

APPENDIX A

NOTICE OF VIOLATION

TU Electric
Comanche Peak Steam Electric
Station

Dockets: 50-445
50-446

License: NPF-87

Construction Permit: CPPR-127

During an NRC inspection conducted on October 22 through December 18, 1992, a 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:

Failure To Train Supervisors In Behavioral Observation

License Condition 2.H of the CPSES, Unit 1, Facility Operating License states, in part, "TU Electric shall fully implement and maintain in effect all provisions of the Physical Security Plan . . . previously approved by the Commission"

Paragraph 3.1 of the licensee's Physical Security Plan states, in part, "CPSES has established and maintains an access authorization program with the objective of providing high assurance that the individuals granted unescorted access to the Protected and Vital Areas are trustworthy and reliable and do not pose a threat to commit radiological sabotage. In order to evaluate eligibility and support the above requirements, the access authorization program complies with the following: 10 CFR 73.56, Regulatory Guide 5.66, and 10 CFR 26."

10 CFR 26.22(a)(4) and 73.56(b)(2)(i) require, in part, that licensees train supervisory personnel in behavioral observation techniques for detecting degradation of performance, impairment, and changes in employee behavior which, if left unattended, could lead to acts detrimental to public health and safety.

Licensee Procedure STA-910, paragraph 6.1.1, states that all TU and contractor employee supervisors shall receive initial and annual recurring training in behavioral observation.

Contrary to the above, on October 27, 1992, it was determined that 20 licensee and contractor supervisors had not received initial behavior observation training and that 21 licensee and contractor supervisors had not received annual recurring behavior observation training .

This is a Severity Level IV violation (Supplement III) (445/9250-04; 446/9250-04).

Pursuant to the provisions of 10 CFR 2.201, TU Electric is hereby required to submit a written statement or explanation to the Regional Administrator, Region IV, with a copy to the U.S. Nuclear Regulatory Commission,

ATTN: Document Control Desk, Washington, D.C. 20555, 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, the Commission may issue an Order or Demand for Information as to 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 20th day of January 1993