

In Reply Refer To:  
Dockets: 50-445/86-01  
50-446/86-01

MAR - 6 1987

TU Electric  
ATTN: Mr. W. G. Council  
Executive Vice President  
400 North Olive, L.B. 81  
Dallas, Texas 75201

Gentlemen:

Thank you for your letters of October 13, 1986, November 4, 1986, and January 9, 1987, in response to our letters dated August 29, 1986, and December 3, 1986. 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,

Original Signed & Signed BY  
E. H. Johnson Johnson

E. H. Johnson, Director  
Division of Reactor Safety  
and Projects

cc:  
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bcc to DMB (IE01)

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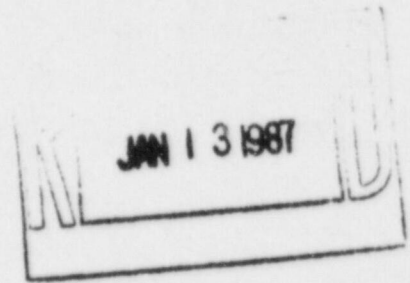
*RPB	*MIS System
*RRI-OPS	*RSTS Operator
*RRI-CONST	*R&SPB
*T. F. Westerman, RSB	DRSP
V. Noonan, NRR	R. Martin, RA
L. Chandler, OGC	*RSB
*RIV File	J. Taylor, IE
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TEXAS UTILITIES GENERATING COMPANY  
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January 9, 1987

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Mr. Eric H. Johnson, Director  
Division of Reactor Safety and Projects  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS.: 50-445 AND 50-446  
INSPECTION REPORT NOS. 50-445/86-01 AND 50-446/86-01  
SUPPLEMENTAL RESPONSE TO NRC NOTICE OF VIOLATION (NOV)  
ITEM A AND NOTICE OF DEVIATION (NOD) ITEMS B AND C

REF: 1. TUGCO Letter TXX-5048 from W. G. Council to E. H. Johnson dated October 13, 1986.  
2. TUGCO Letter TXX-6070 from W. G. Council to E. H. Johnson dated November 3, 1986.

Dear Mr. Johnson:

We have reviewed your letter dated December 3, 1986, requesting additional information to our responses referenced above regarding NOV 445/8601-V-12 and 446/8601-V-03 (Item A) and NOD 445/8601-D-17 (Item B.1), 445/8601-D-20 (Item B.2), 445/8601-D-19 (Item B.3), and 445/8601-D-18 (Item C). We hereby respond to the request for supplemental information in the attachment to this letter.

We requested and received an extension until January 9, 1987 in providing our response during a telephone conversation with Mr. T. F. Westerman on December 18, 1986.

Very truly yours,

*W. G. Council*

W. G. Council

By: *G. S. Keeley*  
G. S. Keeley  
Manager, Nuclear Licensing

RSB/amb  
Attachment

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TXX-6173

January 9, 1987

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c - NRC Region IV (0 + 1 copy)

Director, Inspection and Enforcement (15 copies)  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. V. S. Noonan  
Mr. D. L. Kelley



NOTICE OF VIOLATION  
ITEMS A.1 THROUGH A.6 (445/8601-V-12 AND 446/8601-V-03)

SUPPLEMENTAL REQUEST FOR INFORMATION

With respect to Item A.1, you did not provide the "Reason for Violation" regarding your failure to implement the requirements of Procedure CP-QP-16.3 for Deviation Reports (DRs) which were generated for non-ASME components; e.g., HVAC equipment. Additionally, in regard to "Corrective Action Taken," please confirm that the review of DRs was not limited to just those associated with ASME equipment. With respect to Item A.4, staff review of Procedure CP-QAP-16.1, Revision 25, finds that the document literally requires that nonconforming items identified on nonconformance reports (NCRs) are to be clearly identified with signs, barriers, and/or hold tags. Accordingly, while we have no questions concerning the subsequent revision made to this procedure, we do not concur with your stated reason for disagreement with this finding. Therefore, please provide the information required by the NOV for this item.

With respect to Item A.6, your response indicates that you have restricted consideration of the violation to Comanche Peak Response Team (CPRT) activities only. The fact that you acknowledged in the "Reason for Violation" for Item A.3, the existence of conditions outside of CPRT activities which were not documented on NCRs, supports the stated violation. Therefore, please provide the information required by the NOV for this item.

SUPPLEMENTAL RESPONSE TO ITEM A.1

The TUGCO initial response to this item only addressed the failure to initiate NCR's for items falling under the ASME Section XI program since this was the only activity identified through the TUGCO review of the QA/QC Coordinator's DR/NCR log where other than NCR's were written for DR's received from ERC. NCR's were initiated for all ERC DR's generated for non-ASME components.

It appears that the absence of an NCR number in the QA/QC Coordinator's log led the NRC inspector to believe that an NCR was not intended to be initiated. This was not the case. The DR number and date received were entered in QA/QC Coordinator's log upon receipt for tracking purposes and to assure action was taken. Subsequent to NCR issuance, the log was updated to reflect the corresponding NCR number, date issued and identification of the NCR initiator. We acknowledge that during December 1985 and January 1986 some NCR's were not issued for up to 30 days after DR issuance. This was due primarily to the large number of DRs being generated and the holiday work schedule. We do not consider the delays to be excessive.

As you requested, TUGCO confirms that its review of DR's encompassed all DR's rather than being limited to only those associated with ASME equipment.

NOTICE OF VIOLATION  
ITEMS A.1 THROUGH A.6 (445/8601-V-12 AND 446/8601-V-03)

SUPPLEMENTAL RESPONSE TO ITEM A.4

1. Reason for Violation:

Upon further review, TUGCO agrees that a literal reading of the tagging criteria in CP-QAP-16.1, Revision 25, required the identification of all nonconforming items with signs, barriers, and/or hold tags. However, this was not the intent. The intent was to identify items not yet installed to prevent their inadvertent use or installation. It was not intended to identify items installed and functioning properly since the NCR provides adequate control of those items.

2. Corrective Action Taken:

CP-QAP-16.1, Revision 27, dated August 13, 1986, was issued to require the placement of hold tags on nonconforming items, where practicable, regardless of the stage of component processing. However, on December 22, 1986, a revision to the nonconformance identification and processing procedures was implemented by TUGCO. CP-QP-16.0, "Nonconformance", and its daughter instructions currently provide nonconformance identification requirements which include initial identification of nonconforming conditions on Construction Deficiency Reports (CDR). Tagging criteria is now contained in QI-QP-16.0-8, Revision 0, dated December 22, 1986. Paragraph 3.4 of this procedure requires that "hold tags" be placed on deficient items if:

- a. The item is not installed; or,
- b. Correction of the deficiency without QC witness would preclude proper reinspection.

3. Action to Prevent Recurrence:

The clarification of the procedure requirements provided by CP-QAP-16.1, Revision 27, and implementation of the current nonconformance reporting/identification requirements prevents recurrence of this violation.

4. Date of Full Compliance:

CPSES is currently in compliance.

SUPPLEMENTAL RESPONSE TO ITEM A.6

1. Reason for Violation:

The TUGCO initial response to this item was restricted to consideration of CPRT-related activities because of the limited number of three-part memos initiated by IPC involving nonconforming conditions. The reason for IPC personnel issuing three-part memos in lieu of NCR's was the result of the controlling IPC procedure (IPC-P3) not requiring that NCR's be issued when the inspectors noted a deficiency that was out-of-scope from the inspection checklist.

NOTICE OF VIOLATION  
ITEMS A.1 THROUGH A.6 (445/8601-V-12 AND 446/8601-V-03)

SUPPLEMENTAL RESPONSE TO ITEM A.6 CONT'D

2. Corrective Action Taken:

As identified on NCR E86-200637, 53 out-of-scope three-part memos were initiated by IPC. Quality engineering evaluation of those memos determined that 30 of them documented nonconforming conditions which should have been documented on NCR's. The nonconforming conditions described on the 30 three-part memos have been documented on individual NCR's and included in the monthly trend analysis report. All NCR's were issued on or before 4/30/86. The initial failure to include those 30 items in the monthly trend analysis report did not impact the validity of the monthly reports. This conclusion is based on the unrelated nature of the nonconforming conditions and the relatively small number of the NCRs as compared to the average number of 1300 NCR's trended each month.

3. Action to Prevent Recurrence:

As stated in the response to Item A.3, the Inspection Surveillance Program required the initiation of an NCR for all discrepancies or concerns noted during surveillance activities. However, on December 22, 1986, a revision to the nonconformance identification and processing procedures was implemented by TUGCO. CP-QP-16.0, "Nonconformances", and its daughter instructions currently provide nonconformance identification requirements which includes initial identification of nonconforming conditions on Construction Deficiency Reports (CDR).

4. Date of Full Compliance:

CPSES is currently in compliance.



NOTICE OF DEVIATION  
ITEM B.1 (445/8601-D-17)  
ITEM B.2 (445/8601-D-20)  
ITEM B.3 (445/8601-D-19)

SUPPLEMENTAL REQUEST FOR INFORMATION

With respect to items B.1, B.2, and B.3, please identify what specific documented actions were taken to prevent recurrence for each of the three stated examples.

SUPPLEMENTAL RESPONSE TO ITEMS B.1, B.2, AND B.3

With respect to Items B.1, B.2, and B.3, documentation of action to prevent recurrence is contained in appropriate ERC files. The specific documented actions taken are meetings and discussions that took place between the affected inspector and the lead inspector, overview inspector or the QA/QC Population engineer. These documents are available for NRC review.

Additionally, an Overview Inspection Program was implemented to reinspect a sample of each inspector's work. Results of the Overview Inspection Program are complete and available for NRC review. The inspector for Verification Package No. I-M-LBCO-038 had an overall error rate of 0.19%. The inspector for Verification Package No. I-M-LBCO-144 had an overall error rate of 2.68%. Based on these results and the documented discussions stated above, no further action to prevent recurrence is required.



Attachment to TXX-6173  
January 9, 1987  
Page 5 of 5

NOTICE OF DEVIATION  
ITEM C (445/8601-D-18)

SUPPLEMENTAL REQUEST FOR INFORMATION

Please clarify whether surveillance and/or audits have specifically addressed the work activities of the QA/QC engineer applicable to this deviation.

SUPPLEMENTAL RESPONSE TO ITEM C

With respect to Item C, ERC QA surveillance number II 85-20 specifically addressed the work activities of the QA/QC engineer applicable to the Large Bore Piping Configuration (LBCO) population. This surveillance is available for NRC review.