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Public Service
Electric and Gas
Company

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609-339-5700

JAN 10 1997

LR-N96432

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

**RESPONSE TO A NOTICE OF VIOLATION AND
PROPOSED IMPOSITION OF CIVIL PENALTIES
INSPECTION REPORT NO. 50-272/96-14, 311/96-14, and 354/96-08
FACILITY OPERATING LICENSE DPR-70, DPR-75, and NPF-57
SALEM NUCLEAR GENERATING STATION UNITS 1 AND 2
HOPE CREEK GENERATING STATION UNIT 1
DOCKET NOS. 50-272, 50-311, and 50-354**

Pursuant to the provisions of 10CFR2.201, this letter submits the response of Public Service Electric and Gas Company (PSE&G) to the Notice of Violation and Proposed Imposition of Civil Penalties described in a letter from the NRC dated December 11, 1996. These issues were previously identified in Inspection Report No. 50-272/96-14, 50-311/96-14, and 354/96-08, dated September 30, 1996. Information pertaining to the description of the event, the reason for the violation, and the corrective actions taken is provided in Attachment 1.

In the cover letter that transmitted the Notice of Violation and Proposed Imposition of Civil Penalties, the NRC stated that the violations of fundamental access control requirements represent a significant degradation in the Salem - Hope Creek security program.

In response, PSE&G has implemented comprehensive corrective actions. These corrective actions include the replacement of security management, reestablishing expectations and direction in the security department, ensuring management involvement in the program, and upgrading the training of security personnel. An additional initiative is a security awareness program to communicate management's expectation that security is everyone's responsibility. These corrective actions are in addition to the corrective actions associated with each of the cited violations.

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Should you have questions or comments on this transmittal, do not hesitate to contact us.

Sincerely,

Louis F. Stof

Attachment
Affidavit



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-3-

C Mr. H. J. Miller, Administrator - Region I
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STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

L. F. Storz, being duly sworn according to law deposes and says:

I am Senior Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning Salem Nuclear Generating Station and Hope Creek Generating Station, are true to the best of my knowledge, information and belief.

Louis F. Storz

Subscribed and Sworn to before me
this 10th day of January, 1997

Kimberly Jo Brown

Notary Public of New Jersey

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1998

My Commission expires on _____

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-272/96-14, 311/96-14, and 354/96-08
FACILITY OPERATING LICENSE DPR-70, DPR-75, and NPF-57
SALEM NUCLEAR GENERATING STATION UNITS 1 AND 2
HOPE CREEK GENERATING STATION UNIT 1
DOCKET NOS. 50-272, 50-311, and 50-354 LR-N96432

I. INTRODUCTION

On December 11, 1996, the NRC issued a letter to PSE&G. This letter included a Notice of Violation and Proposed Imposition of Civil Penalties. The issues that were cited as violations were previously identified in Inspection Report 50-272/96-14, 50-311/96-14, 50-354/96-08, dated September 30, 1996. In that inspection report, these issues were cited as apparent violations of NRC requirements.

As noted in the Notice of Violation and Proposed Imposition of Civil Penalties, overall corrective actions have been initiated. These overall corrective actions include the replacement of security management, reestablishing expectations and direction in the security department, ensuring management involvement in the program, and upgrading the training of security personnel. In addition, security has initiated actions to address cultural issues. These actions include items that are focused on security such as an increased number of security drills as well as actions that are focused on the rest of the organization. One of these initiatives is a security awareness program to communicate the message that security is everyone's responsibility. These corrective actions are in addition to the corrective actions associated with each of the cited violations.

In accordance with the provisions of 10CFR2.201, PSE&G hereby submits a written response to the notice of violation which includes: 1) the reason for 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.

In this response, the failure to control photobadge key cards for entry into the protected area will be referred to as Violation A; the contract individual accessing the protected area without a patdown search and poor initial follow-up will be referred to as Violation B; the failure to deactivate photo badge key cards for individuals who no longer require site access will be referred to as Violation C; the failure to complete training for security supervisors prior to assigning them to supervisory duties will be

referred to as Violation D; and the failure to test an intrusion detection system in accordance with procedures will be referred to as Violation E.

II. REPLY TO THE NOTICE OF VIOLATIONS

A. Violation A

1. Description of the Notice of Violation

"License Condition 2.E of License Number NPF-57 for the Hope Creek facility and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10CFR50.90 and 10CFR50.54 (p) .

The Public Service Electric and Gas Company (PSE&G) Salem - Hope Creek Security Plan, Revision 7, dated June 21, 1996, states in Section 5.6, "Access Control to Vital Areas" that "Vital area access is physically controlled by the photobadge-keycard system which permits access into specific areas to persons designated on the current access list contained in the system computers. Positive access control is accomplished by Security Force Personnel (SFP) prior to issuance of the photobadge-keycard. Persons are positively identified by requiring them to request the badge by number, and visually, by comparing the picture to the person before issuing the keycard."

Contrary to the above, on August 14, 1996, vital area access was not physically controlled in that positive access control over photobadge keycards was compromised, thereby creating the opportunity for unauthorized access to the vital areas. Specifically, on that date, an NRC inspector identified that the lock mechanism on a door to one of the badge issue stations had been taped over, rendering the lock incapable of performing its locking function, and at the time, the badges were left unattended in the issue station, and no compensatory measures were in place for the inoperative lock to preclude an unauthorized individual from gaining access to the badges and the protected and vital areas.

"This is a Severity Level III Violation."

2. Response to the Notice of Violation

PSE&G does not dispute the violation.

i. Description of the Event

On August 14, 1996, a Security Force Member (SFM) taped the locking mechanism of a badge issue booth door because the lock was malfunctioning. The condition of the malfunctioning lock was not effectively communicated to security supervision; therefore, no action was taken to repair the lock. The SFMs assigned to this badge issue booth later in the day did not report the condition of the lock to security supervision at turnover because they believed that the SFM that had taped the lock had already reported the condition.

An NRC inspector, during a routine observation, noticed a SFM open the badge issue booth door, apparently without the use of a key. Later the same day, another NRC inspector physically challenged the door and found it to be unlocked due to the taped latch. While the NRC inspector was opening the door on a subsequent attempt, a SFM questioned the NRC inspector regarding his actions and discussion ensued about the taped lock. At this point, the tape was removed from the door lock. The Security Department implemented compensatory measures and initiated Action Requests to evaluate the event and repair the lock.

Subsequent investigative interviews determined that the security door lock taping practice was limited to the badge issue booth doors and not the physical manipulation of other security equipment in the protected area. However, it was also determined that taping of the badge issue booth doors had been done in the past and had since become common practice even though it is prohibited by a security directive.

ii. Reason for the Violation

The reason for this violation was personnel error in that the SFM that taped the lock did not follow an approved security directive. The reasons that immediate repairs were not initiated for the locking mechanism were ineffective intradepartmental communications in that the security supervisor was not made aware of the malfunctioning lock and lack of confidence in the effectiveness of the Corrective Action Program.

In addition, supervision and management have tolerated similar situations in the past. Interviewees indicated that

security supervision was knowledgeable of previous taping of the locking mechanism.

iii. Corrective Steps That Have Been Taken and Results Achieved

The involved security personnel were disciplined and/or remediated.

A heightened supervisory and management presence has been established in the lobby area.

Communications meetings were held with security force personnel to review this event, including stressing procedural compliance, use of the Corrective Action Program, and reinforcing the security force's mission.

Three-part communication training was conducted for the security force.

A formal turnover process has been implemented.

A maintenance team has been formed to provide timely resolution of issues related to security equipment.

The Access Operations Supervisor checklist has been revised to ensure that key physical security and personnel performance parameters are checked frequently during each shift. The Access Operations Supervisor checklist also provides a place to indicate that discrepancies have been processed in accordance with the Corrective Action Program.

iv. Corrective Steps That Will be Taken to Avoid Further Violations

A standards and expectation manual will be developed and provided to the security force by May 1, 1997. This manual will reinforce expectations that have already been rolled out to the security force.

PSE&G is currently initiating the appropriate submittals to implement a hand geometry access system which will preclude future similar violations.

v. Date When Full Compliance Will Be Achieved

Compliance was achieved on August 14, 1996, when the tape was removed from the locking mechanism.

B. Violation B**1. Description of the Notice of Violation**

"License Condition 2.E of License Number NPF-57 for the Hope Creek facility and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10CFR50.90 and 10CFR50.54(p).

1. The PSE&G Salem - Hope Creek Security Plan, Revision 7, dated June 21, 1996, states, in Section 4.2.1.4, "Personnel Search and Access Control," that "Searches at the guardhouses are performed by locally alarming portal or hand-held metal and explosives detectors. When there is reasonable cause to suspect that a person is attempting to introduce firearms, explosives, incendiary devices or other unauthorized material into the protected area, the person is given a physical pat-down search. When the metal and/or explosive detectors are not in service and operating in accordance with equipment test standards, physical pat-down searches are performed."

Contrary to the above, on August 26, 1996, a contractor employee entering the protected area caused two portal metal detectors to alarm on three different attempts to pass through them, and although these alarms provided reasonable cause to suspect that the contractor was attempting to introduce firearms, explosives, incendiary devices or other unauthorized material into the protected area, no physical pat-down search was performed, and the contractor was given his photobadge-keycard and entered the protected area.

2. The PSE&G Salem - Hope Creek Security Contingency Plan, Revision 4, dated February 12, 1996, states, in part, in Section 8.1.3.2, that it will be assumed that a security threat exists until it is known otherwise. Section 8.1.4 of the Contingency Plan defines an intruder as a person present in a protected or vital area without authorization. Section 8.3.2.6 of the Contingency Plan states that in the event of discovery of intruders or attack, notify the Senior Nuclear Shift Supervisor (SNSS) of implementation of Contingency Event 6 (Discovery of Intruders), provide a concise situation report, and request SNSS to classify the event per the Event Classification Guide in Section 16.

Contrary to the above, on August 26, 1996, a contractor who had alarmed the two portal metal detectors on three occasions, entered the protected area without receiving a

pat-down search, was not authorized to enter the protected area without having received a search, and, therefore, should have been assumed to be an intruder and security threat until it was known otherwise; however, the SNSS was not notified of the threat, and the event was not classified per Event Classification Guide 16.

This is a Severity Level III problem.”

2. Response to the Notice of Violation

PSE&G does not dispute the violation.

i. Description of the Event

At approximately 0628 hours on August 19, 1996, a male contractor was accessing the site through the Security Center by normal means. The contractor was successfully screened for explosives and hand-carried items; however, he set off the metal detector alarm. As noted, the contractor cooperated with the instructions to re-enter the metal detector on several occasions. As a result of the unsuccessful screening, a female security force member (SFM) requested the contractor to wait for a hands-on search. The SFM did not effectively communicate with the contractor; consequently, the contractor did not realize that security was expecting him to wait for a hands-on search.

Because the SFM was a different gender than the contractor, the first-line security supervisor directed the SFM to switch with a same gender SFM to perform the hands-on search. During this transition, no one from security maintained positive control of the contractor. The contractor proceeded to obtain his badge and enter the protected area at 0629 hours, without the hands-on search. A non-fully qualified security trainee, during his first morning of in-plant training, observed this evolution. He did not react because he had previously been instructed to merely observe on-going activities because of his qualification status.

The contractor left the area before the assigned same gender SFM arrived. The other SFMs in the area unsuccessfully attempted to locate the contractor in the Security Center. The first-line security supervisor obtained a description of the contractor from the SFMs and the SFM trainee who had observed the incident. The supervisor then briefly entered the protected area in an attempt to locate the contractor. The supervisor was not able to locate the contractor and returned to the Security Center. He then informed his management of the incident.

In an attempt to identify the contractor, a computer report was generated at approximately 0633 hours to determine who entered the protected area between 0615 hours and 0630 hours. This list of names was narrowed down based on the badging booth that the contractor had used (as observed by the SFM trainee). At approximately 0715 hours, the SFM who originally processed the contractor and the PSE&G security supervisor went to the processing center to determine the identity of the contractor via a review of badge photos. Upon determination of the contractor's identity, the SFM and the PSE&G security supervisor returned to the Security Center. The PSE&G security supervisor attempted to reach the contractor's supervisor at approximately 0730 hours. After Security contacted the contractor's supervisor, the contractor was located and escorted outside the protected area to the Security Center at 0747 hours. A badge history was run that showed the contractor did not enter any vital areas and his whereabouts were accounted for by coworkers. The contractor's locker, work area, and access and egress routes were searched; no contraband was discovered.

The contractor fully cooperated with security and remained in the Security Center while the search was being conducted. At approximately 0830 hours, the contractor again passed through the metal detector, causing it to alarm. After removing loose items from his person, the contractor successfully passed through the metal detector. A hands-on search of the contractor was also conducted. Nothing unusual was detected.

Security notified the Salem Control Room of the incident at 0818 hours and the Hope Creek Control Room at 0820 hours. At this point, security informed the Control Rooms of the event and the applicable contingency plan, and made an Event Classification Guide classification recommendation that included a one-hour notification. Both Control Rooms concurred with this classification. Salem notified the NRC Operations Center at 0903 hours. Hope Creek notified the NRC Operations Center at 0913 hours. These notifications were made pursuant to the requirements of 10CFR73.71. However, they were not made within one hour of the start of the event (0629 hours).

Nuclear power plant access control consists of three parts: authorization requirements delineated in 10CFR73.56 and 10CFR73.57, the fitness for duty provisions of 10CFR26, and the positive access controls described in 10CFR73.55.

The authorization requirements consist of a background investigation, psychological assessment, and behavioral observation. In addition, 10CFR26 requires on-going

compliance with fitness for duty regulations. The contractor involved in this event was granted unescorted access authorization based on a request for unescorted access by a PSE&G manager and his completion of, and compliance with, these requirements.

In addition to the authorization and fitness for duty requirements, personnel seeking access to Salem or Hope Creek are subjected to positive access control requirements. These include metal detectors, explosive detectors, x-ray machines, and observation. The contractor involved in this instance was successfully screened for explosives and any hand-carried items. He was not successfully screened through the metal detectors, which represents a failure of the positive access controls.

Generic Letter 91-03 was issued to provide regulatory guidance relative to the reporting of safeguards events. The Generic Letter discusses partial failure of an otherwise satisfactory access authorization or access control program. The Generic Letter states that licensees should properly compensate for these partial failures within 10 minutes of discovery, unless extenuating circumstances prevent compensation within that time. If the partial failures are properly compensated for, the event need not be reported within one hour provided there was no malevolent intent, nothing adverse resulted from the delay, and appropriate measures are taken to ensure a more timely response in the future. It should be noted that the regulatory guidance provided in Generic Letter 91-03 does not require the contractor involved in this event to be classified as an intruder.

The contractor was identified, located, and removed from the protected area; however, additional measures such as immediate notification of the Control Room and deactivation of the contractor's badge, should have been taken to completely compensate for this incident. The investigation, both during and after the incident, demonstrated that there was no malicious intent on the contractor's part, and that his behavior while onsite was normal and routine. The contractor has been employed at this site off and on for over 20 years. Interviews with the SFMs indicated that the contractor cooperated with the original instructions to re-enter the metal detector. Further, the SFM did not observe any unusual behavior or deceit by the contractor. The contractor was identified, removed from the protected area, and re-searched. The contractor cooperated with the investigation and volunteered his locker combination. His locker, work area, and access and egress routes were searched. No contraband was found. Therefore, it was

determined that no malevolent intent was involved and no adverse events resulted from the delay in implementing compensatory measures.

ii. Reason for the Violation

The cause of this event was personnel error on the part of security personnel. This error involved the failure to maintain positive control of the contractor until the hands-on search was conducted.

The cause for the failure to notify the Control Rooms in a timely manner is personnel errors on the part of the first line security supervisor and the PSE&G security supervisor. The security supervisors focused on retrieving the contractor from the protected area and did not refer to security contingency procedures until after the contractor was escorted outside the protected area. Therefore, notification was not made in a timely manner.

PSE&G agrees that the notification to the Control Rooms was not made until the event was essentially over.

iii. Corrective Steps That Have Been Taken and Results Achieved

The contractor was identified and removed from the protected area. The contractor's locker, work area, and access and egress routes were searched.

The involved security personnel were retrained on the proper method of maintaining positive control over an individual prior to conducting a hands-on search.

The contractor and the involved security personnel were disciplined.

Communications meetings were held with security force personnel to review this event, including stressing procedural compliance and reinforcing the security force's mission.

Instruction and expectations relative to maintaining positive control of individuals that require a hands-on search and communications with the Control Room have been reinforced with security supervisors.

iv. Corrective Steps That Will be Taken to Avoid Further Violations

A standards and expectation manual will be developed and provided to the security force by May 1, 1997. This manual will reinforce expectations that have already been communicated.

Security procedures have been reviewed. The revisions identified by this review will be completed by March 1, 1997.

v. Date When Full Compliance Will Be Achieved

Compliance was achieved when the contract individual was removed from the protected area and the 10CFR50.72 notification was made.

C. **Violation C**

1. Description of the Notice of Violation

"License Condition 2.E of License Number NPF-57 for the Hope Creek facility and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10CFR50.90 and 10CFR50.54 (p).

The PSE&G Salem - Hope Creek Security Plan, Revision 7, dated June 19, 1996, states, in part, in the Introduction Section that the implementing documents of this plan are the Security Plan Procedures and Post Orders. Security Plan Procedure 4, Revision 3, dated November 1, 1994, states, in Section 4.13, that when a person granted unescorted access terminates employment or no longer requires access to the site protected area, the cognizant department shall notify the Screening Supervisor within two working days, and the Screening Supervisor ensures that the administrative actions required to inactivate the security photobadge and personnel access clearance are accomplished.

Contrary to the above, the Screening Supervisor was not notified within two working days that 12 employees had been terminated in June and July 1996. Specifically, notification of five employees that were terminated in June 1996 was not made until the 31-day revalidation list was issued in July 1996, and notification of seven employees that were terminated in July 1996 was not made until the 31-day validation list was issued in August 1996.

This is a Severity Level IV Violation."

2. Response to the Notice of Violation

PSE&G does not dispute the violation.

i. Description of the Event

Between July and August 1996 there were several incidents of the failure of various departments to notify security within 48 hours of an employee's termination. These incidents resulted in the above violation. In addition to the examples cited by the NRC, PSE&G has self-identified other instances of occurrence. Review of the specific individual cases where unescorted site access was not terminated within 48 hours as required did not reveal any specific patterns (e.g., multiple departments were involved and the terminations included seasonal layoffs, contractor layoffs and permanent PSE&G personnel resignations or retirements). None of the specific cases included "for cause" terminations. The badges for individuals who have been terminated "for cause" have consistently been deactivated appropriately.

ii. Reason for the Violation

The cause of the failure to deactivate badges within 48 hours of termination is less than adequate management standards, policies, and administrative controls. The responsible departments did not follow the established process for deactivating badges; in addition, the enforcement and implementation of the process have been lax. This has been an on-going issue that security management did not effectively take a leadership role in resolving.

iii. Corrective Steps That Have Been Taken and Results Achieved

Revised expectations for deactivating badges have been communicated to department managers.

A "last-day" badge drop program has been initiated. A badge drop location has been provided where badges can be dropped for employees who no longer have a need to gain site access.

As an interim action, the protected area access authorization review is being done on a weekly basis. Additional instances of non-compliance have been found since the identification of this issue. When these instances are discovered, an action request is initiated in the Corrective Action Program and the responsible manager is held accountable for the non-compliance.

The out-processing process has been enhanced to clarify the process for deactivating badges of terminated employees.

iv. Corrective Steps That Will be Taken to Avoid Further Violations

The actions stated in part (iii) above are considered to be sufficient to avoid further violations.

v. Date When Full Compliance Will Be Achieved

The out-processing program is in full compliance with NRC regulations. Additional emphasis is being placed on the implementation of the program to ensure compliance with the program.

D. Violation D

1. Description of the Notice of Violation

"License Condition 2.E of License Number NPF-57 for the Hope Creek facility and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10CFR50.90 and 10CFR50.54(p).

The PSE&G Salem - Hope Creek Security Training and Qualification Plan, Revision 3, dated February 12, 1996, Section 3.3, states, in part that, the qualification matrix identifies the courses of instruction by job classification, which each person shall pass in order to qualify for performance of related security duties. Section 3.8, titled, Supervisory Training, states that supervisors are required to qualify in all security force tasks. Critical Security Task No. 5, titled, "Conduct Patrols," states, in Element 05-A, that the examinee will demonstrate knowledge of the site by responding correctly to the location of several protected and vital area alarms.

Contrary to the above, on August 20, 1996, the inspectors determined by a review of training records and shift activity logs, that two supervisory personnel were performing Field Operations Supervisor duties prior to qualifying on all of the required critical security tasks for the performance of their related security duties. Specifically, the supervisors were signed off as qualified supervisors by the security training

department and given a 90-day period to complete Element 05-A. However, during the 90-day period, the supervisors were assigned independent Field Operations Supervisor duties, to include contingency response coordination, requiring extensive knowledge of the protected and vital area alarm locations.

This is a Severity Level IV Violation."

2. Response to the Notice of Violation

PSE&G does not dispute the violation.

i. Description of the Event

The qualification process for the Security Force consists of a series of Performance Certification Components (PCC) that must be completed. The number of PCCs to be completed varies depending on the security position of an employee. Each PCC is further broken down into specific tasks.

Four recently hired contract supervisors did not complete a portion of a PCC prior to assuming a supervisory role on shift. For this task, "Demonstrate Knowledge of Site Layout and Features," a 90-day grace period was granted by security management to complete the task. This 90-day grace period was not allowed by procedure; however, it was granted to provide the newly hired employees time to become familiar with the site and stations prior to qualification.

As a result of the above described discretion, two of four recently hired security supervisors were inappropriately assigned work prior to completion of qualification requirements.

ii. Reason for the Violation

The root cause of this violation was personnel error by security management in granting a grace period to qualification requirements without controlling assignments. This allowed the supervisors to supervise work for which they were not qualified.

iii. Corrective Steps That Have Been Taken and Results Achieved

The SFM qualification cards were reviewed for completeness. The discrepancies were limited to the supervisors discussed in this response.

The security lesson plan has been revised to specifically state that there is no grace period for supervisors and armed response officers.

iv. Corrective Steps That Will be Taken to Avoid Further Violations

A standards and expectation manual will be developed and provided to the security force by May 1, 1997. This manual will reinforce expectations that have already been communicated.

v. Date When Full Compliance Will Be Achieved

Full compliance has been achieved. The supervisors involved in this event were completely qualified prior to the discovery of this issue.

E. Violation E

1. Description of the Notice of Violation

"License Condition 2.E of License Number NPF-57 for the Hope Creek facility and License Conditions 2.E of License Numbers DPR-70 and DPR-75 for Salem, require that PSE&G fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10CFR50.90 and 10CFR50.54(p).

The PSE&G Salem - Hope Creek Security Plan, Revision 7, dated June 19, 1996, states, in part, in the Introduction Section, that the implementing documents of this plan are the Security Plan Procedures and Post Orders. Security Plan Procedure 8, Vehicle Access Control, Revision 8, dated February 28, 1996, requires, in part, in Section 10, Use of Crane Gate, that the security shift supervisor/designee direct that the zone be crawl tested after the vehicle passes and prior to securing the patrol. This procedure further states, that the security force member (SFM) No. 1 shall remain posted at the gate until the zone passes the crawl test.

Contrary to the above, on June 5, 1996, a vehicle passed through the Crane Gate, and a crawl test was not conducted prior to SFM 1 being released from the post.

This is a Severity Level IV Violation."

2. Response to the Notice of Violation

PSE&G does not dispute the violation.

i. Description of the Event

On June 5, 1996, a vehicle entered the site through the crane gate. The security supervisor believed that a crawl test would only be required if the vehicle left depressions in the gravel. He inspected the area, determined that no depressions were there, performed a walk-through test, secured the zone, and proceeded to an adjacent zone.

Shortly thereafter, the supervisor discussed the test with another supervisor who knew that the crawl test was required by procedure. The crawl test was then performed satisfactorily.

ii. Reason for the Violation

The root cause of this event was a personnel error in that the security supervisor did not follow the approved procedure for testing the crane gate.

iii. Corrective Steps That Have Been Taken and Results Achieved

The involved security personnel were disciplined.

Communications meetings were held with security force personnel to review this event, including stressing procedural compliance and reinforcing the use of the Corrective Action Program and the security force's mission.

iv. Corrective Steps That Will be Taken to Avoid Further Violations

A standards and expectation manual will be developed and provided to the security force by May 1, 1997. This manual will reinforce expectations that have already been communicated.

v. Date When Full Compliance Will Be Achieved

Compliance was achieved when the zone was satisfactorily crawl tested on June 5, 1996.