

DEC 18 1991

Docket Nos. 50-445  
50-446  
License No. NPF-87  
Construction Permit No. CPPR-127

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: P/C INSPECTION REPORT NOS. 50-445/91-48; 50-446/91-48

Thank you for your letter of November 27, 1991, in response to our letter dated October 28, 1991. We have reviewed your reply and find it responsive to the concerns raised in the letter and paragraph 10 of NRC Inspection Report 50-445/91-48; 50-446/91-48. We will review the implementation of your actions to resolve our concerns during a future inspection.

Sincerely,

*A. Beach*  
A. Bill Beach, Director  
Division of Reactor Projects

cc:  
TU Electric  
ATTN: Roger D. Walker, Manager  
Nuclear Licensing  
Skyway Tower  
400 North Olive Street, L.B. 81  
Dallas, Texas 75201

Juanita Ellis  
President - CASE  
1426 South Polk Street  
Dallas, Texas 75224

RIV:FIPS *B* FIPS *ADG*FIPS *J*  
REBaer:nh ADGaines JBNicholas  
12/17/91 12/17/91 12/17/91

C:FIPS *M* D:DRSS  
BMurray LJCallan  
12/17/91 12/17/91

*A. Beach*  
A. Beach  
12/18/91

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PDR ADOCK 05000445  
Q PDR

*IE-06*  
*1/1*

TU Electric

-2-

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TU Electric  
Bethesda Licensing  
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Newman & Holtzinger, P.C.  
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Texas Department of Labor & Standards  
ATTN: G. R. Bynog, Program Manager/  
Chief Inspector  
Boiler Division  
P.O. Box 12157, Capitol Station  
Austin, Texas 78711

Honorable Dale McPherson  
County Judge  
P.O. Box 851  
Glen Rose, Texas 76043

Texas Radiation Control Program Director  
1100 West 49th Street  
Austin, Texas 78756

Owen L. Thero, President  
Quality Technology Company  
Lakeview Mobile Home Park, Lot 35  
4793 E. Loop 820 South  
Fort Worth, Texas 76119

TU Electric

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bcc with copy of licensee's letter:

✓ bcc to DMB (1E06)

bcc dist. by RIV:

RIV Files

MIS System, RIV

RSTS Operator

DRP

L. Shea, ARM/LFMB

FIPS File

R. D. Martin

DRS

Section Chief, DRP/B

Resident Inspector

Project Engineer, DRP/B

LJCallan

JPJaudon

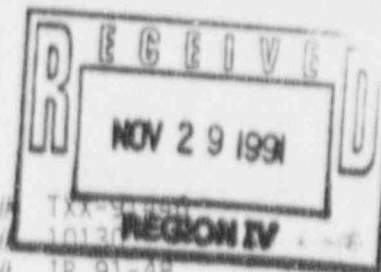
Section Chief, NMIS

B. Murray, FIPS

B. Nicholas, FIPS

R. Gaer, FIPS

T. Gaines, FIPS



Log # TXX-91166  
File # 1013  
Ref # IR 91-48

November 27, 1991

William J. Cahill, Jr.  
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC REQUEST FOR ADDITIONAL  
INFORMATION REGARDING THE LOGKEEPING OF  
INDUSTRIAL VACUUM CLEANERS

- Ref: 1) TU Electric letter from W. J. Cahill Jr. to the  
NRC logged TXX-91166 dated April 24, 1991.
- 2) TU Electric letter from W. J. Cahill Jr. to the  
NRC logged TXX-91265 dated July 25, 1991.
- 3) NRC Inspection Report 50-445/91-48 from Bill Beach  
to W. J. Cahill Jr. dated October 28, 1991.

Gentlemen:

Reference 1 and 2 provided TU Electric's response to two separate notices of violation, and described the corrective actions for the violations. Reference 3 provided the NRC's request for additional information regarding TU Electric's assessment of the industrial vacuum cleaner log keeping discrepancies relative to the previous corrective actions stated in reference 1 and reference 2.

The first event involved a number of contractor personnel who did not perform roving fire watches for assigned areas even though the personnel had made entries in the logs which indicated the watches had been completed. The next event occurred when TU Electric's fire protection technicians failed to document the results of routine inspections which was caused by a lack of attention to detail on part of those performing the inspections. However, TU Electric's review indicated these inspections were generally being performed in compliance with the procedures.

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Our review concluded that the previous events occurred due to failure to follow procedures:

- 1) Roving fire watch personnel did not perform the watches as required by the procedures, but documented the activities as if the activities were performed.
- 2) Fire protection technicians physically inspected the fire doors, but failed to document the results of the inspection as required by the procedure.

For the reasons stated above, TU Electric conducted thorough evaluations of the causes for procedural non-compliances and took extensive corrective and preventive actions.

With regard to the request for additional information stated in reference 3, Radiation Protection Instruction (RPI)-417, "Use of Vacuum Cleaners in Radiologically Controlled Areas" was issued July 3, 1990. The intent of RPI-417 was to control the use of vacuum cleaners used for "contaminated work activities" and established the requirements to verify dose rates upon issuance and return, storage in a secured location, and the requirement that vacuum cleaners be maintained under the control of Radiation Protection (RP) when not in use.

When construction activities resumed on Unit 2, there was significant increase in the use of vacuum cleaners within the Radiologically Controlled Area (RCA), although not for contaminated work activities. Since RP had control of the use of vacuum cleaners in the RCA, the responsibility to control all vacuum cleaners, regardless of their use (i.e., contaminated work or non-contaminated work) was assigned to them. In an effort to account for all industrial vacuum cleaners, RP loosely applied the controls established for radiological (contaminated) use vacuum cleaners and RPI-417 was revised (Rev/1 May 17, 1991) to clarify the requirements associated with industrial use (i.e., non-contaminated) and radiological use (i.e., contaminated) vacuum cleaners. However, as a result of an oversight, no changes were made to form RPI-417-1. The use of the form (log) was considered a convenience with respect to its application for industrial vacuum cleaners. Upon completion the log was simply discarded.

This misapplication of RPI-417 to industrial use vacuum cleaners led to several inconsistencies in the log entries. A ONE Form was issued to document the inconsistencies.

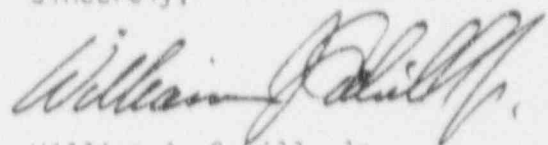
Even though the form was non-quality related and considered an aid only, RP requested ISEG perform an investigation to evaluate the apparent log irregularities. It was discovered a Radiation Protection technician did post-date log entries under the "date returned" column. The intent was to make subsequent daily inventory checks easier to complete. This form was used merely to make inventory record keeping more convenient for RP and did not serve any other purpose. This issue was discussed with the technician involved and RP personnel were informed this was not an accepted practice, even for non-QA/non-procedural type forms.

As a result of this ONE Form, Revision 2 of RPI-417 was issued on October 2, 1991. This revision clearly states that inventory and accountability requirements only apply to radiological use vacuum cleaners. Industrial use vacuum cleaners have been turned over to the tool rooms for control and issue and Radiation Protection is no longer involved in controlling industrial use Vacuum Cleaners. In addition Form RPI-417-1 was revised with the words "for use with contaminated use vacuum cleaners only" added under the title of the form.

TU Electric's review concluded the issue regarding the industrial vacuum cleaner log keeping discrepancies was caused by the ambiguous instructions provided by procedure RPI-417 and not by a failure to follow procedures as was the cause for the previous events. However, these issues are related in that they all involve the completeness and accuracy of recordkeeping.

Nevertheless, TU Electric shares the NRC concern with recordkeeping. Previously, TU Electric issued a memorandum regarding the accurate documentation of records. This memorandum may not have reached all employee levels. To emphasize TU Electric's concerns and expectations and to reach the proper personnel, a followup instructional memorandum will be issued to all employee levels at CPSES Unit 1 regarding accurate record keeping.

Sincerely,



William J. Cahill, Jr.

OB/tg

c - Mr. R. D. Martin, Region IV  
Mr. T. A. Bergman, NRR  
Mr. L. A. Yandell, Region IV  
Resident Inspectors, CPSES (2)