

TU ELECTRIC

Log # TXX-91166
File # 10130
10118 (EA 91-015)
Ref. # 10CFR2.201

William J. Cahill, Jr.
Executive Vice President

April 24, 1991

Mr. James Lieberman, Director
Office of Enforcement
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) UNIT 1
DOCKET NO. 50-445
OPERATING LICENSE NPF-87
RESPONSE TO NOTICE OF VIOLATION, EA 91-015
REGARDING ROVING FIRE WATCHES

REF: 1) NRC Letter from Mr. Robert D. Martin to
Mr. William J. Cahill, Jr., dated March 27, 1991

Gentlemen:

In Reference 1, the NRC issued a Notice of Violation and Proposed Imposition of Civil Penalty (Notice) for certain circumstances related to roving fire watches at CPSES Unit 1. TU Electric accepts the Violation. Attachment 2 provides TU Electric's reply to the Notice of Violation pursuant to 10 CFR 2.201 and the terms of the Notice. Enclosed is a check in the amount of \$50,000.

The Violation involved a number of contractor personnel who did not perform roving fire watches for assigned areas even though the personnel had made entries in logs which indicated that the watches had been completed. These irregularities were identified as a result of investigations initiated by TU Electric. Following identification of the irregularities, TU Electric established a Task Team which conducted a thorough evaluation of the causes of the irregularities. Based upon the results of the Task Team's efforts, TU Electric took extensive corrective and preventive actions for the irregularities, as discussed in detail in Attachment 2. Subsequent reviews have confirmed that these actions were effective in preventing additional roving fire watch irregularities. Additionally, TU Electric conducted a review to determine whether there were any generic implications associated with these irregularities, and it was concluded that the other activities (including other fire protection activities) potentially implicated by the roving fire watch irregularities either were being properly performed or had sufficient controls and/or overviews to assure their proper performance.

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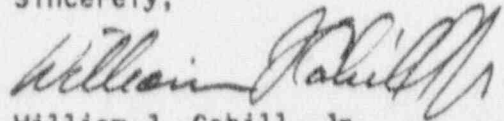
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Reference 1 requested TU Electric to "document what actions have been taken to assure that other contractor efforts are properly conducted and monitored." As discussed in Attachment 2 with respect to TU Electric's review of the generic implications of this Violation, TU Electric did not identify any contractual turnovers that were analogous to the turnover involving the responsibilities for performing fire watches. Additionally, TU Electric has controls (including inspections, surveillances, and audits) to assure the adequate performance of its contractors. To date, the current contractors, in general, have been taking appropriate corrective action to address any identified weaknesses or deficiencies identified by these inspections, surveillances, and audits.

The activities in question are not directly safety-related and did not result in a condition adverse to safety. The factors discussed above demonstrate that TU Electric acted responsibly and aggressively in identifying, investigating, and correcting the identified irregularities and such actions typically result in mitigation of proposed civil penalties. However, TU Electric is mindful of the importance of controlling the actions of its contractors and is not requesting further consideration for mitigation.

If you have any questions, please contact me.

Sincerely,



William J. Cahill, Jr.

RDW/grp
Attachments

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (3)
E. J. W. Clifford, NRR

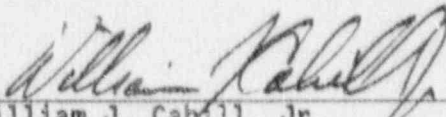
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
Texas Utilities Electric Company
(Comanche Peak Steam Electric
Station, Unit 1)

Docket Nos. 50-445

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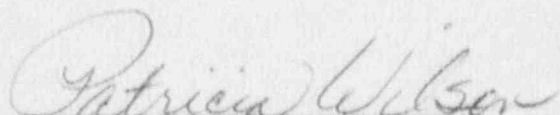
William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Executive Vice President, Nuclear of TU Electric, that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Notice of Violation EA 91-015 regarding roving fire watches; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


William J. Cahill, Jr.
Executive Vice President, Nuclear

STATE OF TEXAS)
COUNTY OF SOMERVELL)

Subscribed and sworn to before me, a Notary Public, on this 23rd day of
April, 1991.




Notary Public

NOTICE OF VIOLATION
(EA 91-015)

CPSES Facility Operating License No. NPF-87, Paragraph 2.6., requires, in part, that TU Electric implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report through Amendment 78 and as approved in the SER (NREG-0797) and its supplements through SSER 24.

CPSES procedure STA-729, Revision 1, "Control of Transient Combustibles, Ignition Sources and Fire Watches," an implementing procedure for the approved fire protection program, states, in part, in Section 6.4.3 that when a fire watch is established in accordance with Section 6.4.1.1.B, a roving fire watch shall, when instructed to activate the post, inspect the assigned rooms or areas on an interval of at least once per hour for all assigned rooms or areas and document such on Form STA-729-2.

Contrary to the above, on numerous occasions between August 19 and October 19, 1990, as determined by a licensee investigation, roving fire watches established in accordance with Section 6.4.1.1.B of CPSES procedure STA-729, Revision 1, did not inspect the assigned rooms or areas on an interval of at least once per hour for all assigned rooms or areas despite the fact that entries made on fire watch assignment sheets (Form STA-729-2) indicated the assigned rooms and areas had been inspected at the required times.

REPLY TO NOTICE OF VIOLATION
(EA 91-015)

TU Electric accepts the Violation and the requested information follows:

1. Reason for the Violation

During the period in question, roving fire watches at CPSES Unit 1 were performed by the Westinghouse Maintenance Service group, which consisted of personnel and first-line supervisors from NUMANCO (a Westinghouse subsidiary). The TU Electric Maintenance Services Organization (MSO) was responsible for directing the roving fire watches performed by the Westinghouse Maintenance Service group, and TU Electric Fire Protection was responsible for establishing the requirements for, reviewing the training materials for, and monitoring the roving fire watches.

TU Electric established a Task Team to identify the causes of the irregularities in the roving fire watch activities. Based upon the results of its investigation, the Task Team made findings in the following areas:

- o Roving Fire Watch Guidance and Practices - Procedure STA-729, "Control of Transient Combustibles, Ignition Sources and Fire Watches," stated that roving fire watches were to be performed at least once per hour for assigned rooms, that personnel performing fire watches must request qualified relief if a break is necessary, that personnel performing roving fire watches may not leave their post unattended, and that supervisors should be informed if fire watches cannot perform as assigned. In many cases, an individual

could perform the fire watch activities in less time than the hour allotted by the procedure. It was the common practice to permit personnel to take breaks, eat lunch, or perform other activities (e.g., emptying trash along the route) during the remaining period that was not needed to perform the fire watch, without being formally relieved. Additionally, it was common practice for personnel to be relieved from their watch outside of their assigned fire watch areas.

- o Training - NUMANCO supervisors did not receive any training on fire watches (other than reading STA-729). Although personnel performing roving fire watches did receive fire watch training, this training was not adequate to ensure that personnel knew how to perform roving fire watches. Additionally, this training did not provide guidance for entering the correct time in the log, did not explain that the log is a record, and did not stress that a signature in the log attests that the technician has complied with STA-729.
- o Adequacy of Supervisory Controls - There were several weaknesses in the supervisory controls applied to roving fire watches. Beginning in August of 1990, NUMANCO supervisors were not present on back shifts, where most of the irregularities subsequently occurred. Additionally, when the responsibility for performing fire watches was transferred to Westinghouse, TU Electric Fire Protection did not directly participate in the transfer or ensure that Westinghouse and NUMANCO personnel understood the nature of their responsibilities under STA-729. Finally, the supervisory practices utilized by Westinghouse and NUMANCO and the monitoring and checks performed by TU Electric Fire Protection were not sufficient to detect the irregularities.
- o Conduct of Supervisors and Lead Technicians - NUMANCO supervisors and lead technicians in some cases either engaged in or tolerated incorrect log entries.

These findings led the Task Team to identify the following two root causes for the irregularities in the performance of roving fire watches:

- o Training on performance of roving fire watches was insufficient; and procedure requirements, established practices, and lead technician/supervisor actions were not consistent. This led to confusion and a lack of understanding regarding the applicable requirements for roving fire watches and their importance.
- o The supervisory and oversight controls in place were not sufficient to assure that all of the requirements for roving fire watches were being met.

2. Corrective Steps and Actions to Avoid Further Violations

The corrective and preventive actions for the roving fire watch activities are as follows:

- o Personnel Actions - In order to emphasize the importance of properly performing and documenting plant activities, the fire watch personnel in question were suspended for 30 days without pay. Similarly, their

immediate supervisors were also suspended for 30 days without pay (or resigned). Finally the TU Electric MSO Supervisor was disciplined and assigned to a position not involving responsibilities for personnel matters (such as personnel discipline, reassignment of personnel, conflict resolutions, etc.), and a new Westinghouse Site Coordinator was appointed.

- o Guidance - TU Electric took several actions to clarify the requirements applicable to roving fire watches. For example, shortly after the weaknesses in the guidance for roving fire watches were identified, the Supervisor of TU Electric Fire Protection provided a memorandum to the Supervisor of MSO clarifying the requirements of roving fire watches. Subsequently, STA-729 was revised to address the identified weaknesses. Specifically, STA-729 was revised to define a fire watch post (i.e., the specific areas to be monitored by a fire watch) in order to clarify that the personnel performing roving fire watches may not leave their assigned fire watch areas during the assigned period unless relieved; to clarify the responsibilities of the Fire Protection and MSO Supervisors; to require supervisors to receive fire watch training; and to clarify the requirements applicable to log entries. Additionally, the Vice President, Nuclear Operations, issued a memorandum to all plant personnel emphasizing the need for and importance of proper entries in plant records, and reiterating that the falsification of records is grounds for discharge.
- o Training - The following actions were taken to improve training to ensure that personnel are aware of the duties of a roving fire watch:
 - As an interim measure, personnel were given a copy of the memorandum from the Fire Protection Supervisor to the MSO Supervisor clarifying the requirements of roving fire watches. Additionally, TU Electric Fire Protection and the Task Team leader held a meeting with the technicians (including those who had been suspended) on the requirements applicable to roving fire watches. This meeting included a discussion of the importance of making proper entries in the logs, the need to remain on post until properly relieved, and the prohibition against performing other duties while performing roving fire watches. Additionally, this meeting included a discussion of the tasks that must be performed by roving fire watches (e.g., checking for combustibles and ignition sources, and checking for compliance with posted housekeeping requirements). An opportunity was also provided for the technicians to ask any questions regarding roving fire watches.
 - A formal training program was developed for roving fire watches. This training encompasses the changes made in STA-729 and the subjects discussed in the interim training sessions. TU Electric Fire Protection will periodically monitor the training class.
 - Personnel performing roving fire watches receive on-the-job training (OJT) by their supervisors to ensure that they understand their responsibilities.

- TU Electric Fire Protection provides on-the-job training to supervisors on their responsibilities and accountabilities for the performance of roving fire watches.
 - General Employee Training has been revised to include an explanation of what constitutes a record, the importance of records, the significance of signing records, and the consequences of falsifying records.
- o Supervisory and Oversight Controls - TU Electric took several actions to improve the supervisory controls for roving fire watches. For example, a supervisor has been assigned to every shift, including back shifts, at least until management is satisfied that personnel understand and are properly implementing the requirements applicable to roving fire watches; personnel performing roving fire watches for an area are being rotated every hour to provide additional assurance that an individual does not backdate or predate several hours' worth of log entries for the area; and personnel performing roving fire watches are not assigned other duties during their watches. Additionally, TU Electric Fire Protection has taken several actions to improve its oversight of fire watches and to ensure that supervisors of fire watches understand their responsibilities. These actions include a direct interface established between Fire Protection and first line supervisors to provide the supervisors with assignments and guidance for performing fire watches, increasing the frequency of field verifications (including checking of logs and questioning personnel performing fire watches), and occasional comparison of the roving fire watch logs to Security key card records.
- o Other Remedial Actions - TU Electric took other remedial actions related to this incident. For example, the National Fire and Medical (NFM) contractor employee who identified but did not document a fire watch irregularity in August 1990 was counseled on the need and method to document identified discrepancies. TU Electric Fire Protection (including NFM employees) attended meetings in which this subject was discussed. TU Electric Fire Protection met with the individuals responsible for performing fire watches for CPSES Unit 2 to assure that they understood their duties. The Vice President, Nuclear Operations and the Plant Manager also held a meeting with the Maintenance Services personnel to encourage them to report problems, and to receive feedback from these personnel. Additionally, the TU Electric Manager of the Materials Management Organization (MMO), who has overall responsibility for management of contracts, revised applicable procedures to require the involvement of the relevant program manager in contract turnovers to assure that the program requirements are understood by the new contractors and contract coordinators.
- o Review for Generic Implications - TU Electric conducted evaluations to determine whether this incident had any generic implications. These evaluations encompassed the following areas:

- Other NUMANCO Activities - In addition to fire watches, NUMANCO performed activities such as housekeeping, decontamination, and security escorting. Security reviewed the escort records for the suspended technicians and did not identify any discrepancies. With respect to the other NUMANCO activities, it was determined that appropriate controls and/or overviews were in place to assure the acceptable performance of the activities.
- Other Fire Protection Activities - Quality Assurance (QA) had performed an audit of the Fire Protection Program and its implementation in 1989 and determined that they were satisfactory in general. QA performed another audit of the Fire Protection Program and its implementation (excluding roving fire watches) in early 1991 and reached similar conclusions.
- Activities Analogous to Roving Fire Watches - Reviews were conducted of other activities that are analogous to roving fire watches (e.g., chemistry rounds, radcon rounds and surveillance, operations rounds, security rounds, and radwaste rounds). These reviews found that the other rounds were subject to more extensive training and overview sufficient to assure acceptable performance of the rounds.
- Analogous Contractual Turnovers - Reviews were performed to identify any analogous contractual turnovers involving operation of CPSES Unit 1. No such contractual turnovers were identified.
- Training - Training programs in many areas are subject to accreditation by the Institute of Nuclear Power Operations (INPO), which provides assurance of the adequacy of these programs. Training programs in other areas generally pertain to activities which are subject to reviews by other organizations.
- Activities of Other Contractors - Contractors which perform safety-related activities for CPSES are required either to establish and implement acceptable QA programs under 10 CFR Part 50 Appendix B or to perform their activities in accordance with TU Electric's QA program. TU Electric evaluates contractors prior to award of contracts to assure the contractor's capability to comply with procurement document requirements. Additionally, TU Electric conducts surveillances, inspections, and audits, as appropriate, to assure the adequacy of performance of contractor activities.

Thus, TU Electric determined that other activities potentially implicated by the roving fire watch activities either were being properly performed or had sufficient controls and/or overviews to assure their proper performance. Additionally, independent of the fire watch irregularities, TU Electric initiated a review to determine whether plant personnel in general understand and are satisfying TU Electric's expectations applicable to their performance. This review is currently ongoing.

3. Date of Full Compliance

TU Electric is currently in full compliance.