

**TU ELECTRIC**

Log # TXX-93092  
File # 10130  
IR 92-50  
Ref. # 10CFR2.201

William J. Cahill, Jr.  
Group Vice President

February 18, 1993

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NGS. 50-445 AND 50-446  
NRC INSPECTION REPORT NO. 50-445/9250; 50-446/9250  
RESPONSE TO NOTICE OF VIOLATION

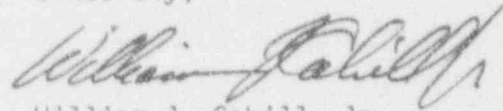
REF: TU Electric letter logged TXX-93088 from  
W. J. Cahill, Jr., to NRC dated February 10, 1993

Gentlemen:

TU Electric has reviewed the NRC's letter dated January 20, 1993, concerning the inspection period of October 22 through December 18, 1992. This inspection covered activities authorized by the NRC operating license NPF-87 and construction permit CPPR-127. Attached to the January 20, 1993, letter was a Notice of Violation (NOV).

TU Electric hereby responds to the Notice of Violation (445/9250-04) in the attachment to this letter.

Sincerely,

  
William J. Cahill, Jr.

NSH/tg  
Attachment

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

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400 N. Olive Street L.B. 81 Dallas, Texas 75201

*Handwritten notes:*  
IEO/  
Add: NRR/DRIS/RSG-B  
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**NOTICE OF VIOLATION**

**(445/9250-04)**

**(446/9250-04)**

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 3.1 of the licensee's Physical Security Plan states, in part, "CPSES has established and maintains an access authorization program with the objective of providing high assurance that the individuals granted unescorted access to the Protected and Vital Areas are trustworthy and reliable and do not pose a threat to commit radiological sabotage. In order to evaluate eligibility and support the above requirements, the access authorization program complies with the following: 10 CFR 73.56, Regulatory Guide 5.66, and 10 CFR 26."

10 CFR 26.22(a)(4) and 73.56(b)(2)(i) require, in part, that licensees train supervisory personnel in behavioral observation techniques for detecting degradation of performance, impairment, and changes in employee behavior which, if left unattended, could lead to acts detrimental to public health and safety.

Licensee Procedure STA-910, paragraph 6.1.1, states that all TU and contractor employee supervisors shall receive initial and annual recurring training in behavioral observation.

Contrary to the above, on October 27, 1992, it was determined that 20 contractor supervisors had not received initial behavior observation training and that 21 contractor supervisors had not received annual recurring behavior observation training.

**RESPONSE TO NOTICE OF VIOLATION**

**(445/9250-04)**

**(446/9250-04)**

TU Electric accepts the violation and the requested information follows:

1. Reason for the Violation

A review of procedures, associated records and the relevant computer data base was performed by TU Electric. This review concluded that anomalies in the computer coding caused some supervisors who had received initial behavior observation training to be dropped from annual

requalification training. Additionally, the rapid management changes in the Unit 2 organizations which were a result of destaffing as Unit 2 construction completion was achieved, contributed to this condition.

2. Corrective Steps Taken and Results Achieved

Upon discovery of these issues a deficiency document was issued to document the cause and corrective actions. Additionally, TU Electric has conducted special training sessions for the supervisors and managers (including foremen and general foremen), who had not previously received behavioral observation training and/or who had not received requalification training.

3. Corrective Steps Taken to Avoid Recurrence

TU Electric management issued an instructional directive stressing the need to comply with procedural guidance regarding behavioral observation training and requalification.

Moreover, referenced letter to the NRC provided detail of management actions regarding Fitness for Duty.

4. Date When Full Compliance Will be Achieved

TU Electric is in full compliance.