

APPENDIX A

NOTICE OF VIOLATION

TU Electric

Docket No. 50-446

Comanche Peak Steam Electric Station, Unit 2 Construction Permit No. CPPR-127

During an NRC inspection conducted on May 3 through June 11, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. CPSES, Unit 1, Facility Operating License, Paragraph 2H, states, in part, "TU Electric shall fully implement and maintain in effect all provisions of the physical security plan . . . previously approved by the Commission"

CPSES Physical Security Plan, paragraph 6.2.3.1 requires that all licensee designated vehicles must be locked or secured when not in use within the protected area.

Contrary to the above, on June 9, 1992, at approximately 11:40 a.m., the inspector identified an unsecured licensee designated vehicle within the protected area which was unattended with the motor running while not in use.

This is a Severity Level IV violation. (Supplement III) (445/9216-01)

- B. Criterion V of Appendix B to 10 CFR Part 50 as implemented by Section 5.0 of the TU Electric Quality Assurance Manual, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances."

Station Administration Procedure STA-806, "Construction Work Requests and Work Orders," Revision 16, Steps 6.3.8 and 6.3.9, states, in part, that the Unit 2 work control center will ensure all permits and clearances have been included and that the Unit 2 shift supervisor or his designee shall sign for work start approval following review and approval of all necessary documents.

Contrary to the above, Construction Work Document ETP-1191, including Startup Work Authorization 82903, was not appropriate to the circumstances in that it was approved, authorized for work, and released to the field for performance on Lattery room exhaust Fan CP2VAFNID10, which was energized from a temporary power source without adequate provisions for ensuring personnel safety and equipment protection.

This is a Severity Level IV violation. (Supplement II) (446/9216-02)

Pursuant to the provisions of 10 CFR Part 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, and a copy to the MRC Resident Inspector, 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 the Notice, an order 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 *14th* day of *July* 1992