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IR 85-09
Ref: 10CFR2.201

William G. Counsil
Executive Vice President

May 6, 1987

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
INSPECTION REPORT NOS. 50-445/85-13 AND 50-446/85-09
REVISED RESPONSE ON NOTICE OF VIOLATION (NOV) ITEM D

REFERENCE: TUGCO Letter TXX-4932 from W. G. Counsil to
E. H. Johnson dated August 14, 1986

Gentlemen:

In pursuing the corrective steps as delineated in our referenced response to NOV 445/8513-V-01 (Item D), we have determined that our corrective actions have been substantially expanded and will take longer than originally anticipated. The original date of full compliance was September 30, 1986. The original Notice of Violation and TU Electric's revised response are provided in the attachment to this letter.

Very truly yours,

W. G. Counsil

W. G. Counsil

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

RSB/mlh
Attachment

c - Mr. E. H. Johnson, Region IV
Mr. D. L. Kelley, RI - Region IV
Mr. H. S. Phillips, RI - Region IV

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NOTICE OF VIOLATION
ITEM D (445/8513-V-01)

- D. Criterion V of Appendix B to 10 CFR Part 50, as implemented by the TUGCO QAP, Section 5.0, Revision 2, dated May 21, 1981, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Paragraph 3.1.1, subparagraphs b and c, of TUGCO Procedure QI-QP-11.3-8, Revision 0, issue date July 7, 1978, "Identification and Color-Coding Inspections", require that conduit designation shall be applied with black ink or paint and that identification of conduit be verified at both sides of all walls and slabs through which conduit passes.

Paragraph 3.1.1, subparagraph b, of TUGCO Procedure QI-QP-11.2-23.7, Revision 1, issue date January 5, 1980, "Verify Conduit Identifications", similarly requires that conduit be identified on both sides of all walls and slabs through which conduit passes. Subparagraph c. of this paragraph states, in part, "Groups of embedded conduits which are flush with the surface of walls, floors and manholes shall be identified on the surface or the wall, floor, or manhole by attaching an identification template near the conduit bank..."

Contrary to the above, the following examples of incomplete and missing conduit identifications were noted in the Unit 1 lower cable spread room, auxiliary building, and safeguards building:

1. Two conduits attached to embedded conduit wall sleeve TSW-A-020 were not identified on the identification template and one conduit which was identified on the template as being present did not, in fact, exist.
2. Two banks of embedded conduit wall sleeves below sleeve TSW-A-023 had no form of identification.
3. At tray section T14GCDH27, there were four sleeves which were not identified by either identification template or conduit marking.
4. At tray section T24WAEF, there were two floor sleeves with an incomplete identification template; i.e., the template contained only the letter TFS.
5. Below battery pack CPI-ELBPSC-187 (Circuit ESB7-11), there were two floor sleeves which were not identified.
6. At a tray section above junction box JB1A-1332, the embedded conduit wall sleeves were not identified by either identification template or marking.

NOTICE OF VIOLATION
ITEM D (445/8513-V-01) - CONT'D

7. Three of five floor sleeves at tray section T120ABB23 were unmarked.
8. Four floor sleeves at tray section T120ABB23 were unmarked.
9. Conduits attached to embedded conduit wall sleeve TSW-A-030 were not identified on the identification template which was present.
(445/8513-V-01)

REVISED RESPONSE TO ITEM D (445/8513-V-01)

1. Reason for Violation

Electrical erection specification ES-100 requirements for thru-wall and thru-floor sleeve identification were found to be inadequate. Therefore, construction installation procedures 35-1195-ECP-19 and 35-1195-ECP-19A which implement these requirements did not provide sufficient guidance to the craft to ensure proper sleeve identification.

2. Corrective Steps Taken and Results Achieved

Both specific and generic NCRs were issued to assess the magnitude of the issues raised in the NOV. A Significant Deficiency Analysis Report (SDAR CP-86-32) was also issued identifying thru-wall embedded conduit sleeves with incorrect/incomplete identification and potential overfill problems. The original field verification efforts initiated to satisfy commitments made in response to the NOV and SDAR entailed walkdowns of all level 1 and 2 cable raceway sleeves. This initial scope of work has since been expanded to include field verification of all electrical sleeves in Units 1 and 2 in accordance with CPE-FVM-EE-023, "Instruction to Acquire Data for Cable Percent - Fill Calculations and Identification of Thru-Floor and Thru-Wall Embedded Conduit Sleeves." All electrical sleeves will be uniquely identified. Furthermore, the walkdown as-built information will include levels 1 through 4 cables in sleeves for both units. The as-built information will be reviewed by Engineering and subsequently incorporated into the cable raceway system (E1-1700 & E2-1700).

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

Design Change Authorization, DCA-21,464 was issued August 16, 1985 and posted against Electrical Specification ES-100, to clarify thru-wall and thru-floor sleeve identification requirements. Construction installation procedures 35-1195-ECP-19, Rev. 11, and 35-1195-ECP-19A, Rev. 2, were revised to reflect the DCA requirements by Document Change Notices DCN-2 on August 26, 1986, and DCN-5 on August 28, 1986, respectively. Craft personnel were trained to the revised procedures by September 22, 1986.

REVISED RESPONSE TO ITEM D (445/8513-V-01) - CONT'D

4. Date When Full Compliance Will be Achieved

Field verification activities for Unit 1 and Common are scheduled for completion by May 22, 1987 with final design verification by September 25, 1987. Field verification activities for Unit 2 are scheduled for completion by January 31, 1988 with final design verification by March 31, 1988. Full compliance will be achieved after completion of these activities.