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SUBJECT: Responds to NRC 910411 ltr re violations noted in insp rept
 50-275/91-03. Corrective actions: watchperson removed from
 compensatory measure responsibilities & replaced w/another
 watchperson.

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May 3, 1991

PG&E Letter No. DCL-91-113

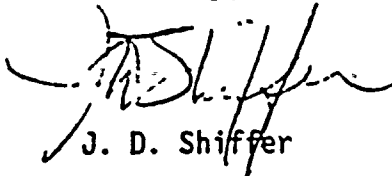
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Reply to Notice of Violation in NRC Inspection Report
No. 50-275/91-03

Gentlemen:

NRC Inspection Report No. 50-275/91-03, dated April 11, 1991, contained a Notice of Violation citing one Severity Level IV violation regarding a security watchperson inattentive to duties. PG&E's response to the Notice of Violation is enclosed.

Sincerely,


J. D. Shiffer

cc: Ann P. Hodgdon
John B. Martin
Phillip J. Morrill
Paul P. Narbut
Harry Rood
CPUC
Diablo Distribution

Enclosure

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION IN
NRC INSPECTION REPORT NO. 50-275/91-03

On April 11, 1991, as part of NRC Inspection Report No. 50-275/91-03, NRC Region V issued a Notice of Violation citing one Severity Level IV violation for Diablo Canyon Power Plant Unit 1. The statement of violation and PG&E's response follow.

STATEMENT OF VIOLATION

Paragraph 2.E of Facility Operating License No. DPR-80 for the Diablo Canyon Power Plant requires the licensee to fully implement and maintain in effect all provisions of the Commission approved physical security, guard training and qualifications, and safeguards contingency plans.

Section 3 of the licensee's approved security plan, as amended, requires in part, that failure of any part of the security detection hardware system at specific portions of the Fuel Handling Building, results in implementation of appropriate compensatory measures.

Paragraph 6.8.1 of the Facility Technical Specifications states in part, that written procedures shall be established, implemented, and maintained covering security plan implementation.

Security Procedure SP-410 requires in part that appropriate compensatory measures be implemented whenever a security alarm zone is removed from the secure mode, and that these measures will remain in effect until such time the zone is secured.

Contrary to the above, on March 10, 1991, at approximately 1615 hours, a security watchperson, posted as a compensatory measure for a security alarm zone removed from the secure mode, at a specific portion of the Fuel Handling Building, was inattentive to duties, in that he was leaning back in a chair, with his head down and eyes closed. The watchman failed to acknowledge the presence of an NRC inspector, when the inspector approached within three feet of the watchperson.

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



REASON FOR THE VIOLATION IF ADMITTED

PG&E acknowledges that the violation occurred as described in the Inspection Report. Although the watchperson accurately described the movements of the NRC Inspector when the latter initially entered the compensatory area, he did not acknowledge the presence of the inspector when the inspector approached within three feet of him. The watchperson was inattentive in that he was leaning back in a chair and his eyes were closed.

A Human Performance Enhancement System (HPES) evaluation of the event determined that the primary causal factor was inappropriate work practices regarding attentiveness while on post. The presence of a second chair at the post enabled the watchperson to elevate his feet off the floor, thereby contributing to his relaxed state. The evaluation also identified the number of hours worked as a secondary causal factor.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The inattentive watchperson was removed from compensatory measure responsibilities and replaced with another watchperson. The compensatory area was searched with no adverse findings.

The following corrective actions have been taken to address the cause of this violation:

1. The watchperson was disciplined.
2. The second chair has been removed from the compensatory post. In addition, the frequency of this post rotation has been increased.
3. A memorandum has been issued cautioning all watchpersons about elements of posture (e.g., feet elevated, slumping in a seated position, positioning the head back or forward) that may contribute to or give the appearance of inattentiveness while performing their duties.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A review of watchperson scheduling to support outage activities will be conducted.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PG&E is in full compliance with Section 3 of the Diablo Canyon Power Plant Physical Security Plan, as amended, which identifies compensatory measures applicable to this compensatory area.

The review of watchperson scheduling will be completed by June 30, 1991.

