

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric
Station

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-88

During an NRC inspection conducted on March 7-11, 1994, one violation of NRC requirements was identified. The violation involved the failure to adequately test a detection system in accordance with Physical Security Plan requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

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 or "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.

This is a Severity Level IV violation (Supplement III) (VIO 445/9409-03; 446/9409-03).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the Regional Administrator, Region IV, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should

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be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an Order or Demand for Information as to why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 7th day of April 1994.

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