

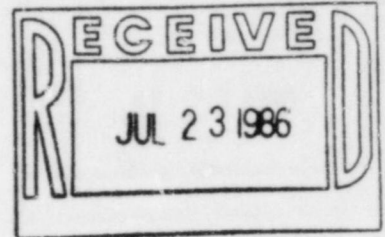
Log # TXX-4917
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 IR 84-08

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.S. 81 • DALLAS, TEXAS 75201

July 23, 1986

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 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NO. 50-445
 RESPONSE TO NRC NOTICE OF VIOLATION
 INSPECTION REPORT NO.: 50-445/84-08

Dear Mr. Johnson:

Your letter of September 17, 1985, regarding our responses to your July 28, 1984, Notice of Violation, identified some additional concerns and suggested that these concerns be addressed by the Comanche Peak Response Team (CPRT). Our responses to your concerns are as follows:

1. Item - "...[W]e find that your response raises a further question regarding actions taken to ensure that inspectors are certified for the full scope of inspection activities to which they are assigned. Since other matters regarding inspector training and qualification were examined by the Technical Review Team (TRT), you should consider answering this additional question in your CPRT Program Plan."

Position - For inspections performed prior to July 1985, CPRT Issue-Specific Action Plans I.d.1, I.d.2 and VII.C will address generic concerns regarding inspector certification and qualification. For ongoing inspection activities, we believe our present system to assure inspectors are certified to perform assigned inspection activities is properly functioning. To provide confidence that the system is presently functioning, we conducted a review of approximately 800 inspection documents completed over the past 6 months by 163 inspectors and did not identify any deficiencies.

2. Item - "...[W]e feel it is appropriate that the matter of incomplete inspection of the crossover leg restraints, as well as the cause of your initially incorrect response to our Notice of Violation be evaluated by the Comanche Peak Response Team."

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Position - With regard to the matter of incomplete inspection of the crossover leg restraints, we believe that the present CPRT Program Plan will identify any generic failure to conduct required inspections. With regard to the matter of the cause of our initially incorrect response to your Notice of Violation, we believe that it resulted from our confusing that problem with another similar matter and that it was an isolated instance; however, we have placed increased emphasis in this area to assure ourselves that future responses are fully accurate.

Please advise us if you need further information regarding this matter.

Very truly yours,

W. G. Council

By: John W. Beck
John W. Beck
Vice President

JWA/gj

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

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