



TU ELECTRIC

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May 5, 1994

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/94-09; 50-446/94-09
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter of April 7, 1994, concerning the inspection conducted March 7-11, 1994. This inspection was conducted to examine selected areas and activities associated with the licensee's physical security program.

Enclosed in the April 7, 1994 letter was a Notice of Violation (NOV). This notice identified a violation regarding inadequate testing of detection aids. The attachment provides TU Electric's response to the Notice of Violation 445/94-09-03; 446/94-09-03.

Sincerely,

William J. Cahill, Jr.

By: D. R. Woodlan
D. R. Woodlan
Docket Licensing Manager

NSH:elc
Attachment

cc: Mr. L. J. Callan, Region IV
Mr. L. A. Yandell, Region IV
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TEC 1

RESTATEMENT OF VIOLATION
(445/9409-03; 446/9409-03)

Inadequate Testing of Detection Aids

License Condition 2.H of the Comanche Peak Steam Electric Station Facility Operating License states, in part, "TU Electric shall fully implement and maintain in effect all provisions of the Physical Security Plan . . . previously approved by the Commission"

Paragraph 7.1.1.1 of the Comanche Peak Steam Electric Station's Physical Security Plan requires both the "E" field and microwave detection systems to detect individuals stepping or jumping in or through the microwaves of "E" field sensing wires. Paragraph 13.6 requires operability and performance testing be conducted in accordance with Regulatory Guide 5.44 which requires testing by jumping.

Contrary to the above, the operability and performance testing conducted by the security test group did not test the systems by jumping. In addition, the testing procedure did not provide for implementation of the Physical Security Plan requirements.

RESPONSE TO THE VIOLATION
(445/9409-03; 446/9409-03)

TU Electric accepts the violation and provides the following information as requested:

1. Reason for Violation

The discrepancy between the Plant Security Plan (PSP) and the testing methodology existed as the result of an interpretation of the PSP statement in section 13.6 referencing the "applicable portions of USNRC Regulatory Guide 5.44...." The design of the Intrusion Detection System, to include the Four Wire Stellar E-Field and the Southwest Microwave equipment, is not conducive to safe testing by jumping. Some of the vertical applications are twelve feet or more. Jumping in accordance with Reg. Guide 5.44 was not considered to be one of the "applicable portions" of the regulatory guideline, and therefore not addressed in the testing procedure.

2. Corrective Steps Taken and Results Achieved

An assessment of the perimeter barriers and intrusion detection system (comprised of cumulative historic reviews, system tests, and perimeter walkdowns) was conducted, and confirmed previous findings that vulnerability to jumping over and/or around the detection equipment is not a concern for the present detection configuration. Therefore, we plan to continue to test the barriers and detection system as described in the security procedure(s).

Based on the above assessment, T.U. Electric does not believe that an undetected intrusion could be initiated through or around the barrier and detection system for the protected area perimeter.

3. Corrective Steps Taken to Avoid Recurrence

TU Electric has taken the following actions:

A review of the Security Plan and implementing testing procedure has resulted in the decision to initiate a 50.54 (p) plan change to describe, in detail, the test methods used at this facility for E* Field and microwave detection systems. This change will eliminate the requirement for testing the two systems by jumping.

4. Date of Full Compliance

TU Electric is in full compliance with testing of detection aids requirements as required by the Physical Security Plan with the exception of testing the detection system via jumping.

The Physical Security Plan change will be submitted under 50.54 (p) no later than June 15, 1994.