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SUBJECT: Responds to NRC 950509 ltr re violation associated w/NRC
 Investigation Rept 1-92-052R.C/As: security training program
 revised to require future written security exams be
 administered/proctored by member of security training staff.

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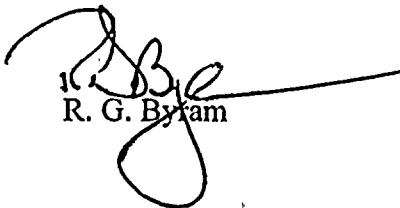
SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(EA 94-212)
PLA-4326 FILE R41-2

Docket Nos. 50-387
& 50-388

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation dated May 09, 1995, that is associated with NRC Investigation Report No. 1-92-052R.

The notice required submittal of a written reply within thirty (30) days of the date of the letter transmitting the Notice of Violation. We trust that the commission will find the attached response acceptable.

Very truly yours,



R. G. Byram

Attachment

copy: Regional Administrator - Region I
Ms. M. Banerjee, NRC Sr. Resident Inspector
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

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REPLY TO A NOTICE OF VIOLATION

Violation (EA 94-212/01013)

During an NRC investigation conducted between October 1, 1992, and August 22, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50.9(a) states, in part, that information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

10 CFR 73.55(b)(4)(i) states, in part, that each guard, watchman, armed response person, and other member of the security organization shall requalify in accordance with Appendix B to this part at least every 12 months. This requalification must be documented. The licensee shall retain the documentation of each requalification as a record for three years after the requalification.

10 CFR 73.55(b)(4)(ii) states, in part, that each licensee shall establish, maintain, and follow an NRC-approved training and qualification plan outlining the processes by which guards, watchmen, armed response persons, and other members of the security organization will be trained, tested, and qualified to ensure that these individuals meet the requirements of this paragraph.

Section 2.1 of the NRC-approved Susquehanna Steam Electric Station Guard Training and Qualification Plan requires, in part, that annual recertification to ensure security force effectiveness shall be accomplished by one or more activities including class-room training involving lectures, group discussions, text review or written examination.

Section 14.0 of the NRC-approved Susquehanna Steam Electric Station Guard Training and Qualification Plan requires, in part, that security records be available for review to NRC inspectors in accordance with applicable state and federal regulations and in sufficient detail to enable them to determine that the program meets applicable regulatory standards.

Contrary to the above, as of September 3, 1992, the licensee's records documenting the requalification of members of its security organization were not complete and accurate in all material respects. Specifically, a written examination given to members of its security organization on September 3, 1992, which was chosen by the licensee as a method under its Guard Training and Qualification Plan to demonstrate security force effectiveness for recertification in a given task area, did not accurately and completely reflect the true knowledge

of some individuals taking the examination, or their effectiveness for requalification. This occurred because, after noting that a number of individuals answered a particular question incorrectly, the former security shift supervisor proctoring the examination retaught the information pertinent to that question, provided an opportunity to change the answers by returning the answer sheets to the individuals who had the incorrect answer, and then submitted the changed or corrected examination results as original answers for grading. The test results were material to the NRC in that the NRC relies on these test results for the demonstration of security force effectiveness under the licensee's implementation of the approved Guard Training and Qualification Plan.

Response

1. Reason for the Violation

The reason for the violation was that a recertification examination provided to members of the security organization on September 3, 1992, was compromised as a result of the actions of a former security shift supervisor (SSS) who proctored the examination. The former SSS was unexpectedly placed in the position of being an "instructor" because the security training staff was unavailable to conduct the scheduled training. This individual was not trained as an instructor prior to instructing the class. During the examination portion of the training the former SSS made an improper decision and provided an opportunity for individuals taking the examination to reconsider an answer.

2. Corrective Actions Taken and the Results Achieved

- a. The security training program has been revised to require future written security examinations be administered/proctored by a member of the security training staff.
- b. Security training will be rescheduled, as appropriate, to minimize the use of Security Shift Supervisors as security training instructors.
- c. Security Shift Supervisor/staff personnel will be trained as instructors prior to conducting security program training.
- d. The security examination forms were redesigned to emphasize PP&L's "Academic Honest Policy Statement." The examination form requires a student to complete the examination, read the Academic Honesty Policy Statement, sign the examination and submit the examination to the proctor.

- e. Two external independent assessments of the security training program have been conducted and concluded that the program complies with regulatory and security program requirements.
- f. Security management conducted meetings with security personnel. Issues discussed included: the necessity for maintaining open communications, a briefing on this incident, PP&L's employee concerns program, and PP&L's Academic Honesty Policy.

3. Corrective Steps That Will Be Taken To Avoid Further Violations

Based upon our internal investigation of the event, PP&L concluded that the incident did not deter from the effectiveness of the security organization. The corrective actions taken in (2) above precludes a similar event from occurring. Additionally, the actions taken also ensure that management's expectations with respect to security training have been communicated to, are understood by and will be consistently carried out by security organization personnel.

As required by 10CFR73 an annual audit of the physical security plan is conducted. This audit which includes an inspection of the security training program will be utilized to assure that management's expectations for security training are achieved. Included in the audit will be a review of compliance with the corrective actions identified in (2) above.

4. Date of Full Compliance

Based on (2) above, PP&L is in full compliance.