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Cont. safeguards inspection
results.

June 25, 1998

Westinghouse Electric Corporation
ATTN: Mr. J. B. Allen, Manager
Columbia Plant
Commercial Nuclear Fuel Division
P. O. Box R
Columbia, SC 29250

SUBJECT: NRC INSPECTION REPORT NO. 70-1151/98-04 AND NOTICE OF VIOLATION

Dear Mr. Allen:

This refers to the inspection conducted June 1-4, 1998, at the Columbia Nuclear Fuel Plant. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the report.

Areas examined during the inspection are identified in the report. Within these areas the inspection consisted of selective examinations of procedures and representative records, interview with personnel, and observation of activities in progress.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations are of concern because they reflect a lack of knowledge of commitments in your Physical Security Plan and your implementing procedures.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

acc # 9807080268 - public } profile
A # 054: 315-325 } chid to non-pub.

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Should you have any questions concerning this letter, please contact us.

Sincerely,

(original signed by
D. A. Ayres)

Edward J. McAlpine, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Docket No. 70-1151
License No. SNM-1107

Enclosures: 1. Notice of Violation
2. NRC Inspection Report

cc w/encls:
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Regulatory Affairs
Commercial Nuclear Fuel Division
Westinghouse Electric Corporation
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Columbia, SC 29250

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NOTICE OF VIOLATION

Westinghouse Electric Corporation
Commercial Nuclear Fuel Division

Docket No. 70-1151
License No. SNM-1107

During an NRC inspection conducted on June 1-4, 1998, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions, NUREG-1600" the violations are listed below:

- A. License Condition SG 2.1, Physical Protection of Special Nuclear Material of Low Strategic Significance requires the licensee to follow the Site Physical Security Plan (PSP) as may be revised.

Revision 24 of the Site PSP, dated September 1, 1997, paragraph 4.1.3, Access Controls, requires that, "... An escort is provided to visitors... and that, ...commercial vehicles requiring entry for delivery or pick up goods are escorted."

Security Procedure No. 304, dated May 9, 1997, Access Controls, requires that visiting personnel and vehicles are,... "accompanied by and remain in view of a (Westinghouse) employee to assure the visitor abides by access authorization, security, safety and health physics restrictions while in the Controlled Access Area."

Contrary to the above, on June 2, 1998, the inspector observed that a commercial vehicle and its driver were not escorted to and from the No. 2 Warehouse as required.

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

- B. 10 CFR 70.32(e) requires changes which do not decrease the effectiveness of the PSP to be described in a report to the NRC within two months after the change is made.

Contrary to the above, on June 3, 1998, changes to the PSP which did not decrease the plan's effectiveness had been in place for a period of time greater than two months, but had not been reported to the NRC. Specifically:

1. The presence of certain fence gates and access portals are not identified in Drawings 4.1 and 4.3 of the PSP.
2. Paragraph 3.2.2 does not identify the correct equipment issued by the current security contractor.
3. The "as built" controlled access area fence line is not described in Paragraph 4.1.1.
4. The signs, required by paragraph 4.1.3.1, for the UF₆ storage fence line have been removed.

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

Enclosure 1

*Acc# 9807080277 - public
A4054: 317-318*

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
This 25th day of June, 1998

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1151

License No.: SNM-1107

Report No.: 70-1151/98-04

Licensee: Westinghouse Electric Corporation

Facility: Commercial Nuclear Fuel Division
Columbia, SC 29250

Inspection Conducted: June 1-4, 1998

Inspectors: W. Tobin, Senior Safeguards Inspector

Approved by: E. McAlpine, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Acc # 9807080278 - public
A4054: 319-325

Enclosure 2

EXECUTIVE SUMMARY

Commercial Nuclear Fuel Division

NRC Inspection Report 70-1151/98-04

The primary focus of this routine, announced inspection was the observation and evaluation of the licensee's programs for security and safeguards. The report includes inspection efforts of one regional inspector. The inspection identified the following aspects of the licensee programs as outlined below:

Security/Safeguards

Access controls of visitors and vehicle were not in compliance with requirements of the Physical Security Plan (PSP). This was identified as a Violation (VIO) (No. 98-04-03) (Section 1, b).

The Plan no longer accurately reflects current conditions and practices. Certain "as built" installations need to be repaired and also to be reflected in the Plan. These issues are identified as a VIO (No. 98-04-02) (Section 1, b).

Prior Inspector Followup Item (IFI) No. 97-05-08, regarding access during drills to the site by offsite responders, can be closed (Section 1, b).

An IFI (No. 98-04-01) identifies another PSP clarification that is necessary (Section 1, b).

REPORT DETAILS

1. Security and Safeguards (IPs 81401, 81402 and 81431)

a. Inspection Scope

License Condition SG-2.1 PHYSICAL PROTECTION OF SPECIAL NUCLEAR MATERIAL OF LOW STRATEGIC SIGNIFICANCE requires the licensee to follow its "Site Physical Security Plan (PSP)" as may be revised. By letter dated September 1, 1997, the licensee submitted Revision 24 to the Plan which was accepted by the NRC in a letter dated September 18, 1997. The inspector reviewed the licensee's program, procedures and performance for adherence to this Plan as well as for meeting the objectives of 10 CFR Part 73.67.

The following procedures were reviewed:

- No. 200 "Security Force Organization", Revision 5, April 16, 1997
- No. 201 "Bomb Threat", Revision 6, June 1, 1998
- No. 300 "Lock and Key Control" Revision 4, April 22, 1997
- No. 301 "Control of Property" Revision 5, April 28, 1997
- No. 302 "Search Process", Revision 4, February 8, 1997
- No. 303 "Patrol Activities", Revision 4, May 8, 1997
- No. 304 "Access Controls", Revision 4, May 9, 1997
- No. 305 "Badge Control", Revision 5, May 28, 1997
- No. 306 "UF6 Storage Site Security", Revision 3, May 12, 1997
- No. 307 "Security Alarm System", Revision 4, May 13, 1997
- No. 500 "Protective Lighting", Revision 3, May 17, 1997
- No. 501 "Perimeter Barrier Inspection", Revision 3, May 17, 1997
- No. 502 "Security Communications", Revision 3, May 20, 1997
- No. 600 "Contingency Situations", Revision 3, June 30, 1997

b. Observations and Findings

This inspection was initiated during the evening hours of June 1 to allow for an evaluation of the Controlled Access Area (CAA) lighting. The inspector found the lighting to be adequate although there were three poles along the southeast perimeter which did not illuminate. The licensee's investigation determined that the bulbs on these three poles were defective and in need of replacement which was done the next day.

In accordance with the Plan, the licensee's security organization and the contract security force were adequately staffed and managed. It was noted that several "part-time" security officers help to mitigate the turnover rate being experienced by the contractor. Shift coverage during the daytime hours is requiring more than the minimal number of officers to be assigned to various access posts. Training is provided by the South Carolina State Law Enforcement Division (SLED); four hours of basic responsibilities and limitations. Additional training is provided by the contractor both offsite and onsite. The inspector verified that the officers on duty were carrying the SLED certification card which is furnished after the completion of a police background investigation.

The inspector verified that the Richland County Sheriff has provided a Letter of Agreement, dated May 15, 1997, to the licensee to respond to the facility.

During a review of the Plan, the inspector identified an inaccuracy which the licensee agreed needed to be clarified in a Plan revision. Paragraph 4.1.3.2 states that the Safeguards Coordinator "and" the Security Coordinator need to authorize access in writing; in fact the correct word is "or" and not "and". An Inspector Followup Item (IFI) will track the licensee's effort to clarify and revise the Plan (IFI No. 70-1151/98-04/01).

Relative to prior IFI No. 70-1151/97-05-08, which dealt with the access of offsite responders during drills (not actual emergencies), the inspector reviewed Procedure No. 304 as identified above, discussed the issue with management and various officers, and reviewed item No. 593 of the licensee's Commitment Tracking System. Guidance is now in effect that will prevent unescorted access to responders during non-emergency drills but will allow unfettered access to offsite responders during actual emergencies. IFI No. 70-1151/97-05-08 will be "Closed".

The inspector witnessed the operability of the alarmed access portals in the CAA barrier, verified the audio-visual annunciation of their alarms at the "guard station", and was present for telephone and radio checks onsite and offsite. Records of the various tests of this equipment were reviewed. Records of the patrols of the CAA were also reviewed. All three access portals were visited and the officers were found to be knowledgeable of their duties and responsibilities. The inspector toured the manufacturing and storage areas of the plant, specifically the conversion room, the calcining area, the pellet press operation and the final assembly process were visited by the inspector. Tamper seals were verified to be correctly installed on the shipping containers as required by the Plan.

During a tour of the CAA barrier the inspector identified an area approximately ten inches in length along the top of the CAA fence that was not provided with the barbed wire outrigger. The licensee was referred to paragraph 4.1.1 of the Plan which describes the CAA barrier as having such an outrigger, the licensee agreed and requested expeditious installation which was to occur the last day of the inspection. Elsewhere, along the CAA barrier and on the UF₆ storage area fence line, the licensee is committed to posting signs, "... that indicate the requirement for authorized access to the area...", per paragraph 4.1.3.1 of the Plan. The inspector found that the signs hanging on the CAA barrier were so "bleached" as to be unreadable, and that there were no such signs on the UF₆ storage fence line. The licensee agreed and informed the inspector that the signs would be replaced. Paragraph 3.2.2 lists the equipment provided to the officers, the former contractor provided batons which the current contractor does not. Paragraph 4.1.1 describes the CAA barrier fence fabric; at the south side of the Office Building, where the CAA barrier meets the wall, the CAA fence description is not as the fence is installed. Drawings No. 4.1 and 4.3 of the CAA barrier fence line need to identify the two fences used by South Carolina Gas and Electric personnel to access their power distribution equipment. These two Drawings also need to identify all the "alarmed access portals" that are present in the CAA barrier. The failure to currently meet PSP commitments and to change

the PSP to identify current conditions and practices is cited as a VIO (No. 70-1151/98-04-02).

Paragraph 4.1.3 of the Plan requires that, "...An escort is provided to visitors..., and that ...commercial vehicles requiring entry for delivery or pick up of goods are escorted." Security Procedure No. 304, Access Controls, requires that visiting personnel and their vehicles are, "...accompanied by and remain in the view of an employee to assure the visitor abides by access authorization, security, safety and health physics restrictions while in the Controlled Access Area." On the afternoon of June 2, 1998, the inspector witnessed the controls exercised over vehicles and drivers entering and exiting the CAA at the vehicle gate. A driver was issued an "Escort Required" badge after being identified (his drivers license) and properly logged in as required. The driver then returned to his delivery vehicle and drove alone to the shipping and receiving warehouse, approximately 50 yards from the officer at the gate. This officer visually monitored the driver/vehicle until they arrived at the warehouse roll up door at which time the officer "assumed" the warehouse personnel were to escort the driver. In answer to the inspector's questions, officers explained that this was a common practice and that there was no notification to the warehouse to expect the driver nor was there any notification to the officers when the driver was leaving. Upon further inquiry, at the warehouse, it was determined that drivers enter through a personnel door and push the button to open the roll up door. This attracts the attention of the warehouse personnel who are performing other functions. They then go to assist the driver back the vehicle into the off loading ramp at which time they perform an escort function until the driver/vehicle leave and the door is rolled down. The inspector advised the licensee's Security Manager of the situation. The immediate corrective action was to equip the warehouse with a security radio so that security would alert them to the arrival of a driver, the "Escort Required" badge number would then be read back to the security officer from the warehouse personnel who were escorting the driver. Upon completion of the transaction the warehouse alerts the officer of the departure of the vehicle and it would be observed leaving the warehouse and departing the CAA. The failure to perform the requirements of paragraph 4.1.3 of the Plan is cited as a VIO (No. 70-1151/ 98-04-03)

c. Conclusion

Except as noted above, the licensee is meeting the Plan requirements and the criteria of 10 CFR Part 73.67. There is a need for the licensee to audit its Plan procedures and program to verify accuracy of current conditions and commitments.

2. Exit Meeting

The Exit Meeting was held on June 4 with those so identified in the Attachment in attendance. The licensee was informed of the findings of the inspector, a discussion of the corrective actions ensued, no proprietary information was identified and no exceptions were voiced. On June 23, the licensee's Regulatory Affairs Manager was telephonically advised of the results of this inspection.

ATTACHMENT

1. PERSONS CONTACTED

- J. Allen, Plant Manager
- *J. Byrd, Contract Security Supervisor
- R. Flake, Team Manager
- *W. Goodwin, Regulatory Affairs Manager
- W. Hare, Materials Manager
- J. Heath, Regulatory Engineer Manager
- R. Jacobs, Shift Supervisor
- *A. Kaminski, Human Resources Manager
- *E. Keelen, Product Assurance Manager
- G. Labruyers, Manager Materials Operation
- C. Morthers, Chemical Operator
- *P. Stroud, Security Manager
- E. Swaney, Warehouse Manager
- *R. Williams, Safeguards Coordinator

*Denotes attendance at the Exit Meeting.

2. INSPECTION PROCEDURES USED

- IP 81401 - Plan and Procedures
- IP 81402 - Reports of Safeguards Events
- IP 81431 - Physical Protection of SNM

3. LIST OF ITEMS OPENED OR CLOSED

<u>Number</u>	<u>Status</u>	<u>Description</u>
97-05-08	Closed	IFI - Access controls during drills
98-04-01	Open	IFI - Accuracy of Security Plan
98-04-02	Open	SL4 - Barrier fence, equipment, drawings
98-04-03	Open	SL4 - Visitor access control

4. ACRONYMS USED

- CAA - Controlled Access Area
- IFI - Inspector Followup Item
- PSP - Physical Security Plan
- SLED - State Law Enforcement Division
- SNM - Special Nuclear Material
- VIO - Violation