

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

October 29, 2002

Mr. C. L. Terry, Senior Vice President and Principal Nuclear Officer TXU Energy ATTN: Regulatory Affairs Comanche Peak Steam Electric Station P.O. Box 1002 Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION - NRC INTEGRATED

INSPECTION REPORT 50-445/02-04; 50-446/02-04

Dear Mr. Terry:

On October 5, 2002, the NRC completed an inspection at your Comanche Peak Steam Electric Station, Units 1 and 2, facility. The enclosed report documents the inspection findings which were discussed on October 10, 2002, with Mr. R. Flores and other members of your staff.

This inspection examined activities conducted under your licenses as they related to safety and compliance with the Commission's rules and regulations and with the conditions of your licenses. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection no findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

William D. Johnson, Chief Project Branch A Division of Reactor Projects

Dockets: 50-445

50-446

Licenses: NPF-87

NPF-89

Enclosure:

NRC Inspection Report 50-445/02-04; 50-446/02-04

cc w/enclosure: Roger D. Walker Regulatory Affairs Manager TXU Generation Company LP P.O. Box 1002 Glen Rose, Texas 76043

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10/29/02				

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Dockets: 50-445, 50-446

Licenses: NPF-87, NPF-89

Report: 50-445,446/02-04

Licensee: TXU Generation Company LP

Facility: Comanche Peak Steam Electric Station, Units 1 and 2

Location: FM-56, Glen Rose, Texas

Dates: July 7 - October 5, 2002

Inspectors: D. B. Allen, Senior Resident Inspector

A. A. Sanchez, Resident Inspector

D. W. Schaefer, Physical Security Inspector, Division of Reactor Safety

C. J. Paulk, Senior Project Engineer, Project Branch A J. M. Keeton, Project Engineer, Project Branch A

Approved by: W. D. Johnson, Chief, Project Branch A

Division of Reactor Projects

Attachment: Supplemental Information

SUMMARY OF FINDINGS

Comanche Peak Steam Electric Station, Units 1 and 2 NRC Inspection Report 50-445/02-04; 50-446/02-04

IR 05000445-02-04; IR 05000446-02-04; TXU Energy; on 07/07/2002-10/05/2002; Comanche Peak Steam Electric Station; Units 1 & 2. Integrated Resident & Regional Report.

The inspection was conducted by resident inspectors, regional project engineers and a regional security inspector. No findings were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

Licensee identified violations

Violations of very low safety significance, which were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee have been entered into the licensee's corrective action program. These violations and corrective action tracking numbers are listed in Section 4OA7 of this report.

Report Details

Summary of Plant Status

Unit 1 began the report period operating at essentially 100 percent power. On September 28, 2002, the unit was expeditiously shutdown following indications of a primary to secondary leak from Seam Generator 2. The unit entered Mode 3 at 3:12 am, beginning Refueling Outage 1RF09.

Unit 2 began the report period operating at essentially 100 percent power. On July 29, 2002, the unit's power was reduced to approximately 75 percent power to repair a tube leak in Condenser Waterbox 2A. The unit was returned to essentially 100 percent power on August 1, 2002. The unit operated at essentially 100 percent power for the remainder of the report period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness

1R04 Equipment Alignment (71111.04)

.1 Partial System Walkdown

a. <u>Inspection Scope</u>

The inspectors conducted partial walkdowns of the following three risk-significant systems to verify that they were in their proper standby alignment as defined by system operating procedures and system drawings. During the walkdowns, inspectors examined system components for materiel conditions that could degrade system performance. In addition, the inspectors evaluated the effectiveness of the licensee's problem identification and resolution program in resolving issues which could increase event initiation frequency or impact mitigating system availability.

- Unit 1 Train A emergency diesel generator in accordance with System Operating Procedure SOP-609A, "Diesel Generator System," Revision 15, while the Unit 1 turbine-driven auxiliary feedwater pump was inoperable due to scheduled maintenance on related valves on August 1, 2002
- Unit 2 Train B safety injection system in accordance with System Operating Procedure SOP-201B, "Safety Injection System," Revision 4, while the Train A safety injection system was removed from service for planned surveillance on August 19, 2002
- Unit 1 Train A containment spray system in accordance with System Operating Procedure SOP-204A, "Containment Spray System," Revision 12, while Train B Containment Spray Pump 1-02 was out of service for planned maintenance on September 10, 2002

No findings of significance were identified.

.2 Detailed Semi-Annual Walkdown

a. Inspection Scope

The inspectors conducted a detailed semi-annual inspection of the Unit 1, Train A emergency diesel generator using System Operating Procedure SOP- 609A, "Diesel Generator System," Revision 15, to ascertain if the system and its operating procedures were in accordance with the design and licensing bases of the system. Outstanding maintenance work requests and design issues were reviewed to determine if any impacted the system's ability to operate as designed. The system engineer was interviewed concerning the diesel generator's maintenance history and the licensee's long range plans to address aging and obsolescence issues. The system engineer accompanied the inspector on a walkdown of the mechanical and electrical subsystems on August 7, 2002.

b. Findings

No findings of significance were identified.

1R05 <u>Fire Protection (71111.05)</u>

a. Inspection Scope

The inspectors assessed the licensee's control of transient combustible materials, the materiel condition and lineup of fire detection and suppression systems, and the materiel condition of manual fire equipment and passive fire barriers during tours of the following six risk-significant areas. The licensee's fire preplans and Fire Hazards Analysis Report were used to identify important plant equipment, fire loading, detection and suppression equipment locations, and planned actions to respond to a fire in each of the plant areas selected. Compensatory measures for degraded equipment were evaluated for effectiveness.

- Fire Area 1SE16- Unit 1 safeguards building 832-foot elevation electrical equipment room on August 1, 2002
- Fire Zone 1SK17 Unit 1 main steam and feedwater penetration area, safeguards building 852-foot through 880-foot elevations, on August 6, 2002
- Fire Zone 1SG10 Unit 1 Train A emergency diesel generator room, on August 11, 2002
- Fire Area 2SB015 Unit 2 auxiliary building Room 94 (containment access corridor), on August 23, 2002

- Fire Area EA043 Unit 1 and 2, steam generator blowdown Room 113, on August 23, 2002
- Fire Zone 1SB004- Unit 1 safeguards building 790-foot elevation safeguards corridor, on September 20, 2002

No findings of significance were identified.

1R11 <u>Licensed Operator Requalifications (71111.11)</u>

a. <u>Inspection Scope</u>

The inspectors observed a training session in the control room simulator and attended the posttraining critique on July 24, 2002. The scenario included a main turbine stop valve closure, steam generator tube leak which later evolved into a steam generator tube rupture, a faulted steam generator, a reactor trip and safety injection. Simulator observations included formality and clarity of communications, group dynamics, the conduct of operations, procedure usage, command and control, and activities associated with the emergency plan.

b <u>Findings</u>

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. <u>Inspection Scope</u>

The inspectors independently verified that Comanche Peak Steam Electric Station (CPSES) personnel properly implemented 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for six equipment performance problems identified in the following Smart Forms (SMF):

- SMF-2001-002644-00
- SMF-2002-000017-00
- SMF-2002-000669-00
- SMF-2002-000691-00
- SMF-2002-000729-00
- SMF-2002-000870-00

The inspectors reviewed whether the structures, systems, or components (SSCs) were properly characterized in the scope of the Maintenance Rule Program and whether the SSC failure or performance problem was properly characterized. The inspectors assessed the appropriateness of the performance criteria established for the SSC (if applicable).

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed four selected activities regarding risk evaluations and overall plant configuration control. The inspectors discussed emergent work issues with work control personnel and reviewed the potential risk impact of these activities to verify that the work was adequately planned, controlled, and executed. The activities reviewed were associated with:

- Unit 2 Train B safety injection surveillance, corrective actions for a degraded switch in the Train B solid state protection system, and scheduled calibration of containment pressure instrumentation on July 8, 2002
- Crane operations in the vicinity of Emergency Transformer XST2 to support
 Unit 2 condenser tube leak repair concurrent with power reduction and
 scheduled surveillance testing of solid state protection system on July 29, 2002
- Presence of divers in the station service water pump bays with scheduled maintenance on a Unit 2 Train A auxiliary feedwater valve, surveillance testing of Unit 2 turbine-driven auxiliary feedwater pump, and Unit 1 Train A emergency diesel generator surveillance run on August 5-8, 2002
- Performance of OPT-447A, Train A solid state protection system testing following light socket failure which tripped both 48 Vdc power supply breakers, energized source range Channel N-31, and opened reactor trip Breaker RTA, concurrent with planned surveillance testing of Train A emergency diesel generator and painting in the service water intake structure scheduled for the week of September 16-20, 2002

b. <u>Findings</u>

No findings of significance were identified.

1R14 Personnel Performance During Nonroutine Evolutions and Events (71111.14)

.1 Unit 1 Primary to Secondary Leak and Plant Shutdown

a. <u>Inspection Scope</u>

On September 28, 2002, Unit 1 was shutdown expeditiously following indications of a primary to secondary leak. The inspectors observed control room activities during the plant shutdown to Mode 3. The observations included plant parameters and equipment

performance during the shutdown, licensee's use of procedures, communications, and command and control by the unit supervisor.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. <u>Inspection Scope</u>

The inspectors selected six operability evaluations conducted by CPSES personnel during the report period involving risk-significant systems or components. The inspectors evaluated the technical adequacy of the licensee's operability determination, determined whether appropriate compensatory measures were implemented, and determined whether all other pre-existing conditions were considered, as applicable. Additionally, the inspectors evaluated the adequacy of the CPSES problem identification and resolution program as it applied to operability evaluations. Specific operability evaluations reviewed are listed below.

- Evaluation EVAL-2002-1432-01, Evaluation of the diesel generator capability to start loads energized on restoration of the bus voltage by the diesel generator when blackout sequencer is not available, as allowed by Technical Specification 3.8.2 in Modes 5 and 6, reviewed on August 13, 2002
- Quick Technical Evaluation QTE-2002-002267-01-00, Evaluation of reactor water makeup valves design conditions for postaccident operability, reviewed on August 22, 2002
- Quick Technical Evaluation QTE-2002-002189-01-00, Evaluation of flow diverted from containment spray through relief Valve 2CT-0005, reviewed on August 15, 2002
- Quick Technical Evaluation QTE-2001-001881-01-01, Evaluation of operability of Valve 2-HV-2399 with less than specified seating pressure, reviewed on August 15, 2002
- Quick Technical Evaluation QTE-2002-002493-01-00, Evaluation of the atmospheric relief valves on Unit 2 after air leakage caused valve positioners to be replaced on three atmospheric relief valves in Unit 1, reviewed on September 5, 2002
- Quick Technical Evaluation QTE-2002-003002-02-00, Operability evaluation of the Unit 2 Train B service water pump discharge piping after a considerable amount of corrosion was found on the pipe and the pipe supports, reviewed on September 18-19, 2002

No findings of significance were identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

During the week of September 30, 2002, the inspectors reviewed the open operator workaround items contained in the plan of the day. The inspectors reviewed the CPSES condition reporting system (Smart Forms) for additional degraded or nonconforming conditions that could complicate the operation of plant equipment. The individual and cumulative effects on mitigating systems and the operator's ability to implement abnormal or emergency procedures were evaluated.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. <u>Inspection Scope</u>

The inspectors witnessed or reviewed the results of two postmaintenance tests for the following maintenance activities:

- Replacement of the air supply valve and solenoid valve on the Unit 2 turbine driven auxiliary feedwater pump steam admission Valve 2-HV-2452-2 on August 8, 2002
- Repair of containment service air header isolation Valve 1CA-0031 and retest of OPT-845A, "Appendix J Leak Rate of Penetration MV-005 (1CA-0016 and 1-HV-3486)," Revision 1, on August 14, 2002

In each case, the associated work orders and test procedures were reviewed against the attributes in Inspection Procedure 71111, Attachment 19, to determine the scope of the maintenance activity and determine if the testing was adequate to verify equipment operability.

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities (71111.20)

a. Inspection Scope

The inspectors evaluated licensee Unit 1 Refueling Outage (1RF09) activities to ensure that risk was considered when deviating from the outage schedule, the plant configuration was controlled in consideration of facility risk, mitigation strategies were properly implemented, and Technical Specification requirements were implemented to maintain the appropriate defense-in-depth. Specific outage activities reviewed and/or observed by the inspectors include:

- Unit shutdown and cooldown
- Defense-in-depth and mitigation strategy implementation
- Containment closure capability
- Reactor coolant system instrumentation including Mansell level instrumentation
- Decay heat removal
- Electrical power sources
- Core offload activities
- Midloop activities, including steam generator manway removals and nozzle dam installations

b. <u>Findings</u>

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. <u>Inspection Scope</u>

The inspectors evaluated the adequacy of periodic testing of important nuclear plant equipment including aspects such as preconditioning; the impact of testing during plant operations; and the adequacy of acceptance criteria. Other aspects evaluated included test frequency and test equipment accuracy, range and calibration; procedure adherence; record keeping; the restoration of standby equipment; test failure evaluations; jumper control (if applicable); and the effectiveness of the licensee's problem identification and correction program. The following three surveillance test activities were observed by the inspectors:

 Unit 1 Train A motor driven auxiliary feedwater pump operability test and stroke test of Valve 1-PV-2453B in accordance with OPT-206A, "AFW System," Revision 20, in conjunction with trip actuating device operability test for loss of both main feedwater pumps in accordance with OPT-450A, "Train A Safeguards Slave Relay K640 Actuation test," Revision 8 on August 22, 2002

- Unit 1 Train B safety injection pump operability test in accordance with OPT 204A, "SI System," Revision 10, performed on September 11, 2002 and reviewed on September 18-19, 2002
- Unit 2 OPT-447B, "Mode 1, 3 and 4 Train A SSPS Actuation Logic Test,"
 Revision 6, surveillance performed and reviewed on September 23, 2002

b. Findings

No findings of significance were identified.

1EP6 Drill Evaluation (71114.06)

a. <u>Inspection Scope</u>

The inspectors observed a simulator training evaluation performed on August 20, 2002, and identified in advance as contributing to the emergency preparedness performance indicator "Drill/Exercise performance (DEP)." The training scenario provided opportunities for emergency classification and offsite notifications. This inspection included observing the simulator performance, the postexercise critique and reviewing the licensee's rational for determining the success or failure of classifications and notifications for timeliness and accuracy.

b. Findings

No findings of significance were identified.

3. SAFEGUARDS

Cornerstone: Physical Protection

3PP1 Access Authorization (71130.01)

a. <u>Inspection Scope</u>

The inspector performed the following inspection activities and compared them with applicable regulatory requirements:

- Reviewed licensee event reports and safeguards event logs to identify problems in the access authorization program.
- Reviewed procedures, audits, and self-assessments for behavior observation, access authorization, fitness-for-duty, supervisor and escort training, and requalification training.

- Interviewed five supervisors/managers and five individuals who had escorted visitors into the protected and/or vital areas to determine their knowledge and understanding of their responsibilities in the behavior observation program.
- Reviewed condition reports, licensee event reports, safeguards event logs, audits, selected security event reports, and self-assessments of the licensee's access authorization program to determine the licensee's ability to identify and resolve problems.
- Interviewed security management concerning the use of overtime and plant limitations regarding maximum hours of weekly overtime for security officers to confirm potential worker fatigue issues were being adequately addressed per 10 CFR Part 26.

b. Findings

No findings of significance were identified.

3PP2 Access Control (71130.02)

a. <u>Inspection Scope</u>

The inspector performed the following inspection activities and compared them with applicable regulatory requirements:

- Reviewed licensee event reports and safeguards event logs to identify problems with access control equipment.
- Reviewed procedures and audits for testing and maintenance of access control equipment and for granting and revoking unescorted access to protected and vital areas.
- Interviewed security personnel concerning the proper operation of the explosive and metal detectors, X-ray devices, and key card readers.
- Observed licensee testing of access control equipment and the ability of security personnel to control personnel, packages, and vehicles entering the protected area.
- Reviewed procedures to verify that a program was in place for controlling and accounting for hard keys to vital areas.
- Reviewed the licensee's process for granting access to vital equipment and vital areas to authorized personnel having an identified need for that access.
- Reviewed condition reports, licensee event reports, safeguards event logs, audits, selected security event reports, and self-assessments for the licensee's

access control program in order to assess the licensee's ability to identify and resolve problems regarding the access control program.

 Interviewed key security department and plant support personnel to determine their knowledge and use of the corrective action reports and resolution of problems regarding repair of security equipment.

b. <u>Findings</u>

No findings of significance were identified.

3PP3 Response to Contingency Events (71130.03)

The Office of Homeland Security (OHS) developed a Homeland Security Advisory System (HSAS) to disseminate information regarding the risk of terrorist attacks. The HSAS implemented five color-coded threat conditions with a description of corresponding actions at each level. NRC Regulatory Information Summary (RIS) 2002-12a, dated August 19, 2002, "NRC Threat Advisory and Protective Measures System," discusses the HSAS and provides additional information on protective measures to licensees.

a. <u>Inspection Scope</u>

On September 10, 2002, the NRC issued a Safeguards Advisory to reactor licensees to implement the protective measures described in RIS 2002-12a in response to the Federal government declaration of threat level "Orange." Subsequently, on September 24, 2002, the OHS downgraded the national security threat condition to "Yellow" and a corresponding reduction in the risk of a terrorist threat.

The inspector interviewed licensee personnel and security staff, observed the conduct of security operations, and assessed licensee implementation of the threat level "Orange" protective measures. Inspection results were communicated to the region and headquarters security staff for further evaluation.

b. <u>Findings</u>

No findings of significance were identified.

3PP4 Security Plan Changes (71130.04)

a. Inspection Scope

The inspector completed the following actions and compared them with applicable regulatory requirements:

Reviewed the Physical Security Plan, Revisions 33 and 34, dated
 February 12, 2001, and April 18, 2002, respectively, to determine if requirements of 10 CFR 50.54 (p) were met.

 Reviewed the safeguards event logs from January 1, 2001, to July 1, 2002, and interviewed security personnel to determine their knowledge and use of the corrective action program and resolution of problems as it relates to making changes to the licensing documents.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Barrier Integrity

a. <u>Inspection Scope</u>

The inspector reviewed a sample of performance indicator data submitted by the licensee regarding the barrier integrity cornerstone to verify that the licensee's data was reported in accordance with the requirements of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2. The sample included data for October 2001 through June 2002 for both units for the following performance indicators:

- Reactor coolant system specific activity
- Reactor coolant system identified leak rate

b. Findings

No findings of significance were identified.

.2 Physical Protection

a. Inspection Scope

The inspector reviewed the licensee's security program for collection and submittal of performance indicator data. Specifically, a random sampling of security event logs and corrective action reports, from January 1, 2001, to July 1, 2002, were reviewed for the following program performance areas:

- Protected area security equipment
- Personnel screening program performance
- Fitness-for-duty program performance

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152)

a. Inspection Scope

The inspectors reviewed SMF-2001-001881-00 that was initiated to document that Valve 2-HV-2399, a Unit 2 steam generator blowdown isolation valve, was found closed during a watch turnover. The inspectors reviewed the history of issues related to the blowdown isolation valves for each unit to determine if problems were properly identified, characterized, and entered into the corrective action program for evaluation and resolution. The inspectors evaluated the Smart Form to determine that the CPSES problem identification activities were complete and accurate and that maintenance effectiveness and operability issues were appropriately evaluated and dispositioned. Also, the CPSES personnel's efforts in establishing the scope of problems, generic implications, and common cause were evaluated by reviewing pertinent work orders, engineering requests, and action plans. The inspectors' reviews were performed to determine if CPSES personnel had completed, or planned to complete, the corrective actions in a timely manner, commensurate with the risk associated with the issue.

b. <u>Findings</u>

No findings of significance were identified.

4OA3 Event Followup (71153)

.1 (Closed) Licensee Event Report 50-446/02-001-00: Reactor Trip Due to Primary Water Pump Vibration High Signal

The inspectors reviewed the apparent cause of the reactor trip, the corrective actions, the breaker failure analysis performed by an independent testing laboratory, and event history of turbine trip followed by reactor trip. No findings of significance were identified. This licensee event report is closed.

.2 (Closed) Licensee Event Report 50-446/02-002-00: Unit 2 Steam Generator Level Channel Operational Test Missed Technical Specification Surveillance

The inspectors reviewed the licensee event report and no findings of significance were identified. The inspectors verified the licensee's corrective actions had been completed. This event was determined to be a violation of the licensee's Technical Specification Surveillance Requirements (SR) 3.3.2.5 for Table 3.3.2-1, Item 5b. Subsequent testing of the affected channels demonstrated that the channels would have performed their safety function had they been required. Therefore, no adverse safety impact existed. See Section 4OA7 of this report.

.3 Unit 1 Primary to Secondary Leak and Plant Shutdown

a. Inspection Scope

On September 26, 2002, Unit 1 received alarms and high readings on the condenser offgas radiation monitor and the Steam Generator 2 steamline radiation monitor. Six additional spikes in the radiation levels occurred until the unit was shutdown on September 28, 2002. The inspectors monitored the plant indications and the licensee's actions leading up to the decision to commence the shutdown. The inspection of the plant shutdown is documented in Section 1R14 of this inspection.

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

Exit Meeting Summary

The inspector presented the physical protection inspection results to Mr. R. Bird, Plant Support Manager, and other members of licensee management at the conclusion of the inspection on July 12, 2002. No proprietary information was identified.

The inspectors presented the resident inspection results to Mr. R. Flores, Deputy to Vice President of Engineering, and other members of licensee management at the conclusion of the inspection on October 10, 2002. The inspectors asked the licensee representatives whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee Identified Violations

The following violation of very low significance (Green) was identified by CPSES personnel and is a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600, for being dispositioned as a noncited violation (NCV).

Technical Specification Surveillance Requirements (SR) 3.3.2.5 for Table 3.3.2-1, Item 5b, requires that channel operational test be performed every 92 days on the steam generator high water level instrumentation to verify protection against excessive feedwater flow. On June 19, 2002, licensee engineers found that the surveillance had not been adequately performed as required by Technical Specifications since making a modification to the Westinghouse 7300 Series instrument process loops on Unit 2 in 1996. LER 50-446/02-002-00 was initiated. See Section 4AO3.2 for inspection details.

The safety significance of this violation was determined to be very low (Green) by the Safety Significance Determination Process because subsequent testing of

the affected channels demonstrated that the channels would have performed their safety function had they been required.

If you deny this noncited violation, you should provide a response with the basis for your denial, within 30 days of the date of this inspection report, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Comanche Peak Steam Electric Station.

ATTACHMENT

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Alps, Security Mana	ge	r
------------------------	----	---

- R. Bird, Plant Support Manager
- J. Britt, Corporate Security Manager
- J. Brown, Fitness-For-Duty Coordinator
- D. Bozeman, Manager, Emergency Planning
- J. Curtis, Manager, Radiation Protection
- S. Ellis, Manager, Operations
- R. Flores, Deputy to Vice President of Engineering
- A. Hall, Operations Overview Manager
- N. Harris, Principal Regulatory Assurance Technologist
- T. Hope, Regulatory Affairs Performance Manager
- F. Madden, Licensing Manager
- B. Mays, Engineering Programs Manager
- P. Mills, Nuclear Overview Senior Specialist
- D. Moore, Plant Manager
- C. Terry, Senior Vice President & Principal Nuclear Officer
- R. Walker, Manager, Regulatory Affairs
- D. Wilder, Manager, Radiation and Industrial Safety

Contractor

L. Askren, Burns Project Manager

NRC

None

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

50-446/02-001-00 LER Reactor trip due to primary water pump vibration high signal (Section 4OA3)

50-446/02-002-00 LER Failure to perform Unit 2 steam generator level channel

operational test (Section 40A3)

<u>Discussed</u>

None

PARTIAL LIST OF DOCUMENTS REVIEWED

2

Procedures

NUMBER DESCRIPTION REVISION

STA-744 Maintenance Effectiveness Monitoring Program