



Log # TXX-94184
File # 10130
IR 94-09
Ref. # 10CFR2.201

June 30, 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
SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION

- REF: 1) TU Electric letter logged TXX-94112 from
Mr. William J. Cahill, Jr. to the NRC dated May 5, 1994,
Response to Notice of Violation
- 2) NRC Inspection Report 445/94-09; 446/94-09 dated
April 7, 1994. Notice of Violation 94-09-03
- 3) TU Electric letter logged, TXX-4007 from Mr. R. J. Gary
to NRC dated July 15, 1983
- 4) NRC letter, dated August 10, 1983 Responding to Reference 3,
from Mr. B. J. Youngblood

Gentlemen:

During a telephone conversation on May 17, 1994, between TU Electric and
your Region IV Staff concerning TU Electric's response (reference 1) to the
Notice of Violation 445 and 446/94-09-03, your Staff requested additional
information. The information requested is being provided in the attachment
to this letter.

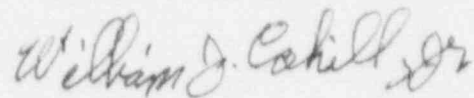
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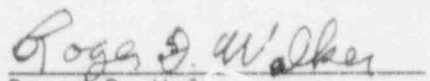
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The subject violation identified inadequate testing of detection aids associated with the physical security program. The attachment provides TU Electric's revised, supplemental response to the Notice of Violation.

Sincerely,



William J. Cahill, Jr.

By: 
Roger D. Walker
Regulatory Affairs Manager

NSH:tg

ATTACHMENT

cc: Mr. L. J. Callan, Region IV
Ms. M. A. Miller, Region IV
Resident Inspectors, CPSES

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 provides the following information as requested:

1. Reason for Violation

The discrepancy between the Plant Security Plan (PSP) and the testing methodology existed as a result of an interpretation of the PSP statement in section 13.6 which refers to referencing the applicable portions of NRC 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.

On June 24, 1983, Mr. R. Gary, Executive Vice President of Texas Utilities Generating Company (now known as TU Electric) corresponded in reference 3 with Mr. Denton (NRC) identifying that during the development and review of the Physical Security Plan (PSP), it was noted that the Regulatory Guide 5.44 criteria for jumping in the E-Field was not realistically attainable and testable. The letter identified thirteen separate points which stated the reasons not to include the jumping criteria in the PSP.

The letter further requested that the NRC evaluate the criteria in question and treat the criteria as a design criteria, rather than a commitment until the issues addressed by TU Electric could be resolved.

On August 10, 1983, Mr. B. J. Youngblood, Chief Licensing Branch, NRC responded to Mr. R. J. Gary in reference 4 with respect to the letter's subject. The NRC concluded that they were in tentative agreement with TUGCo findings [realistic, attainable and testable performance criteria versus the wording in Regulatory Guide 5.44] and would forward these concerns to the Regulatory Improvement staff to potentially modify Regulatory Guide (RG) 5.44. The NRC also agreed with TU Electric's assessment, that the ability to detect jumping would be a design criteria versus a commitment to perform additional testing utilizing jumping, and that no PSP change was necessary at that time.

As a result, jumping in accordance with RG 5.44 was not considered to be one of the "applicable portions" from the regulatory guideline, based on the previous correspondence with the NRC, the criteria was not incorporated into TU Electric's testing procedures. Additionally, no PSP change was initiated to clarify this; because the understanding at that time was that no change was necessary.

2. Corrective Steps Taken and Results Achieved

An assessment of the perimeter barriers and intrusion detection system comprised of cumulative history reviews, system tests, and perimeter walkdowns was conducted. The assessment confirmed previous findings that certain areas are not vulnerable to penetration by jumping.

Various tests were conducted in an effort to determine an alternative methodology to jumping, which TU Electric could use to meet the requirements of paragraph 7.1.1.1 of the PSP. Currently, simulated jumping test procedures have been identified that test detection capabilities of both microwave and E-field detections systems respective to an individual jumping into or through the identified zones.

3. Corrective Steps Taken to Avoid Recurrence

TU Electric has modified the testing procedure to specify; zones subject to simulated jumping testing, and the methodology by which the tests will be conducted.

4. Date of Full Compliance

TU Electric is in full compliance.