

APPENDIX A
NOTICE OF VIOLATION

TU Electric	Dockets: 50-445/88-56 50-446/88-52
Comanche Peak Steam Electric Station Units 1 and 2, Glen Rose, Texas	Permits: CPPR-126 CPPR-127

During an NRC inspection conducted on August 3 through September 8, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3 of the TU Electric Quality Assurance Plan (QAP), states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings"

Paragraph 6.3 of ECE 5.01, Revision 0, states, in part, "Applicable design inputs shall be identified, documented, and their selection reviewed and approved to the level of detail necessary to permit the design activity to be carried out in a correct manner"

Contrary to the above, the following conditions were identified:

1. In Calculation TNE-CS-CA-CA-1a, Revision 6, used an unconservative design input for evaluation of minimum separation requirements for certain 1/4-inch diameter Hilti Kwik Bolts (HKBs).
2. The calculation does not meet one of the restrictions cited in the applicable Design Basis Document DBD-CS-015, Revision 2.
3. Note 5 on drawing S-0910 SH CA-1b is inconsistent with Procedure CCI-113.

This is a Severity Level IV violation (Supplement II)
(445/8856-V-02; 446/8852-V-01).

- B. Criterion XV of Appendix B to 10 CFR Part 50 requires that nonconforming items shall be reviewed and accepted, rejected, repaired, or reworked in accordance with documented procedures.

Section 15.2.2 of the TU Electric Quality Assurance Plan, Revision 0, dated February 1, 1988, requires that conditions which render the quality of an item unacceptable or indeterminate be identified, resolved, and closed out.

Contrary to the above, NCR M-23438N, Revision 1, which identifies that Bill of Material items 7, 14, and 16 are installed on pipe support CC-1-040-019-E33S and do not meet material traceability requirements was dispositioned "Rework" and closed out although the material remains nonconforming and was not reworked.

This is a Severity Level IV violation (Supplement II) (445/8856-V-01).

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, DC, 20555, with a copy to the Assistant Director for Inspection Programs, Comanche Peak Project Division, Office of Special Projects, within 30 days of the date of the letter transmitting this 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 if admitted, (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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause 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.

FOR THE NUCLEAR REGULATORY COMMISSION

RF Warnick

Dated at Comanche Peak Site
this 3rd day of October 1988