



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

November 24, 2000

William T. Cottle, President and
Chief Executive Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, Texas 77483

SUBJECT: MEETING WITH SOUTH TEXAS PROJECT

Dear Mr. Cottle:

This refers to the meeting conducted in the Region IV office on November 20, 2000. This meeting was conducted to discuss the protective strategy enhancement program at the South Texas Project.

The attendance list and presentation are enclosed with this summary (Enclosures 1 and 2).

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos.: 50-498
50-499
License Nos.: NPF-76
NPF-80

STP Nuclear Operating Company

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Enclosures:

1. Attendance List
2. Licensee Presentation

cc w/enclosures:

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ENCLOSURE 2

SOUTH TEXAS PROJECT

DEFENSIVE STRATEGY
ENHANCEMENT PROGRAM

Presented to Region IV
Nuclear Regulatory Commission

November 20, 2000

WHERE ARE WE

- STPNOC has a good Physical Security Program.
- The September 25, 2000 Attachment 3 Inspection identified several opportunities for improvement.
- Management is receptive/supportive of change.
- Will take time to effectively implement change.

WHERE ARE WE

Since successfully passing the OSRE in 1993, several programmatic and regulatory changes have taken place at STP.

1. In 1994 STPNOC's perimeter detection system was upgraded.
2. In 1995 STPNOC's weapons mix changed. A Security Plan change was submitted and approved by the NRC.
3. In 1999-2000
 - STP's defensive strategy was changed
 - Room "x" was added to the 1993 target sets
 - Increased the number of responders in the Security Plan
 - \$350,000 worth of delay barriers and protective cover was installed.

WHERE DO WE WANT TO BE

1. Must continue to meet and maintain Regulatory requirements.
2. Must aggressively address the NRC's September 25th Attachment 3 unresolved issues.
3. Must integrate Operations, PRA and Security's knowledge of STPNOC's defensive strategy and target set development.
4. Must develop a comprehensive defensive strategy that meets the long-term strategic physical security program requirements.
5. Must develop and maintain an objective. Safeguards Performance Assessment Program.
6. Must provide realistic tactical training drills and exercises to STPNOC's officers.
7. Must conduct continuous and focused self-assessments, utilizing industry peers.
8. Must work with NEI and benchmark industry peers to ensure we stay abreast of industry standards.

HOW DO WE GET THERE

1. Develop an interim Action Plan to address the NRC's Attachment 3 unresolved items.
 - Incorporate input from action owners
 - Address Industry lessons learned as well as NRC observations/issues (Attachment 1)
2. Review plan of action with members of STPNOC's Senior Management and meet to address STPNOC's Strategic Plan of Action with NRC Region IV.
3. Benchmark other utilities that are recommended by the NRC and Industry Peers.
 - San Onofre – next OSRE Nov. 27-Dec. 1
 - Arkansas Nuclear – next Attachment 3
 - Waterford – observe training program – January-February 2001
 - Callaway – attend Attachment 3 Inspection scheduled Nov. 13-Nov. 17, 2000

HOW DO WE GET THERE

- Duane Arnold – review their success with the September OSRE – Dec. 18-21, 2000
 - Comanche Peak-review defensive strategy – January 2001
4. Review and revise, if necessary, the stations target sets based on Operations and PRA input.
- Review Industry Lessons Learned
 - Review and seek concurrence from NRR
5. Modify site defensive strategy as necessary.
6. Conduct focused self-assessment of current and proposed defensive strategy.
- Review Plan of Action with NEI/Industry Peers
 - Have peers from DAEC, Callaway, Diablo Canyon, Comanche Peak and San Onofre participate in the focused self assessment in January – February 2001

HOW DO WE GET THERE

7. Validate the proposed strategy by using contract defensive strategy experts such as Dennis Collins, Dick Spears.
8. Incorporate applicable input into the action plan.
 - Obtain funding and purchase weapons
 - Obtain funding and purchase firing range modifications
 - Modify procedures with operator assistance
 - Begin modification or defensive strategy
9. Train the Security Force on modified defensive strategy:
 - Tactical position training
 - Under duress training
 - Train evaluators and controllers
 - Outline objectives
 - Critique the process and exercise lessons learned

HOW DO WE GET THERE

- Incorporate feedback from Security officers
 - Officers to self assess the process
 - Train onshift, nights, and weekends
 - Challenge defensive strategy multiple entries
 - Develop scenarios, document, critique, write CRs, correct lessons learned
10. Keep NRC Region IV Branch Chief in Arlington advised.
11. Develop an objective Safeguards Performance Assessment Program. Involves development and maintenance of:
- Comprehensive tabletop drills and exercises
 - Training based on changes in strategy, industry lessons learned and self identified concerns
 - Obtain input from Operations and PRA personnel

HOW DO WE GET THERE

- Scenarios – based on comprehensive/realistic events
- Objectives – that are specific, measurable and realistic
- Train Controllers and Evaluators to add value to a team's overall performance
- Utilize station's Corrective Action Program to achieve continuous improvement – build upon lessons learned
- Optimize the use of adversaries – use peers, LLEA, FBI
- Tactical training methods that reflect the site's specific challenges
- Exercises to be structured in a manner to ensure they provide credible, realistic, thorough tests of the protective strategy

HOW DO WE GET THERE

12. The Safeguards Performance Assessment Program must assess/measure certain key program elements:

- Sufficient number of security personnel
- Respond within appropriate timelines to protected positions with appropriate armament
- Provide Target Set Protection
- Integrated Response
- Coordination and Planning – specifically between Operations and Security
- Command and Control
- Communications
- Alarm Station Operations
- Individual Responder Tactics
- Team Response Tactics
- Use of Deadly Force
- Alarm Assessment and Intrusion Detection Equipment

HOW DO WE GET THERE

- Weapons Handling and Proficiency
 - Controller Participation
 - Post Drill/Exercise Briefing/Critiques
 - Defensive Positions
 - Deployment of Responders and Equipment
 - Training
13. Conduct Force on Force Drills with challenging adversaries (STARS, Industry Peers, LLEA, and FBI).
14. Develop long term relationships with Local Law Enforcement, FBI, and other response agencies.
- Outline specific responsibilities
 - Ensure the Security Force members know how to respond

HOW DO WE GET THERE

15. Provide ongoing leadership to the industry by developing and maintaining objective criteria to measure physical Security regulatory performance.
16. Develop a comprehensive plan of action to prepare STPNOC for an OSRE (Attachment 2&3).

ACHMENT 1

SUBJECT	OWNER	TIMEFRAME	NEED TO KNOW/DO
Weapons mix does not meet site defensive strategy criteria	A.J. Hebert Dan Bilski	Feedback by 11/27/00	<ol style="list-style-type: none"> 1. Based on "strategy" select weapon(s) of choice. 2. Benchmark weapons qualification requirements by type. 3. Optical range device required – red dot. 4. Determine most cost-effective method to purchase weapons. 5. If decide on rifles, then no slugs to be used for shotguns.
Tactical weapons familiarization/demonstration did not include stress evaluation. (loading on move or firing under stress)	Dan Bilski	Feedback by 11/27/00	<ol style="list-style-type: none"> 1. Review past tactical courses at STP (1998, 1999). 2. Benchmark other top training programs. 3. What we drill we must practice (verify 40' tower vs. 80') 4. Recommend range modifications. Determine cost.
Armed responders need to be trained on strategy (fallback positions/target sets)	Dan Bilski SFS Team Mike Hall	Feedback by 11/22/00	<ol style="list-style-type: none"> 1. Enhance current strategy – include outage, total system failure. 2. Benchmark recent OSRE's. Determined what proved to be successful. 3. Stop adversary at the fence vs. within the vital area. What is best? 4. Must develop canned scenarios, Drills, critique process, evaluation process, trained controllers, and trained evaluators. Must drill with a number of adversaries, i.e. Local Law Enforcement, FBI, STARS Security personnel.
Target sets need to include operator actions – including Plant Operating Procedures.	Paul Serra Operations Mike Hall Rick Grantom	Feedback by 11/27/00	<ol style="list-style-type: none"> 1. Must have an Operator assigned to the Security OSRE preparation effort 2. Procedure development – Ops/Security 3. Security communication with Control Room protocol and criteria needs to be established. 4. Operator actions that mitigate core damage must be included in procedures, must be included in training and force on force or tabletop drills. 5. Target sets should include components that collectively would cause core damage (NEI)? 6. In drills and tabletops need to grade security performance not operator performance.
Target Set re-evaluation – too few, too many?	Operations Risk Management Mike Hall	Feedback by 11/27/00	<ol style="list-style-type: none"> 1. Benchmark with other Utility's that have conducted successful OSRE's, i.e. Duane Arnold. 2. Validate Target set's with NRR (Dave Oreck)
Secondary Timelines are not comprehensive enough	Dan Bilski SFS Team Mike Hall	Feedback by 11/27/00	<ol style="list-style-type: none"> 1. For a specific number of drill scenarios, create comprehensive timelines for each. For all other, develop maximum time vs. distance timelines
Resolve respiratory protection concerns with HP	Mike Hall Paul Serra	11/22/00	<ol style="list-style-type: none"> 1. Serra to resolve with Tim Powell.
Secure gun lockers at required response locations	Condition Report Ken Sciba	Feedback by 11/15/00	<ol style="list-style-type: none"> 1. Determine if 50.59 requirement for lockers that have been or need to be secured. 2. Develop an action to "secure" the lockers at the required location. 3. Verify which lockers have been secured..
Command And Control	SFS Team Mike Hall Dan Bilski	Feedback by 11/22/00	<ol style="list-style-type: none"> 1. Benchmark how other utilities perform command and control functions 2. Determine whether we need to use of CAS for Command and Control 3. Redeployment (strategy) – determine effectiveness.

ATTACHMENT 2

Discuss observations with NRC Region IV Branch Chief	October 5, 2000
Review observations with SFS and develop a plan of action	October 6-10, 2000
Present observations and fundamental plan of action to NRC Region IV	November 20, 2000 (week of)
Benchmark	November 4, 2000 – October 2001
Develop a comprehensive plan of action that address' Attachment 3 Inspection Unresolved items: Target set's, Defensive Strategy, Weapons and Training.	January 2,000
Conduct a focused self assessment using Industry Peers	February 2001
Present to STPNOC Management the plan for approval	March 2001
Follow-up with NRC Region IV Branch Chief	April, June, August, October, December 2001
Implement Plan of Action	March – December 2001
Train Security Force members	April 2001 to ----- ongoing
Conduct Force on Force Drills	April 2,001 to ----- ongoing

