



Log # TXX-6269
File # 10130
IR 86-15
IR 86-12
Ref # 10CFR2.201

William G. Council
Executive Vice President

February 6, 1987

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 NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-445/86-15 AND 50-446/86-12

Gentlemen:

We have reviewed your letter dated December 22, 1986, concerning the inspection conducted by Mr. I. Barnes and other members of the Region IV Comanche Peak Group during the period June 1-30, 1986. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak Steam Electric Station Units 1 and 2. Attached to your letter were Notices of Violations and Deviations.

On January 20, 1987, per a telecon with your Mr. Ian Barnes, we requested and received an extension for 445/8615-V-07; 446/8612-V-07 until February 6, 1987.

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

Very truly yours,

W. G. Council

W. G. Council

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

RDD/gj

c - Mr. Eric H. Johnson, Region IV
Mr. D. L. Kelley, RI - Region IV
Mr. I. Barnes, - Region IV

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NOTICE OF VIOLATION
ITEM F.2 (445/8615-V-07 AND 446/8612-V-07)

- F. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, dated July 31, 1984, of the TUGCO QAP, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above:

2. No procedures or instructions existed to control the activity by which the onsite fabrication shop provides identification for identical items fabricated in the shop. This identification is necessary to assure that quality control inspections are traceable to the items inspected. Traceability of inspections is presently being informally accomplished by stamping the inspection report number on the item when inspection is complete. (445/8615-V-07; 446/8612-V-07).

RESPONSE TO ITEM F.2 (445/8615-V-07 AND 446/8612-V-07)

We admit to the violation and the requested information follows:

1. Reason for Violation

The violation was the result of failure to incorporate methods implemented to control inspection traceability of identical shop fabricated items into written procedures/instructions.

2. Corrective Steps Taken and Results Achieved

Procedures CP-CPM-7.3A, "Material Storage/Identification for Structural Steel Fabrication", and QI-QP-11.14-1, "Inspection of Site Fabrication and Installation of Structural and Miscellaneous Steel", were revised to incorporate methods implemented to control inspection traceability of identical shop fabricated items. These methods assure inspection traceability.

NOTICE OF VIOLATION
RESPONSE TO ITEM F.2 (445/8615-V-07 AND 446/8612-V-07) (CONT'D)

3. Corrective Steps Which Will Be Taken To Avoid Further Violations

The implementation of QI-QP-11.14-1, Rev. 24, issued July 28, 1986, and CP-CPM-7.3A, Rev. 0 DCN#2, issued August 12, 1986, should prevent recurrence.

4. Date When Full Compliance Will Be Achieved

Full compliance was achieved August 12, 1986.