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APR 01 1994

Docket No. 50-282
Docket No. 50-306

Northern States Power Company
ATTN: Mr. D. D. Antony
Vice President, Nuclear
Generation
414 Nicollet Mall
Minneapolis, MN 55401

Dear Mr. Antony:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NOS. 50-282/
93022(DRSS); 50-306/93022(DRSS))

This will acknowledge receipt of your letter dated March 14, 1994, in response to our letter dated February 11, 1994, transmitting a Notice of Violation associated with protection of Safeguards Information at the Prairie Island Nuclear Generating Plant. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

Original Signed by John A. Grobe

John A. Grobe, Acting Chief
Reactor Support Programs Branch

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PDR ADOCK 05000282
Q PDR

cc: E. L. Watzl, Site Manager,
Prairie Island Site
M. Wadley, Plant Manager
OC/LFDCB
Resident Inspector, RIII Prairie
Island
Resident Inspector, RIII Monticello
John W. Ferman, Ph.D.,
Nuclear Engineer, MPCA
State Liaison Officer, State
of Minnesota
State Liaison Officer, State
of Wisconsin
Prairie Island, LPM, NRR

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bcc: PUBLIC IE04

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3/21/94

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USNRC
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March 14, 1994

Northern States Power Company.

Please contact Mel Opstad at (612) 337-2038 if you have any questions or wish further information concerning this matter.

Sincerely,

Melford T. Opstad

for Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator III NRC
NRR Project Manager
Senior Resident Inspector, Prairie Island NRC
J. Silberg

Attachment: A) Reply to Notice of Violation

REPLY TO NOTICE OF VIOLATION

Docket Nos. 50-282 and 50-306

VIOLATION:

During an NRC inspection conducted between December 13, 1993 and January 14, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR 2, Appendix C (1993), the violation is listed below:

10 CFR 73.21(d)(2) states in part, "While unattended, Safeguards Information shall be stored in a locked security storage container".

Contrary to this requirement, on August 19, 1993, a copy of the entire plant security plan was left unattended for up to two minutes at the security section within the Nuclear Projects Department Building located outside of the protected area.

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

NSP REPLY TO THE NOTICE OF VIOLATION

A strong and direct NSP management involvement resulted from the Safeguards Information (SGI) event at Prairie Island. This involvement determined that NSP should not only address the root cause for the Prairie Island event, but also should examine their entire SGI program for other potential weaknesses and institute corrective actions on a broad basis. This examination resulted in significant changes to the NSP SGI program at all locations. The changes demonstrate a determined oversight by NSP management for program compliance as well as a concerted effort by the entire NSP security team to prevent recurrence. Although the changes to the NSP SGI program were system wide, only areas applicable to Prairie Island (site and Corporate interface) are identified within this reply.

REASON FOR THE VIOLATION

The root cause determination for the violation was personnel error and inattention to detail in fulfilling individual responsibilities to protect or control SGI.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The following corrective action has been completed at the Prairie Island Site:

- * Inventoried and accounted for all SGI located within the various departments.
 - Departments both inside and outside the protected area.
- * Moved all identified SGI into the protected area.
 - Resulted in greater than 85% reduction in locations used for the storage of SGI.
- * Established a specific minimum number of SGI repositories.
- * Consolidated the identified SGI in the repositories. These repositories are located:
 - Within the document control vault within a GSA approved locking cabinet.
 - Within the Access Coordinator's office within GSA approved locking cabinets.
 - Within the Security Alarm Stations.
 - Other areas to be determined that are constantly manned by personnel authorized access to SGI.
- * Changed combinations on all SGI containers.
- * Reduced inventories through reviews of current SGI and destroyed any SGI that was redundant or not applicable.
 - This resulted in a reduction of approximately 75% of retained SGI.
- * Specifically documented all retained SGI by drawer for each SGI container.
- * Established a minimum number of personnel required for access to SGI combinations.
- * Provided for specific SGI custodians who are knowledgeable of their job requirements and responsible for:
 - Possessing and controlling combinations for SGI containers.
 - Maintaining a running inventory of the SGI located within the SGI containers under their control.
 - Issuing, receiving and cataloging SGI.
 - Verifying that SGI containers are secured prior to leaving the repository unattended.
- * Established a specific control and dissemination procedure for SGI.
 - Establishes program guidance.
 - Establishes program documentation criteria.
- * Separated stored composite security plans and procedures.

- Placed half into separate binders.
 - Placed each half in separate SGI containers.
 - Requires a dual failure to fully compromise any of the composite plans or procedures.
- * Provided a self contained personal computer (PC) and printer in the Access Coordinator's office for composing SGI documents.
 - Established procedures for purging backup capabilities on other PC's when used to compose SGI.
 - Provided training and guidance on PC use for SGI.
- * Required, to the greatest extent practical, that the use of SGI be conducted in an established repository.
 - Removal of SGI from a repository and from the protected area requires two person responsibility, sign out and control at all times when outside of the protected area.
- * Holding supervision responsible and directly accountable for the actions of their subordinates when control of SGI is at issue.
- * Provided remote GSA approved containers, outside the protected area, for interim, emergency storage of SGI that may be authorized for use, transit or received by mail.
- * Sensitized the security team and plant staff to the issue.
 - Staff meetings, labor management meetings and general site meetings.
 - Enhancement recognition within General Employee Training.
 - Security staff awareness meeting topic.

The following corrective actions were completed at the Corporate Office.

- * Consolidated areas where SGI materials may be retained.
 - Greater than 80% reduction in areas.
 - Transferred all SGI drawings and microfiche cards to the nuclear plant sites.
- * Established a single restricted access repository for SGI.
 - Meets the criteria of NUREG 0794, 4.1 for SGI controlled access areas.
 - Card reader and key pad controlled.
 - Use and review of SGI is restricted to this area with adequate space and furniture required.
 - Room is protected with a motion detector alarm (volumetric).
- * Designated specific SGI custodian(s) for the control and accountability of SGI.

- * Compiled an SGI standard guide.
 - Used for quick reference of what constitutes SGI.
 - Consolidated the various NRC guidance documents into a single reference manual.
- * Reviewed and reduced by approximately 60%, retained SGI.
- * Sensitized entire security team to the issue of SGI.
- * Management personnel are held accountable for the actions of subordinates relative to the SGI issue.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No additional corrective actions are believed to be necessary at this time. The actions described in the preceding section are considered adequate to avoid further violation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- * Full compliance has been achieved.