

APPENDIX B

NOTICE OF DEVIATION

TU Electric

Comanche Peak Steam Electric Station,
Units 1 and 2

Dockets: 50-445/87-16
50-446/87-13
Permits: CPPR-126
CPPR-127

As a result of the NRC inspection conducted on August 5 through September 2, 1987, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the following deviation was identified:

Appendix 1A(B) of the FSAR commits the applicant to Regulatory Guide 1.68, Revision 2, August 1978. Regulatory Position C.2 of Regulatory Guide (RG) 1.68 (Revision 2 of August 1978), requires, in part, the establishment of administrative controls to ensure adequate retesting of systems or design features maintained or modified during or following preoperational testing. RG 1.68 requires that upon licensing, all safety related systems and design features must meet the preoperational test acceptance criteria as described in the FSAR with any and all exceptions identified to the NRC and appropriately justified.

In deviation from the above, Operations Administrative Procedure STA-623, "Post Work Testing," Revision 1 of June 26, 1987, does not contain administrative controls to ensure adequate retesting of systems or design features which have been maintained or modified following preoperational testing (445/8716-D-01).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each deviation: (1) the reasons for the deviation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further deviations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

OCT 23 1987

Dated

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PDR ADOCK 05000445
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