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TU ELECTRIC

September 16, 1992

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. 50-445/92-30; 50-446/92-30
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

TU Electric has reviewed the NRC's letter dated August 17, 1992, concerning the inspection conducted by Messrs. A. B. Earnest and T. W. Dexter during the period July 22 through July 31, 1992. These inspections covered activities authorized by NRC Operating License NFP-87 and Construction Permit CPPR-127. A Notice of Violation was attached to the August 17, 1992, letter. TU Electric's reply to the Notice of Violation is attached.

In addition, the August 17, 1992, letter discussed a weakness identified in the implementation of the fitness-for-duty program concerning the potential for early notification of employees selected for random drug tests. TU Electric has evaluated the weakness and determined that the effectiveness of the fitness-for-duty program was not degraded by the weakness because:

1. Drug testing is periodically administered without notifying the supervisors in advance. Hence, the potential for early notification does not always exist.
2. The fitness-for-duty program does not solely rely on random drug testing to identify personnel who are not fit for duty. Behavioral observation is another method used to identify personnel who are not fit for duty.
3. The weakness was isolated to a very small percentage of the overall number of personnel in the fitness-for-duty program.

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Although the weakness did not compromise the fitness-for-duty program, the procedure controlling the fitness-for-duty program has been revised to provide clarification of the requirements for personnel notification to assure confidentiality. This procedure revision should preclude the potential for early notification.

Sincerely,

William J. Cahill, Jr.

By: 
D. R. Woodlan
Docket Licensing Manager

JET/tg
Attachment

c - Mr. J. L. Milhoan, Region IV
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR
Resident Inspectors, CPSES (2)

NOTICE OF VIOLATION
(445/9230-01; 446/9230-01)

Inadequate Access Control - Vital Area

License Condition 2.H of the CPSES, Unit 1, 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 5.2 of the physical security plan identifies the control room as a separate vital area, and paragraph 6.3 requires that access to vital areas be via doors that are normally locked and alarmed.

Contrary to the above, the inspectors discovered on July 28, 1992, that the shared control room, a vital area, could be accessed in a manner that bypassed the locked and alarmed doors.

REPLY TO NOTICE OF VIOLATION
(445/9230-01; 446/9230-01)

Reason For Violation

The reason for the violation was an oversight on the part of plant personnel for failing to identify and address the access between two vital areas.

Corrective Steps Taken and Results Achieved

A security guard was immediately placed at the unlocked and unalarmed access point. A walkdown of the control room boundary was performed and showed that no additional paths of entry existed.

Corrective Steps Taken to Avoid Further Violation

The Physical Security Plan was revised to consolidate the two areas of concern into a single vital area. The same access level was assigned for entry into all portions of the new area via doors that are normally locked and alarmed.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.