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Robert A. Fenech
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January 14, 1994

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

Gentlemen:

In the Matter of	)	Docket Nos. 50-327
Tennessee Valley Authority	)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327, 328/93-51 - REPLY TO NOTICE OF VIOLATION (NOV) 50-327, 328/93-51-01

The enclosure contains TVA's reply to Douglas M. Collins' letter to Mark O. Medford dated December 15, 1993, which transmitted the subject NOV. The violation involved failures by members of the security force to comply with access control procedural requirements.

If you have any questions concerning this submittal, please telephone C. H. Whittemore at (615) 843-7210.

Sincerely,

Robert A. Fenech

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Enclosure
cc: See page 2

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cc (Enclosure):

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ENCLOSURE

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327, 328/93-51
DOUGLAS M. COLLINS' LETTER TO MARK O. MEDFORD
DATED DECEMBER 15, 1993

Violation 50-327, 328/93-51-01

"During an NRC inspection conducted on November 15-19, 1993, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C the violation is listed below:

> "Section 1.1.1.6 of the licensee's approved Physical Security Plan (PSP), Revision 32, dated June 7, 1993, states in part, 'To aid in the protection of the site, security force personnel are required to provide access control; provide backup and response for exterior and interior intrusion alarm annunciations, conduct tests of security equipment, issue and make security badges; and provide other security services as required by the Site Security Manager. Details of individual assignments are identified in site implementing procedures.'
>
> "Paragraph 3.2.1.1 of the PSP, Revision 32, dated June 7, 1993, states in part 'Personnel access to the protected area shall be through a locked door, gate, or turnstile controlled by a uniformed and armed MSF in a bullet resistant structure.'
>
> "Paragraph 21.0, of Physical Security Instruction (PHYSI) 32, Appendix K, states in part, 'Post 3 shall control access to the PA by utilizing the push - button control to unlock the turnstile.'
>
> "Contrary to the above, on August 10, 1993, a Licensee Quality Assurance Auditor observed that the push button control for the turnstile that provides access to the protected area was wedged in the open position which allowed the turnstile to free-wheel until secured by the attendant security officer.
>
> "Paragraph 3.2.1.7, of the PSP, Revision 32, dated June 7, 1993, states in part, 'Manufactured (completed) ID badges will remain in the protected area with the exception of MSF's ID badges while conducting vehicle searches.....'
>
> "Paragraph 8.1, of the PHYSI-32, Appendix 5, Revision 8, dated October 23, 1992, states in part, 'on each shift, MSFs working this post are responsible for conducting an accountability of persons that have gone into the protected area to ensure ID badges are accounted for.'

"Contrary to the above, on July 31, and September 1, 1993, security badges were removed from the protected area access portal by security officers to be utilized for authorized access into the Emergency Raw Cooling Water (ERCW) facility. located in a separate protected area. In each instance the security badges were not returned to the protected area access portal and were subsequently located in a security vehicle and a security officer's residence.

"Paragraph 3.3.A of PHYSI-32, Appendix J, Revision 8, dated October 23, 1992, states in part, 'All alarms must be responded to within ten minutes.'

"Contrary to the above, on August 11 and 25, 1993, no response and open detect alarms were received from vital area doors and response by the security force exceeded the established response time of 10 minutes. In each instance the vital door in question was locked and alarmed.

"Paragraph 12.3.2.1 of the PSP, Revision 32, dated June 7, 1993 states in part, 'metal search equipment shall be tested at least once every seven days to test the performance of the device.'

"Periodic Instruction, 0-P1-SQS-000-646.W, Metal Detector Functional Test, Revision 0, dated June 12, 1991, states in part, 'This test is performed weekly to ensure metal detectors in the protected area access portal are operational,' and 'This test is to be performed at least once every seven days.'

"Contrary to the above, on July 24, 1993, the required 7-day functional test for metal detector located in the protected area access portal was not completed within the required 7-day interval.

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

Reason for Violation

The NRC inspectors reviewed the Safeguards Event Logs along with the accompanying root cause determination and recurrence controls for each event. Each of the access control problems mentioned in the NRC inspection report and recorded in the TVA-SQN Safeguards Event Report log as security violations was attributed to lack of attention. Individually, the violations were judged not to be significant, and each issue had been adequately addressed with the appropriate corrective action. However, collectively, they indicated an adverse performance trend.

Corrective Actions That Have Been Taken and the Results Achieved

Event: "On August 10, 1993, a Licensee Quality Assurance Auditor observed that the push button control for the turnstile that provides access to the protected area was wedged in the open position which allowed the turnstile to free-wheel until secured by the attendant security officer."

Corrective Action Taken: The push-button control was restored to service; the officer responsible was immediately relieved of duty, retrained, and counseled and subsequently suspended.

Event: "On July 31, and September 1, 1993, security badges were removed from the protected area access portal by security officers to be utilized for authorized access into the Emergency Raw Cooling Water (ERCW) facility, located in a separate protected area."

Corrective Action Taken: The badges were immediately returned to the access portal or deprogrammed to prevent use, an investigation was conducted and determined that no unauthorized use had occurred, a box was placed in the patrol vehicle for the collection of badges used for access into the ERCW facility, and the officers involved were counseled or received a formal warning letter.

Event: "On August 11 and 25, 1993, no response and open detect alarms were received from vital area doors and the response by the security force exceeded the established response time of 10 minutes. In each instance, the vital door in question was locked and alarmed."

Corrective Action Taken: Upon discovery of the August 11 alarm, response officers were dispatched, the alarm was cleared, and the area was checked for unauthorized activities. The primary alarm system was checked and confirmed no unauthorized entry. The responsible officer was counseled on the necessity to consistently review the card reader transaction tape. SQN has subsequently evaluated the need to respond to card reader open door detect alarms and removed this requirement from the appropriate procedure. The primary alarm system is still responded to as required by procedure. Although response officers were not dispatched within the required timeframe for the August 25 event, several security officers processed through the door between the alarm occurrence and the point at which the alarm was discovered and cleared. The primary alarm was confirmed to be functional and no unauthorized activity had occurred. The officer was retrained on the appropriate procedures and counseled.

Event: "On July 24, 1993, the required 7-day functional test for the metal detector located in the protected area access portal was not completed within the required 7-day interval."

Corrective Action Taken: The required functional test was completed within approximately five hours after the 7-day interval expired.

Corrective Actions Taken to Avoid Future Violations

In July 1993, a review of the Safeguards Event Report log was conducted. The review identified a plant-wide negative trend in human-error-type violations. A memorandum was issued to the SQN site managers describing the problem and requesting corrective actions. As a result, the managers of the sections experiencing the greatest number of errors strengthened their disciplinary action. In October 1993, Site Security management recognized a human error, negative trend developing, involving onsite security forces. The Site Security Manager immediately formulated and implemented a corrective action plan. The plan required the Site Security supervisors to communicate the problem that SQN was experiencing involving human errors (including access control) to Site Security personnel and clearly define management's expectations. Additionally, the disciplinary action for violations committed by onsite security force personnel was significantly increased. This effectively increased Site Security personnel's sensitivity to the problem. Site Security management is particularly aware of the necessity for identifying and correcting access control problems. As a result of increasing the disciplinary actions and decreasing the threshold level for human errors relating to access control, the number of events has been reduced significantly.

Date When Full Compliance Will be Achieved

TVA SQN is in full compliance.