

GULF STATES UTILITIES COMPANY



RIVER BEND STATION

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AREA CODE 504

635 6094

346 8661

March 29, 1993

RBG- 38284

File Nos. G9.5, G15.4.1

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/93-02

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violations for NRC Inspection Report 50-458/93-02. The inspection was conducted by Mr. A.B. Earnest on January 19-22, 1993 of activities authorized by NRC Operating License NPF-47 for River Bend Station -Unit 1. GSU's reply to the violations are provided in the attachments.

Consistent with NRC Region IV's request, Unresolved Item 9301-01 involving potential inadequacies of contingency procedures is to be discussed in a management meeting currently scheduled for April 12, 1993 in Arlington, TX.

Should you have any questions, please contact Mr. L.A. England at (504) 381-4145.

Sincerely,

J. E. Booker

J.E. Booker
Manager - Safety Assessment
and Quality Verification
River Bend Nuclear Group

KES
SLW JHM
LAE/KES/DNL/SLW/JHM/kvm

Attachment

cc: U.S. Nuclear Regulatory Commission
Document Control Desk
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NRC Resident Inspector
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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION (458-9302-02) LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated February 26, 1993.

VIOLATION

Failure to Follow Drill Procedure

Condition 2.D of the River Bend Station Operating Licensing NPF-47, requires the licensee maintain in effect and fully implement all provisions of the commission approved Physical Security Plan. This includes amendments and changes pursuant to the authority of 10CFR50.54(p).

The Introduction Section of the Physical Security Plan states that security procedures provide the detailed instructions necessary to implement the plan.

Paragraph 6.2 of Security Procedure PSP-4-501 requires notification of the control room, local law enforcement agencies, and members of the security shift that a drill will be conducted. Paragraph 6.3.2 of Security Procedure PSP-4-501 also requires that actual penetration of the protected or vital areas not occur during drills.

Contrary to the above, on July 27, 1992, licensee personnel failed to notify the appropriate personnel that a drill was being conducted. Further, during test drills, licensee personnel failed to adequately search a package that penetrated the PA.

REASON FOR THE VIOLATION

During the course of the quality assurance audit of the RBS security program conducted July 27, 1992 through August, 1992, the audit team expressed a need to conduct a contingency drill to observe the security force response. On July 27, 1992, the auditor who would be conducting the drill met with the Director - Nuclear Station Security (DNSS) and explained what type of drill he wanted to conduct. As part of the drill, the auditor's plan included an event to create an alarm on the protected area (PA) intrusion detection system to evaluate the Security Department's ability to respond. The auditor proposed to "cause" an alarm by "any" method. It was mutually agreed that he could initiate two alarms. One of the methods was to throw a bag over the PA barrier and intrusion detection system to see if it's presence inside the area would be detected. Because the security system is not designed to detect aerial assaults, the DNSS explained to the auditor that the throwing of the bag would probably not be detected, but

the auditor still wanted this to be part of the exercise.

In an effort to maintain drill integrity, the auditor requested that he be accompanied by security personnel at all times in lieu of notifying the security shift supervisor of the drill. In order to assist and monitor the auditor's activity, three members of the Security Department equipped with communication equipment accompanied the auditor. Prior to leaving the DNSS' office to begin the drill, the auditor and the DNSS discussed the content of the bag, which consisted of a toy gun, a knife and a disarmed hand grenade. As stated in the notice of violation, the DNSS complied with the auditor's request, which resulted in a failure to notify the appropriate personnel that a drill was being conducted. This action constituted a failure to follow drill procedures.

By complying with the auditor's request the action also resulted in the PA barrier being penetrated by a bag which was not properly searched by a qualified member of the security force. This, also, was not done in compliance with drill procedures.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The following corrective actions have been completed:

- As a result of the incident, the DNSS was counseled on his failure to follow procedures and the importance of procedural compliance.
- Because the security procedure was vague on who could actually authorize drills, the procedure was revised to clarify who can authorize and who should be notified for the various types of security drills. Both senior QA and Security management personnel met and agreed that future QA requested drills shall be planned and conducted strictly in accordance with procedures.
- On October 14, 1992, a Quality Assurance Department policy statement regarding conducting tests, drills or exercises was published. As a result of these actions, during the QA audit conducted during February, 1993 the security drills were run for the audit team without incident.

FURTHER STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

As future drills are requested, Security management will ensure that drills are conducted in accordance with established guidance and procedures. Along with above corrective actions, this will prevent a recurrence of this type event.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

Corrective action was completed and full compliance achieved on February 10, 1993.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION (458-9302-03) LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated February 26, 1993

VIOLATION

Inadequate Protection of Safeguards Information

10CFR 73.21 requires that all safeguards information be marked in a conspicuous manner, Further, that all unattended safeguards information either be in the possession of someone authorized access to the information or that it be stored in an approved container.

Contrary to the above, on January 2, 1992, the licensee introduced a safeguards information document into the work request system without marking or protecting it as safeguards information. Further, on April 16, 1992, a copy of the Physical Security Plan was left unattended on a desk outside the protected area for about 5 minutes.

REASON FOR THE VIOLATION

During installation of plant Modification Request (MR) 91-0072, which installed a hatch in the protected area barrier at the end of the G-tunnel, it was determined upon completion of the modification that the locking mechanism on the door may not have been adequate to meet security locking criteria. In order to correct this, it became necessary to generate another MR to add additional equipment to improve on the initial installation. The initial MR documentation which installed the hatch was determined not to be safeguards. When the additional MR was prepared to change the existing design, it too was not initially determined to be safeguards. However, after being reviewed by a QA engineer, the classification of the document was questioned. Because of the guidance in determining the classification of a document, it was agreed that the potential to question the document classification did exist. To be on the conservative side, it was, therefore, agreed to recover all known copies of the document, destroy those copies and classify the original as safeguards information.

With regards to the physical security plan being left unattended on a desk outside the protected area for about five minutes, the reason for this violation was that the individuals in charge of the material (momentarily) failed to follow established procedures, and is attributable to human error.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

As a result of this incident, the plant procedure that outlines the control of safeguards information was revised to provide additional criteria regarding what constitutes a safeguards document. The procedure also provides guidance regarding documents that may be questioned regarding classification. With regards to the physical security plan being left unattended for about 5 minutes outside the PA, the Director - Nuclear Station Security (DNSS) was counseled on the responsibilities of controlling safeguards when outside an authorized container.

Due to other instances involving safeguards information, other corrective actions have been or are being taken to improve the over all program. Those corrective actions are described in GSU's response to Notice of Violation IR 9230-01 (RBG-37742 dated November 16, 1992), and Safeguards Licensee Event Report 92-S03 (RBG-37648 dated October 27, 1992).

FUTURE STEPS WHICH WILL BE TAKEN TO AVOID FUTURE VIOLATION

Security will continue to monitor the safeguards information control program to ensure that safeguards information is being handled in accordance with procedural requirements. Security has taken steps to reduce the volume of safeguards information that exist, will continue to monitor new information that is generated, and will reduce the number of persons who possess and/or maintain safeguards to reduce the exposure to handling errors.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

Immediate corrective action was completed and full compliance achieved on February 26, 1993.