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June 27, 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. 50-445/94-12; 50-446/94-12  
RESPONSE TO NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter of May 26, 1994, concerning the inspection conducted May 2-6, 1994. This inspection was conducted to examine selected areas and activities associated with the licensee's radiation protection program.

Enclosed in the May 26, 1994 letter was a Notice of Violation (NOV). This notice identified a violation regarding improper work activities in a radiation work area. The attachment provides TU Electric's response to the Notice of Violation 445/94-12-01; 446/94-12-01.

Sincerely,

*William J. Cahill, Jr.*  
William J. Cahill, Jr.

By: *Roger D. Walker*  
Roger D. Walker  
Regulatory Affairs Manager

NSH:bm  
Attachment

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RESTATEMENT OF VIOLATION  
(445/9412-01; 446/9412-01)

Improper Work Activities in a Posted Radiation Work Area

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 7.e(1) recommends that procedures for access control to radiation areas, including a radiation work permit system, be covered by written procedures. STA-606, "Work Requests and Work Orders," Revision 20, Section 6.6.4.4 requires that workers comply with radiation work permits. General Access Permits 94-02 and 94-03 required that workers notify radiation protection representatives before working in overhead areas.

Contrary to the above, on May 3, 1994, radiation workers were observed working in overhead areas between levels 810 and 832 of the auxiliary building in accordance with General Access Permits 94-02 and 94-03 without first notifying representatives of the radiation protection group, as required by General Access Permits 2 and 3.

RESPONSE TO THE VIOLATION  
(445/9412-01; 446/9412-01)

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

1. Reason for Violation

This violation occurred as a result of individuals not being fully cognizant of the applicable requirements of their General Access Permit (GAP). ONE Form 94-602 was initiated to document this incident. Workers installing conduit and pulling cable, failed to contact Radiation Protection (RP) as required by GAPs 94-02 and 94-03, if working greater than 8 feet above the floor. They also failed to contact the RP Lead Technician prior to work in the Radiologically Controlled Area (RCA) as required by STA-656 6.3.5.

Additional contributing factors were also identified. Specifically, Radiation Protection had issued numerous GAPs with associated subtasks which specified essentially the same radiological precautions. Many GAPs were developed primarily to track worker exposures as a function of task or work group (e.g., scaffold erection, design modification work, etc.). Consequently, workers were often required to use several different GAPs even though the radiological requirements were not significantly different and in some cases were identical. This situation contributed to confusion on the part of workers in keeping track of various GAP requirements on a daily basis, due to the number of GAPs and subtasks that workers were required to utilize.

2. Corrective Steps Taken and Results Achieved

Radiation Protection Technicians were instructed to question workers in the field about their knowledge of the requirements of their respective GAP or Radiation Work Permit (RWP). This effort continued for several days with no further GAP or RWP violations noted. On May 4th the Radiation Protection Manager issued a memorandum, CPSES-9404114 "Compliance with RWP/GAP Requirements", to Departmental Managers and Supervisors detailing the event and reminding workers of the importance of complying with GAP/RWP requirements.

On May 6th representatives of the Radiation Protection Department met with the management and foreman of the group involved with the incident to discuss the event and summarize necessary corrective actions. During this meeting clarification was provided by Radiation Protection concerning the special precautions that were not complied with, which resulted in the violation.

3. Corrective Steps Taken to Avoid Recurrence

TU Electric has taken the following actions:

On May 27th a procedure change was issued to STA-656, "Radiation Work Control," to eliminate the requirement to contact the RP Lead Technician prior to starting work in the RCA. The need for pre-work RP assistance/contact is specified in the applicable GAP or RWP as necessary.

All existing GAPs and subtasks were reviewed with the objective of minimizing the number of GAPs solely based on radiological safety considerations. This effort has been completed and the revised GAPs were issued on June 13. After issuance of the revised permits, Radiation Protection will again query workers in the field for a period of time to monitor compliance with requirements of the revised GAPs and RWPs.

4. Date of Full Compliance

TU Electric is in compliance with all actions identified with the exception of re-querying radiation workers in the field with respect to monitoring compliance with the revised GAP/RWP criteria. The followup review to determine the effectiveness of the revised GAPs will be completed August 30, 1994.