NOV - 8 1990

Docket Nos. 50-445/90-37
50-446/90-37
License Nos. NPF-87
CPPR-127

TU Electric
ATTN: W. J. Cahill, Jr., Executive
Vice President, Nuclear
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

Thank you for your letter of October 22, 1990, in response to our letter and Notice of Violation dated September 21, 1990. 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 By:
Thomas P. Gwynn

Samuel J. Collins, Director
Division of Reactor Projects

cc:
TU Electric
ATTN: Roger D. Walker, Manager,
Nuclear Licensing
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Juanita Ellis
President - CASE
1426 South Polk Street
Dallas, Texas 75224

*RIV:RI:MQPS	*C:MQPS	D:DRS	D:DRP
BMcNeill/cjg	IBarnes	LJCallan	SJCollins
/ /90	/ /90	11/4 /90	11/8 /90

*Previously concurred

IE01
1/1

GDS Associates, Inc.
Suite 720
1850 Parkway Place
Marietta, Georgia 30067-8237

Billie Pirner Garde, Esq.
Robinson, Robinson, et. al.
103 East College Avenue
Appleton, Wisconsin 54911

TU Electric
Bethesda Licensing
3 Metro Center, Suite 610
Bethesda, Maryland 20814

Heron, Burchette, Ruckert, & Rothwell
ATTN: William A. Burchette, Esq.
Counsel for Tex-La Electric
Cooperative of Texas
1025 Thomas Jefferson St., N.W.
Washington, D.C. 20007

E. F. Ottney
P.O. Box 1777
Glen Rose, Texas 76043

Newman & Holtzinger, P.C.
ATTN: Jack R. Newman, Esq.
1615 L. Street, N.W.
Suite 1000
Washington, D.C. 20036

Texas Department of Labor & Standards
ATTN: G. R. Bynog, Program Manager/
Chief Inspector
Boiler Division
P.O. Box 12157, Capitol Station
Austin, Texas 78711

Honorable George Crump
County Judge
Glen Rose, Texas 76043

Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin
DRP
Section Chief (DRP/B)
DRSS-FRPS
MIS System
RIV Files
I. Barnes
B. McNeill

Resident Inspector (2)
DRS
Project Engineer (DRP/B)
Lisa Shea, RM/ALF
RSTS Operator

TUELECTRIC

Log # TXX-90555
File # 10130
IR 90-37
Ref. # 10CFR2.201

William J. Cahill, Jr.
Executive Vice President

October 22, 1990

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
NRC INSPECTION REPORT NOS. 50-445/90-37; 50-446/90-37
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated September 21, 1990, concerning the inspection conducted by the NRC staff during the period August 27 through August 31, 1990. This inspection covered activities authorized by NRC facility Operating License NPF-87 and NRC Construction Permit CPPR-127 for CPSES Units 1 and 2, respectively. Attached to the September 21, 1990 letter was a Notice of Violation.

TU Electric hereby responds to the Notice of Violation in the attachment to this letter.

Sincerely,

William J. Cahill, Jr.

By: Roger D. Walker
Roger D. Walker
Manager of Nuclear Licensing

JDS/cld
Attachment

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)

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Attachment to TXX-90555
Page 1 of 2

Notice of Violation
(446/9037-01)

MISSED SURVEILLANCE REQUIREMENT

Unit 1 Technical Specification 4.0.5 requires as a surveillance requirement that inservice testing of ASME Code Class 2 pumps shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, except where specific written relief has been granted by the Commission. Section XI of the Code requires that the quarterly pump test frequency shall be doubled when the test results fall within the alert range. Technical Specification 4.0.2 requires that each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

Contrary to the above, the Code Class 2 residual heat removal pump ISX-RHAPRH-01, was placed in the alert status on June 28, 1990, and the specified surveillance test frequency increased to once per 46 days; however, the surveillance test was not completed until August 14, 1990, which exceeded the specified surveillance interval and the maximum allowable extension permitted by Technical Specification 4.0.2.

Response to Notice of Violation
(446/9037-01)

TU Electric accepts the violation and the requested information follows.

1. Reason for the Violation

Scheduling of routine Technical Specification (TS) surveillances at CPSES is accomplished in part by a Managed Maintenance Computer Program (MMCP). This program provides an automatic prompt to schedule upcoming surveillances based on the TS due date. Subsequently, based on a scheduled date manually entered into the program, MMCP prints a Surveillance Work Order (SWO) to ensure timely performance of the specified surveillance. Appearing on each SWO is the manually entered scheduled date, the actual TS due date, and a violation date that reflects the maximum extension allowed by the TS.

When conditions require surveillance performance at increased frequency, the Surveillance Test Program procedure directs the responsible Surveillance Test Coordinator (STC) to make provisions for manually scheduling the surveillance for performance at the increased frequency. In the case of the subject surveillance on Residual Heat Removal (RHR) Pump 01, the method utilized by the Operation's STC to provide for the test was to manually enter a scheduled date reflecting the increased frequency (similar to routine scheduling but without a prompt by MMCP). However, MMCP was not updated to reflect the new due date and new violation date. The SWO subsequently printed by MMCP showed the new (increased frequency) scheduled date, but still showed the due date and violation date of the normal surveillance interval.

When testing could not be performed on the new scheduled date, operators checked the unmodified due date to ensure it would not be missed and unknowingly rescheduled the surveillance to a date that fell outside the new due date plus extension. The violation is attributable to the method utilized to manually schedule the increased frequency surveillance.

2. Corrective Steps Taken and Results Achieved

Discovery of this violation occurred subsequent to the successful testing of the pump. Therefore, corrective steps were not necessary to re-establish the required surveillance interval or to verify operability of the pump. Failure to comply with the increased surveillance frequency was promptly documented via appropriate plant procedures and the cause of the missed surveillance identified.

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

A memorandum addressing the violation has been distributed to Surveillance Test Coordinators. Additionally, the Surveillance Test Program procedure will be reviewed and revised if necessary to ensure that requirements for updating the frequency of surveillance intervals, when necessary, are clearly specified.

4. Date When Full Compliance Will be Achieved

Programmatic review will be completed by October 31, 1990, and changes, if necessary, incorporated by November 15, 1990.