cfm as required by Technical Specification 4.7.7.1j and the surveillance test was successfully completed. A ONE Form was issued to document the initial unsatisfactory condition. An evaluation was conducted which concluded that the test procedures should be revised so that each surveillance measures the system flow rate and that the "as left" conditions for each test satisfy all the applicable surveillance requirements of the other related surveillances.

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Also refer to the TU Electric responses to Licensee Event Report 445/97-006-00 and Supplement Licensee Event Report 445/97-006-01.

3. Corrective Actions Taken to Preclude Recurrence

· ACOT/CHAN CAL Catalytic Recombiner Hydrogen and Oxygen Analyzer Procedures

ACOT/CHAN CAL procedures have been revised to include instructions for hydrogen analyzer standardization when required and Gaseous Waste Processing System procedure has been revised to include hydrogen analyzer standardizations when the equipment is placed in service.

Control Room Ventilation Filter Test Procedures

To prevent recurrence, applicable procedures have been revised to include the requirement that the "as left" condition for each test satisfies all the applicable surveillance requirements of the other related surveillances.

4. Date of Full Compliance

TU Electric is in full compliance.

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RESTATEMENT OF THE VIOLATION (445(446)/9718-04)

B. Technical Specification 6.8.1 requires, in part, that the licensee establish, implement and maintain procedures covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A requires specific procedures for each surveillance test listed in the Technical Specifications.

Procedure PPT-SX-7505A, "Control Room Pressurization Test Train A." Revision 0, implemented the surveillance requirements of Technical Specification 4.7.7.1j. Section 7.0 of the procedure required the use of a temperature indicating device accurate to ±2°F.

Contrary to the above, Thermometer IC1473, which had a calibration accuracy of $\pm 2.2^{\circ}$ C (equivalent to $\pm 4^{\circ}$ F), was used during the performance of Procedure PPT-SX-7505A on August 7, 1997.

RESPONSE TO THE VIOLATION (445(446)/9718-04)

TU Electric accepts the violation, the response as requested is provided below:

1. Reason for Violation

The reasons for violation are:

Following completion of the Control Room Pressurization Test, it was discovered that the digital thermometer used in the test did not meet the accuracy requirements set forth in the procedure. The procedure called for an accuracy of ± 2.0 °F and the instrument used had a "Limited Use" calibration sticker with an accuracy of ± 2.2 °C.

In this event, inattention to detail by not verifying the accuracies of the instrumentation as specified by the procedure led to the violation.

2. Corrective Steps Taken and Results Achieved

Upon discovery, immediate actions were taken to recalculate airflow using the instrument inaccuracies of the test equipment that was used in the test and to verify that the Technical Specification acceptance limit of 800 cfm was not exceeded. No additional matters of concern were identified.

3. Corrective Actions Taken to Preclude Recurrence

To preclude recurrence, a Lessons Learned memorandum was issued by the

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System Engineering Manager emphasizing the need for System Engineering personnel to ensure the instruments used in any testing meet the required accuracies as described in the procedures and instruments that have a yellow "Limited Use" calibration tag be carefully reviewed to verify adequacy for the task at hand.

4. Date of Full Compliance

TU Electric is in full compliance.