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 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga      05000323  
 AUTH. NAME      AUTHOR AFFILIATION  
 SHIFFER, J. D.      Pacific Gas & Electric Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                                  Document Control Branch (Document Control Desk)

SUBJECT: Forwards revised response to violations noted in Insp Repts  
 50-275/87-19 & 50-323/87-19 dtd 870625. Response withheld  
 (ref 10CFR73.21).

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**PACIFIC GAS AND ELECTRIC COMPANY**

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JAMES D. SHIFFER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

August 26, 1987

PGandE Letter No.: DCL-87-211

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

Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Revised Response to IEIR 50-275/87-19 and 50-323/87-19  
Safeguards Notice of Violation

Gentlemen:

NRC Inspection Report Nos. 50-275/87-19 and 50-323/87-19, dated May 29, 1987, contained a Notice of Violation citing one Severity Level V violation. PGandE's response to this Notice of Violation expressing disagreement with the violation was provided in PGandE letter DCL-87-146, dated June 25, 1987.

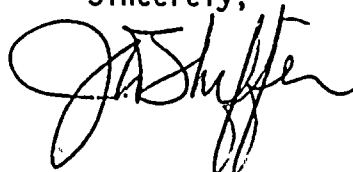
NRC letter dated July 24, 1987 informed PGandE that after further NRC review of the circumstances of the violation, it was determined that the basis for the issuance of the Level V Violation remained valid.

PGandE hereby submits a new response to the violation. This response replaces the previous response in its entirety.

The enclosures to this letter contain safeguards information which must be protected against unauthorized disclosure in accordance with the provisions of 10.CFR 73.21.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



Enclosure

cc w/enc.: B. A. Dettman  
J. Lieberman  
R. F. Locke  
J. B. Martin  
P. P. Narbut  
R. G. Todaro  
J. D. Townsend

cc w/o enc.: GONPRAC  
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ENCLOSURE

Revised Response to IEIR 50-275/87-19 AND 50-323/87-19  
Safeguards Notice of Violation



## ENCLOSURE

Revised Response to IEIR 50-275/87-19 AND 50-323/87-19  
Safeguards Notice of Violation

On May 29, 1987, NRC Region V issued a Notice of Violation (Notice) citing one Severity Level V violation as part of NRC Inspection Report Nos. 50-275/87-19 and 50-323/87-19 for Diablo Canyon Units 1 and 2.

PGandE's revised response to this violation follows.

STATEMENT OF VIOLATION

Paragraph 2E of the Facility Operating License No. DPR-80 for the Diablo Canyon Power Plant reads in part:

Physical Protection

"The licensee shall fully implement and maintain in effect all provisions of the Commission approved physical security, guard training and qualifications, and safeguards contingency plans, including amendments made pursuant to the authority of 10 CFR 50.54(p)."

The licensee's approved Physical Security Plan (PSP), dated 1974, as amended, in Section 3.1.3 reads in part, that the "Surveillance hardware consists of self-contained TV cameras positioned in such a manner that the entire plant perimeter may be monitored from consoles is CAS [central alarm station] and SAS [secondary alarm station]."

Further, Chapter 11 titled: Overall Physical Security Program Performance, in describing the alarm system and the closed circuit television (CCTV) system reads in part: "An alarm system completely surrounds [the] protected areas.... Complementing the alarm system is a series of CCTV cameras which provides total and continuous monitoring of the protected area perimeter.... The CCTV system, including pan, tilt and zoom cameras, has the capability of monitoring any portion of this perimeter, though not the entire perimeter at one time."

Contrary to the above, on May 4, 1987, there were four separate areas (totaling approximately 110 feet) along the protected area perimeter which were not capable of being viewed by any of the CCTV cameras. As a result, the video consoles in the CAS and SAS were unable to view these four separate areas of the plant perimeter.

This is a Severity Level-V Violation (Supplement III).





REASON FOR THE VIOLATION IF ADMITTED

This violation resulted from PGandE's interpretation that the primary purpose of the closed circuit television (CCTV) system was to aid in the assessment of protected area (PA) intrusion alarms, not necessarily to view the entire PA fence. PGandE acknowledges, though does not agree with, the NRC's interpretation that the CCTV system, through either fixed or pan-tilt-zoom cameras, must be capable of viewing all portions of the PA fence line, although not at the same time.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. CCTV Camera 4 has been realigned and now views the fence line south of the discharge structure.
2. CCTV Camera 5 in front of the discharge structure has been realigned to improve fence line observation. A gap in CCTV coverage still exists in this area, however, an appropriate compensatory measure has been taken until permanent corrective action is completed.
3. The angle in the fence line north of CCTV Camera 5 has been removed, thus, this section of fence line is now under CCTV observation.
4. CCTV Camera 6 has been realigned and now covers the gap at the base of CCTV Camera 31.

NOTE: Refer to the attached figure which reflects the changes identified above.

5. A memorandum has been distributed to Alarm Station personnel to ensure that the current interpretation of the CCTV commitment is understood.
6. Within sixty days of this response, PGandE will revise and submit Sections 3.1.3C and 11.D of the Diablo Canyon Physical Security Plan. This revision will reflect the language of the plan that existed prior to the Security Plan change that was submitted in DCL-87-159, dated June 30, 1987, as a result of the Notice of Violation.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

PGandE acknowledges, though does not agree with, the NRC's interpretation of the CCTV commitment. Future modifications to the PA perimeters will be designed consistent with this interpretation.

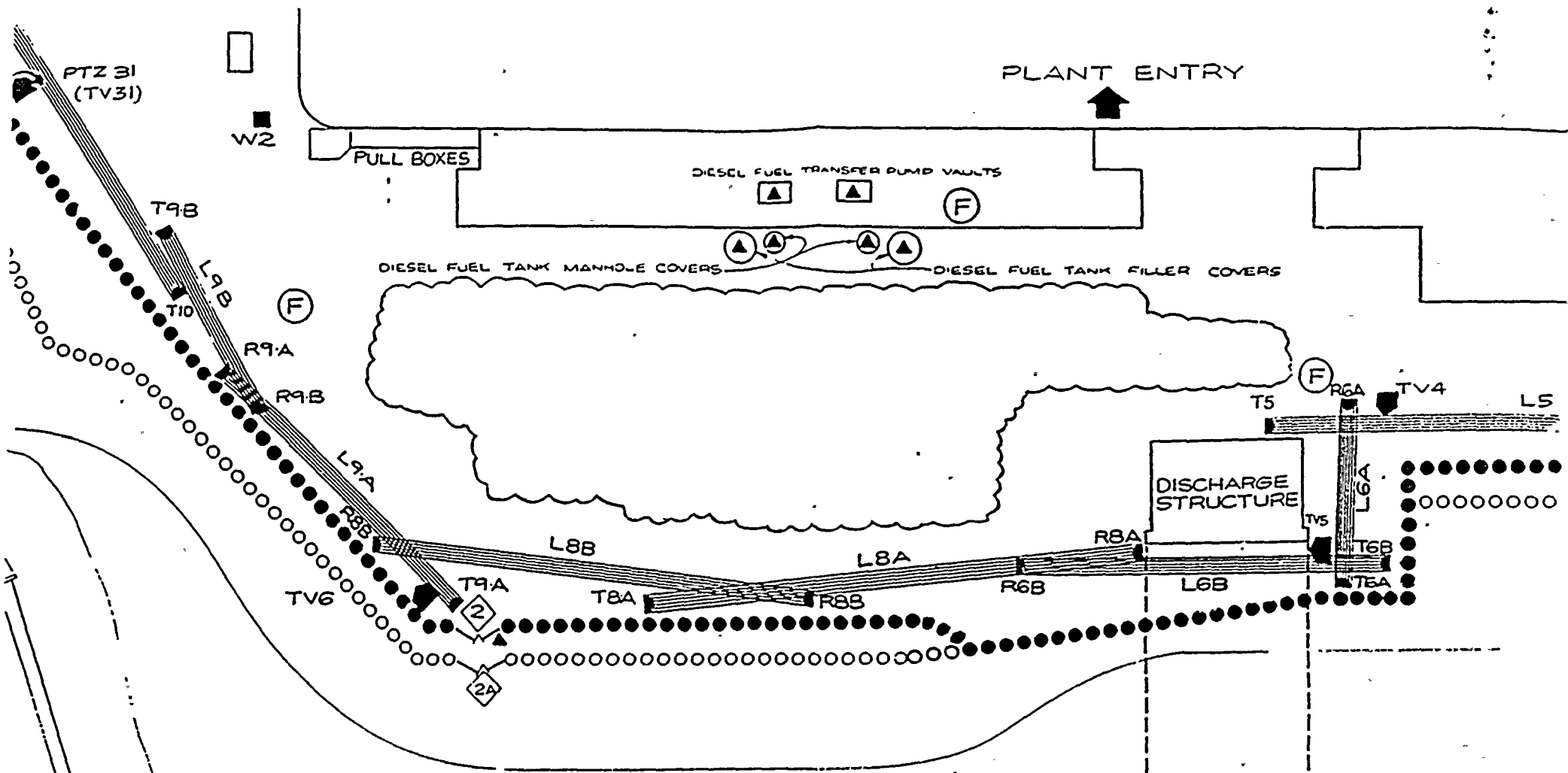
DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PGandE believes that full compliance with the NRC's interpretation of the CCTV commitment has been achieved.



ATTACHMENT





**SECURITY  
SAFEGUARDS INFORMATION**

