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NRC STAFF SENDS "GENERIC LETTER" ON
VERIFICATION OF PLANT RECORDS

The Nuclear Regulatory Commission staff has sent a "Generic Letter" to all utilities licensed to operate or holding permits authorizing the construction of nuclear power plants to advise them of the results of staff inspections which addressed the potential for incomplete or inaccurate records at licensed nuclear power plants.

The letter also reminds licensees and their employees and contractors that the NRC may take enforcement action against the licensee and/or any individual who deliberately causes a licensee to be in violation of NRC requirements, including the falsification of required records, procedures developed to implement regulatory requirements or other regulatory requirements.

The inspections followed an April 1992 "Information Notice" which alerted the industry to NRC concerns regarding record falsification that had occurred at several nuclear power plants. While the "Information Notice" did not require licensees to take any actions, many of them initiated actions to ensure that their personnel were properly performing their assigned duties.

The inspections found that at least 30 nuclear power plant sites at least one discrepancy between security computer records and documented logs existed.

Several licensees had found that not only auxiliary operators but contractor fire watches and health physics technicians had been responsible for creating incomplete or inaccurate records. This concerns the NRC both from the standpoint of inaccurate and incomplete records regarding the status and condition of plant equipment and the failure of fire watches to provide a required compensatory action.

Other licensees discovered a number of other problems related to the conduct of plant rounds, log taking and record keeping: unlicensed operators performing certain rounds much faster than management expected, some unlicensed operators lacking a clear understanding of what their signatures on log sheets met and, when multiple rounds or log readings were

required in a single shift, the operators performing a generally rigorous first tour but a much less formal second tour. In another case, management review of the tour and logging requirements revealed that operators could not reasonably be expected to conduct the specified rounds in the time provided.

In addition, the staff found that licensee responses to the "Information Notice" were positive, taking the opportunity to review records, sensitize employees and appropriately revise procedures and training. They also took various disciplinary actions against the involved individuals in accordance with their internal programs and policies and commensurate with the seriousness of the violations involved. Disciplinary actions taken against licensed operators ranged from employment termination to leave without pay.

Escalated enforcement actions, such as a civil penalty, were not taken in these cases because licensees identified the violations either on their own initiative or as a result of audits and inspections responsive to the "Information Notice", the licensees took appropriate corrective actions for any potential program weaknesses and they took disciplinary action against the individuals involved. Enforcement actions were not taken against the individuals involved because they already had been disciplined by their employers.