



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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October 30, 1995

EA 95-211

TU Electric
ATTN: C. L. Terry, Group Vice President
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SUBJECT: CLOSURE OF INVESTIGATION 4-94-031

This is in reference to an investigation conducted by the NRC's Office of Investigations (OI) which was conducted to determine whether radwaste operators (RWOs) at the Comanche Peak Steam Electric Station (CPSES) falsified records related to the verification of valve lineups for waste discharges.

As the enclosed investigation synopsis indicates, this concern was not substantiated. However, the investigation did conclude that RWOs were deliberately deviating from CPSES procedural requirements in two respects: 1) by performing independent verifications of radwaste valve lineups without assuring "physical separation," as it is defined in CPSES procedures; and 2) by performing radwaste valve lineups out of sequence with the steps in written procedures.

NRC has reviewed the circumstances surrounding these violations and determined: 1) that the RWOs who failed to meet the "physical separation" requirement during independent verifications believed they were meeting the intent of the requirement by turning away when another operator checked the position of a valve; and 2) that the RWOs who admitted they didn't follow the exact sequence in the valve lineup procedures generally had a reasonable basis for performing the verification steps out of order and in some cases believed it was allowable. As TU Electric concluded from its own review of this matter, the involved valve lineup procedures may have been overly restrictive in specifying the order in which it was performed.

While the NRC concludes that the RWOs' actions did, with some limited exceptions, violate radwaste and station administrative procedures, the NRC recognizes that these actions had no effect on radwaste discharges or on the safety of the facility in general. The more important issue is that RWOs mistakenly believed that they could deviate from plant procedures without following an approved process for doing so. Their actions were, in effect, a "work-around" designed to resolve inefficiencies in the involved procedures.

The NRC acknowledges that TU Electric has addressed this matter by: conducting one-on-one discussions with each RWO regarding procedural compliance and the need to perform procedural steps in the specified order; revising radwaste procedures to remove unnecessary restrictiveness and improve efficiency; requiring RWOs to read portions of station administrative procedures regarding procedural compliance; reviewing other radwaste procedures for similar

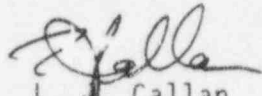
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problems; and scheduling audits of radwaste discharges to assure procedural compliance.

Based on our review of all of the circumstances in this case, including TU Electric's parallel review having identified similar problems, the minor safety significance associated with these procedural deviations and TU Electric's corrective actions, these violations are being treated as Non-Cited Violations, consistent with Sections IV and VII of the NRC Enforcement Policy.

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's Public Document Room.

Sincerely,



L. J. Callan
Regional Administrator

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SYNOPSIS

This investigation was initiated by the Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region IV (RIV), on August 16, 1994, to determine if radwaste operators (RWOs) at Texas Utilities (TU), Comanche Peak Steam Electric Station (CPSES), failed to perform required double verification on sample collection and analyses for release permits prior to discharge, but signed the forms as though the verification had been performed.

Based on the evidence developed during this investigation, the allegation that RWOs deliberately falsified double verification documentation was unsubstantiated. However, investigation substantiated that RWOs deliberately failed to follow CPSES procedures that require independent verification by RWOs who are physically separated and following procedural steps in a specific order.