

JAN 3 1 1994

Docket Nos. 50-269, 50-270, 50-287,
50-369, 50-370, 50-413,
AND 50-414

License Nos. DPR-38, DPR-47, DPR-55
NPF-9, NPF-17, NPF-35,
AND NPF-52

EA 93-311

Duke Power Company
ATTN: Mike Tuckman, Vice President
Nuclear Production Department
P. O. Box 1007
Charlotte, NC 28291

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY
(NRC INSPECTION REPORT NOS. 50-269, 270 AND 287/93-32, 50-369 AND
370/93-31, AND 50-413 AND 414/93-35)

This letter refers to the Enforcement Conference held at our request on January 13, 1994. This meeting concerned activities authorized for your Oconee, McGuire, and Catawba facilities. Your presentation was beneficial in clarifying the reasons for the problems in your Safeguards Information Program and giving us an understanding of your commitments for corrective actions to preclude recurrence, and your evaluations of the level of compromise and mitigating factors dealing with the failures to protect Safeguards Information. A list of attendees, conference summary and a copy of your handout are enclosed. We are continuing our review of these issues to determine the appropriate enforcement action.

Clarifications and corrections to Inspection Report Nos. 50-296, 270, and 287/93-32, 50-369 and 370/93-31, and 50-413 and 414/93-35 are identified in Enclosure 2. Our records have been changed to reflect the clarifications and corrections.

In accordance with Section 2.790 of the NRC's "Rule of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

1511

9402090090 940131
PDR ADOCK 05000269
Q PDR

J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

Enclosures: (See page 2)

JE04 1/1

Duke Power Company

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Enclosures:

1. List of Attendees
2. Conference Summary
3. Handout

cc w/encs:

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Vice President
Oconee Site
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Duke Power Company
ATTN: Mr. T. C. McMeekin
Vice President
McGuire Site
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Duke Power Company
ATTN: Mr. D. L. Rehn
Site Vice President
Catawba Site
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(cc w/encs cont'd - See page 3)

Duke Power Company

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(cc w/encls cont'd)

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County Supervisor of

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Walhalla, SC 29621

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Dayne H. Brown, Director

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Health & Natural Resources

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Raleigh, NC 27611-7687

(cc w/encls cont'd - See page 4)

Duke Power Company

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(cc w/encls cont'd)
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720 East Fourth Street
Charlotte, NC 28202

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Nuclear Technical Services Manager
Carolinas District
Westinghouse Electric Corporation
2709 Water Ridge Parkway, Ste. 430
Charlotte, NC 28217

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Cooperative, Inc.
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County Manager of York County
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York, SC 29745

Piedmont Municipal Power Agency
121 Village Drive
Greer, SC 29651

bcc w/encls: (See page 5)

Duke Power Company

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bcc w/encls:
NRR/DRIS/SB

L. A. Wiens, NRR
V. Nerses, NRR
R. E. Martin, NRR
W. Miller, RII
M. S. Lesser, RII
R. Watkins, RII
A. R. Herdt, RII
Document Control Desk (RIDS IE04), 016

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NRC Resident Inspector
U.S. Nuclear Regulatory Commission
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York, SC 29745

J. Lieberman, OE

RII:DRSS
MASNYK:JC
01/21/94

RII:EICS
URYC
01/13/94

RII:DRSS
MCGUIRE
01/21/94

RII:ORA
EVANS
01/31/94

RII:DRSS
COLLINS
01/24/94

RII:DRP
LESSER
01/24/94

RII:DRSS
MALLETT
01/24/94

ENCLOSURE 1

LIST OF ATTENDEES

U. S. NUCLEAR REGULATORY COMMISSION

Region II

C. Evans, Regional Counsel
B. Mallett, Deputy Director, Division of Radiation Safety and Safeguards
O. Masnyk, Safeguards Specialist
L. Reyes, Deputy Regional Administrator
B. Uryc, Acting Director, Enforcement and Investigation Coordination Staff
R. Watkins, Project Engineer
L. Watson, Enforcement Specialist

Office of Enforcement

R. Rosano, Enforcement Specialist

Office of Nuclear Reactor Regulation

N. Ervin, Reactor Security Specialist
L. Wiens, Project Manager, Project Directorate II-3

DUKE POWER COMPANY

Corporate

P. Coliainni, Licensing Engineer
S. Coop, Licensing Manager
R. Eller, Security Specialist
M. Tuckman, Senior Vice President, Nuclear Generation

Oconee

S. Benesole, Compliance Manager
J. Bryan, Security Engineer
B. Dolan, Safety Assurance Manager
J. Hampton, Vice President
T. McQuarrie, Security Manager

McGuire

T. Godfrey, Security Support Supervisor

Catawba

ENCLOSURE 2

ENFORCEMENT CONFERENCE SUMMARY

An Enforcement Conference was held on January 13, 1994, at the Region II Office to discuss the failures to protect Safeguards Information at the Oconee, McGuire, Catawba, and Duke General Office facilities.

The Deputy Regional Administrator expressed concern with the licensee's failures to protect Safeguards Information and invited the licensee to share their understanding and assessment of the incidents. The Acting Director of the Enforcement and Investigation Coordination Staff explained the enforcement process and those portions of the policy pertinent to this conference. The Deputy Director for the Division of Radiation Safety and Safeguards recapped the NRC's understanding of the apparent violations and the regulatory requirements.

Licensee officials provided a briefing outlining their understanding of the events, the root causes for the violations, proposed and implemented corrective measures, and their evaluation of the extent of compromise of Safeguards Information. This briefing is contained in Enclosure 3 to this Summary. The licensee also offered the following clarifications, corrections, and comments on Inspection Report 50-269, 270, and 287/93-32, 50-369 and 370/93-31, and 50-413 and 414/93-35 as follows:

The last paragraph on page 3 of the report discusses the fact that Catawba drawings were loaded to the Computer Assisted Drafting System (CADS) Network but were not available at the time of the inspection. The licensee emphasized that these drawings were never available to Network users. The licensee further clarified the first paragraph on page 4, in that Safeguards Information is no longer stored at the Wilkinson Boulevard Storage facility. The fourth paragraph on that same page states that significant Safeguards Information for the McGuire facility was compromised. The licensee stated that they felt this was mitigated by the fact that the information dealt with an area that was manned by Security personnel twenty-four hours a day, therefore, the information compromised could not be used to defeat the security systems involved. The third paragraph on page 5 states "Also, the licensee is not sure of the numbers, if any, of floppy disks that were given out that contained Safeguards Information." The licensee wished to go on record stating that there was no reason to suspect a problem in this area. An apparent violation was discussed in the second paragraph on page 9. This was attributed to the Oconee facility, in fact it occurred at the McGuire facility.

The licensee was advised that their comments would be noted in this Summary. They were told that the apparent violations would be subject to review and that they would be advised of the outcome of the NRC's deliberations by separate correspondence.

ENCLOSURE 3

DUKE POWER COMPANY

ENFORCEMENT CONFERENCE

SECURITY

JANUARY 13, 1994

DUKE POWER COMPANY
ENFORCEMENT CONFERENCE
ATTENDEES

CORPORATE

MIKE TUCKMAN

SR VICE PRESIDENT
NUCLEAR GENERATION

SKIP COPP

LICENSING MANAGER

RON ELLER

SECURITY SPECIALIST

PAUL COLAIANNI

LICENSING ENGINEER

OCONEE

JIM HAMPTON

VICE PRESIDENT
OCONEE

TOM MCQUARRIE

SECURITY MANAGER

BRYAN DOLAN

SAFETY ASSURANCE MANAGER

STEVE BENESOLE

COMPLIANCE MANAGER

JAY BRYAN

SECURITY ENGINEER

MCGUIRE

TERRY GODGREY

SECURITY SUPPORT SUPERVISOR

CATAWBA

JIM ROACH

SECURITY MANAGER

DUKE POWER COMPANY
ENFORCEMENT CONFERENCE
JANUARY 13, 1994

AGENDA

INTRODUCTION	JIM HAMPTON
OVERVIEW OF SI PROGRAM	SKIP COPP
CAD EVENT	SKIP COPP
ONS UNSECURED SI CONTAINER	TOM MCQUARRIE
MISC EVENTS	SKIP COPP
SUMMARY	SKIP COPP
CLOSING REMARKS	MIKE TUCKMAN

SI PROGRAM OVERVIEW

THE SAFEGUARDS INFORMATION (SI) PROGRAM ESTABLISHES ADMINISTRATIVE CONTROLS FOR THE PROTECTION OF SI AGAINST UNAUTHORIZED DISCLOSURE AS SET FORTH IN 10CFR73.21

THE PROGRAM IS GOVERNED BY NUCLEAR POLICY MANUAL, NUCLEAR SYSTEM DIRECTIVE 206 "SAFEGUARDS AND INFORMATION CONTROL" (NSD 206)

AN INFORMATION HANDBOOK ENTITLED "PROTECTION OF SAFEGUARDS INFORMATION" IS PROVIDED TO ALL SI USERS DURING INITIAL AND BI-ANNUAL REFRESHER TRAINING.

TOPICS COVERED

DEFINITION OF SAFEGUARDS INFORMATION

**RESPONSIBILITIES OF SITE SAFEGUARDS ADMINISTRATORS
AND SITE DOCUMENT CONTROLLERS**

SAFEGUARDS ACCESS PREREQUISITES

CLASSIFICATION AND MARKING

DOCUMENT STORAGE

ESTABLISHING A CONTROLLED ACCESS AREA

TRANSFER OF SAFEGUARDS INFORMATION

ELECTRONIC DATA PROCESSING

REPRODUCTION OR DESTRUCTION

LOSS OR COMPROMISE

EMPLOYEES' RESPONSIBILITIES

CAD SYSTEM EVENT

DESCRIPTION

DRAWINGS WITH SI WERE ARCHIVED (COPIED) TO NON-SI TAPES.

**THIS APPARENTLY OCCURRED STARTING IN 1978 AND WAS NOT
DISCOVERED UNTIL 1993 WHEN A NON-SI TAPE WAS LOADED TO THE
NETWORK FILE MANAGER AND AN SI DRAWING WAS ACCESSED WITH
THIS SYSTEM.**

ROOT CAUSE

**INADEQUATE WORKPLACE PROCEDURES FOR HANDLING DRAWINGS
CONTAINING SI INFORMATION.**

CAD SYSTEM EVENT

BACKGROUND

THE COMPUTER AIDED DRAFTING (CAD) SECTION:

LOCATED IN THE DUKE POWER COMPANY GENERAL OFFICE

PROVIDED AUTOMATED DRAFTING SERVICES FROM 1975 THROUGH 1991

WORKED WITH NUCLEAR PLANT SECURITY DRAWINGS FROM 1976 TO 1991

DIGITIZED EXISTING HAND DRAWN PLANT DRAWINGS

SAVED THE DIGITIZED DRAWING FILES ON 9-TRACK TAPES FOR ARCHIVING

RETRIEVED AND REVISED ARCHIVED DRAWINGS TO INCORPORATE PLANT CHANGES

ARCHIVED ELECTRONIC DRAWING FILES ON 9-TRACK TAPES

ARCHIVED SAFEGUARDS INFORMATION FILES ON SECURITY 9-TRACK TAPES

STORED SECURITY 9-TRACK TAPES IN APPROVED SAFEGUARDS INFORMATION CONTAINERS

CAD SYSTEM EVENT

THE CAD SECTION WORK FLOW PATH:

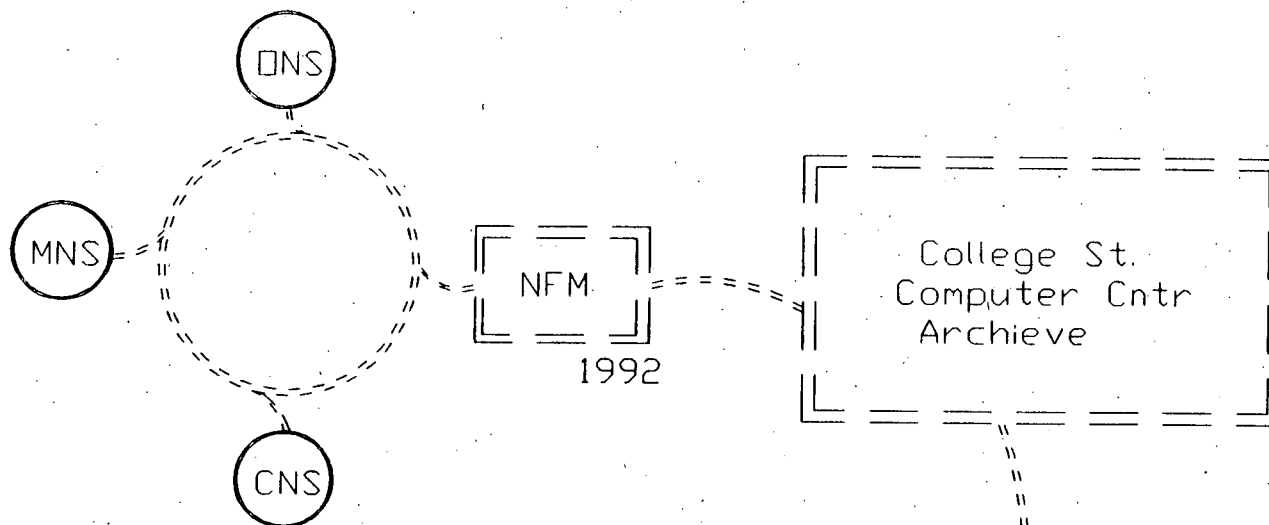
- A) DRAWING BROUGHT TO CAD AREA.
- B) THE JOB FORM WAS COMPLETED WHICH INCLUDED:
 - JOB PRIORITY
 - ARCHIVE TAPE NUMBER (IF DRAWING FILE ALREADY EXISTED)
 - SECURITY WRITTEN IN COMMENTS BLOCK
- C) JOB ASSIGNED TO GRAPHICS OPERATOR.
- D) GRAPHICS OPERATOR CREATED THE DIGITIZED DRAWING, OR COPIED EXISTING DRAWING FILE FROM ARCHIVE TAPE AND MADE CHANGES.

1975-1984

- E) GRAPHICS OPERATOR PLOTTED DRAWING AND ARCHIVED NEW DRAWING FILE.
- F) DRAWING WITH JOB TICKET GIVEN TO CAD CHECKER.
- G) AFTER FINAL CHECK, DRAWING WAS PICKED UP.

AFTER 1984

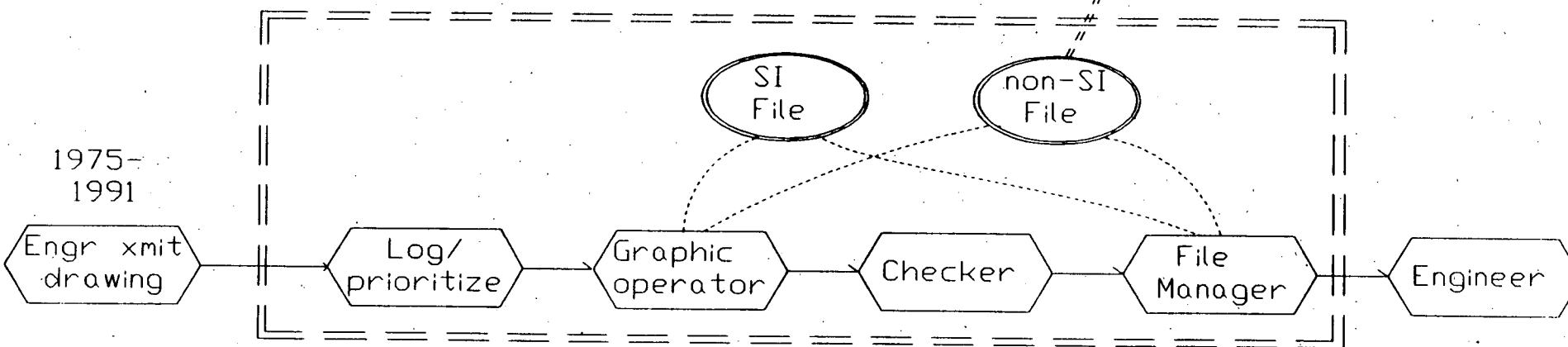
- E) GRAPHICS OPERATOR PLOTTED THE DRAWING.
- F) DRAWING WITH JOB TICKET GIVEN TO CAD CHECKER.
- G) AFTER FINAL CHECK, DRAWING WAS PICKED UP.
- H) CAD CHECKER INFORMED THE CAD FILE MANAGER OF WHICH FILES TO ARCHIVE AND THE CAD FILE MANAGER COPIED THE DRAWING FILES TO ARCHIVE TAPES.



1989

CAD Area

1975-
1991



CAD SYSTEM EVENT

REASON FOR OCCURRENCE

CAD JOB PRIORITY

UNTIL 1979 THERE WERE ONLY JOB PRIORITY CODES 1-RUSH, 2-NORMAL, AND 3-NO RUSH.

JOB PRIORITY 4-SECURITY WAS ADDED IN 1979.

THE LACK OF A RUSH JOB PRIORITY FOR SECURITY JOBS LED TO NUMEROUS INSTANCES OF SECURITY JOBS BEING PROCESSED UNDER JOB PRIORITY 1-RUSH, AND LOSING THIS BARRIER IN CONTROLLING SAFEGUARDS INFORMATION FILES.

INADEQUATE WORKPLACE PROCEDURE

ARCHIVING SUBSEQUENT REVISIONS OF A DRAWING FILE TO THE SAME ARCHIVE TAPE WAS PART OF CAD WORKPLACE PROCEDURES. THIS WAS CARRIED OUT WITHOUT REGARD TO THE JOB PRIORITY CODE.

STARTING IN 1984, A FULL TIME CAD FILE MANAGER WAS ASSIGNED TO RETRIEVE AND ARCHIVE ALL DRAWING FILES. THE PROCESS OF TELLING THE CAD FILE MANAGER WHICH FILES TO ARCHIVE WAS NOT CONTROLLED BY WORKPLACE PROCEDURE, CHANGED OVER TIME, AND DID NOT ALWAYS INDICATE WHICH FILES WERE TO BE TREATED AS SAFEGUARDS INFORMATION.

CAD SYSTEM EVENT

IMMEDIATE CORRECTIVE ACTION

ALL UNCONTROLLED SAFEGUARDS INFORMATION ELECTRONIC FILES WERE EITHER DESTROYED OR SECURED.

SECURITY FORCE PERSONNEL AT ALL SITES WERE INFORMED AND INSTRUCTED TO MAINTAIN AN ENHANCED AWARENESS OF THE SPECIFIC SYSTEMS INVOLVED.

LONG TERM CORRECTIVE ACTION

SELF ASSESSMENT CONDUCTED TO THOROUGHLY REVIEW:

WORK PROCESSES OF ALL DUKE POWER COMPANY GROUPS WORKING WITH ELECTRONIC SAFEGUARDS INFORMATION FILES TO ENSURE APPROPRIATE HANDLING THROUGHOUT ALL WORK PROCESSES.

ALL ASPECTS OF THE SAFEGUARDS INFORMATION PROGRAM AT DUKE POWER COMPANY WITH EMPHASIS ON THE EXPECTATIONS AND GUIDANCE PROVIDED TO INDIVIDUALS ADMINISTERING THE PROGRAM.

THE REPORT OF THIS SELF ASSESSMENT INCLUDES OVER 40 OBSERVATIONS AND RECOMMENDATIONS. EACH OF THESE WILL BE EVALUATED AND APPROPRIATE ACTION TAKEN ON EACH ONE.

CAD SYSTEM EVENT

SIGNIFICANCE

TOTAL OF 96 DRAWINGS (237 FILES) WERE FOUND UNCONTROLLED.

EVALUATIONS OF THE UNCONTROLLED McGUIRE SAFEGUARDS INFORMATION DRAWINGS DETERMINED THEIR COMPROMISE DID NOT POSE A SIGNIFICANT THREAT TO PLANT SECURITY.

EVALUATION OF THE UNCONTROLLED CATAWBA SAFEGUARDS INFORMATION DRAWINGS DETERMINED SOME DRAWINGS CONTAINED SIGNIFICANT SAFEGUARDS INFORMATION. FOUR DRAWINGS TOGETHER WOULD ALLOW DETERMINATION OF THE RANDOMIZED WIRING COLOR CODES FOR THE UNITS AND THE ALARM TAMPER OPERATION SCHEME (OPEN OR CLOSE ON ALARM TAMPER). A SAFEGUARD EVENT REPORT WAS COMPLETED AND THE NRC WAS NOTIFIED VIA THE EMERGENCY NOTIFICATION SYSTEM.

EVALUATION OF THE UNCONTROLLED OCONEE SAFEGUARDS INFORMATION DRAWINGS DETERMINED SOME DRAWINGS CONTAINED SIGNIFICANT SAFEGUARDS INFORMATION. THREE DRAWINGS COULD ASSIST IN THE UNDERSTANDING OF THE WIRING OF 2 VITAL AREA DOORS. A SAFEGUARD EVENT REPORT WAS COMPLETED AND THE NRC WAS NOTIFIED VIA THE EMERGENCY NOTIFICATION SYSTEM.

CAD SYSTEM EVENT

AGGRAVATING FACTORS

OPPORTUNITIES EXISTED TO IDENTIFY PROBLEM

THERE WERE SEVERAL POINTS IN THE CAD WORK PROCESS FOR PERSONNEL TO HAVE IDENTIFIED UNCONTROLLED SAFEGUARDS INFORMATION.

NUMEROUS DRAWING WERE WORKED ON AT DIFFERENT TIMES UNDER BOTH SECURITY AND NON-SECURITY JOB PRIORITY CODES.

SAFEGUARDS INFORMATION ELECTRONIC FILES WERE IMPROPERLY HANDLED IN THE CAD AREA AS EARLY AS 1978 UNTIL THIS DISCOVERY.

INADEQUATE REVIEW AND AWARENESS OF CAD WORK PROCESSES BY SAFEGUARDS DOCUMENT CONTROLLERS

NO DOCUMENT CONTROLLER REVIEWED THE INTERNAL WORK PROCESSES OF THE CAD SECTION TO ENSURE COMPLIANCE WITH EXISTING DIRECTIVES.

NUCLEAR POLICY MANUAL NUCLEAR STATION DIRECTIVE (NSD) 206 STATES THAT EACH DOCUMENT CONTROLLER IS RESPONSIBLE FOR ENSURING COMPLIANCE WITH NSD 206 WITHIN THE DEPARTMENT/GROUP AND HAS LEAD RESPONSIBILITY IN COORDINATING SAFEGUARDS DOCUMENT CONTROL ACTIVITIES.

CAD SYSTEM EVENT

MITIGATING FACTORS

HIGHLY IMPROBABLE THAT UNAUTHORIZED PERSON GAINED ACCESS TO THE UNCONTROLLED INFORMATION

EACH TAPE HAS OVER 350 FILES AND EACH CARTRIDGE HAS OVER 2000 FILES.

OVER 200 9-TRACK TAPES AND 30 MAGNETIC TAPE CARTRIDGES WERE STORED IN THE CAD AREA.

MOST FILE NAMES ARE IDENTIFIED BY RANDOM ELECTRONIC RETRIEVAL NUMBERS THAT BEAR NO RESEMBLANCE TO THE DRAWING NUMBER.

INDIVIDUALS IN THE CAD SECTION CAPABLE OF RUNNING THE 9-TRACK TAPE MACHINE OR CARTRIDGE READER WERE ALL CLEARED FOR SAFEGUARDS INFORMATION ACCESS.

THE CAD AREA WHERE THE TAPES AND CARTRIDGES WERE STORED IS RELATIVELY SMALL WITH ONLY A FEW ENTRANCES AND UNAUTHORIZED PERSONS IN THE AREA WOULD BE NOTICED.

THE CAD AREA WAS LOCKED AFTER NORMAL WORKING HOURS.

NO TAPES HAVE EVER BEEN NOTED AS MISSING OR LOST. ARCHIVE TAPES AND CARTRIDGES WERE USED FREQUENTLY AND STORED SYSTEMATICALLY AND A MISSING TAPE WOULD HAVE BEEN READILY NOTICED.

RETRIEVING DATA FROM THE FILES ON AN ARCHIVE TAPE WOULD TAKE EXPENSIVE SPECIALIZED COMPUTER EQUIPMENT AND SPECIFIC OUT OF DATE SOFTWARE.

NON-SECURITY TAPES WERE ONLY COPIED TO CARTRIDGES STARTING EARLY IN 1993.

CAD SYSTEM EVENT

MITIGATING FACTORS

COLLEGE STREET COMPUTER CENTER

ACCESS TO THE CENTER IS CONTROLLED BY SECURITY GUARDS AND THE INNER AREA WHERE THE CARTRIDGES WERE STORED IS KEY-CARD ACCESS CONTROLLED.

FILE BACK-UP TRANSMISSIONS WERE COMPLETED THROUGH HARD CONNECTED DATA LINKS MAINTAINED BY DUKE POWER COMPANY.

NFM SYSTEM

ONLY 15 FILES WERE FOUND ON THE MCGUIRE NFM SYSTEM.

THESE MCGUIRE FILES WERE ACCESSIBLE ON THE SYSTEM LESS THAN FIVE MONTHS.

INFORMATION IN THESE MCGUIRE FILES WAS EVALUATED AS NOT CONTAINING SIGNIFICANT SAFEGUARDS INFORMATION.

UNSECURED CONTAINER

12/06/93

CONTAINER DISCOVERED CLOSED BUT UNLOCKED

REVIEW INITIATED WITH CO-WORKER AND DOCUMENT CONTROLLER

NO APPARENT TAMPERING

CONTENTS INVENTORIED AND VERIFIED

SITE SAFEGUARDS ADMINISTRATOR NOTIFIED

SECURITY EVALUATION INITIATED

REPORTABILITY DETERMINED

RESIDENT NOTIFIED

ENS NOTIFICATION

INTERNAL NOTIFICATIONS

SECURITY OFFICERS / MNS / CNS / GO

UNSECURED CONTAINER CONCLUSIONS

PERSONNEL ERROR-INAPPROPRIATE ACTION

SELF IDENTIFIED

PROGRAM REVIEW

TRAINING / RE-TRAINING PROGRAM ESTABLISHED

CLASS 6 CONTAINER

CUSTODIAN / DOCUMENT CONTROLLER ASSIGNED

ACCESS LIST ESTABLISHED

ANNUAL REVIEW OF CONTAINER INTEGRITY

**EMPLOYEE IDENTIFIED PROBLEM AND ACTED IN ACCORDANCE WITH
TRAINING**

IMMEDIATE CORRECTIVE ACTION ACHIEVED FULL COMPLIANCE

UNSECURED CONTAINER CORRECTIVE ACTIONS

IMMEDIATE

CONTENTS INVENTORIED AND LOCKED

HEIGHTENED SECURITY AWARENESS

INITIATED END OF DAY CONTAINER CHECK

SUBSEQUENT

NOTICE TO SITE DOCUMENT CONTROLLERS (ACKNOWLEDGEMENT REQUIRED)

PROBLEM INVESTIGATION PROCESS INITIATED

CORRECTIVE ACTION PROBLEM REPORT TO MANAGERS OF PERSONNEL INVOLVED

OPEN / LOCKED STATUS SIGNS IMPLEMENTED

ENTRY / EXIT LOG ESTABLISHED

PROPOSED

EVALUATE Q.V. ASSESSMENT RECOMMENDATIONS

UNSECURED CONTAINER SAFETY SIGNIFICANCE

AGGRAVATING FACTORS

SIGNIFICANT SAFEGUARDS INFORMATION

LENGTH OF TIME

MULTIPLE USERS OF CONTAINER

LOCATED OUTSIDE P.A.

ROOM NOT CONSISTENTLY LOCKED

UNAUTHORIZED ACCESS CANNOT BE DISPROVED

MITIGATING FACTORS

NO EVIDENCE OF UNAUTHORIZED DISCLOSURE

BUILDING LOCATED WITHIN THE OCA

BUILDING ROUTINELY LOCKED AND PATROLLED

ROOM NORMALLY OCCUPIED DURING THE DAY SHIFT

UNMARKED CONTAINER

APPEARED LOCKED

NO EVIDENCE OF TAMPERING WITH CONTAINER OR CONTENTS

NO MISSING DOCUMENTS

SECURITY SYSTEM IS COMPLEX

REDUNDANCY

FIELD ROUTING DIFFICULT TO LOCATE

DEFENSE IN DEPTH, P.A. / V.A. / SYSTEMS

PROGRAMS ADDRESS OVERT / COVERT ACTS

MISC EVENTS SUMMARY

UNLOCKED SAFEGUARDS CONTAINERS

ONS-3, MNS-0, CNS-0

- UNSECURED SATELLITE FILE CONTAINER ONS I&E, 7/9/92
- UNSECURED SI CONTAINER ONS SSF COMPUTER RM, 1/18/93
- UNSECURED SI CONTAINER ONS SEC ADMIN AREA, 4/26/93

UNSECURED SAFEGUARDS, LEFT IN COPIER

ONS-0, MNS-0, CNS-2

- SI JAMMED IN COPY MACHINE IN CNS ENG AREA, 8/25/92
- SECURITY SHIFT JOURNAL LEFT ON COPIER OUTSIDE CNS CAS, 12/22/92

SAFEGUARD LOST OR MISSING

ONS-1, MNS-0, CNS-2

- PAGES CONTAINING SI MISSING AFTER CNS PLAN REVISION INSERTED, INVESTIGATION SUGGESTED PAGES SHREDDED, 1/27/93
- ONS I&E PROCEDURE LOST DURING ROUTING, 2/23/93
- CNS SEC PLAN PAGE MISSING AFTER REVISION INSERTION, 4/27/93. (EVENT DID NOT MEET 73.71 LOGGING CRITERIA)

SI LEFT UNATTENDED

ONS-1, MNS-1, CNS-0

- ONS SAFEGUARDS DOCUMENTS LEFT UNATTENDED DURING QV AUDIT IN SECURITY ADMIN AREA, 1/20/93
- LIST OF COMBINATIONS FOR SAFEGUARDS CONTAINERS IN MNS ENG AREA LEFT UNATTENDED, 11/19/93 (LISTED UNDER ONS IN INSPECTION REPORT)

MISC EVENTS SUMMARY

SI STORED IN IMPROPER CONTAINERS

ONS-0, MNS-0, CNS-1

- SI DISCOVERED IN DESK THAT HAD BEEN MOVED FROM GO TO CNS, 8/16/93

SI IMPROPERLY TRANSMITTED

ONS-1, MNS-0, CNS-1

- CNS DOCUMENT CONTROLLER RECEIVED SEALED PACKAGE OF SI THAT WAS NOT DOUBLE WRAPPED AND GAVE NO INDICATION OF CONTENT, 12/21/92. (EVENT DID NOT MEET 73.71 LOGGING CRITERIA)
- SEALED AND MARKED SI PACKAGE WAS MAILED IN INTER-OFFICE ENVELOPE THAT DID NOT MEET DOUBLE WRAPPED CRITERIA, 2/11/93.

CORRECTIVE ACTION SUMMARY MISCELLANEOUS EVENTS

[illegible]

MISC EVENTS CORRECTIVE ACTION

**CORRECTIVE ACTIONS TAKEN WERE SPECIFIC FOR EACH
EVENT**

11 OF 13 EVENTS WERE LOGGED, ALL WERE TRENDED

**3 EVENTS INVOLVED UNSECURED SAFEGUARDS
CONTAINERS**

**AS A RESULT OF THESE 3 EVENTS AND THE OPEN SI
CONTAINER OUTSIDE THE PA, ADDITIONAL CORRECTIVE
ACTION DEEMED NECESSARY.**

INTERIM CORRECTIVE ACTION

- 1) SIGN ON EACH SI CONTAINER WITH INTERNAL COMBO LOCK TO
INDICATE LOCKED/UNLOCKED STATUS OF CONTAINER**
- 2) SIGNATURE CARD FOR ALL SI CONTAINERS WHICH ARE
ACCESSED BY MULTIPLE USERS**

LONG TERM CORRECTIVE ACTION

- 1) RELOCATE SI CONTAINERS INSIDE PA WHERE POSSIBLE**
- 2) EVALUATE CAA'S FOR ALL SI CONTAINERS OUTSIDE PA**
- 3) INVESTIGATE VISUAL INDICATION ON SI CONTAINERS WITH
INTERNAL COMBO LOCKS**
- 4) CONTINUE EFFORTS TO REDUCE VOLUME OF SI AND NUMBER OF
SI CONTAINERS**
- 5) REINFORCE EXPECTATIONS REGARDING ACCOUNTABILITY FOR
PROPER HANDLING OF SI**

CAD SYSTEM EVENT SUMMARY

1) IDENTIFICATION

DUKE IDENTIFIED AND REPORTED EVENT TO NRC

2) CORRECTIVE ACTION

TIMELY, EFFECTIVE CORRECTIVE ACTION WAS TAKEN TO
IDENTIFY AND PROPERLY CONTROL FILES

3) LICENSEE PERFORMANCE

DUKE'S OVERALL PERFORMANCE IN SECURITY HAS BEEN
EXCELLENT AS REFLECTED BY PREVIOUS NRC EVALUATIONS AT
ALL 3 DUKE NUCLEAR STATIONS

4) PRIOR OPPORTUNITY TO IDENTIFY

BASED ON THE LENGTH OF TIME THAT THIS SITUATION EXISTED,
THIS PROBLEM SHOULD HAVE BEEN IDENTIFIED EARLIER.

5) MULTIPLE OCCURRENCES

EXAMINATION OF PREVIOUS VIOLATIONS, REPORTED EVENTS AND
LOGGED EVENTS REVEALS NO TREND THAT INDICATES THAT THIS
IS A RECURRING PROBLEM

UNSECURED SAFEGUARDS CONTAINER EVENT

SUMMARY

1) IDENTIFICATION

DUKE IDENTIFIED AND REPORTED THE EVENT PROMPTLY TO NRC.

2) CORRECTIVE ACTION

IMMEDIATE CORRECTIVE ACTION WAS TAKEN TO ASSURE NO SI WAS MISSING AND CONTAINER WAS SECURED.

LONG TERM CORRECTIVE ACTION STILL BEING EVALUATED.

3) LICENSEE PERFORMANCE

OVERALL PERFORMANCE IN SECURITY AT DUKE POWER HAS BEEN EXCELLENT AS REFLECTED BY PREVIOUS NRC EVALUATIONS AT ALL DUKE NUCLEAR STATIONS.

4) PRIOR OPPORTUNITY TO IDENTIFY

ALTHOUGH THE CONTAINER WAS NOT LOCKED FOR A PERIOD OF SEVERAL WEEKS, THERE WAS NO NEED TO ACCESS THE CONTAINER DURING THAT TIME AND THE CONTAINER HAD THE APPEARANCE OF BEING LOCKED.

5) MULTIPLE OCCURRENCES

THREE INSTANCES OF SECURITY CONTAINERS BEING LEFT UNSECURED INSIDE THE PA HAVE OCCURRED IN THE PAST TWO YEARS, HOWEVER, THESE INVOLVED FILING CABINETS WITH LOCKING BARS WHEREAS THE UNSECURED CONTAINER OUTSIDE THE PA HAD AN INTERNAL COMBINATION LOCK.

MISC SAFEGUARDS EVENTS

SUMMARY

1) IDENTIFICATION

ALL EVENTS WERE IDENTIFIED BY DUKE PERSONNEL.

2) CORRECTIVE ACTION

WHERE APPROPRIATE, IMMEDIATE CORRECTIVE ACTION WAS TAKEN. SEVERAL EVENTS WERE CONSIDERED ISOLATED INSTANCES SO NO LONG TERM CORRECTIVE ACTION DEEMED NECESSARY.

3) LICENSEE PERFORMANCE

DUKE'S OVERALL PERFORMANCE IS SECURITY HAS BEEN EXCELLENT AS REFLECTED BY PREVIOUS NRC EVALUATIONS AT ALL 3 DUKE NUCLEAR STATIONS.

4) PRIOR OPPORTUNITY TO IDENTIFY

DUE TO THE NATURE OF THESE EVENTS, THERE WAS NO PRIOR OPPORTUNITY TO IDENTIFY THEM.

5) MULTIPLE OCCURRENCES

THE LISTED EVENTS ALL INVOLVE FAILURE TO CONTROL SI PROPERLY, HOWEVER, THERE IS NO SINGLE ROOT CAUSE THAT CAN BE ASSIGNED TO ALL OF THEM COLLECTIVELY.