

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Nuclear Plant

Docket No. 50-390
License No. NPF-90
EA 98-207

During an NRC inspection conducted on March 23-25, 1998, 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:

License Condition E of the Watts Bar Unit 1 Facility Operating License, dated February 7, 1996, requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved Physical Security Plan.

- A. Paragraph 5.5 of the Physical Security Plan (PSP), Revision 2, dated March 2, 1998, states that the metal detectors used for personnel search are walk-through type units and are capable of detecting a source located on an individual.

Contrary to the above, on March 25, 1998, two metal detectors failed on nine occasions to detect a test weapon located on an individual during a walk-through test. (01013)

- B. Paragraph 6.2A of the PSP, Revision 2, dated March 2, 1998, states that Closed Circuit Television (CCTV) cameras provide visual surveillance of the perimeter barrier, the perimeter intrusion detection system, and those portions of the isolation zones necessary to enable assessment of alarm stimuli prior to a successful penetration of the protected area.

Contrary to the above, on March 23, 1998, CCTV cameras in nine zones failed to provide adequate visual surveillance of the perimeter barrier, the perimeter intrusion detection system, and those portions of the isolation zones necessary to enable assessment of alarm stimuli which prevented the alarm station operators from adequately assessing alarms and preventing successful penetration of the protected area. Also, in one of those zones, a degraded camera prevented the alarm station operators from assessing an alarm in the event of an intrusion. (01023)

- C. Paragraph 6.3 B1 of the PSP, Revision 2, dated March 2, 1998, states that each zone of microwave equipment is designed to detect an individual weighing a minimum of 35 kilograms crawling, jumping, walking, or running between the transmitter and receiver, or in front of the transmitter.

Contrary to the above, on March 24, 1998, when penetrated, the microwave equipment failed to detect an individual weighing in excess of 35 kilograms jumping between the transmitter and receiver, or in front of the transmitter. Specifically, the microwave equipment failed to generate an alarm six times in five locations. (01033)

These violations represent a Severity Level III problem (Supplement VI).

Enclosure 1

9807070252 980618
PDR ADOCK 05000390
G PDR

Pursuant to the provisions of 10 CFR 2.201, TVA (Licensee) 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 or severity level, (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 previously 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.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

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 18th day of June 1998

SUMMARY OF LICENSEE'S POSITION ON THE VIOLATIONS
AND BASES FOR NRC CONCLUSIONS

A. METAL DETECTORS

LICENSEE'S POSITION: At the predecisional enforcement conference, TVA stated that all metal detectors met TVA weekly testing procedural requirements for operability, and TVA's testing methodology was consistent with previously issued NRC guidance. TVA referenced NRC Review Guideline #3, dated February 16, 1978, which described an operational test for metal detectors acceptable to the NRC. TVA also stated that the metal detectors in question successfully passed the weekly operational test conducted on March 23, 1998, just prior to the NRC's inspection. In addition, TVA stated that the "kick through" method used by the NRC inspectors during the testing was previously identified by TVA as a practice to be prevented when passing through the metal detectors, and that TVA resolved this issue by training the security guards to specifically observe and then prevent this method. Based on this, TVA stated that no violation of regulatory requirements occurred.

BASIS FOR NRC CONCLUSION:

The Watts Bar PSP states that metal detectors used for personnel search are capable of detecting a source "located on an individual." Notwithstanding the NRC Review Guideline #3 you referenced in the predecisional enforcement conference, your facility was specifically licensed to the requirements contained in your PSP. In this case, the requirements for metal detector capability are clear, and your equipment failed to satisfy these requirements. The test weapon location and walk through methodology used are inconsequential in this case because the metal detectors were tested to the PSP design requirements. Furthermore, credit could not be given for guard intervention for the "kick through" method because the guards were not in a proper location to observe individuals entering the metal detectors. TVA acknowledged that guard training to specifically observe and prevent the "kick through" method did not appear to be effective. Based on the above, the NRC has concluded that a violation of regulatory requirements occurred.

B. CLOSED CIRCUIT TELEVISION ASSESSMENT SYSTEM

LICENSEE POSITION: TVA stated at the predecisional enforcement conference that the CCTV assessment system satisfied regulatory requirements. This conclusion was based on TVA's position that the overall security plan recognizes the acceptability to augment CCTV cameras with security officer response, as supported by Paragraph 4.1L of the PSP, which states that the central alarm station will assess the alarm by CCTV or dispatch a security officer to investigate the area. The licensee also stated that pan/tilt/zoom (PTZ) cameras could be used to augment CCTV cameras. Supplemental information provided by TVA after the conference referenced NRC Inspection Report 50-259, 260, 296/96-07, which documented a security inspection conducted at TVA's Browns Ferry

Nuclear Plant. TVA contended that this inspection report information gave credit for the use of PTZ cameras to augment CCTVs. In Inspection Report 50-259, 260, 296/96-07, TVA inferred that the NRC identified a CCTV camera problem similar to problems identified at Watts Bar, but dispositioned the issue differently.

BASIS FOR NRC CONCLUSION:

The NRC agrees that security officer response is an important feature of the overall PSP and is supported by Paragraph 4.1L of the PSP. However, the PSP specifically requires that CCTV cameras provide visual surveillance to enable assessment of alarm stimuli prior to a successful penetration of the protected area. The NRC inspection determined that the CCTV cameras were unable to satisfy this PSP requirement. The supplemental information TVA provided after the enforcement conference stated that the NRC had previously given credit for the use of PTZ cameras. The NRC agrees that PTZ cameras can be used to assist in the assessment of alarm stimuli; however, the requirement is clear that CCTV cameras alone are required by the PSP to perform this visual surveillance. Based on the above, the NRC has concluded that a violation of regulatory requirements occurred.

In addition, Inspection Report 50-259, 260, 296/96-07, which documented an NRC inspection conducted at the Browns Ferry facility, identified an isolated CCTV camera problem. This issue was dispositioned as an isolated issue of minor significance, and was not reflective of overall CCTV performance problems at the Browns Ferry facility. This is very dissimilar to the Watts Bar issue in which multiple deficiencies were identified.

C. MICROWAVE DETECTION EQUIPMENT

LICENSEE'S POSITION: TVA contended at the predecisional conference that the microwave detection equipment satisfied security plan requirements, in that the multiple zone fields which were penetrated during the inspection were done so only after NRC contractors consciously identified the zone fields, thereby gaining a knowledge of the microwave field limits. With this knowledge, the licensee contended that NRC contractors were then able to defeat the microwave field zones. TVA contended that supplemental information provided after the predecisional enforcement conference by TVA regarding security logs, and affidavits from TVA personnel observing the NRC testing, supported their claim that the microwave zones were penetrated only after the NRC team gained a knowledge of the microwave field limits. TVA contended that an unauthorized individual who represented a threat could not have predictably circumvented the system and defeated a specific zone with a high degree of confidence without insider knowledge.

BASIS FOR NRC CONCLUSION:

The microwave equipment testing performed at the Watts Bar facility was consistent with testing performed at other facilities and at Watts Bar

during pre-licensing testing of this system. The NRC agrees that in some zones, alarms were generated prior to the conduct of microwave equipment testing. However, this fact is irrelevant in the determination of whether the microwave equipment satisfied regulatory requirements. Based on the above, the NRC has concluded that a violation of regulatory requirements occurred.

LIST OF ATTENDEES

Nuclear Regulatory Commission:

J. Johnson, Deputy Regional Administrator
J. Jaudon, Director, Division of Reactor Safety (DRS)
B. Mallett, Deputy Director, DRS
A. Boland, Director, Enforcement and Investigations Coordination Staff (EICS)
S. Sparks, Senior Enforcement Specialist, EICS
G. Belisle, Chief, Special Inspection Branch, DRS
H. Christensen, Chief, Branch 6, Division of Reactor Projects
P. VanDoorn, Senior Resident Inspector, Watts Bar
L. Stratton, Security Inspector, DRS
C. Evans, Regional Counsel
D. Thompson, Security Inspector, DRS
D. Orrik, Office of Nuclear Reactor Regulation

Tennessee Valley Authority:

J. Scalice, Chief Nuclear Officer
R. Purcell, Site Vice President
C. Kelley, Site Security Manager (Acting)
N. Nelson, Business and Work Performance Manager
P. Pace, Site Licensing Manager
J. Maddox, Engineering and Materials Manager
R. Beecken, Maintenance and Modifications Manager
E. Vigluicci, TVA Office of the General Counsel
L. Turney, Jr., Security Equipment and Maintenance Coordinator
R. Steele, Contract Security Manager



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

MAY 26 1998

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

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - FOLLOWUP INFORMATION
REGARDING THE TVA/NRC MEETING ON MAY 11, 1998

During the TVA/NRC meeting at the Region II offices on May 11, 1998, TVA presented information regarding the issues identified during a recent Regional Assist Inspection. As stated in the meeting, TVA does not consider that the results of the inspection constitute a non-compliance with the WBN Security Plan. The purpose of this letter is to provide the following information which supports TVA statements in the enforcement conference:

1. Log of Central Alarm Station/Secondary Alarm Station (CAS/SAS) for March 24, 1998, from 0600-0955 showing log entries for PIDS zone testing. The time clock used is the same as that used by the alarm system.
2. Printout of test alarms for Perimeter Intrusion Detection System (PIDS) showing several alarms on zones of interest prior to the log entry [see item 1, above] for the test.

Enclosure 4

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MAY 26 1998

3. Affidavits of a TVA manager who observed some testing, two security personnel who were assisting the test team, and a QA assessor who monitored the testing from the CAS, which discuss testing methods that first identified zone boundaries prior to testing the zones.

Regarding an NRC comment in the meeting that credit is never given for the use of Pan-Tilt-Zoom cameras, please consider a previous reference to their use in a Regional Assist Inspection documented in Browns Ferry Inspection Report 50-259, 260, 296/96-07 dated July 19, 1996, page 2, paragraph 2.2. The disposition in that same report of a camera problem similar to the issue that is part of the Watts Bar Escalated Enforcement Item (EEI) as an Inspector Followup Item should have some bearing on the disposition of the WBN issue.

Should there be any questions on this information, please contact me at (423) 365-1824.

Sincerely,



P. L. Pace
Licensing and Industry Affairs Manager

Enclosure

cc (Enclosure):

NRC Resident Inspector
Watts Bar Nuclear Plant
1260 Nuclear Plant Road
Spring City, Tennessee 37381

Mr. Robert E. Martin, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

U.S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

**SITE SECURITY
SHIFT ACTIVITY LOG**

CAS/SAS - 24 HOURS

DATE/TIME - FROM: 3-24-98 10600 HRS.

TO: 3-25-98 10600 HRS.

CAS SAS:

POSTS: DAY SHIFT

NIGHT SHIFT

1 - Hale
1A - Hambly
2 - Smith
2A - N/A

1 - MOORE
1A - WETT
2 - BOYD
2A - N/A

DAY SHIFT SUPERVISOR :

Marcus J. Sullivan

NIGHT SHIFT SUPERVISOR:

Colin Bunnell

NOTE: EACH INDIVIDUAL MUST SIGN

1. SECURITY RADIO CHECKS COMPLETED:

DAY SHIFT: 0605 NIGHT SHIFT: 2000

2. RADIO AND TELEPHONE CHECKS COMPLETED WITH LLEA:

NIGHT SHIFT (ONLY): 2001

POST PATROLS:

PRINT LAST NAME AND TIME ON EACH CHECK

DAY SHIFT:		M. Anderson	M. Anderson	Casey
5A -	(1)	<u>0853</u>	(2) <u>1209</u>	(3) <u>1605</u>
		Manning	Manning	Strader
5B -	(1)	<u>0831</u>	(2) <u>1149</u>	(3) <u>1550</u>
		Casey	Casey	M. Anderson
6A -	(1)	<u>0928</u>	(2) <u>1138</u>	(3) <u>1615</u>
		Strader	Strader	Manning
6B -	(1)	<u>0900</u>	(2) <u>1202</u>	(3) <u>1606</u>

SHIFT TURNOVER OF SECURITY KEYS FOR POST 5 ACCOUNTED FOR Yes No

NIGHT SHIFT:		WILKEY	WILKEY	GREEN
5A -	(1)	<u>2030</u>	(2) <u>2351</u>	(3) <u>0507</u>
		GARRISON	GARRISON	RALPH
5B -	(1)	<u>2134</u>	(2) <u>2355</u>	(3) <u>0507</u>
		Green	GREEN	WILKEY
6A -	(1)	<u>2147</u>	(2) <u>2351</u>	(3) <u>0449</u>
		D Ralph	RALPH	GARRISON
6B -	(1)	<u>2147</u>	(2) <u>2351</u>	(3) <u>0506</u>

SHIFT TURNOVER OF SECURITY KEYS FOR POST 5 ACCOUNTED FOR Yes No

CASISAS - 24 HOURS

ENTRY #	TIME	EVENT / RESPONSE - FINDINGS / ACTION TAKEN
4	0600	Officer Hale assumed post and duties. CAS keys present seal # 01574. ^{wait}
5	0628	WP 7 & 8 online due to shift change. ^{wait}
6	0629	WP 7 offline. ^{wait}
7	0642	Post 15 & 9C off fog patrol. ^{wait}
8	0730	WP 8 offline. ^{wait}
9	0737	Post 5B report Key box SM office secure. ^{wait}
10	0800	104 Turney with NRC team to start PIDS test at Z 27. ^{wait}
11	0820	9C Bucher posted near DGB for response to Z 7, 8, 11, 12 due to camera test by NRC. ^{wait}
12	0825	Z-31 failed test by NRC posted 15A cctv CAS. ^{wait}
13	0828	Z-32 failed test by NRC posted 6B strader standing by. ^{wait}
14	0838	15 Cagle 10-97 Z-32 6B 10-98. ^{wait}
15	0844	Z-37 & Z-38 failed NRC test SGT Bayles comp Z-38 6B strader comp Z-37. ^{wait}
16	0854	Z-39 + Z-40 failed NRC test 6A standing by. ^{wait}
17	0855	Post 9B Grayson comp Z-32, 37, 38 cctv SAs, post 6B, 15 SGT Bayles 10-98. ^{wait}
18	0901	Post 15 Cagle posted Z-39 + 40, 6A 10-98.
19	0936	Z-3 failed NRC Test 6B strader standing by. ^{wait}
20	0940	SGT Bayles 10-97 Z-3 6B 10-98. ^{wait}
21	0955	Officer Cruver posted Z-3 SGT Bayles 10-98. ^{wait}

ISS FORM 019/2 (8/95)

03/24/98

08:01:03 AMG # 7111: Alarm added. (Z29 MW UI)
08:01:04 AMG # 7112: Alarm added. (Z29 MW LI)
08:01:37 AMG # 7113: Alarm added. (Z29 MW LI)
08:02:01 AMG # 7114: Alarm added. (Z28 EF I)
08:04:30 AMG # 7116: Alarm added. (Z25 IR I)
08:09:28 AMG # 7117: Alarm added. (Z27 IR I)
08:10:00 AMG # 7118: Alarm added. (Z42 IR I)
08:10:57 AMG # 7119: Alarm added. (Z28 EF I)
08:12:14 AMG # 7120: Alarm added. (Z42 IR I)
08:13:01 AMG # 7121: Alarm added. (PA-1 S)
08:13:33 AMG # 7122: Alarm added. (Z28 EF I)
08:14:28 AMG # 7123: Alarm added. (Z28 EF I)
08:14:43 AMG # 7124: Alarm added. (Z29 MW LI)
08:14:44 AMG # 7125: Alarm added. (Z29 MW UI)
08:15:23 AMG # 7126: Alarm added. (Z28 EF I)
08:15:34 AMG # 7127: Alarm added. (Z29 MW UI)
08:15:34 AMG # 7128: Alarm added. (Z29 MW LI)
08:17:04 AMG # 7129: Alarm added. (Z29 MW UI)
08:17:06 AMG # 7130: Alarm added. (Z29 MW LI)
08:18:14 AMG # 7133: Alarm added. (Z29 MW UI)
08:19:05 AMG # 7134: Alarm added. (Z29 MW UI)
08:19:13 AMG # 7135: Alarm added. (Z30 MW UI)
08:19:13 AMG # 7136: Alarm added. (Z29 MW LI)
08:19:14 AMG # 7137: Alarm added. (Z30 MW LI)
08:23:00 AMG # 7141: Alarm added. (Z31 MW LI)
~~08:23:00 AMG # 7142: Alarm added. (Z31 MW UI)~~
~~08:24:01 AMG # 7143: Alarm added. (Z31 MW LI)~~
~~08:24:01 AMG # 7144: Alarm added. (Z31 MW UI)~~ - 0825 Log #12, Zone 31, Failed Test
~~08:26:33 AMG # 7145: Alarm added. (Z32 MW UI)~~
~~08:26:33 AMG # 7146: Alarm added. (Z32 MW LI)~~
~~08:27:30 AMG # 7147: Alarm added. (Z32 MW LI)~~
~~08:27:30 AMG # 7148: Alarm added. (Z32 MW UI)~~ - 0828 Log #13, Zone 32, Failed Test
08:29:32 AMG # 7149: Alarm added. (Z42 IR I)
08:29:51 AMG # 7150: Alarm added. (Z33 MW UI)
08:30:01 AMG # 7151: Alarm added. (Z33 MW LI)
08:33:05 AMG # 7152: Alarm added. (Z33 MW LI)
08:33:18 AMG # 7153: Alarm added. (Z33 MW UI)
08:34:00 AMG # 7154: Alarm added. (Z35 MW LI)
08:35:29 AMG # 7156: Alarm added. (Z34 MW LI)
08:35:35 AMG # 7157: Alarm added. (Z34 MW UI)
08:36:34 AMG # 7158: Alarm added. (Z35 MW UI)
08:36:59 AMG # 7159: Alarm added. (Z35 MW UI)
08:38:42 AMG # 7160: Alarm added. (Z35 MW UI)
08:38:47 AMG # 7161: Alarm added. (Z36 MW UI)
08:38:48 AMG # 7162: Alarm added. (Z35 MW LI)
08:38:48 AMG # 7163: Alarm added. (Z36 MW LI)
08:40:44 AMG # 7167: Alarm added. (Z37 MW UI)
08:40:44 AMG # 7168: Alarm added. (Z36 MW UI)
08:40:53 AMG # 7169: Alarm added. (Z37 MW LI)
08:40:54 AMG # 7170: Alarm added. (Z36 MW LI)
08:42:55 AMG # 7171: Alarm added. (Z38 MW UI)
08:42:56 AMG # 7172: Alarm added. (Z38 MW LI)

03/24/98

08:42:56 AMG # 7173: Alarm added. (Z37 MW UI)
08:42:58 AMG # 7174: Alarm added. (Z37 MW LI)
08:43:29 AMG # 7175: Alarm added. (Z42 IR I) --- 0844 Log #15, Zone 37/38, Failed Test
08:44:35 AMG # 7176: Alarm added. (Z42 IR I)
08:46:30 AMG # 7177: Alarm added. (Z37 MW LI)
08:46:31 AMG # 7178: Alarm added. (Z37 MW UI)
08:47:51 AMG # 7179: Alarm added. (Z38 MW UI)
08:47:56 AMG # 7180: Alarm added. (Z38 MW LI)
08:49:21 AMG # 7181: Alarm added. (Z39 MW UI)
08:51:24 AMG # 7182: Alarm added. (Z39 MW UI)
08:51:25 AMG # 7183: Alarm added. (Z39 MW LI)
08:51:25 AMG # 7184: Alarm added. (Z40 MW UI)
08:51:25 AMG # 7185: Alarm added. (Z40 MW LI)
08:52:45 AMG # 7186: Alarm added. (Z40 MW UI)
08:52:46 AMG # 7187: Alarm added. (Z40 MW LI)
08:52:46 AMG # 7188: Alarm added. (Z39 MW UI)
08:52:46 AMG # 7189: Alarm added. (Z39 MW LI)
08:53:29 AMG # 7190: Alarm added. (Z42 IR I)
08:53:43 AMG # 7191: Alarm added. (Z41 MW UI)
08:53:43 AMG # 7192: Alarm added. (Z41 MW LI)
08:55:46 AMG # 7194: Alarm added. (Z42, IR I) --- 0854 Log #16, Zone 39/40, Failed Test
08:58:23 AMG # 7195: Alarm added. (Z41 MW UI)
08:58:24 AMG # 7196: Alarm added. (Z41 MW LI)
08:59:28 AMG # 7198: Alarm added. (Z40 MW UI)
08:59:28 AMG # 7199: Alarm added. (Z41 MW UI)
08:59:28 AMG # 7200: Alarm added. (Z40 MW LI)
08:59:36 AMG # 7201: Alarm added. (Z41 MW LI)
09:00:08 AMG # 7202: Alarm added. (Z40 MW UI)
09:01:02 AMG # 7204: Alarm added. (Z41 MW UI)
09:01:42 AMG # 7205: Alarm added. (Z41 MW LI)
09:04:09 AMG # 7206: Alarm added. (Z42 IR I)
09:04:39 AMG # 7207: Alarm added. (Z41 MW UI)
09:04:40 AMG # 7208: Alarm added. (Z41 MW LI)
09:19:06 AMG # 7210: Alarm added. (Z42 IR I)
09:28:57 AMG # 7219: Alarm added. (Z42 IR I)
09:31:20 AMG # 7221: Alarm added. (Z1 EF-G I)
09:33:22 AMG # 7222: Alarm added. (Z1 EF-G I)
09:33:59 AMG # 7223: Alarm added. (Z2 MW UI)
09:34:45 AMG # 7224: Alarm added. (Z2 MW UI)
09:36:11 AMG # 7225: Alarm added. (Z3 MW UI)
09:36:21 AMG # 7226: Alarm added. (Z3 MW LI) ---0936 Log #19, Zone 3, Failed Test
09:38:54 AMG # 7227: Alarm added. (Z3 MW UI)
09:38:59 AMG # 7228: Alarm added. (Z3 MW LI)
09:39:00 AMG # 7229: Alarm added. (Z4 IR LI)
09:39:00 AMG # 7230: Alarm added. (Z4 MW UI)
09:39:47 AMG # 7231: Alarm added. (Z4 MW UI)
09:41:21 AMG # 7232: Alarm added. (Z5 MW UI)
09:41:56 AMG # 7233: Alarm added. (Z5 MW UI)
09:41:56 AMG # 7234: Alarm added. (Z6 MW UI)
09:41:56 AMG # 7235: Alarm added. (Z6 MW LI)
09:41:56 AMG # 7236: Alarm added. (Z5 IR LI)
09:42:55 AMG # 7237: Alarm added. (Z42 IR I)

WATTS BAR NUCLEAR PLANT

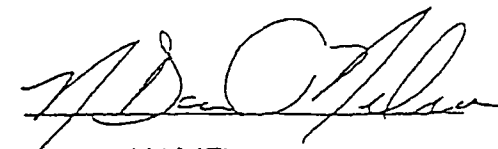
AFFIDAVIT OF N. DAVID NELSON

STATE OF TENNESSEE)
) SS
COUNTY OF RHEA)

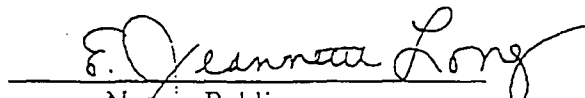
N. David Nelson, being first duly sworn, deposes and says:

1. I am currently employed by the Tennessee Valley Authority (TVA) as Business & Work Performance Manager at TVA's Watts Bar Nuclear Plant (Watts Bar), near Spring City Tennessee, a position I have held since October 2, 1994. At the time of the events herein, the Security Manager reported to me. I have read the NRC's letter to TVA dated April 15, 1998, describing the bases for TVA's Predecisional Enforcement Conference held on May 11, 1998, and attended that conference. I have personal and official knowledge of the matters stated herein.

2. While observing the NRC Regional Assist Team perform testing on Zones 31, 32, 2, and 3, I observed the team do a pre-jump test, by approaching the zone, finding where the zone alarmed by setting off the alarm and confirming such by radio with a security officer located in WBN's Central Alarm Station, and then approach the zone at that point in order to perform a jump test of Zone 31 and 32 crossover and Zone 2 and 3 crossover. These were the only zones I can recall while the tests were being conducted.


(NAME)

Sworn to and subscribed before me
this 13th day of May, 1998.


Notary Public

My commission expires: June 27, 2001
1

UNITED STATES TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT

AFFIDAVIT OF L. GLENN TURNEY JR.

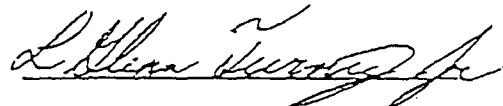
STATE OF TENNESSEE)
) SS
COUNTY OF RHEA)

L. Glenn Turney Jr., being first duly sworn, deposes and says:

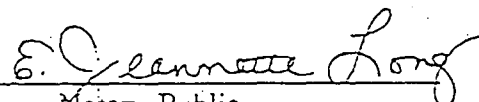
1. I am currently employed by the Tennessee Valley Authority (TVA) as Security and Equipment and Maintenance Coordinator at TVA's Watts Bar Nuclear Plant (Watts Bar), near Spring City Tennessee, a position I have held since March 2, 1998. At the time of the events herein, I was responsible for providing security support for NRC contractor testing. I have read the NRC's letter to TVA dated April 15, 1998, describing the bases for TVA's Predecisional Enforcement Conference held on May 11, 1998. I have personal and official knowledge of the matters stated herein.

2. During the Regional Assist Inspection conducted March 23 through March 25, 1998, at Watts Bar Nuclear Plant, I was present with and witnessed the NRC team in the exterior Perimeter Isolation Zone during all CCTV assessment testing and Perimeter Intrusion Detection System testing. I was also present with and witnessed the NRC team in the West Access Control Portal during their testing of the metal detectors and x-ray machines.

During the conduct of the Perimeter Intrusion Detection System testing, I observed that the NRC team, in each zone tested, initially performed a "walk up" test with which they determined where the microwave's zone of detection began by setting off an alarm in order to set up their jump test attempt. The NRC team did so by physically moving into the zone of detection, verifying that the intrusion into the zone was detected by radio link to a security officer monitoring the alarms in WBN's Central Alarm Station, and then using that information to establish a jumping point from which they initiated their jumps. To the best of my recollection, the NRC team used this detection and jumping technique in each jump test performed as part of their inspection activities.


(NAME)

Sworn to and subscribed before me
this 13th day of May, 1998.


Notary Public

My commission expires: June 27, 2001

CC0029982

UNITED STATES TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT

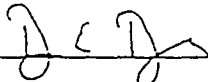
AFFIDAVIT OF ROGER E. REYNOLDS

STATE OF TENNESSEE)
) SS
COUNTY OF RHEA)

Roger E. Reynolds, being first duly sworn, deposes and says:

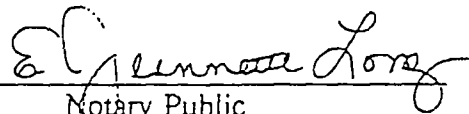
1. I am currently employed by the Tennessee Valley Authority (TVA) as Security Shift Coordinator TVA's Watts Bar Nuclear Plant (Watts Bar), near Spring City Tennessee, a position I have held since March 2, 1998. At the time of the events herein, I was responsible for observing the testing of Microwave Zones 1 through 4. I have read the NRC's letter to TVA dated April 15, 1998, describing the bases for TVA's Predecisional Enforcement Conference held on May 11, 1998. I have personal and official knowledge of the matters stated herein.

2. While observing the NRC Regional Assist Team perform testing on Zones 1 through 4, I observed the team do a pre-jump test by approaching the zone, finding where the zone alarmed, then approach to that point and perform a jump test of the Zone 2 and 3 crossover point. These were the only zones I witnessed while the tests were being conducted.



(NAME)

Sworn to and subscribed before me
this 13th day of May, 1998.



Notary Public

My commission expires: June 27, 2001
000029982

UNITED STATES TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT

AFFIDAVIT OF C. RICKY CREWS

STATE OF TENNESSEE)
) SS
COUNTY OF RHEA)

C. Ricky Crews, being first duly sworn, deposes and says:

1. I am currently employed by the Tennessee Valley Authority (TVA) as a Nuclear Assurance Assessor at TVA's Watts Bar Nuclear Plant (Watts Bar), near Spring City Tennessee, a position I have held since 1991. At the time of the events herein, I was responsible for observing the Regional Assist Team. I have read the NRC's letter to TVA dated April 15, 1998, describing the bases for TVA's Predecisional Enforcement Conference held on May 11, 1998. I have personal and official knowledge of the matters stated herein.

2. On March 23rd at night time, I observed two members of the Regional Assist Team performing camera assessments within the isolation zone. At that time while in the Central Alarm Station (CAS), I observed the team's approach to various zones. The appropriate PTZ camera had already been called up and was aimed at the team while approaching the zones and overlap areas. Confirmation was given to Turney (who was with the team) when an alarm was received. The team started testing from the intake toward the west access portal. Glenn Turney (Security) was with the team. Several attempts were made at the same zones after they had acknowledgment of an alarm.

On March 24th morning, the team started back at the intake and started performing microwave tests toward the west access portal and up to at least Zone 3. Observing from CAS, again the appropriate PTZ camera was already aimed at the team

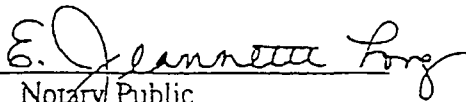
as they approached each zone and overlap areas. Several attempts were made at the same zones after they had acknowledgment of an alarm. Confirmation was given to Turney (who was with the team) when an alarm was received.



(NAME)

Sworn to and subscribed before me

this 3~~rd~~ day of May, 1998.



Notary Public

My commission expires: June 27, 2001
000029982