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GULF STATES UTILITIES COMPANY

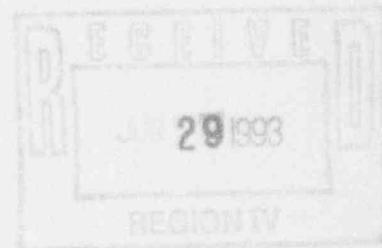
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U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Gentlemen:

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

Pursuant 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) continued response to the Notices of Violation 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 Notice of Violation 9302-04 is provided in the attachment. This follows discussions provided to NRC Region IV personnel in Arlington, Texas on April 12, 1993.

Should you have any questions, please contact Mr. D.N. Lorring at (504) 381-4157.

Sincerely,

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

DNL/KES/JHM/SLW/kvm

Attachment

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

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION (458/9302-04) LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated May 17, 1993.

VIOLATION

Condition 2.D of the River Bend Station Operating License 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 made pursuant to the authority of 10 CFR 50.54(p).

Threat Event M4 (Alarm System Outage) of the contingency portion of the Physical Security Plan requires response force members to control paths from the protected area barrier to the vital complex barrier. In addition, the Security Response Force members must control access to the vital islands. Paragraph 1.3.3 (Security Concept of Operations) states, in part, "The RBS security concept of operations is based on the following: . . . 4. Delay of intruders short of the VI's by barriers and the Security/Response Force until the arrival of LLEA support." Paragraph 3.1.2.a states that the Director - Nuclear Station Security is responsible for assuring security force members are trained to respond to safeguards contingencies.

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

Contrary to the above, the licensee implemented Security Contingency Procedure PSP-4-409 on January 6, 1993, without ensuring that the contingency measures detailed in the procedure would meet security plan requirements. The procedure did not include actions to interdict intruders prior to their reaching the vital islands which is violation of the contingency portion of the Physical Security Plan. In addition, the licensee did not adequately train the security force on the requirements of the procedure.

REASON FOR VIOLATION

In September 1992 the Security organization at River Bend Station (RBS) began evaluating its program in preparation for the NRC's operational safeguards response evaluation (OSRE). As part of the preparation, Security began to develop a more detailed defense strategy in order to better protect the plant against radiological sabotage. Of critical importance was the identification and location of the vital components and systems required to safely shut down the plant. Time line studies, the location and criticality of target sets, once identified, made it clear

that RBS defense strategy needed improvement to better protect the plant against adversaries before they could damage certain components and/or systems. This decision to make improvements in defense strategies also included establishing patrols inside the vital islands (VI) to protect vital equipment as opposed to posting a compensatory measure outside the VI doors to interdict an adversary.

It was determined by security management that PSP-4-409, "Safeguards Contingency (Alarm System Outage)" needed to be revised in order to allow security to react in a more timely manner while dealing with an alarm system outage. The revised procedure however, did not clearly delineate the difference between compensating for the loss of the alarm system and establishing defensive positions in response to an intrusion threat. Based on the way procedure PSP-4-409 was written (even though listed as a contingency procedure), it addressed compensatory actions more than safeguards contingency actions. This dual role of the procedure contributed to confusion by the security shift personnel in distinguishing between compensation of a systems failure versus an overt adversary attack. It was found that further confusion could be induced during performance of PSP-4-409 if security shift members were requested to change from a compensatory role to a safeguards contingency role without having the central alarm station appropriately announce security condition changes (seccon red).

During the review and revision process of changing the procedure to reflect ongoing tactical exercises (which is what OSRE is), security procedure preparation personnel failed to recognize that the procedures were in conflict with the Physical Security Plan (PSP) to protect VIs instead of vital equipment. This oversight was primarily caused by a lack of administrative controls to provide an adequate review of procedure changes.

Also, due to a lack of appropriate administrative controls, individuals participating in the tactical exercises failed to recognize that the procedure revision was in conflict with the contingency portion of the PSP. Personnel involved in OSRE preparations recognized that the strategy employed by the OSRE program to protect the plant was a better strategy than that identified in the PSP but failed to recognize the disparity. However, those failures to adequately distinguish between the compensatory action to address a total system outage as a result of component failure and a total system outage as a result of an adversary action, were contributing factors.

Training on the procedure change had been accomplished by having the security officers read and sign a statement acknowledging that they understood the change to the procedure. In addition, each shift conducted exercises on the proposed changes to the procedure, and was asked to report any problems encountered while conducting the exercises. No problems were reported at that time.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Procedure PSP-4-409 was revised again on April 7, 1993, to position compensatory officers controlling access outside the vital islands. PSP-4-409 is now in compliance with the Contingency Plan. Formal classroom training on the revision to PSP-4-409 utilizing a table top

mockup of the protected area and power block has been conducted and documented. Through the training process following the procedure revision, the confusion regarding compensation versus defensive strategies was clarified.

The procedure review process has been proceduralized in security procedure PSP-4-101, "Administration (Document Control)" to provide detailed instruction regarding the procedure review process. The procedure was effective May 3, 1993.

Changes to procedures and security position instructions (SPIs) will not be implemented prior to completion of any identified training on the approved procedure. The security staff will determine the appropriate training required for changes/revisions to procedures and SPIs. This requirement is in PSP-4-101 which was effective on May 3, 1993.

Security line departments (Security Operations, Access Control/Fitness for Duty, Security Training and Security Administration) are now responsible for their respective procedures, and are required to review and/or revise the procedures for which they are responsible. The effective date was May 3, 1993.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Currently, a procedure PSP-4-305 "Security System Compensation" is being written to identify compensatory actions to be taken for component failures as opposed to actions to be taken as a result of an intrusion threat. This will result in a more user friendly procedure. The estimated effective date is September 30, 1993.

Plan changes to the Physical Security Plan and the Safeguards Contingency Plan per 10CFR 50.54(p) are in the submittal process which will further clarify how RBS security will protect vital equipment. The plan changes will be submitted to the NRC by July 16, 1993.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Security plans, procedures and SPI's will be reviewed for content and adequacy by April 1, 1994.