

ENCLOSURE 1

NOTICE OF VIOLATION

TU Electric  
Comanche Peak Steam Electric Station

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

During an NRC inspection conducted on July 20 through August 30, 1997, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. 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 general plant operating procedures for power operation, startup, shutdown of safety-related systems and for conducting maintenance.

Procedure OPT-457B, "Train A Safeguards Slave Relay K740 and K741 Actuation Test," Revision 2, Step 8.8, required that Valve 2-8812A be closed.

Procedure OPT-214B, "Diesel Generator Operability Test," Revision 4, Step 8.1.V, required that the emergency diesel generator be immediately loaded.

Procedure SOP-103A, "Chemical and Volume Control System," Revision 10, Step 5.3.10, required that the inlet and outlet valves of the cation bed demineralizer be closed.

Contrary to the above:

1. On May 7, 1997, while performing Procedure OPT-457B, a licensed operator failed to close Valve 2-8812A per Step 8.8.
2. On August 7, 1997, during the performance of Procedure OPT-214B, a licensed operator did not immediately load Emergency Diesel Generator 2-01 per Step 8.1.V.
3. On August 21, 1997, while securing flow through the cation bed demineralizer, an auxiliary operator failed to close the inlet and outlet valves of chemical and volume control system cation bed Demineralizer 1-01 per Step 5.3.10, of Procedure SOP-103A.

This is a Severity Level IV violation (Supplement I) (50-445(446)/9717-01).

- B. Technical Specification 4.6.3.1 states, "The containment isolation valves shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test, and verification of isolation time."

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Contrary to the above, on July 8, 1997, the licensee failed to test Valve 1-IV-4175, Unit 1 containment isolation accumulator sample valve, after performing maintenance on the valve actuator.

This is a Severity Level IV violation (Supplement 1) (50-445/9717-04)

- C. License Condition 2.H of the facility operating license, requires, in part, that the licensee fully implement and maintain in effect all provisions of the Commission-approved physical security plan. Section 7.1.3 of the Physical Security Plan required, in part, that illumination in the protected area be at least 0.2 foot-candles.

Contrary to the above, on August 27, 1997, the areas under two trailers and under a vending truck located within the protected area were not illuminated to at least 0.2 foot-candles.

This is a Severity Level IV violation (Supplement III) (445(446)/9717-06).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas  
this 19th day of September 1997