W3F1-2000-0076
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PR

May 23, 2000

Mr. E.W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

RECEIVED
MAY 25 2000
REGION IV

Subject: Waterford 3 SES
            Docket No. 50-382
            License No. NPF-38
            Waterford 3 Security Improvement Plan

Dear Mr. Merschoff:

On May 30, 2000, in the NRC Region IV office, Entergy will present an overview of
the efforts we are taking to improve the performance of Waterford 3 Security. The
purpose of this letter is to formally submit our Security Improvement Plan
(Attachment 1) prior to this meeting for your review.

The management team at Waterford 3 and senior Entergy management are
committed to improving our performance in Security and restoring Waterford 3 to a
position of excellence in the industry. We believe the plan's goals, strategies,
actions, and performance measures will serve as an effective road map to
performance improvement.

The fundamental intent of this improvement plan is to document and track those
short-term actions that are required to support implementation of our enhanced
defensive strategy. The plan also includes actions that will result in sustained
superior performance in future years.

This improvement plan is a living document, and as such, any alterations in scope or
schedule will be communicated during periodic update meetings with the NRC Staff.
All of the commitments contained in this submittal are identified on the attached
Commitment Identification/Voluntary Enhancement Form (Attachment 2).

Please contact me if you have any questions or require additional information.

Very truly yours,

C.M. Dugger
Vice President, Operations
Waterford 3

CMD/DCM/rtk
Attachments

cc: NRC, Document Control Desk
            N. Kalyanam, NRC-NRR
            J. Smith
            N.S. Reynolds
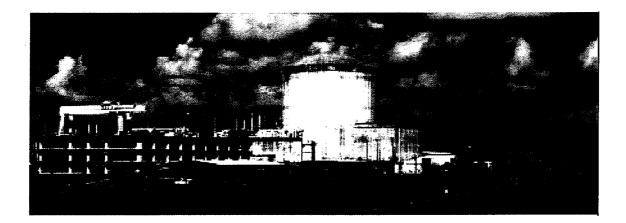   NRC Resident Inspectors Office

Attachment 1 to
W3F1-2000-0076

Waterford 3 Security Improvement Plan

Entergy

Waterford 3

Security Improvement Plan

May, 2000

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SUMMARY

Waterford 3 has developed a Security Improvement Plan designed to improve the Security program design, implementation and performance. The plan was developed in response to several inspections, audits and assessments that indicate a decline in performance over the last few years.

The Security Improvement Plan presents goals, strategies, associated actions and performance indicators, and commits to firm, realistic dates for achieving every action. The plan supports both near-term and continuous improvement. Input to the Security Improvement Plan included information from Root Cause Analyses, Condition Reports, NRC inspections and evaluations, and self-assessment reports.

We are committed to fostering an environment that supports continuous improvement of our performance and the implementation of this improvement plan. Management fully supports efforts toward the pursuit of excellence in the Security Program with a vision of making it one of the premier Security programs in the region.

Success will be measured through the use of performance indicators to trend the performance of the organization throughout the implementation of this plan. We are determined to move to a state of excellence. We are dedicated and committed to initiatives and programs that will help us achieve top performance.

Actions

This section of the Waterford 3 Security Improvement Plan identifies actions that, when completed, will result in significant improvement. Strategies were developed to clearly reflect the steps necessary to demonstrate achievement of the Security Goals. Actions were then organized under the relevant strategies.

Security Goal: 1. Enhance the Defensive Strategy

Action	ECD	Status	Owner	Phone	References
Strategy: A - Develop a Target Set List with Documented Bases					
1 Establish integrated team to develop target set list utilizing PRA tools and operational considerations.	4/30/00	X	J.B. Holman	6265	
2 Develop a list of Target Sets and document bases.	5/15/00	X	J.B. Holman	6265	RCA 2000-0272 CA 5
3 Review Target Set list with NRC NRR representative and revise to incorporate any comments	5/29/00	W	R.C. Fron	6340	
Strategy: B - Improve the Defensive Strategy to Protect Identified Target Sets					
1 Perform independent assessments of current defense strategy to identify areas for improvement.	4/30/00	X	R.C. Fron	6340	
2 Improve command and control during contingency response by assigning the Security Shift Supervisor responsibility to direct contingency response from CAS.	3/23/00	X	R.C. Fron	6340	RCA 2000-0272 CA 6
3 Incorporate guidance on the use of protective masks into contingency response and training plans.	7/15/00	W	T.E. Duet	6299	IR-2000-03
4 Evaluate and document response time calculations to consider changes in defensive strategy	7/15/00	W	T.E. Duet	6299	
5 Develop an enhanced defensive strategy for protection of target sets and document this stategy.	7/15/00	W	J.M. Maher	6441	RCA 2000-0272 CA 7
6 Develop administrative controls to ensure plant conditions (e.g. blocked open doors, missing barriers, etc.) are evaluated to ensure that protective strategy assumptions (e.g. response times) are not invalidated.	7/31/00	S	G.S. Zetsch	6354	IR-2000-03
7 Increase approved Security staffing levels to effectively implement enhanced defensive strategy and begin filling vacancies.	5/11/00	X	R.C. Fron	6340	
Strategy: C - Train Personnel on the Enhanced Defensive Strategy					
1 Train the current Security response force on enhanced defensive strategy.	11/17/00	S	T.E. Duet	6299	
2 Train Operations personnel on enhanced defensive strategy.	8/31/00	S	R.W. Fletcher	6038	
Strategy: D - Revise Plans and Procedures and Implement Enhanced Defensive Strategy					
1 Revise the Physical Security Plan to implement any changes in defensive strategy.	11/17/00	S	G.S. Zetsch	6354	
2 Revise the Safeguards Contingency Plan to implement any changes in defensive strategy.	11/17/00	S	G.S. Zetsch	6354	
3 Revise the Security Training and Qualification Plan to implement any changes in defensive strategy.	11/17/00	S	G.S. Zetsch	6354	
4 Develop Operations off-normal procedure for security events.	7/15/00	W	J.V. Signorelli	3122	

Status Codes: S = Scheduled (not started yet), W = Working (in progress), X = Closed (completed with documentation)

WATERFORD 3 SECURITY IMPROVEMENT PLAN

Security Goal: *2. Maintain Security Facilities and Equipment in Excellent Condition*

Action	ECD	Status	Owner	Phone	References
Strategy: A - Plan for Equipment/Facility Upgrades as Appropriate					
1 Revise Security Equipment Upgrade Project as appropriate utilizing results of independent assessment of defensive strategy and revised defensive strategy.	6/20/00	W	J.E. Howard	6327	RCA 2000-0272 CA 12
2 Develop a schedule to implement portions of Security Equipment Upgrade Project which support enhanced defensive strategy.	6/20/00	W	J.E. Howard	6327	RCA 2000-0272 CA 12
Strategy: B - Implement Portions of Upgrade Plan to Support Defensive Strategy					
1 Develop and implement Engineering Request # 00-0348 to harden 7 security access doors.	12/15/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
2 Develop and implement Engineering Request # 00-0348 to install bullet resistant defensive positions enclosures at 2 doors.	10/2/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
3 Develop and implement Engineering Request # 00-0071-03-01 to install ~ 1500' of delay fencing along perimeter isolation zone and between buildings on the west side of plant.	8/31/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
4 Develop and implement Engineering Request # 00-0350 to Install 3 ballistic structures (BREs) certified UL Level 8.	9/4/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
5 Develop and implement Engineering Request # 00-0362 to install concealment structures around BREs.	11/15/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
6 Develop and implement Engineering Request # 00-0351 to install/upgrade 11 ballistic fighting positions to UL Level 8.	9/7/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
7 Develop and implement Engineering Request # 00-0361 to install grenade nets at 3 locations.	12/15/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
8 Develop and implement Engineering Request # 00-0364 to upgrade the Intrusion Detection System around the Ultimate Heat Sink.	12/18/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
9 Develop and implement Engineering Request # 00-0363 to improve the intruder deterrent features on the Fuel Handling Building Ventilation System.	8/31/00	S	J.E. Howard	6327	RCA 2000-0272 CA 12
10 Improve weapons range training facility by extending the range, constucting a tower for elevated shooting, and installing a moving target system.	7/15/00	W	J.E. Howard	6327	RCA 2000-0272 CA 12
Strategy: C - Improve Maintenance and Reliability of Equipment					
1 Develop and document maintenance guidelines for video equipment to improve maintenance testing and calibration.	5/31/00	W	A.J. Joseph	3302	RCA 2000-0272 CA 10
2 Complete tuning of all cameras using revised methodology to improve performance.	8/31/00	W	A.J. Joseph	3302	RCA 2000-0272 CA 10
3 Review and make improvements to the preventative maintenance program to support and maintain the Security System.	1/31/01	S	B.L. Phillips	6746	RCA 2000-0272 CA 10

Status Codes: S = Scheduled (not started yet), W = Working (in progress), X = Closed (completed with documentation)

Entergy   WATERFORD 3 SECURITY IMPROVEMENT PLAN

Security Goal: *3. Enhance the Security Training and Qualification Program*

Action	ECD	Status	Owner	Phone	References
Strategy: A - Learn from Others					
1 Ensure all Security Shift Supervisors participate in at least 1 assessment, assistance visit or benchmarking trip at nuclear plant.	3/31/01	S	R.C. Fron	6340	
Strategy: B - Enhance the Security Initial Training Program					
1 Revise the Initial Training Program content to incorporate changes to defensive strategy.	8/15/00	W	T.E. Duet	6299	RCA 2000-0272 CA 11
2 Revise the Initial Weapons Training & Qualification Program to incorporate changes to defensive strategy and improve security officer proficiency.	6/15/00	W	R.W. Lailheugue	6754	RCA 2000-0272 CA 11
Strategy: C - Enhance the Security Continuing Training Program					
1 Revise the Weapons Training & Re-qualification Program to incorporate changes to defensive strategy and improve security officer proficiency.	6/15/00	W	R.W. Lailheugue	6754	RCA 2000-0272 CA 11
2 Develop and implement a Security Continuing Training program to train on bases of defense strategy, industy events and and appropriate industry changes.	10/15/00	W	T.E. Duet	6299	
3 Complete 40 hrs of weapons training for existing response force.	11/17/00	S	R.W. Lailheugue	6754	

Security Goal: *4 . Enhance the Integrated Plant Response to Contingencies*

Action	ECD	Status	Owner	Phone	References
Strategy: A - Develop a Drill Process to Test Integrated Plant Response to Contingencies					
1 Develop a program to exercise the site on integrated site response for contingencies.	7/1/00	S	R.C. Fron	6340	
2 Implement NEI 97-07, "Security Contingency Response Self-Assessment Program".	12/15/00	W	R.F. Burski	6774	NEI 97-07
3 Initiate quarterly Force-on-Force drills until such time as an industry standard is adopted.	5/31/01	W	R.F. Burski	6774	RCA 2000-0272 CA 17
Strategy: B - Train and Test All Site Personnel on Response to Security Events					
1 Develop training for site personnel on response to security events and include in General Employee Training.	7/15/00	S	J.M. O'Hern	6001	
2 Provide training and test currently badged employees on response during security events.	9/30/00	S	J.M. O'Hern	6001	

Status Codes: S = Scheduled (not started yet), W = Working (in progress), X = Closed (completed with documentation)

Security Goal: *5. Improve Organizational Effectiveness*

Action	ECD	Status	Owner	Phone	References
Strategy: A - Assess the Effectiveness of the Security Organization					
1 Perform an organizational effectiveness study of the Security Organization, which includes all modes of operation.	8/15/00	S	R.C. Fron	6340	RCA 2000-0272 CA 1
2 Review previous audit reports, assessment reports, corrective action recommendations, industry lessons learned, inspection reports, etc. to ensure actions are entered into the corrective action program or otherwise resolved effectively.	6/28/00	S	R.C. Fron	6340	RCA 2000-0272 CA 15
3 Implement a schedule to conduct Security program self-assessments and industry benchmark activities.	6/15/00	S	R.C. Fron	6340	RCA 2000-0272 CA 3
Strategy: B - Develop a Strategy to Address Improvement Areas and Increase Effectiveness					
1 Implement a strategic plan to address and monitor, as a minimum, the actions necessary to correct existing problems relating to management practices, program design and implementation, complacency, training, and ownership.	8/15/00	S	R.C. Fron	6340	RCA 2000-0272 CA 2
Strategy: C - Provide Security Management Tools and Training					
1 Provide Security management, including contract personnel, training on change management	11/28/00	S	J.M. O'Hern	6001	RCA 2000-0272 CA 4
2 Develop a staffing plan including successor planning for key Security management positions.	9/28/00	S	R.C. Fron	6340	RCA 2000-0272 CA 8
3 Conduct training for line supervisors in handling union/personnel issues	1/31/01	S	G.T. Ingrassia	6439	RCA 2000-0272 CA 13
4 Develop a method to ensure those agreements between the Wackenhut project management and Union officials are communicated appropriately to the Wackenhut line supervision.	6/15/00	S	G.T. Ingrassia	6439	RCA 2000-0272 CA 14
5 Define roles and responsibilities of the Security organization.	9/28/00	S	R.C. Fron	6340	RCA 2000-0272 CA 9
6 Utilize an action tracking system for the Security organization to capture such things as performance monitoring, management observations, assessment results and industry best practices.	8/15/00	S	R.C. Fron	6340	RCA 2000-0272 CA 16

Performance Measures

The following Performance Measures have been assembled for this Plan to clearly quantify and trend characteristics where improvement in Waterford 3 Security performance is targeted. These performance measures will be frequently reviewed as an indication of our progress.

Measure #1: Number of Security Incident Reports

Measure #2: Weapons Training - % that Demonstrate Proficiency on First Attempt During Quarterly Cold-fire Testing on Handguns

Measure #3: Weapons Training - % that Demonstrate Proficiency on First Attempt During Quarterly Cold-fire Testing on Shotguns

Measure #4: Weapons Training - % that Demonstrate Proficiency on First Attempt During Quarterly Cold-fire Testing on Rifles

Measure #5: Number of Response Force Personnel on Staff and % of Response Force Fully Trained and Qualified

Measure #6: Security Personnel Error Rate

Measure #7: Security Equipment Performance Index

Measure #8: % Overtime for the Security Department

Measure #9: Table-Top Drill Performance

Measure #10: Force-on-Force Drill Performance

Measure #11: QA Audit/Surveillance Results

Attachment 2 to
W3F1-2000-0076

Commitment Identification/Voluntary Enhancement Form

COMMITMENT IDENTIFICATION/VOLUNTARY ENHANCEMENT FORM

Attachment 2 to W3F1-2000-0076
Waterford 3 Security Improvement Plan
May 23, 2000
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COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER
Review Target Set list with NRC NRR representative and revise to incorporate any comments.	X		5/29/2000	
Incorporate guidance on the use of protective masks into contingency response and training plans.		X	7/15/2000	
Evaluate and document response time calculations to consider changes in defensive strategy.	X		7/15/2000	
Develop an enhanced defensive strategy for protection of target sets and document this stategy.	X		7/15/2000	CR 2000-0272
Develop administrative controls to ensure plant conditions (e.g. blocked open doors, missing barriers, etc.) are evaluated to ensure that protective strategy assumptions (e.g. response times) are not invalidated.	X		7/31/2000	
Train the current Security response force on enhanced defensive strategy.	X		11/17/2000	
Train Operations personnel on enhanced defensive strategy.	X		8/31/2000	
Revise the Physical Security Plan to implement any changes in defensive strategy.		X	11/17/2000	
Revise the Safeguards Contingency Plan to implement any changes in defensive strategy.		X	11/17/2000	
Revise the Security Training and Qualification Plan to implement any changes in defensive strategy.		X	11/17/2000	
Develop Operations off-normal procedure for security events.		X	7/15/2000	
Revise Security Equipment Upgrade Project as appropriate utilizing results of independent assessment of defensive strategy and revised defensive strategy.	X		6/20/2000	CR 2000-0272
Develop a schedule to implement portions of Security Equipment Upgrade Project which support enhanced defensive strategy.	X		6/20/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0348 to harden 7 security access doors.	X		12/15/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0348 to install bullet resistant defensive positions enclosures at 2 doors.	X		10/2/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0071-03-01 to install ~ 1500' of delay fencing along perimeter isolation zone and between buildings on the west side of plant.	X		8/31/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0350 to Install 3 ballistic structures (BREs) certified UL Level 8.	X		9/4/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0362 to install concealment structures around BREs.	X		11/15/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0351 to install/upgrade 11 ballistic fighting positions to UL Level 8.	X		9/7/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0361 to install grenade nets at 3 locations.	X		12/15/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0364 to upgrade the Intrusion Detection System around the Ultimate Heat Sink.	X		12/18/2000	CR 2000-0272
Develop and implement Engineering Request # 00-0363 to improve the intruder deterrent features on the Fuel Handling Building Ventilation System.	X		8/31/2000	CR 2000-0272
Improve weapons range training facility by extending the range, constucting a tower for elevated shooting, and installing a moving target system.	X		7/15/2000	CR 2000-0272

COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER
Develop and document maintenance guidelines for video equipment to improve maintenance testing and calibration.	X		5/31/2000	CR 2000-0272
Complete tuning of all cameras using revised methodology to improve performance.	X		8/31/2000	CR 2000-0272
Review and make improvements to the preventative maintenance program to support and maintain the Security System.	X		1/31/2001	CR 2000-0272
Ensure all Security Shift Supervisors participate in at least 1 assessment, assistance visit or benchmarking trip at nuclear plant.	X		3/31/2001	
Revise the Initial Training Program content to incorporate changes to defensive strategy.		X	8/15/2000	CR 2000-0272
Revise the Initial Weapons Training & Qualification Program to incorporate changes to defensive strategy and improve security officer proficiency.		X	6/15/2000	CR 2000-0272
Revise the Weapons Training & Re-qualification Program to incorporate changes to defensive strategy and improve security officer proficiency.		X	6/15/2000	CR 2000-0272
Develop and implement a Security Continuing Training program to train on bases of defense strategy, industy events and and appropriate industry changes.		X	10/15/2000	
Complete 40 hrs of weapons training for existing response force.	X		11/17/2000	
Develop a program to exercise the site on integrated site response for contingencies.	X		7/1/2000	
Implement NEI 97-07, "Security Contingency Response Self-Assessment Program".	X		12/15/2000	
Initiate quarterly Force-on-Force drills until such time as an industry standard is adopted.	X		5/31/2001	CR 2000-0272
Develop training for site personnel on response to security events and include in General Employee Training.		X	7/15/2000	
Provide training and test currently badged employees on response during security events.	X		9/30/2000	
Perform an organizational effectiveness study of the Security Organization, which includes all modes of operation.	X		8/15/2000	CR 2000-0272
Review previous audit reports, assessment reports, corrective action recommendations, industry lessons learned, inspection reports, etc. to ensure actions are entered into the corrective action program or otherwise resolved effectively.	X		6/28/2000	CR 2000-0272
Implement a schedule to conduct Security program self-assessments and industry benchmark activities.	X		6/15/2000	CR 2000-0272
Implement a strategic plan to address and monitor, as a minimum, the actions necessary to correct existing problems relating to management practices, program design and implementation, complacency, training, and ownership.	X		8/15/2000	CR 2000-0272
Provide Security management, including contract personnel, training on change management.	X		11/28/2000	CR 2000-0272
Develop a staffing plan including successor planning for key Security management positions.	X		9/28/2000	CR 2000-0272
Conduct training for line supervisors in handling union/personnel issues.	X		1/31/2001	CR 2000-0272
Develop a method to ensure those agreements between the Wackenhut project management and Union officials are communicated appropriately to the Wackenhut line supervision.	X		6/15/2000	CR 2000-0272
Define roles and responsibilities of the Security organization.	X		9/28/2000	CR 2000-0272
Utilize an action tracking system for the Security organization to capture such things as performance monitoring, management observations, assessment results and industry best practices.	X		8/15/2000	CR 2000-0272