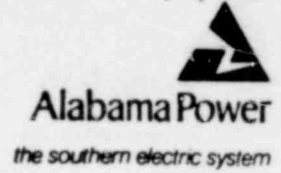


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USNRC REGION II  
ATLANTA, GEORGIA

F. L. CLAYTON, JR.  
Senior Vice President



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September 5, 1979

Mr. James P. O'Reilly  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

In response to Item 10 of IE Bulletin No. 79-16, Alabama Power Company submits the following response:

ITEM 1:

Establish criteria for granting unescorted access to each vital area, which shall be based upon the following:

- a. A screening program meeting ANSI N18.17.
- b. The individual has a valid need for access to the equipment contained in each vital area to which access is authorized. Valid need is based upon assigned duties requiring the performance of specific tasks upon or associated with specific equipment located in each vital area to which access is granted. Valid need to enter one vital area shall not necessarily indicate that the person has a need to enter any other vital area.

RESPONSE:

- 1a: APCo and contractors have screening programs that meet ANSI N18.17, 1973, Section 4.3. The programs are applicable to all personnel granted unescorted access to vital areas.
- 1b: Before each individual is authorized unescorted access to a vital area, it is determined that he has a valid need to enter that area. The authorization is based on the individual's assigned duties required to be performed in each of the vital areas. Authorization to enter one vital area does not necessarily give access to other vital areas.

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ITFM 2:

An access list will be established for each area not to exceed 31 days. An individual will be on the access list only for the duration of the task to be performed. If an individual has a valid need for unescorted access for a single entry or for intermittent occasions during this period, a separate daily access list shall be prepared. All access lists shall be approved by the station manager (or equivalent) or his designated representative.

RESPONSE:

Authorized access of plant employees and non-employees who have a need for frequent access into protected and vital areas is established by a properly executed written access authorization from the Plant Manager or his designee, the issuance of a permanent photo-type security badge, and the individual receiving the necessary training for unescorted access. Individuals meeting these criteria are considered to have established a need for unescorted access to work and to introduce needed material and vehicles to facilitate their work in the protected areas, vital areas and isolation zones to which access is authorized. Unescorted access authorization is based on an initial determination made by the Plant Manager or an individual designated by the Plant Manager to grant access to protected and vital areas. The need for access will be revalidated at least every 31 days. Personnel not meeting the above criteria and having a need to enter a protected or vital areas, shall be appropriately badged and escorted. Access lists are maintained that contain the name, social security account number, name of employer, areas to which access is authorized, and the period of access for all persons who are granted unescorted access to Protected and Vital areas. These lists are controlled and updated every 31 days. Daily addenda are made as necessary.

ITEM 3:

Individuals will be removed from the access list immediately upon termination of need. If an individual has not entered the vital area during the effective period of the access list (not to exceed 31 days) the need for access should be reassured prior to extending the authorization. To ensure that these actions are taken, the access list shall be reviewed and reapproved at least every 31 days.

RESPONSE:

Individuals will be removed from the access list immediately upon termination of need. The access list is reviewed and reapproved at least every 31 days and each individual's need for access is reaffirmed.

ITEM 4:

Void access authorizations for all personnel not satisfying the criteria in 1.a and 1.b and where appropriate, reprogram the key card system and reissue key cards that are coded to implement the above vital area access authorization program.

RESPONSE:

For personnel not satisfying the criteria in 1.a and 1.b, their key card-badge will be removed from the badge rack and their use of the card in-

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validated in the Computer Key Card System.

ITEM 5:

Develop reasonable alternatives so that the number and frequency of access to vital areas can be minimized consistent with safe operations.

RESPONSE:

Through implementation of Items 1 through 4, the number and frequency of access to vital areas will be minimized consistent with safe plant operations.

ITEM 6:

Establish emergency procedures where, during an emergency, additional authorized personnel, meeting criteria in 1.a and 1.b, can move freely throughout the vital areas with their entry and exit being recorded. Upon securing from the emergency, the entry/exit record will be reviewed, and normal access control will be reestablished.

RESPONSE:

An inactive list of authorized individuals who meet all access requirements except present need will be maintained and such personnel will have badges for emergency use. In the event of an emergency, badges would be issued to appropriate personnel from this list and their entry and exit recorded. Upon securing from the emergency, the entry and exit record will be reviewed and normal access control will be re-established.

ITEM 7:

Prevent tailgating by one or more of the following:

- a. Establish procedures that require authorized personnel to prevent other personnel, including those authorized unescorted access, from tailgating. Ensure all authorized personnel are trained in the procedure, and establish a management program that ensures that the procedure is properly performed.
- b. Acquire equipment, such as turnstiles, to prevent tailgating. Ensure that such equipment will not deny access or egress under emergency conditions.
- c. Station a guard, watchperson or escort at the vital area access portal. This alternative would be most useful when there is a large number and frequency of access, such as occurs with containment during refueling.
- d. By any other means that achieve this objective.

RESPONSE:

Procedures will be revised to prevent tailgating through vital area portals. Authorized personnel will be trained in the requirements of this procedure. An OQA audit program will be established to ensure that the procedure is properly performed. Disciplinary measures will be provided for violators.

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ITEM 8:

Assign corporate responsibility for management oversight of VA access control and require personal involvement to ensure that all intermediate levels of management are properly discharging their responsibilities in this regard.

RESPONSE:

The Plant Manager has overall responsibility for vital area access control. Plant procedures designate certain specific responsibilities to intermediate levels of plant management. All plant management will be trained in their specific responsibilities as required by procedures. The Corporate OQA and Security Departments have audit responsibility in this area.

ITEM 9:

Conduct routine functional tests of the electronic access control system, including each key card reader, to verify (i) its operability and proper performance, and (ii) the accuracy of the data recorded. This test should be incorporated into the seven-day test required by 10 CFR 73.55 (g).

RESPONSE:

The electronic access control system, including each key card reader will be subjected to functional testing every seven (7) days to verify its operability, proper performance, and the accuracy of the data recorded.

ITEM 10:

Implementation Schedule.

RESPONSE:

Items 1.a, 1.b, 2 (except daily addendum) and 3 are currently implemented.

Items 4, 5, and 9 will be implemented upon completion of the current outage and at such time that the security computer and electronic access control system is fully operational.

Items 6, 7, and 8 will be implemented within 90 days from the date of this response.

Yours very truly,

  
F. L. Clayton, Jr.

FLCjr/JGS/mmb

cc: Mr. R. A. Thomas  
Mr. G. F. Trowbridge  
NRC Office of Inspection  
& Enforcement  
Washington, D. C.

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