

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric Station

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

During an NRC inspection conducted on May 2-6, 1994, one violation of NRC requirements was identified. 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:

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.

This is a Severity Level IV violation (Supplement IV) (445/446/9412-01).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should 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, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or 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 26th day of May 1994