



**PECO ENERGY**

**David R. Helwig**  
Vice President  
Limerick Generating Station

PECO Energy Company  
Limerick Generating Station  
PO Box 2300  
Sanatoga, PA 19464-0920  
215 327 1200, Ext. 3000

10 CFR 2.201

April 4, 1994

Docket Nos. 50-352

50-353

License Nos. NPF-39

NPF-85

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

SUBJECT: Limerick Generating Station, Units 1 and 2  
Reply to a Notice of Violation  
NRC Combined Inspection Report Nos. 50-352/94-03 and 50-353/94-03

Attached is PECO Energy Company's reply to a Notice of Violation for Limerick Generating Station (LGS), Units 1 and 2, which was contained in your letter dated March 02, 1994. The cited violations involved (1) failure of security force members (SFM) to follow procedures at the main personnel access control point; (2) failure of an SFM to search covered cargo areas of a vehicle; and (3) failure to provide an SFM in addition to a vehicle escort. The attachment to this letter provides a restatement of the violations followed by our reply.

If you have any questions or require additional information, please contact us.

Very truly yours,

GHS:cah

attachment

cc: T. T. Martin, Administrator, Region I, USNRC w/attachment  
N. S. Perry, USNRC Senior Resident Inspector, LGS "

9404110358 940404  
PDR ADDCK 05000352  
Q PDR

April 4, 1994  
Page 2

bcc:	D. M. Smith - CB, 63C-3	w/attachment
	J. B. Cotton - CB, 53A-1	"
	R. W. Boyce - GML5-1	"
	C. L. Adams - SMB2-1	"
	J. G. Hufnagel - SMB3-1	"
	C. A. Mengers - SSB4-3	"
	G. A. Hunger, Jr. - CB, 62A-1	"
	M. A. Karney - TSC1-2	"
	J. L. Kantner - SMB2-4	"
	J. Doering, Jr. - CB, 63C-5	"
	Secretary, NCB - CB, 63C-7	"
	PA DER BRP Inspector - SMB3-1	"
	Commitment Coordinator - CB, 62A-1	"
	Correspondence Release Point - SMB1-2	"

Reply to a Notice of Violation

Restatement of the Violations

During NRC inspection on January 31 - February 4, 1994, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, these violations are listed below:

1. Limerick Generating Station Unit 1 and Unit 2 Technical Specifications, Amendments 47 (Unit 1) and 10 (Unit 2), dated October 4, 1990, Section 6.8.1.e, Administrative Controls, require that written procedures for Security Plan implementation be established, implemented, and maintained.

Plant Protection Procedure PP-019, Revision 14, Paragraph 5.3 requires in part that vehicles entering the protected area with unsearched material will be escorted by a Security Force Member in addition to the vehicle escort.

Contrary to the above, on November 19, 1993, the licensee allowed a vehicle with unsearched material to enter the protected area without providing a Security Force Member other than the vehicle escort. In this case, the licensee authorized the use of a security lock to secure the container of unsearched material in lieu of providing a second escort, despite the lack of review and approval of that option.

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

2. Limerick Generating Station Unit 1 and Unit 2 Technical specifications, Amendments 47 (Unit 1) and 10 (Unit 2), dated October 4, 1990, Section 6.8.1.e, Administrative Controls, require that written procedures for Security Plan implementation be established, implemented, and maintained.

Plant Protection Procedure PP-013, Revision 14, Paragraph 5.4 states in part that, after successfully passing through the explosive detector and metal detector, personnel will be permitted to retrieve their cleared articles from the x-ray discharge and proceed to the area beyond the search equipment.

PP-013 Paragraph 5.7.4 states in part that all persons who require a pat-down search or hand-held metal detector search will be kept under observation until after the appropriate search is conducted.

Surveillance Test Procedure ST-07-084-311-0, Revision 15, Section 7.4, Paragraph 7.4.2, Walk-Through Metal Detectors, states in part that the Security Force Member will remove all metals practicable from his/her person (i.e., rings, wrist watches, coins, keys, belt buckles, or other metallic objects) prior to conducting this test.

Contrary to the above, on February 2, 1994, the following were noted:

- o An individual was permitted to retrieve his cleared articles from the x-ray discharge prior to being search with a hand-held metal detector;
- o An individual who was required to be searched with a hand-held metal detector was not kept under observation until after that search was conducted; and
- o A Security Force Member was preparing to perform a surveillance test of the walk-through metal detectors without removing a belt buckle from his person. (The inspectors requested that he remove the belt buckle before the tests).

These are examples of a Severity Level IV violation. (Supplement III)

3. Section 3.2.2 of the licensee's NRC approved Physical Security Plan (the Plan), Paragraph 1, requires that all vehicles be searched for firearms, explosives, and incendiary devices prior to entry into the Protected Area. That search is further required to include the vehicle cab, engine compartment, undercarriage and cargo areas.

Contrary to the above, on February 4, 1994, a Security Force Member search of a vehicle incident to vehicle entry into the Protected Area did not include two covered cargo areas located on the lower right side of the vehicle.

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

April 4, 1994

Page 3

## RESPONSE

### Violation No. 1

#### Admission of the Violation

PECO Energy Company acknowledges the violation.

#### Reason for the Violation

During the course of the inspection, a review of vehicle activities for the previous six months revealed that on November 19, 1993, a vehicle with unsearched material was allowed to enter the Protected Area Boundary (PAB) with one Security Force Member (SFM) escorting the vehicle. A Sea Van mounted on a flat bed truck with a radiation placard attached was secured with a security lock by the on-duty Shift Security Coordinator prior to being transported to the radwaste area for a radiological controlled search. Although there was no apparent degradation of security since the vehicle was thoroughly searched in the sally port prior to being permitted access, Limerick Generating Station (LGS) Security Plant Protection (PP) procedure PP-019, Rev. 14, states that, a second escort in addition to the vehicle escort is required to accompany the unsearched material to its destination.

The root cause for this violation was cognitive personnel error which resulted in procedural non-compliance. The Shift Security Coordinator made a conscious decision to secure the unsearched material in the Sea Van using a security lock in lieu of using a second escort as required by procedure PP-019. An additional causal factor was identified as less than adequate management enforcement of standards, policies and administrative controls.

#### Corrective Actions Taken and Results Achieved

Once the specific nature of the violation was clearly identified, the Shift Security Coordinator who authorized the unsearched Sea Van to enter the protected area with a security lock in lieu of a second escort was immediately disciplined in accordance with existing policies and procedures regarding procedural non-compliance.

#### Corrective Actions to Avoid Future Non-compliance

All Shift Security Coordinators were apprised of the incident and management expectations regarding procedural compliance were heightened. This action was completed on February 4, 1994.



This specific incident along with the preliminary results of the inspection as identified at the exit meeting were discussed with the SFMs by the Security Manager at guard mounts immediately following the exit. This included a synopsis of the events which occurred during the inspection week, potential violations and weaknesses, and planned corrective actions including the re-qualification and heightened management expectation with regard to procedural compliance/attention to detail. This action was completed on February 5, 1994.

Heightened management expectations, oversight and involvement were included in all aspects of the corrective actions. This included the Manager and/or Director attending extended guard mounts to address issues and concerns, and provide follow-up as required. Discussion of current performance and planned improvements are documented at each of these on-going meetings. The initial meetings were held on March 4 and March 21, 1994.

Routine management oversight is being performed as part of the challenge program described in more detail in the reply to Violation No. 2 to ensure adequate management enforcement of standard policies and administrative controls.

#### Date When Full Compliance was Achieved

Full compliance was achieved on November 19, 1993, when the Sea Van was transported to the radwaste area, and was immediately searched by an SFM following a radiological survey of the van by Health Physics.

#### Violation No. 2

##### Admission of the Violation

PECO Energy Company acknowledges the violation.

##### Reason for the Violation

On February 2, 1994, three procedural violations were observed by the NRC in the main personnel access area in the Technical Support Center (TSC). These included an individual who failed the walk-through metal detector search and was subsequently allowed to retrieve his cleared articles from the X-ray discharge prior to being searched; an individual who failed the walk-through metal detector search and was not kept under positive control by the SFM as he secured the hand-held metal detector to perform the search; and an SFM who failed to remove all metal from his person (belt

April 4, 1994

Page 5

buckle) in accordance with the test requirements prior to performing a metal detector surveillance test.

The root cause for each of these specific deficiencies was identified as personnel error due to inattention to detail which resulted in procedural non-compliance. In each instance, a Security procedure specified the appropriate actions to be taken by the SFM during the performance of their duties, but the procedures were not followed. With respect to the incident involving the personnel search, a contributing factor was identified relative to human factoring in that there was no specially designated area to perform the search.

An overall contributing factor to all of these incidents was less than adequate management enforcement of standards, policies and administrative controls.

#### Corrective Actions Taken and Results Achieved

As the issues described above were identified by the inspectors, immediate remedial actions were taken with the involved individuals and their supervisors. Concerning the search related incidents, the individuals entering the plant were thoroughly searched by an SFM prior to being permitted access to the Protected Area. Concerning the test related incident, once the SFM was made aware of the issue by the NRC inspector, the SFM removed all metal from his person and satisfactorily performed the metal detector surveillance test.

Immediate corrective action included the issuance of a read and sign memorandum on February 2, 1994 to all SFMs. This memo was reviewed with the NRC inspectors prior to release to ensure clarity of the observations and provide insight into the nature of the immediate corrective actions. The memo detailed four negative observations with regard to job performance associated with activities in the entry area and described the NRC inspectors' observations. It also reiterated management expectations with regard to attention to detail and procedural compliance.

Each individual involved in the observations described above was counseled by their supervisor and re-instructed on procedural compliance and the performance of the job task, as applicable. This action was completed on February 2, 1994.

Guard mount announcements describing each incident and reiterating management expectations were performed on all shifts starting with "B" shift on February 2, 1994, and continuing through "C" shift with completion on "A" shift on February 3, 1994.

A designated search area, which can be observed by the SFM in the badge issue area or bullet resisting enclosure (BRE), was created to enhance the SFMs ability to

maintain positive control over individuals requiring pat down or an additional hand-held metal detector search.

#### Corrective Actions to Avoid Future Non-compliance

As mentioned at the inspection exit meeting held on February 4, 1994, a re-qualification plan was put into effect at 1600 hours that same day to ensure that all SFMs were cognizant of existing procedures and requirements. All SFMs were successfully re-qualified on these Training And Qualification (T&Q) requirements prior to assuming post on the entry area search train. This action was completed by February 16, 1994.

Management personnel assigned monitoring functions in the entry area received entry area qualification training to ensure task specific knowledge in all areas of entry area search function. This action was completed by February 18, 1994.

A challenge program was initiated on February 15, 1994, to review and assess SFMs during the performance of the entry area job related tasks. This management review and assessment, which includes immediate on-the-spot corrective actions if required, is being performed on a shift-to-shift basis for the entry area, and is being documented and displayed as a performance indicator of entry area equipment and personnel access processing. This program will continue for a minimal six month period as a supplement to the T&Q challenge program and be re-evaluated at the end of this period. On February 25, 1994, the week 1 data was gathered and documented to initialize the program as specified for the time period not to be less than six months from this date.

#### Date When Full Compliance was Achieved

With respect to the two search related incidents, full compliance was achieved on February 2, 1994, when the individuals entering the plant were each thoroughly searched by an SFM prior to being permitted access to the Protected Area. With respect to the test related incident, full compliance was also achieved on February 2, 1994, when the SFM removed all metal from his person and satisfactorily performed the metal detector surveillance test.

#### Violation No. 3

#### Admission of the Violation

PECO Energy Company acknowledges the violation.



April 4, 1994

Page 7

#### Reason for the Violation

On February 4, 1994, an SFM performing a vehicle search in the sally port failed to open and search two compartments on the lower right side of the vehicle.

The root cause for this violation was identified as personnel error due to inattention to detail which resulted in procedural non-compliance. An existing Security procedure specifies that all compartments of a vehicle will be searched prior to allowing access to the Protected Area. Less than adequate management enforcement of standards, policies and administrative controls was also identified as a causal factor to this violation.

#### Corrective Actions Taken and Results Achieved

Once the omitted areas were identified by the NRC, they were immediately searched by the SFM prior to the vehicle being permitted access to the Protected Area.

The culpable SFM was immediately disciplined in accordance with existing policies and procedures with regard to procedural non-compliance.

#### Corrective Actions to Avoid Future Non-compliance

Vehicle search was included in the re-qualification plan to reiterate management expectations with regard to procedural compliance/attention to detail. As indicated previously, this action was completed by February 16, 1994.

Vehicle search was also included in the challenge program initiated on February 15, 1994, and will continue for a nominal six month period.

The preliminary results of the inspection identified at the exit meeting, including the vehicle search, were discussed with the SFMs at guard mounts immediately following the exit. This included a synopsis of the events which occurred during the inspection week, potential violations and weaknesses, and planned corrective actions. This action was completed on February 5, 1994.

#### Date When Full Compliance was Achieved

Full compliance was achieved on February 4, 1994, when the omitted areas were immediately searched by the SFM prior to the vehicle being permitted access to the Protected Area.