

ENCLOSURE

NOTICE OF VIOLATION

Pennsylvania Power and Light Company  
Susquehanna Steam Electric Station  
Units 1 & 2

Docket Nos. 50-387;50-388  
License Nos. NPF-14; NPF-22  
EA 94-212

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 re-taught 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. (01013)

This is a Severity Level III violation. (Supplements III and VII)

Pursuant to the provisions of 10 CFR 2.201, Pennsylvania Power and Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an Order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at King of Prussia, Pennsylvania  
this 9th day of May 1995