



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

511 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

MAY 19 1993


Docket: 50-458
License: NPF-47

Gulf States Utilities
ATTN: P. D. Graham
Vice President (RBNG)
P.O. Box 220
St. Francisville, Louisiana 70775

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 50-458/93-08

Thank you for your letter of May 3 1993, in response to our letter and Notice of Violation dated April 2, 1993. 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,


L. J. Callan, Director
Division of Radiation Safety
and Safeguards

cc:
Gulf States Utilities
ATTN: J. E. Booker, Manager-
Nuclear Industry Relations
P.O. Box 2951
Beaumont, Texas 77704

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1401 L Street, N.W.
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JEH 11

bcc to DMB (IE04) w/copy of licensee's letter dated May 3, 1993:

bcc distrib. by RIV:

J. L. Milhoan

B. Murray, DRSS/FIPS

A. B. Earnest, FIPS

DRP

Section Chief, DRP/C

Project Engineer, DRP/C

Section Chief, DRP/TSS

DRS

Resident Inspector (2) - River Bend

Senior Resident Inspector - Cooper

Senior Resident Inspector - Fort Calhoun

MIS System

FIPS File

RIV File

Lisa Shea, RM/ALF, MS: MNBB 4503

E. Baker, NRR Project Manager (MS 13 H15)

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|--------------|---------|---------------|-----------|--|
| RIV: FIPS | C: FIPS | DD: DRSS | D: DRSS | |
| ABearnest:nh | BMurray | BDChamberlain | LJCalhoun | |
| 5/18/93 | 5/18/93 | 5/18/93 | 5/18/93 | |

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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION (458/9308-01) LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated April 2, 1993.

VIOLATION

Failure to Maintain Keycard Accountability

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

Security Position Instruction, Procedure SPI-12, paragraph 3.2.4(1) states, in part, "Supervise the inventory of all KCs (Keycards) and VKCs (Visitor Keycards) as follows:" Paragraph 3.2.4(1)(i) states, "Using the SUP1 console, log out KCs displayed as [in] the PA but in the rack. Prepare a SECFM 115, Security Incident Report."

Contrary to the above, the inspectors identified that on August 24, 1992, and March 1, 1993, keycards were displayed as being in the protected area when, in fact, the badges were in the security badge racks. The keycard inventory did not identify the discrepancy in the keycard accountability program.

REASON FOR VIOLATION

The senior access control supervisor (SACS) failed to ensure that a proper keycard manual inventory accountability was initiated and conducted in accordance with his security position instruction (SPI-12). In delegating the keycard accountability duties to the access control officers who actually perform the keycard accountability task, the SACS failed to directly oversee the task being performed and failed to recognize that the security position instructions (SPI-4) for the access control officers did not contain guidance on performing the task, i.e. the implementing procedures were silent on how to perform keycard accountability. This activity had been performed by access control officers through experience. This event was caused by an inadequate procedure. Failure by the SACS to ensure that the keycard accountability was performed is considered human error and a lack of attention to detail.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

1. Implementing Procedure PSP-4-300 has been revised to incorporate the requirement to perform keycard accountability.

2. The senior access control supervisor's security position instruction (SPI-12) has been revised to include the following:

"The Senior Access Control Supervisor shall conduct and document a pre-accountability briefing prior to the accountability being initiated."

3. The access control officers' security position instruction (SPI-4) has been revised to include the details necessary on how to conduct a proper manual keycard accountability at the end of the day. The SPI also specifies that once the keycard manual accountability is performed, the officers are to switch roles and perform a second keycard accountability check.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

All security operations supervisors and access control officers have been retrained on the revised security position instructions and the importance of performing a correct keycard accountability.

Security procedures and SPIs are being reviewed by the security operations supervisors and officers to identify areas where additional information or clarification is required. This review is to be completed by April 1, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Compliance has been achieved.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION (458/9308-02) LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated April 2, 1993.

VIOLATION

Failure to Maintain Uninterruptible Power to the Security Systems

Paragraph 7.5 of the Physical Security Plan requires that security equipment be furnished uninterruptible power from buses that are also backed by standby diesel generators.

Contrary to the above, the inspectors identified that from July 22 until August 4, 1992, the uninterruptible power supply system was in manual bypass, thereby, eliminating uninterruptible power for the system.

REASON FOR THE VIOLATION

During the course of Refueling Outage 4, in the above described July, 1992 time frame, the Electrical Maintenance Department (EMD) performed maintenance work orders on Security's uninterruptible power supply (UPS) system. Security management was not officially notified that the security UPS system was taken out-of-service. The EMD was working on the inverter and was changing out battery cells in the direct current (dc) power source, all of which is part of the UPS power supply system serving the security system loads with normal power.

In order to ensure personnel safety while maintenance personnel were working on the system, the normal power (including the UPS system) was de-energized. To provide the security system loads with power during the maintenance period, the manual bypass switch was switched to the alternate source of power. While the power supply system was in this configuration, River Bend Station (RBS) was in noncompliance with the Physical Security Plan (PSP) since the PSP has no provision for maintenance of the power supply system. However, maintenance of the system must be performed to prevent degradation of the equipment.

At the time that maintenance was being performed, Security's central alarm station (CAS) was aware that the work was being performed and that the UPS was de-energized. When the power supply was shifted to manual bypass an indicator light was illuminated on the CAS board. This is the normal configuration for maintenance on all RBS inverters including safety related systems. However, the full extent of the work and the length of time the UPS would be offline were not apparent to Security at the beginning of the maintenance period.

As a result of this incident, it was also determined that no list of the major electrical loads for security equipment had been identified to Security or Operations. Consequently, Operations did not know that Security needed to be informed when Operations was preparing to tag out the UPS power supply system.

Inadequate procedures and a lack of communications are root causes of this event.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

This event was self-identified by GSU personnel. When Security realized the unusual length of time involved with the maintenance of the power supply system, personnel from Security and EMD met and discussed being in noncompliance with the PSP and how the maintenance activity could be promptly performed. Improved communications and notifications needed during future maintenance periods was also discussed. Security management initiated a condition report (CR 92-0651) to address the situation and to ensure that Security would be made aware of future maintenance activity involving the power supply system. Licensing personnel notified NRC Region IV inspection personnel by telephone on August 4, 1992, that RBS was operating in the alternate power supply configuration.

As a result of this event, Design Engineering provided Security and Operations with a list of the various sources of power and major loads for security equipment. Security requested that Operations take action necessary to ensure Security is properly notified prior to tagging out or working on power supply equipment. Operations has incorporated this information into procedure OSP-0019 "Electrical Bus Outages" to ensure that Security is notified prior to tagging security power supply equipment out of service. Information has also been incorporated into security procedures to ensure that, when the notification is made to Security, the alarm station operator will take necessary compensatory measures. These actions will enhance communications and heighten awareness of being without the UPS system which will minimize downtime of the UPS system.

FUTURE STEPS TO BE TAKEN TO AVOID FUTURE VIOLATIONS

As future maintenance activities are performed, Security management will monitor the activity to ensure that communications have taken place between departments so that Security is aware of the full impact of the maintenance and that proper compensatory measures are taken.

During the next submittal of a PSP revision, a statement clarifying the power supply requirements during maintenance on the UPS system will be added in the text.

DATE CORRECTIVE ACTION WILL BE COMPLETED

Full compliance was achieved on August 4, 1992. Training on procedure changes, additional corrective actions to provide for Security contingencies involving power supply outages, and the revision of the PSP will be completed by May 30, 1993.