

FEB 1 - 1991

Docket No. 50-445/91-03  
50-446/91-03  
License No. NPF-87  
EA: 91-015

TU Electric  
ATTN: W. J. Cahill, Jr., Executive  
Vice President, Nuclear  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-445/91-03; 50-446/91-03

This refers to the inspection conducted by Messrs. S. D. Butler and A. Singh of this office on January 14-18, 1991. The inspection included a review of activities authorized for your Comanche Peak Steam Electric Station facility. At the conclusion of the inspection, the findings were discussed with you and other members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. These areas included proper implementation of your fire protection program referenced in paragraph 2.6 of your operating license and, more specifically, roving firewatch log irregularities identified by you on October 5, 1990. Within these areas, the inspection consisted of selective examination of station administrative procedures that implement your fire protection report, review of your task team investigation of the log irregularities (documented as PIR FX 90-2317), interviews with responsible licensee employees and contractors, plant walkdowns with fire protection and firewatch personnel, and a review of records and recent roving firewatch logs.

Based on the results of this inspection, two apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1990). Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

An enforcement conference to discuss these apparent violations has been scheduled for February 19, 1991. The purposes of this conference are to discuss the apparent violations, their causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide an opportunity for you to present your proposed corrective actions; and to discuss any other information that will help us determine the appropriate enforcement

\*RIV:RI-WAT  
SDButler  
1/30/91

\*DRS/TPS  
ASingh  
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\*C:DRP/B  
DDChamberlain  
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\*EO  
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D:DRS  
SJCcollins  
2/1/91

\*previously concurred

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action in accordance with the Enforcement Policy. In particular, we request that you address the potential generic aspects of this problem since you have already identified other areas where roving watches are used and you have other management interfaces with contractors which are relied upon to perform safety-related activities. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

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Samuel J. Collins, Director  
Division of Reactor Projects

Enclosure:

Appendix - NRC Inspection Report  
50-445/91-03  
50-446/91-03

cc w/enclosure:

TU Electric  
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Texas Department of Labor & Standards  
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Chief Inspector  
Boiler Division  
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Austin, Texas 78711

Honorable George Crump  
County Judge  
Glen Rose, Texas 76043

Texas Radiation Control Program Director  
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Austin, Texas 78756

bcc to DMB (IE01)

bcc distrib. by RIV:

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