

# CATEGORY 1

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FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.      05000335  
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.      05000389  
AUTH.NAME      AUTHOR AFFILIATION  
PLUNKETT,T.F.      Florida Power & Light Co.  
RECIP.NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to violations noted in insp repts 50-335/98-01 & 50-389/98-01. Corrective actions: terminated access authorization for both individuals & temporarily suspended terminations of access authorization in plant's badging ofc.

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April 28, 1998

L-98-108  
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 Nos. 50-335 and 50-389  
Reply to a Notice of Violation  
NRC Inspection Report 98-01 (EA 98-064)

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

The violation resulted from the failure to remove the access authorization of favorably terminated contract employees. FPL has concluded that the failure was not programmatic in nature and resulted from human error. However, FPL understands the significance of the violation in that an unauthorized person, as defined in our Physical Security Plan, gained access to the site's protected area. FPL has taken comprehensive corrective actions to resolve the identified condition, and has reviewed the event for generic implications. We are confident that our corrective actions will prevent recurrence.

Please contact us with questions on the enclosed violation response.

Very truly yours,

Thomas F. Plunkett  
President  
Nuclear Division

TFP/JAS/EJW

Attachment

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

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PDR ADOCK 05000335  
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STATE OF FLORIDA            )  
  )        ss.  
COUNTY OF PALM BEACH    )

Thomas F. Plunkett being first duly sworn, deposes and says:

That he is President, Nuclear Division, of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

Thomas F. Plunkett  
Thomas F. Plunkett

STATE OF FLORIDA  
COUNTY OF Palm Beach

Sworn to and subscribed before me

this 28 day of APRIL, 1998  
by Thomas F. Plunkett, who is personally known to me.

Roberta S. Economy  
Name of Notary Public - State of Florida



Roberta S. Economy  
MY COMMISSION # CC633464 EXPIRES  
June 1, 2001  
BONDED THRU TROY FAIR INSURANCE, INC.

Print, type or stamp Commissioned Name of Notary Public)

Violation

Facility Operating License Nos. DPR-67 and NPF-16, Amendment 151, dated May 16, 1997, require that the licensee shall fully implement and maintain in effect all provisions of the Commission approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to the provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 50.90 and 10 CFR 50.54(p).

Section 13.4.4 of the licensee's Physical Security Plan, Revision 50, dated November 24, 1997, states, in part, "Upon notification of the voluntary termination or the termination for cause of an individual authorized unescorted access, the Plant Security Supervision shall ensure that the keycard and hand geometry access capabilities are inactivated."

Section 5.3(d) of the licensee's Physical Security Plan, Revision 50, dated November 24, 1997, states, in part, "Only those individuals with identified need for access and having appropriate authorization, shall be granted unescorted vital area access."

Contrary to the above, on December 31, 1997, plant security supervision failed to implement Section 13.4.4 of the Physical Security Plan to ensure that a voluntarily terminated individual's keycard and hand geometry access capabilities were inactivated. As a result, one unauthorized individual's unescorted access to vital areas continued in violation of the requirements of Section 5.3(d) of the Physical Security Plan between December 31, 1997, and January 2, 1998, and, in fact, the individual entered the protected area on January 2, 1998. In addition, on December 31, 1997, plant security supervision failed to implement Section 13.4.4 of the Physical Security Plan to ensure that a second favorably terminated individual's keycard and hand geometry were inactivated.

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

Response

1. FPL concurs with the violation.

2. REASON FOR VIOLATION

The cause of the violation was human error in that the individual tasked with deleting the contractor employees' badges failed to follow established plant procedures for terminating badges.



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3. **CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED**

- A. Upon discovery on January 2, 1998, the access authorization for both individuals was terminated.
- B. Terminations of access authorization in the plant's badging office were temporarily suspended.
- C. As an interim action, all access termination transactions were accomplished in the security operations center (Secondary Alarm Station) where an independent verification process existed.
- D. Appropriate personnel disciplinary actions were administered to the accountable FPL and contractor employees.

4. **CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS**

- A. The termination of access process was reviewed and standardized so that the badging office conducted access termination in the same manner as the security operations center. The revised procedure specifically requires that an independent verification be accomplished prior to the required termination time. This was achieved on January 5, 1998.
  - B. Access processing and badging personnel were trained on the new termination process discussed in Corrective Action 4.A. above.
  - C. Based on benchmarking of other licensees, a Physical Security Plan (PSP) change (Revision 51) was made to permit 48 hours for removal of access authorization for employee terminations under favorable conditions. Access authorization terminations under unfavorable conditions continue to be required to be completed immediately.
5. Full compliance was achieved on January 2, 1998, with the removal of the access authorization for both individuals involved in the violation as stated in Corrective Action 3.A. above.