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August 21, 1989

William J. Cahill, Jr.
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
REVISED RESPONSE TO NRC NOTICE OF VIOLATION
(NOV) 445/8730-V-06

REF: (1) TU Electric letter TXX-88079 from W. G. Council to USNRC
dated January 15, 1989

Gentlemen:

Reference (1) provided our response to NOV 445/8730-V-06. In that response we noted that although the subject capacitors did not adversely affect the operation of the diesel generator, a functional test of the Unit 1 control circuits would be performed with the capacitors removed and appropriate actions would be taken based on the results of that test. This testing has been performed and we have determined that the capacitors did provide a necessary function. Our response has been revised to incorporate this information and describe the resulting additional actions which have been taken. Our response has also been revised to update the status of other actions previously described in Reference (1).

Revision bars in the right margin of the attached revised response indicate the changed portions of the text.

Sincerely,

William J. Cahill, Jr.

FAM/vld
Attachment

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

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NOTICE OF VIOLATION
ITEM A (445/8730-V-06)

- A. Criterion III of Appendix B to 10CFR Part 50, as implemented by Section 3.0, Revision 3, dated July 31, 1984, of the TU Electric Quality Assurance Plan (QAP), requires in part, that measures must be established to assure that applicable regulatory requirements and design bases, as defined in Part 50.2 and as specified in the license application, for those structures, systems and components to which this appendix applies, are correctly translated into specifications, drawings, procedures, and instructions. The design control measures must provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. In addition, design changes, including field changes, must be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, the NRC inspector identified two capacitors connected in parallel with a relay coil located in both Unit 1 emergency diesel generator control panels that were not shown on facility electrical drawings nor described in any associated documents (445/8730-V-06).

RESPONSE TO NOTICE OF VIOLATION
ITEM A (445/8730-V-06)

TU Electric agrees with the alleged violation and the requested information follows:

1. Reason for Violation

No documentation could be found which indicated that the capacitors were installed subsequent to receipt of the panels at CPSES. The wire markers and lugs used for the capacitor installations are identical to those used elsewhere in the vendor (IMO Delaval) supplied control panel. A vendor representative has stated that the capacitors could have been vendor installed. However, the personnel who designed the circuit are no longer with Delaval and Delaval had no records of the capacitors being installed. For the above reasons, TU Electric believes that the capacitors were vendor installed, and that the vendor failed to show the capacitors on the applicable drawings as required by the diesel generator purchase specification.

2. Corrective Steps Taken and Results Achieved

The subject capacitors were originally identified by our Startup Group during a point to point verification of control panel wiring performed as part of diesel generator functional testing. The Startup engineer noted that capacitors were not shown on the electrical drawings. He relocated the capacitors outside their cable bundle for easier visibility intending to further evaluate the apparent discrepancy. Subsequently, the NRC inspector observed the capacitors and informed TU Electric of his concern. Test Deficiency Report (TDR) 5597 and Nonconformance Report (NCR) 87-02828 were written to document the discrepancy. The point to point verification of the wiring in both Unit 1 diesel generator control panels did not identify any other design discrepancies. The Unit 2 diesel generator panels were checked for the same capacitor installations and none were found. Our Startup Group will perform a complete verification of the Unit 2 diesel generator control panels as part of the diesel generator functional test.

Our initial evaluation determined that, although the capacitors did not adversely affect operation of the diesel generator, they did not appear to serve a necessary function. As part of the disposition of NCR 87-02828, a functional test of a Unit 1 control circuit was performed with the capacitors removed. It was determined that the capacitors delay the unlatching of relay TD-4 upon deenergization of the TD-4 power supply. This delay provides assurance that the operation of TD-4 and other associated annunciator and auxiliary equipment relays is sequenced properly. We have determined that failure (shorting) of the capacitors would not adversely affect starting, running, or stopping the diesel generator.

A vendor approved design change has been installed in the Unit 1 diesel generator control circuitries which performs the same function as the removed capacitors. The same design change will be installed in the Unit 2 diesel generator control circuitries.

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

We have determined that, except for the diesel generator sets, no other safety related components have been supplied by IMO Delaval. Our Authorized Vendor List now requires the responsible engineering organization to evaluate Delaval safety related purchase orders and specify additional quality verification/inspection by TU Electric QA for critical processes/activities. This measure should provide increased assurance of Delaval compliance with purchase specification requirements.

Issue Specific Action Plan (ISAP) VII.a.9 has been implemented to address concerns regarding vendor compliance with procurement requirements. TXX-88310 from W. G. Council to the NRC, dated March 15, 1989, has been transmitted describing additional actions taken as a result of the ISAP VII.a.9 results report.

4. Date When Full Compliance Will be Achieved

Unit 1 compliance was established upon completion of the modification to control circuits described in paragraph 2.

Installation of the design change in the Unit 2 diesel generator control circuits will be completed prior to Unit 2 Hot Functional Testing.

Unit 2 diesel generator functional testing, including a point to point verification of both Unit 2 diesel generator control panels, is scheduled for completion prior to Plant Hot Functional Testing.