

FEB 14 1990

In Reply Refer To:
Docket: 50-382/89-28
EA No. 89-211

Louisiana Power & Light Company
ATTN: J. G. Dewease, Senior Vice President
Nuclear Operations
317 Baronne Street
New Orleans, Louisiana 70160

Gentlemen:

Thank you for your letter of January 2, 1990, in response to our letter and Notice of Violation dated October 19, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

ISI

Samuel J. Collins, Director
Division of Reactor Projects

cc:
Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Vice President
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Louisiana Power & Light Company
ATTN: J. R. McGaha, Jr., Plant Manager
P.O. Box B
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RIV:SEPS
RCaldwell
2/9/90

C:SEPS
DPowers
2/9/90

D:DESS
BBeach
2/12/90

D:DESS
S:Collins
2/12/90

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Louisiana Power & Light Company

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Louisiana Power & Light Company
ATTN: L. W. Laughlin, Site
Licensing Support Supervisor
P.O. Box B
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Louisiana Power & Light Company
ATTN: G. M. Davis, Manager, Events
Analysis Reporting & Response
P.O. Box B
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Monroe & Leman
ATTN: W. Malcolm Stevenson, Esq.
201 St. Charles Avenue, Suite 3300
New Orleans, Louisiana 70170-3300

Shaw, Pittman, Potts & Trowbridge
ATTN: Mr. E. Blake
2300 N Street, NW
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Middle South Services, Inc.
ATTN: Ralph T. Lally, Manager
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P.O. Box 61000
New Orleans, Louisiana 70161

Chairman
Louisiana Public Service Commission
One American Place, Suite 1630
Baton Rouge, Louisiana 70825-1697

Louisiana Power & Light Company
ATTN: R. F. Burski, Manager, Nuclear
Safety and Regulatory Affairs
317 Baronne Street
New Orleans, Louisiana 70112

Department of Environmental Quality
ATTN: William H. Spell, Administrator
Nuclear Energy Division
P.O. Box 14690
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President, Police Jury
St. Charles Parish
Hahnville, Louisiana 70057

Mr. William A. Cross
Bethesda Licensing Office
3 Metro Center
Suite 610
Bethesda, Maryland 20814

U.S. Nuclear Regulatory Commission
ATTN: Resident Inspector
P.O. Box 822
Killona, Louisiana 70066

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

bcc to DMB (IE04)

bcc with nonsafeguards portion of licensee's letter:

Lisa Shea, RM/ALF
Resident Inspector
Section Chief, DRP/A
DRP
SEPS File
DRS
MIS System
RSTS Operator
RIV File
Inspector
Section Chief
B. Beach
Project Engineer, DRP/A
D. Wigginton, NRR Project Manager
J. Lieberman, NRR
G. Sanborn

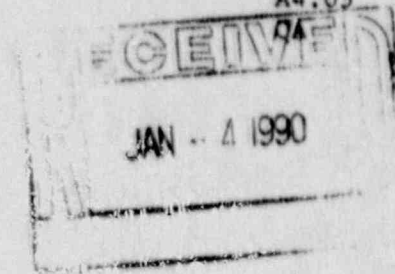


Louisiana Power & Light Company
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New Orleans, LA 70160-0340
Tel. 504 595 2805

R. F. Burski
Nuclear Safety & Regulatory Affairs
Manager

W3P89-2169

A4.05



January 2, 1990

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 89-28

Gentlemen:

In accordance with 10 CFR Part 2.201, Louisiana Power & Light hereby submits in Attachment 1 the responses to Violations A and E (EA-211).

If you have any questions concerning these responses, please contact O.P. Pipkins at (504) 464-3236.

Very truly yours,

RFB/OPP/ssf
Attachment

cc: Messrs. R.D. Martin, NRC Region IV
F.J. Hebdon, NRC-NRR
D.L. Wigginton, NRC-NRR
E.L. Blake
W.M. Stevenson
NRC Resident Inspectors Office

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ATTACHMENT I

LP&L RESPONSE TO NOTICE OF VIOLATION

(NRC Inspection Report 89-28)

VIOLATION NOS. A (382/8928-02) & B (382/8928-01)

10CFR73.21(d)(2) states, in part, that "While unattended, Safeguards Information shall be stored in a locked security container."

- A. "Contrary to the above, a safe containing Safeguards Information was discovered to be unlocked and unattended at approximately 8:10 a.m. on September 12, 1989, in a facility outside of the plant's Protected Area. The safe had been unlocked and unattended for about 16 hours." (8928-02)
- B. "Contrary to the above, the NRC determined through interviews with licensee employees that a safe containing Safeguards Information in a facility outside the plant's Protected Area was unlocked and unattended for about 40 minutes on September 11, 1989." (8928-01)

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

RESPONSE

(1) Reason For The Violation

Violations A & B

The root cause of both parts of the violation was personnel error in that the employee failed to follow Procedure NOP-007, "Handling of Safeguards Information," by not ensuring that the safe was under the positive control of an authorized person at all times (Steps 5.10.1 and 5.10.3) while it remained open. The situation was fostered by a weakness in NOP-007 in that although the procedure was specific on the requirement, it did not contain specific procedural steps to ensure the safe was properly relocked.

As discussed in Security Incident Report SIR-89-S05-00 and the enforcement conference on November 7, 1989, on September 11, 1989 a clerk in the Document Control Center (located within the Controlled Access Area) requested access to a safe containing safeguards information to obtain plant drawings. The safe was opened by an authorized individual, the drawings were removed, and the safe was subsequently closed but not locked and was unattended in violation of NOP-007. At approximately 1610 hours on September 11, 1989 the clerk returned the drawings to the safe and "locked it by spinning the combination dial."

Upon returning to work on September 12, 1989, the original clerk, for whom the safe had been opened the previous day, requested access to the safe in question to complete the work started on September 11, 1989. When opening the safe the clerk discovered that the safe could be opened without turning the combination dial. Since no one opened the safe that morning, the event was reported to her supervisor and Security.

An investigation by a licensed locksmith indicated that the combination dial may not have been rotated sufficiently when the clerk attempted to lock the safe on September 11, 1989. Failure to make at least one full rotation of the combination dial could prevent the tumblers from completely resetting, thus allowing the safe to be opened without entering the combination.

Following the discovery of the unlocked safe, an investigation was conducted by site security personnel and an independent investigator from another utility company. Based on these investigations, LP&L is confident that no safeguards information was compromised.

(2) Corrective Steps Which Have Been Taken And The Results Achieved

Violation A

The event was promptly reported to Site Security by personnel who discovered the unlocked safe. The event was properly classified and reported to the NRC.

An immediate preliminary investigation was conducted by Site Security and a timely independent investigation by an outside investigator from another utility company was initiated. Three separate inventories, including a page-by-page inventory, were conducted to ensure that the safe contents were not compromised. In addition, an independent inspection of the safe's locking mechanism was conducted by a licensed locksmith.

Violations A & B

Responsible personnel received counseling from their supervisor.

Personnel in Document Control (area where events occurred) were retrained on the proper way of controlling safes containing safeguards information. Document Control also changed the combinations of their safeguards information safes.

The governing procedure, NOP-007, was revised. Although the previous revision met regulatory requirements, new enhancements above regulatory requirements were included to provide more guidance to personnel and additional controls over safeguards information. In addition, the procedure was revised to provide guidance on operating the combination dial when locking a safe.

Additional training for controllers of safes containing safeguards information was conducted. The purpose of this training was to discuss "Lessons Learned" from this event and outline procedure enhancements.

LP&L also conducted a management review of existing locations that store and control safeguards information. The objective was to reduce the number of locations, or the amount of safeguards information contained in the safe, if appropriate. As a result of the effort, two safeguards information control locations were eliminated (Operations and Nuclear Services) and Corporate Security reduced the amount of safeguards information maintained by that organization.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

The actions discussed above should prevent recurring violations.

(4) Date When Full Compliance Will Be Achieved

LP&L is currently in full compliance.