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Waterford 3

W3F1-2000-0080
A4.05
PR

June 23, 2000

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Reporting of Security Incident Report

Gentlemen:

Attached is Security Incident Report (SIR) 00-S02-00 for Waterford Steam Electric Station Unit 3. This report provides details of the discovery of a loss of control of Safeguards Information. This condition is being reported pursuant to 10 CFR Part 73, Appendix G, Paragraph I(c).

All of the commitments contained in this submittal are identified on the attached Commitment Identification/Voluntary Enhancement Form. If you have any questions, please contact Lisa Borel at (504) 739-6403.

Very truly yours,

A handwritten signature in cursive script, reading "Everett P. Perkins, Jr.", with a long horizontal flourish extending to the right.

E.P. Perkins, Jr.
Director,
Nuclear Safety Assurance

EPP/LBB/rtk
Attachment

cc: E.W. Merschoff, (NRC Region IV), N. Kalyanam, (NRC-NRR),
A.L. Garibaldi, P. Lewis - INPO Records Center, J. Smith,
N.S. Reynolds, NRC Resident Inspectors Office,
Louisiana DEQ/Surveillance Division

JEH

NRC FORM 366 (6-1998)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001 <small>Estimated burden per response to comply with this mandatory information collection request: 50.0 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small>					
LICENSEE EVENT REPORT (LER)										
FACILITY NAME (1) Waterford Steam Electric Station, Unit 3					DOCKET NUMBER (2) 05000-382		PAGE (3) 1 of 5			
TITLE (4) Safeguards Information Saved on Computer Connected to a Local Area Network										
EVENT DATE (5) MONTH DAY YEAR			LER NUMBER (6) YEAR SEQUENTIAL NUMBER REVISION NUMBER			REPORT DATE (7) MONTH DAY YEAR			OTHER FACILITIES INVOLVED (8)	
05 24 00			00 S02 00			06 23 00			FACILITY NAME N/A FACILITY NAME N/A	
OPERATING MODE (9) 1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more) (11)							
POWER LEVEL (10) 100			20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(2)(i)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.405(a)(1)(ii)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		X 73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER	
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		<small>Specify in Abstract below or in NRC Form 366A</small>	
20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)						
LICENSEE CONTACT FOR THIS LER (12)										
NAME Lisa A. Borel, Sr. Licensing Engineer					TELEPHONE NUMBER (Include Area Code) (504) 739-6403					
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES <small>(If yes, complete EXPECTED SUBMISSION DATE).</small>						X NO				
ABSTRACT (Limit to 1400 spaces, i. e., approximately 15 single-spaced typewritten lines) (16)										
<p>On May 24, 2000, an electronic version of a letter marked Safeguards Information was discovered on a computer workgroup server. This is contrary to Waterford 3 procedure W5.503 section 5.15 which states that Safeguards Information may not be processed, produced or stored on an automatic data processing system that is connected to a Local Area Network (LAN) or Wide Area Network (WAN). Security was notified, the electronic file was deleted from the server and the server backup tapes were placed in the Safeguards safe. This is a loss of control of Safeguards Information and is being reported pursuant to 10CFR73, Appendix G, I(c). A one-hour notification was issued per the same requirement. The apparent cause of this event is Human Error/Inadequate Work Practice due to processing and saving Safeguards Information on a computer connected to the network not in accordance with the site procedure. The employee involved was an experienced engineer who was cognizant of the requirements of W5.503. The activity being performed was an infrequent activity for this individual and it is likely that the requirement was forgotten during preparation of the letter. There was no malevolent intent on the part of any employee. This condition did not affect any system, structure or component in the plant. This event is not considered a Safety System Functional Failure (SSFF).</p>										

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Waterford Steam Electric Station, Unit 3	05000-382	00	S02	00	2 OF 5

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

REPORTABLE OCCURRENCE

On May 24, 2000, an electronic version of a Waterford 3 letter including an attachment marked Safeguards Information was discovered on a departmental workgroup server. This event is being reported pursuant to 10 CFR Part 73, Appendix G, Paragraph I(c) as a discovered vulnerability in a safeguard system that could allow unauthorized or undetected access to a protected area, material access area, controlled access area, vital area, or transport for which compensatory measures have not been employed. On May 24, 2000, a one-hour report of this event was issued per the same paragraph.

INITIAL CONDITIONS

At the time this condition was identified, Waterford 3 was operating in Mode 1 at approximately 100% power. No structures, systems or components were out of service that contributed to this event.

EVENT DESCRIPTION

On May 24, 2000, while reviewing files on a departmental workgroup server for possible deletion, an electronic version of a Waterford 3 letter including an attachment marked Safeguards Information was discovered. This is contrary to Waterford 3 procedure W5.503 section 5.15 which states that Safeguards Information may not be processed, produced or stored on an automatic data processing system that is connected to a Local Area Network (LAN) or Wide Area Network (WAN). The individual who discovered the file is authorized access to Safeguards Information. Security was notified and confirmed that this letter did contain Safeguards Information. This condition was a loss of control of Safeguard Information. The electronic file was deleted from the server and the server backup tapes were placed in the Safeguards safe. The temporary file was deleted from the computer hard drive of the individual who discovered the condition, and the recycle bin was emptied. Further investigation revealed that the file was a response to NRC Staff concerns identified as a potential weakness during the April 1996 Operational Safeguards Response Evaluation (OSRE).

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Waterford Steam Electric Station, Unit 3	05000-382	00	S02	00	3 OF 5

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CAUSAL FACTORS

The root cause of this event is human error in that the individual involved prepared and saved a document containing Safeguards Information on a computer that was connected to the LAN contrary to the procedural requirements of W5.503. A more basic root cause could not be determined. The individual involved has no recollection of the specifics resulting in Safeguards Information being stored on a network drive. The most probable cause was inattention to detail and overconfidence in that the individual involved (who was safeguards authorized) had prepared many letters of transmittal of safeguards information to the NRC Staff. The individual involved was experienced in the handling of Safeguards Information and was cognizant of the requirements of W5.503. Normally, this individual prepared only cover letters that transmit Safeguards Information to the NRC Staff and these letters do not in themselves contain Safeguards Information. The Safeguards Information is normally contained in an attachment prepared by Security. It is likely that in this unusual situation where the individual involved was preparing both the transmittal letter and the attachment, it was forgotten that Safeguards Information may not be processed or stored on a computer connected to the LAN.

CORRECTIVE ACTIONS

1. The Security Superintendent was immediately notified of the condition.
2. The file was deleted from the server and the server backup tapes were placed in the Safeguards safe. The temporary file was deleted from the computer hard drive of the individual who discovered the condition, and the Recycle Bin was emptied.
3. Information Technology (IT) was requested to perform a search of all servers for documents containing the text "Safeguards Information" and provide a list to Licensing. IT identified 311 files belonging to 17 different departments that contained the text "Safeguards Information". Each department reviewed the identified files and confirmed that no Safeguards Information was contained in any of the files.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Waterford Steam Electric Station, Unit 3	05000-382	00	S02	00	4 OF 5

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

4. Information Technology sent an e-mail to the entire WF3 site requesting that each person who processes Safeguards Information perform a search for files containing the words "Safeguards Information" on all computer hard drives and any backup storage files that could potentially contain safeguards information.
5. Licensing notified the Licensing and Security Departments at the other EOI sites of this condition and recommended that they also review their computer drives (hard drives, network drives and any backup storage files) for this potential.
6. Security issued a memorandum to all Safeguards Information Authorized Users to remind them of the requirements of W5.503 section 5.15 concerning processing of Safeguards Information on an automatic data processing system.
7. Training, both initial and annual requalification, will be developed and implemented for all personnel authorized to handle Safeguards Information.

SAFETY SIGNIFICANCE

The Safeguard Information found on the departmental server was a response to a NRC Staff concern related to Waterford 3's ability to adequately protect the Westside Access to Containment. Because the item of concern was characterized by the NRC Staff as a potential weakness and not a vulnerability, no immediate compensatory actions were needed or taken. It is assumed that the document was saved on the server on the date of the letter, February 4, 1997. Since that date until the time of discovery, any person with access to that departmental server could have viewed the Safeguard document. Since 1997, a total of 58 employees (both former and current) had access to the departmental server. Although many of these employees did not have authorization to view Safeguards Information, there is no evidence or reason to believe that this file was used in any unauthorized capacity. Also during that period, there were no known incidents or attempts to gain unauthorized access to the plant. This event is not considered a Safety System Functional Failure (SSFF).

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SIMILAR EVENTS

A review of Security Incident Reports dating back to 1994 was performed. No previous similar events involving Safeguards Information being processed or stored on computers connected to the LAN were identified.

ADDITIONAL INFORMATION

Energy Industry Identification System (EIIS) codes are identified in the text within brackets [].

COMMITMENT IDENTIFICATION/VOLUNTARY ENHANCEMENT FORM

Attachment #1 to W3F1-2000-0080

Reporting of Security Incident Report - SIR 00-S02-00

Loss of Control of Safeguards Information

June 23, 2000

Page 1 of 1

COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER
Develop & Implement Initial and Annual Re-qualification training for personnel authorized to handle Safeguards Information (A 25960)		X	12/31/00	CR 2000-0524

*Check one only

VOLUNTARY ENHANCEMENT(S)	ASSOCIATED CR OR ER