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Writer's Direct Dial Number:

March 21, 1994  
C321-94-2038

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Dear Sir:


Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 50-219/94-02  
Reply to a Notice of Violation

Enclosure 1 to NRC Inspection Report 50-219/94-02 contained two Notices of Violation. Attachments I and II to this letter contain the replies to the Notices of Violation, as required by 10 CFR 2.201.

Due to receiving the above Inspection Report on March 7, 1994, we requested a response time extension from the Region I office on March 8, 1994. Approval was obtained from the Region I office on March 10, 1994, to extend the response time to March 31, 1994.

Should you have any questions, please contact Mr. Terry Sensue, Oyster Creek Licensing Engineer, at 609-971-4680.

Very truly yours,

*for*   
John J. Barton  
Vice President and Director  
Oyster Creek

JJB/TS:gl

Attachments

cc: Administrator, Region I  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

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## ATTACHMENT I

### VIOLATION:

1. The Oyster Creek Generating Station Security Plan dated June 14, 1993, Revision 51, Section 3.1.3.1.1, states in part that the outdoor lighting system provides an illumination level of not less than 0.2 foot candles along the entire isolation zone, perimeter barrier, and all exterior areas within the protected area (PA).

Contrary to the above, on January 20, 1994, between approximately 6:00 p.m. and 7:30 p.m., while conducting a lighting survey of the PA and isolation zone, two exterior areas within the protected area were identified by the inspectors to be illuminated to less than the required 0.2 foot candles. Specifically, the deficient areas were at two separate trailers that did not have skirting or temporary lighting. No associated compensatory measures were in place.

### GPUN REPLY:

GPU Nuclear concurs with the violation, in part.

### REASON FOR THE VIOLATION

The cause of the violation was personnel error in identifying a Protected Area (PA) lighting deficiency and subsequently implement compensatory measures.

### CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

One of the exterior areas within the PA was immediately placed on the list of "low light" areas and was physically checked by a roving patrol at approximately half-hour intervals during the hours of darkness. The Building Maintenance Department replaced a missing piece of trailer skirting to correct the deficiency.

The other exterior area within the PA was previously identified as a "low light" area and was being physically checked by a roving patrol at approximately half-hour intervals during the hours of darkness. The Building Maintenance Department replaced a missing piece of trailer skirting to correct the deficiency.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Security, Facilities Management, and craft personnel were informed of this event and reminded to increase their awareness in identifying a PA lighting deficiency and in implementing compensatory actions. Also, Facilities Management and craft personnel were trained on skirting requirements. The Building Maintenance Dept. is installing skirting on temporary trailers located within the PA. This effort is to reduce the amount of temporary lighting used within the PA. Currently these trailers have temporary under trailer lighting.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on January 25, 1994, when the missing pieces of trailer skirting was installed and work was completed.

## ATTACHMENT II

### VIOLATION:

2. The NRC-approved Oyster Creek Security Training and Qualification Plan (T&Q Plan), dated February 27, 1992, Revision 0, Section 1.2.1.3, states in part that glaucoma shall be disqualifying unless controlled by acceptable medical or survival means, provided the medications used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security duties. Additionally, Section 1.5 (c) of the T&Q Plan states in part that all armed security personnel are required to meet the vision requirement identified in Section 1.2.1.3, at a time interval no greater than every 13 months, and Section 1.5(a) of the T&Q Plan states in part that security personnel will be requalified to perform their assigned crucial security tasks and duties at a time interval no greater than every 13 months.

Contrary to the above, on January 19 and 20, 1994, as documented by security medical records, 42 of the 69 security officers had not been tested within 13 months for glaucoma, and review of six licensee security training records revealed that two security officers were not requalified within 13-months to perform their assigned crucial security tasks.

### GPUN REPLY:

GPU Nuclear concurs with the violation as written.

### REASON FOR THE VIOLATION

The cause of the violation was an inadequate tracking system used for identifying glaucoma testing frequencies, and crucial security tasks requalification frequencies.

A contributing cause to the violation was the glaucoma testing equipment malfunctioned and all the required tests could not be performed as scheduled. Due to the time period required to repair the equipment, as well as the time

necessary to efficiently reschedule the effected personnel, the remaining glaucoma tests were not conducted until the 13 month requalification criteria had been exceeded. In addition, one security officer not requalified to perform crucial security tasks had been eligible for central alarm station operator duties but did not perform those duties when the 13 month requalification criteria was being exceeded.

#### CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

The remaining glaucoma tests were conducted for the 42 security officers that had exceeded the 13 month requalification criteria by approximately 23 days.

The response drill proficiency test was conducted for the one security officer that had exceeded the 13 month requalification criteria by approximately 8 days.

The central alarm station proficiency test was conducted for the other security officer that had exceeded the 13 month requalification criteria by approximately 5 days.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

An automated tracking system has been developed and implemented. The new tracking system replaced a manual tracking system that was difficult to administer due to the number of security personnel and their qualifications that are required to be tracked.

#### DATE WHEN FULL COMPLIANCE WAS ACHIEVED

It should be noted during Safeguards Inspection 50-219/94-02 (01/18-21/94) there were no security personnel in excess of the 13 month requalification criteria for any of the qualifications required in the T&Q Plan.

Full compliance was achieved on June 23, 1993, for glaucoma testing. Full compliance was achieved on February 24, 1993, for response drill proficiency. Full compliance was achieved on May 11, 1993, for central alarm station proficiency.