

10-11-84

In Reply Refer To:  
Docket: 50-445/84-21

Texas Utilities Electric Company  
ATTN: M. D. Spence, President, TUGCO  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Thank you for your letter of August 17, 1984, in response to our letter and the attached Notice of Violation dated July 18, 1984. As a result of our review, we find that additional information is needed as discussed with your Mr. R. E. Camp on September 24, 1984.

Specifically, the preventive action taken to assure proper indication of installed instrumentation when used for certified test data appears unlikely to provide that assurance. Your letter refers to a change to CP-SAP-7, "Format and Content of Test Instructions/Procedures." Upon reviewing the August 15, 1984, interim change to Section 4.3.3.6.h of CP-SAP-7, we are concerned that the added note does not direct the procedure writer to include a prerequisite or test step which ensures that installed instrumentation (whether previously in service or not) is filled and vented just prior to obtaining preoperational test data. Instead the change suggests that the writer consider such a provision, and then only where the proposed preoperational or acceptance test procedure places the system in service vice the "System Operating Procedure." Whether or not the preoperational test places the system in service is not germane to the problem. Also, whether the system has been in or out of service before the test has little effect on the presence of air in dead-ended differential pressure detector piping. The interim change to CP-SAP-7 does not appear to provide reasonable assurance that differential pressure detectors will provide reliable data because it does not require the test procedure to contain provisions for filling and venting such detectors before data are obtained. Unless this assurance is provided, Criterion XI and XII of 10 CFR 50, Appendix B would not be satisfied.

In light of the above concern, your response to Notice of Violation 445/8421-02 is inadequate with respect to "preventive action."

<i>mm</i> RRI <i>for</i> WSmith/mh 10/3/84	TL/TF <i>DD</i> DMHunnicut 10/3/84	D/RV <i>RF</i> RLBart 10/03/84	U/D/S&P RDenise 10/4/84	NKR <i>RB</i> Tippolito 10/10/84
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Please provide the supplemental information within 30 days of the date of this letter.

Sincerely,

Original Signed by:  
R. L. BANGART

Richard L. Bangart, Director  
Region IV Comanche Peak Task Force

cc:  
Texas Utilities Electric Company  
ATTN: B. R. Clements, Vice  
President, Nuclear  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Texas Utilities Electric Company  
ATTN: H. C. Schmidt, Manager  
Nuclear Services  
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bcc's w/ltr dtd 8/17/84  
bcc to DMB (IE01)

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