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JUN 19 1997

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

Gentlemen:

In the Matter of )  
Tennessee Valley Authority ) Docket No. 50-390  
50-391

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 50-390/97-03 AND 50-391/97-03

The purpose of this letter is to provide a reply to a Notice of Violation (NOV) 50-390; 391/97-03. Violation 97-03-01 concerns the failure to position a security officer to adequately observe Protective Area turnstiles. TVA's reply to this NOV is provided in Enclosure 1 of this letter.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,

  
J. A. Scalice

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Enclosure  
cc: See page 2

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cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
REPLY TO NOTICE OF VIOLATION (NOV)  
NOV 50-390; 391/97-03-01

DESCRIPTION OF VIOLATION 50-390; 391/97-03-01

"The licensee's Physical Security Plan, Revision 0, dated November 5, 1996, paragraph 4.1(d), states that "normal personnel access to the PA is through a locked door, turnstile, or gate controlled by a MSF [Member of the Security Force] from a bullet-resisting (BR) structure. The individual in the BR structure monitors the access area to the PA and has the ability to override the turnstile to prevent their use."

Administrative Order 2.2, Personnel/Vehicle Access, Revision 5, dated February 28, 1997, paragraph 2.1(D) requires that "The ACP [Access Control Person] MSF is responsible for final access to the PA through the ACP and PA sally port gates and locking down the turnstile when required."

Contrary to the above, on April 23, 1997, another individual other than the person authorized access using their key card and hand geometry gained unauthorized access to the protected area because the final access control officer was not in a position to observe the turnstiles and was assigned duties that detracted from the primary duties of observing personnel accessing into the protected area.

TVA RESPONSE

TVA agrees that the violation occurred.

REASON FOR VIOLATION

This violation occurred during the course of a drill conducted by NRC. The Access Control Officer (ACO) failed to detect that an individual had gained unauthorized access into the PA. Contributing factors to this failure were that the location of the ACO in relation to the turnstiles precluded the officer from having a clear line of sight to all of the turnstiles, and the fact that the ACO had other duties (i.e., visitor processing, open/closing the PA and nuisance gates, raising and lowering the vehicle barrier, answering "helicopter" phone and directing vehicles to approach the PA for search and entry), which detracts from the primary duty of observing personnel accessing the PA.

In addition, Security management failed to recognize the importance of the access control problems (i.e., observe activities occurring at the turnstiles) in NRC's letter to TVA dated February 20, 1997. Security management considered NRC to be addressing previous access control problems that had occurred at WBN and concluded that the issue had been resolved.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Security reviewed the layout and operation of the access portal and initiated corrective actions which included:

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
REPLY TO NOTICE OF VIOLATION (NOV)  
NOV 50-390; 391/97-03-01

1. During scheduled shift change, an additional officer is posted in a position where one of the officers can constantly observe the approach to the turnstiles and have the capability to immediately lock down the turnstiles if any problems are encountered.
2. During times other than shift changes, the number of available turnstiles for entry to the protected area (PA) was reduced. If the Access Control Officer cannot constantly observe individuals entering the PA, the turnstiles are locked down until full attention can be returned to the turnstiles.
3. A line was placed on the floor to control the entry process to allow a single individual at a time at a specific turnstile. An additional officer was placed near the turnstiles for approximately two weeks to introduce and instruct plant personnel on the new entry process.
4. Field Note 97-013 was issued to define and emphasize the responsibilities of the Access Control Officer. The involved security officers were trained to the Field Note.
5. Security Management has been counseled on the necessity for carefully reviewing any security correspondence.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

A revision of Administrative Order 2.2 will be issued to clarify that all PA turnstiles may only be open when an additional officer is posted and to identify the reduced PA access points during non-shift change periods. The revision will also emphasize the importance of continuous observation of PA access and the necessity of locking the turnstiles when not under continuous observation.

DATE WHEN IN FULL COMPLIANCE WILL BE ACHIEVED

The revision to the security administrative order and training on the procedure will be completed by August 15, 1997.