

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.
AUTH. NAME AUTHOR AFFILIATION
PLUNKETT, T.F. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

DOCKET #
05000335
05000389

SUBJECT: Responds to violations noted in insp repts 50-335/96-16 & 50-389/96-16. Corrective actions: revised security procedure 0006125, "Reporting of Safeguards Events," & will develop security event response guidance.

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OCT 18 1996

L-96-255
10 CFR 2.201

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

Re: St. Lucie Units 1 and 2
Docket No. 50-335 and 50-389
Reply to a Notice of Violation
NRC Special Inspection Report 96-16

Florida Power and Light Company has reviewed the subject Notice of Violation and, pursuant to 10 CFR 2.201, the responses to the violations are attached.

Very truly yours,



T. F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant

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PDR ADOCK 05000335
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VIOLATION A:

10 CFR 73.71, Reporting of Safeguards Events, Appendix G, (a)(3) "Reportable Safeguards Events," requires the licensee to report to the NRC within one hour following discovery, followed by a written report within 30 days, events which cause interruption of normal operations through tampering with controls including the security system.

The licensee's Security Procedure, SP-0006125, Reporting of Safeguards Events, Revision 9, dated April 20, 1995, Paragraph 8.2 (I) defines one of those specific events as being a "confirmed tampering of suspicious origin with safety or security equipment."

Contrary to the above on July 29, 1996, the licensee failed to report the confirmed tampering with security equipment (locks) within one hour to the NRC.

This is a Severity Level IV violation (Supplement III)

RESPONSE:

1. FPL concurs with the violation.
2. REASON FOR VIOLATION

The reason for the violation was personnel error in that the event was not correctly identified as involving tampering. A contributing factor to the error was inadequate procedural guidance. The security event reporting procedure in use on July 26, 1996, did not provide a clear definition of tampering nor clear guidance for making reportability determinations for tampering events.

On July 26, 1996, glue was discovered in the lock core of an entry door to the Unit 2 Control Element Drive Mechanism Control System (CEDMCS) room. Further inspection revealed that several padlock/door lock sets (a total of eleven locks) on both units had been similarly vandalized.

The affected locks were determined not to adversely impact plant operations or the Physical Security Plan. Based on this determination, it was incorrectly interpreted that this event did not constitute "tampering" as described in St. Lucie Plant Security Procedure No. 0006125, "Reporting of Safeguards Events." The procedure required



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"confirmed tampering of suspicious origin with safety or security equipment" to be reported as a Safeguards Event. Failure to identify this incident as "tampering with security/safety equipment" resulted in utility personnel not reporting the incident to the Nuclear Regulatory Commission (NRC) within one hour, as required.

3. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The event was reported to the NRC in Licensee Event Report 96-S01 on September 11, 1996, in FPL's 30 day report on the discovery of additional tampering of key locked switches on August 14, 1996.

4. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. Security Procedure No. 0006125, "Reporting of Safeguards Events" was revised to clarify the definition of "tampering" and the reportability determinations for similar events.
 - B. Security event response guidance will be developed to provide for actions in response to an event that resulted from, or is suspected to have resulted from, deliberate or malicious acts directed against plant safety or security equipment. This action will be completed by October 31, 1996.
5. Full compliance was achieved on September 11, 1996 with the completion of Item 3 above.

VIOLATION B:

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 1.c includes administrative procedures for equipment control. Administrative Procedure No. 2-0010123, "Administrative Control of Valves, Locks and Switches," Revision 73 implements this requirement with respect to administratively controlled keys. Step 8.2.1 of this procedure states in part that cubicles containing critical controls in remote locations shall be locked and the keys maintained under Administrative Control.

Contrary to the above, on August 19, 1996, keys used for the control of Power Operated Relief Valves V1474 and V1475 located in the 2A and 2B electrical penetration rooms respectively, were located in the unlocked cubicles which house

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these switches.

This is a Severity Level IV violation (Supplement I)

RESPONSE:

1. FPL concurs with the violation, as clarified below.
2. REASON FOR VIOLATION

Requirements

Step 8.1.2. of Administrative Procedure (AP) No. 2-0010123, "Administrative Control of Valves, Locks and Switches," states, in part, that:

A valve, switch or fuse is placed under Administrative Control by:

- A. Physically locking the valve or switch

Step 8.2.1. of AP No. 2-0010123 states, in part, that:

Cubicles and racks containing critical instrumentation and controls shall be locked and the keys maintained under administrative control.

Background

The power operated relief valve (PORV) electrical isolation switches are used to electrically isolate PORV operation from the control room in the event of a fire requiring reactor shutdown and evacuation of the control room. The electrical isolation switches are located in the electrical penetration room and are key locked switches housed in protective boxes. Since the electrical isolation switches themselves are key locked, the protective boxes in which the key locked electrical isolation switches are housed are not required to be locked in accordance with AP No. 2-0010123. The keys used for the electrical isolation of the PORVs require administrative control in accordance with AP No. 2-0010123. Maintaining the keys for the PORV electrical isolation key locked switches in the unsecured switch boxes violated the administrative control requirements of AP No. 2-0010123.



Discussion

The cause of the violation was inadequate administrative controls to ensure adequate key accessibility and while, at the same time, maintaining key control. The development and review of the original procedures for control room inaccessibility focused only on the ability of the operators to carry out their shutdown functions. The review was not sufficient in that, while the procedure assured the accessibility of keys post-control room evacuation, it did not ensure that the keys were maintained under adequate administrative control.

Operating procedure ONOP 2-0030135, "Control Room Inaccessibility," stated that a backup set of the PORV electrical isolation switch keys are located in the switch boxes in the electrical penetration room (one set of keys is also maintained in the locked key box on the remote shutdown panel). Maintaining a set of keys in the switch boxes was intended to ensure that the keys were accessible to support control room evacuation. Procedure AP No. 2-0010123, in step 8.1.2.A, lists one means of administrative control for switches to be the physical locking of the switch. Placing the keys inside the unsecured switch boxes, in accordance with ONOP 2-0030135, violated the administrative control requirements of AP No. 2-0010123.

3. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- A. The Unit 2 PORV electrical isolation switch keys were removed from the unsecured switch boxes. Control of the PORV electrical isolation switch keys was assigned to a utility nonlicensed operator, the senior nuclear plant operator (SNPO).
- B. The requirement for the PORV electrical isolation switch keys to be kept in the unsecured switch boxes was deleted from ONOP 2-0030135. This action was completed by August 29, 1996.

4. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. Physical custody of the PORV electrical isolation switch keys was assigned to the SNPO, who maintains them on the watchstanding shift key ring. This was done to ensure both the control of the keys as well as their availability to operate the switches in a timely manner, if required. This resolves the previous conflict between the operating procedure and administrative procedure. The chain of custody for the keys is maintained by the SNPO acknowledging custody of the keys, via his signature, on Check Sheet 2, Nuclear Plant



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Operator/SNPO Turnover Check Sheet, of AP No. 0010120, Conduct of Operations.

- B. Procedures AP No. 1-0010123 and AP No. 2-0010123 (for Units 1 and 2, respectively) will be revised to add to each procedure a list of key rings and keys held by each watchstander. This will also ensure the periodic performance of a key inventory. The procedure revisions will be completed by October 31, 1996.
- C. The potential for additional previously unrecognized procedural conflicts in Unit 2 procedures AP No. 2-0010123 and ONOP 2-0030135 concerning key and lock control was reviewed and no additional conflicts were identified.
- D. The potential for previously unrecognized procedural conflicts in Unit 1 procedures AP No. 1-0010123, "Administrative Control of Valves, Locks and Switches," and ONOP 1-0030135, "Control Room Inaccessibility," concerning key and lock control was reviewed and no additional conflicts were identified.
- E. Programmatic improvements to the St. Lucie Plant's administrative control of keys will be made. The changes being considered include:
 - 1) Stricter shift controls and accountability for keys checked out by the operating crew during the operating shift;
 - 2) A review of the key control log at shift turnover meetings to confirm shift to shift control of administratively controlled keys;
 - 3) Changes to the Operations and Security procedures to define actions and notifications to be taken in the event of loss of control of administratively controlled keys; and,
 - 4) The establishment of a site-wide numbering system for controlled keys to ensure better response to missing or lost key events.

The evaluation and implementation of changes determined to be required will be completed by November 29, 1996.

- F. The quality of St. Lucie Plant procedures, and revisions to those procedures, as well as the quality of procedures being developed to implement plant process



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improvements, are the focus of management attention and action. In order to ensure that plant procedures are of consistent quality, St. Lucie Plant has formed the Procedures Development Group within the Information Services Department. It is intended that this group will ultimately be responsible for the development of, and revisions to, plant procedures. The focused accountability for the development, maintenance, and administration of plant procedures will help to ensure that procedural conflicts such as the one identified by this violation will be prevented from occurring for new procedures, and systematically identified and corrected, if present in existing procedures.

5. Full compliance was achieved on August 29, 1996, with the completion the actions identified in Item 3 above.