

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Atomic Energy Commission
NUCLEAR SCIENCE CENTER
16 Reactor Road
Narragansett, R.I. 02882-1165

December 10, 2001

ATTN: Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Reply to a Notice of Violation

Pursuant to the provisions of 10 CFR 2.201, the Rhode Island Nuclear Science Center hereby responds to a Notice of Violation transmitted with a letter dated November 23, 2001 and received November 28, 2001. Our responses will restate the alleged violation as presented in the Notice of Violation followed immediately by our response.

1. License Condition 3.e, "Physical Security Plan," in part, states: "The licensee shall maintain and fully implement all provisions of the Commission's approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p)."

The Rhode Island Nuclear Science Center Security Plan, dated August 1994, revised July 26, 2000, in the Section entitled Testing, states that the alarm detection system shall be tested quarterly in agreement with the vendor providing the service.

Contrary to the above, from August 30, 1999, when this requirement was implemented, until the present, the testing of the alarm detection system exceeded the quarterly requirement.

This is a Severity Level IV violation (Supplement IV).

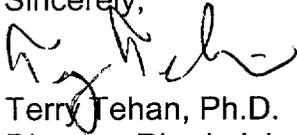
Response: (1) Reason for violation: the supervisory staff did not insure that the alarm testing was being conducted within the correct time frame as stated in the Security Plan. (2) Corrective steps include: reminding the staff of the requirements to insure that all surveillances are completed on schedule and establishing a new scheduling matrix indicating the time interval in which the surveillances must be completed. (Note: staff members assumed that due to the installation of a new alarm system that is self-checking, that the redundant testing by staff was unnecessary). (3) Corrective steps to avoid further violations: include displaying the scheduling matrix on a poster board so that all staff members can easily

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monitor the required surveillances and review the Security Plan to eliminate those items that relate to Moderate Strategic Significance due to the change in the RINSC license status to Low Strategic Significance. (4). The date of full compliance: the alarm detection system has been tested as of September 25, 2001 and will be tested on a new quarterly schedule beginning on January 1, 2002.

If you need additional information or clarification of this letter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Tehan". The signature is fluid and cursive, with a prominent initial "T".

Terry Tehan, Ph.D.

Director, Rhode Island Nuclear Science Center

CC: The Rhode Island Atomic Energy Commission
Mr. Craig Bassett, USNRC