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IR 88-58  
IR 88-54  
Ref. # 10CFR2.201

William G. Council  
Executive Vice President

October 21, 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 NRC INSPECTION REPORT NOS.  
50-445/88-58 AND 50-446/88-54

Gentlemen:

TU Electric has reviewed your letter dated September 21, 1988 concerning the inspection conducted by Mr. M. Runyan and an NRC consultant during the period August 3 through September 8, 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*  
W. G. Council

By: *D.R. Woodlan*  
D.R. Woodlan  
Docket Licensing Manager

RDD/mlh  
Attachment

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

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NOTICE OF VIOLATION  
(445/8858-V-02)

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 dated February 1, 1988, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings.

Paragraph 7.1 of Field Verification Method (FVM) CPE-SWEC-FVM-EE/ME/IC/CS-090, Revision 5, states: "Those commodities and associated attributes identified on Attachments 1-4 of this FVM shall be reinspected by Quality Control in accordance with the referenced specification criteria identified on Attachments 1-4 of the FVM." Attachment 3 to this FVM shows that location, orientation, and welding are to be inspected for structural steel.

Contrary to the above, Post Construction Hardware Validation Program (PCHVP) package CS-090-SG1-773-54-S1, for a safety-related watertight door, contains Inspection Report 1-018 with attributes for location, orientation, and welding incorrectly marked "N/A" (not applicable). Construction traveler CE-82-201-8903, the original construction document, specifies, in part that: (1) the door assembly location and location be verified and (2) welding be used between the door and the associated embeds. The welds provide structural attachment of the door frame to the building walls and/or provide a watertight seal. The attributes for location, orientation, and welding are applicable to this PCHVP package (445/8858-V-02).

RESPONSE TO NOTICE OF VIOLATION  
(445/8858-V-02)

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

1. Reason for Violation

This violation was the result of incorrect interpretation and implementation of NQI-3.09-M-005, "Field Verification of Structural and Miscellaneous Steel". Specifically, the embedded frame for the watertight door should have been inspected as a "structural steel" item which includes attributes for inspection of location, orientation and site-performed welding. However, the watertight door inspection documented in package CS-090-SG1-773-54-S1 was for a "structural embed" inspection. The applicable inspection attribute for structural embeds is for base metal damage/defects. Since watertight door frames are unique configurations in that they are considered "embedded structural steel" items, the applicable attributes for PCHVP inspections were not consistently implemented, as exemplified by the incomplete inspection noted in this violation.

NOTICE OF VIOLATION  
(445/8858-V-02)

2. Corrective Steps Taken and Results Achieved

Of the twelve watertight doors subject to Post Construction Hardware Validation Program (PCHVP) inspection, seven doors have been inspected including door number S-6 as documented in package CS-090-SG1-773-54-S1. The seven completed packages have been reviewed by QC supervision to determine if additional deficiencies existed. As a result of this review, DR C-88-04499 was initiated to document the failure to inspect the location, orientation and site-performed welds on door S-6 as noted in the violation, as well as failure to inspect for base metal damage of embeds for doors S-4 and S-26, packages CS-090-SG1-773-53-S1 and CS-090-DG-1-810-85-S08, respectively. The disposition of DR C-88-04499 will correct these deficiencies.

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

In addition to the review of completed watertight door packages described above, QC supervision performed reviews of other miscellaneous steel commodities inspected per NQI-3.09-M-005. Pipe whip restraints, platforms, monorails and electrical equipment packages were reviewed to determine if similar deficiencies existed. This review did not identify inspection deficiencies similar to those involving embedded watertight door commodities. Based on this review we consider this violation to be limited to the inspection of embedded watertight doors.

QC personnel responsible for watertight door inspections have been instructed in the requirements of NQI-3.09-M-005 to assure that the required inspections of embedded watertight door commodities are correctly performed. This instruction of QC personnel is considered sufficient to avoid further violations.

4. Date When Full Compliance Will be Achieved

The review and reinstruction described above was achieved on October 18, 1988. The corrective actions associated with DR C-88-04499 will be completed by November 30, 1988.

Outgoing Correspondence bcc (6):

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\* - First Class Mail

August 25, 1988