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NOV 23 1990

Docket Nos. 50-424, 50-425  
License Nos. NPF-68, NPF-81

Georgia Power Company  
ATTN: Mr. W. G. Hairston, III  
Senior Vice President -  
Nuclear Operations  
P. O. Box 1295  
Birmingham, AL 35201

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY  
(NRC INSPECTION REPORT NOS. 50-424/90-27 AND 50-425/90-27)

This letter refers to the Enforcement Conference held at our request on November 13, 1990. This meeting concerned activities authorized for your Vogtle facility and support functions located in Birmingham, Alabama. Your presentation was beneficial in clarifying the reasons for the continuing occurrence of violations in your Safeguards Information Program and understanding your commitments for corrective actions to preclude recurrence. A list of attendees, conference summary and a copy of your handout are enclosed. We are continuing our review of these issues to determine the appropriate enforcement action.

In accordance with Section 2.790 of the NRC's "Rule of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

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J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. List of Attendees
2. Conference Summary
3. Handout

cc w/encls:

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NOV 23 1990

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ENCLOSURE 1

LIST OF ATTENDEES

U. S. Nuclear Regulatory Commission

S. D. Ebner, Regional Administrator  
J. L. Milhoan, Deputy Regional Administrator, RII  
J. P. Stohr, Director, Division of Radiation Safety  
and Safeguards (DRSS), RII  
E. W. Merschoff, Deputy Director, Division of Reactor  
Projects (DRP), RII  
G. R. Jenkins, Director, Enforcement and Investigation  
Coordination Staff (EICS)  
A. R. Herdt, Chief, Reactor Projects Branch 3, DRP, RII  
W. E. Cline, Chief, Nuclear Materials Safety and Safeguards  
Branch, DRSS, RII  
D. R. McGuire, Chief, Safeguards Section, Nuclear Materials  
Safety and Safeguards Branch, DRSS, RII  
K. E. Brockman, Chief, Reactor Projects Section 3B, DRP, RII  
R. Hyc, Senior Enforcement Coordinator, EICS, RII  
A. Tillman, Safeguards Inspector, DRSS, RII  
B. R. Bonser, Senior Resident Inspector, Vogtle Nuclear Plant  
S. E. Sparks, Projects Engineer, DRP, RII  
W. Scott, Office of Nuclear Reactor Regulation (LPQB)  
R. P. Rosano, Senior Enforcement Specialist, Office of Enforcement

Georgia Power Company

R. P. McDonald, Executive Vice President  
W. G. Hairston, III, Senior Vice President - Nuclear  
Operations  
C. K. McCoy, Vice President - Vogtle Project  
J. T. Beckhari, Vice President - Hatch Project  
P. Rushton, Acting General Manager - Vogtle Support  
W. B. Shipman, Acting General Manager - Vogtle  
T. V. Greene, Assistant General Manager - Plant Support -  
Vogtle  
J. A. Bailey, Manager Licensing - Vogtle  
J. D. Heidt, Manager - Nuclear Engineering and  
Licensing - Hatch  
E. M. Dannemiller, Nuclear Security Manager - Vogtle  
W. C. Ramsey, Jr., Southern Company Services, PEM-Vogtle  
D. L. Self, Oglethorpe Power Corporation

## ENCLOSURE 2

### ENFORCEMENT CONFERENCE SUMMARY

An Enforcement Conference was held on November 13, 1990, at the Region II Office to discuss the recurring violations relating to the protection of safeguards information at the Vogtle Electric Generating Plant and the Vogtle support functions located in the Corporate Offices in Birmingham, AL.

The Regional Administrator expressed concern with the continuing problems in the security program at Vogtle, noting that to date corrective actions have not been effective in preventing recurrence of violations relating to the protection of safeguards information. The Regional Administrator further expressed the need for the licensee to establish a baseline for defining the status of all safeguards material associated with the Vogtle project. From this baseline, the licensee could then develop corrective actions for the problems associated with the protection of safeguards information both at the Vogtle Site and the Corporate Offices in Birmingham, AL that would preclude further recurrence of violations of regulatory requirements in the Safeguards Information Program.

Georgia Power Company officials acknowledged the recurrence of violations relating to the protection of safeguards materials and agreed with the Regional Administrator's view of the problem and the comments contained in the associated NRC Inspection Report, which attributed the recurrence of events relating to the protection of safeguards information to personnel error and failure to adhere to procedural requirements. It was noted by licensee officials that several of the safeguards events under current review related to old issues and were identified by corrective actions implemented for previous violations.

Licensee officials provided a detailed briefing of the circumstances of several events relating to the protection of safeguards information that had been identified and reported to the NRC since the Enforcement Conference of May 22, 1990. In addition, corrective actions initiated in response to the identified events, and long term actions proposed to correct the programmatic problem were provided, as defined in the licensee's handout as Enclosure 3. The occurrence of delays in reporting Safeguards Events to the NRC was attributed to internal conflicts relative to what constituted safeguards information and the degree of significance warranting 1-hour telephone reporting versus logging in the Quarterly Safeguards Event Log.

The licensee's presentation was summarized by contention that a good baseline for adequate correction of the programmatic problems in the Safeguards Information Program had not as yet been established, and would require further search and review of all associated vendor files and architectural engineering locations. Georgia Power Company officials committed to the establishment of a Task Force to effect all actions necessary to ensure positive control and protection of safeguards information.

AGENDA

ENFORCEMENT CONFERENCE

NOVEMBER 13, 1990

ATLANTA, GEORGIA

A. OPENING REMARKS

S. D. EBNETER  
R. P. MCDONALD

B. GENERAL DISCUSSION

o INTRODUCTION

C. K. MCCOY

o BIRMINGHAM SAFEGUARDS EVENTS

P. D. RUSHTON

EVENT  
DESCRIPTION  
CORRECTIVE ACTIONS

o SITE SAFEGUARDS EVENTS

T. V. GREENE

EVENT  
DESCRIPTION  
CORRECTIVE ACTIONS

o ADDITIONAL CORRECTIVE ACTIONS

C. K. MCCOY

C. CLOSING REMARKS

S. D. EBNETER  
R. P. MCDONALD



## INTRODUCTION

- o MAJOR PROBLEMS ATTRIBUTED TO PERSONNEL ERROR AND FAILURE TO ADHERE TO PROCEDURE REQUIREMENTS.
  
- o INDIVIDUALLY ADDRESSED LETTERS REQUIRING FAMILIARIZATION WITH SAFEGUARDS DOCUMENT CONTROL REQUIREMENTS AND A SEARCH BY EMPLOYEES FOR SAFEGUARDS DOCUMENTS (SITE, SCS, BECHTEL, AND CORPORATE OFFICE) WERE SENT TO EMPLOYEES TO BE SIGNED AND RETURNED
  
- o PERSONNEL ACCOUNTABILITY
  
- o DISCUSSION OF INDIVIDUAL EVENTS

**BIRMINGHAM EVENTS**

**P. D. RUSHTON**



DATE

MAY 22 TO JULY 23, 1990

EVENT

CIRCUMSTANCES LEADING UP TO JULY 23, 1990, RED PHONE NOTIFICATION

CHRONOLOGY

- MAY 22 ENFORCEMENT CONFERENCE AND COMMITMENT TO SEARCH AND CERTIFY PERSONAL WORK AREAS AND HOMES ARE FREE OF SAFEGUARDS MATERIAL.
- JUNE 15 FOURTEEN DOCUMENTS TURNED IN TO VEGP DOCUMENT CONTROL AS POTENTIALLY SAFEGUARDS. NONE WERE CONSIDERED SIGNIFICANT.
- JULY 16-20 QUALITY ASSURANCE DEPARTMENT CONDUCTS AUDIT OF SCS INCLUDING SPECIAL ATTENTION TO SAFEGUARDS PRACTICES. AN OPEN CONTAINER INCIDENT FROM NOVEMBER, 1989, WAS IDENTIFIED.
- JULY 23 FOURTEEN DOCUMENTS IDENTIFIED ABOVE HAD BEEN SENT TO THE SITE FOR SECURITY DEPARTMENT REVIEW. ONE OF THE 14 DOCUMENTS WAS DEEMED TO BE SIGNIFICANT. THE OPEN CONTAINER INCIDENT AND THE SIGNIFICANT DOCUMENT WERE DETERMINED TO BE REPORTABLE.

DATE

NOVEMBER 29, 1989

EVENT

UNSECURED SAFEGUARDS CONTAINER AT SCS

DESCRIPTION

- DURATION OF 25-50 MINUTES
- AN ENGINEER PLACED SOME DOCUMENTS IN THE CONTAINER AND THOUGHT HE HAD LOCKED IT.
- SHORTLY THEREAFTER A SUPERVISOR FOUND THE CONTAINER UNLOCKED.
- CONTAINER IS IN A ~~LOCKED~~ ROOM IN A CONTROLLED ACCESS BUILDING
- NOT PROPERLY REPORTED TO LICENSEE

CORRECTIVE ACTION

- CONTENTS AUDITED, NOTHING MISSING
- OTHER ACTIONS AFTER JULY 23

## CORRECTIVE ACTION

1. SEARCH OF OTHER ARCHIVED RECORDS - ONE PAGE IN ONE DOCUMENT CONTAINED SAFEGUARDS INFORMATION WHICH WAS NOT SIGNIFICANT.
2. DISPATCHED OUR DOCUMENT CONTROL SUPERVISOR TO BECHTEL OFFICES IN GAITHERSBURG TO EVALUATE THEIR PROGRAM - SATISFACTORY RESULTS, DECIDED TO ELIMINATE CONTAINER LOCATION AT BECHTEL, LOS ANGELES.
3. DISPATCHED NEL STAFF MEMBERS TO SCS ATLANTA OFFICES TO EVALUATE THEIR PROGRAM - DECIDED TO ELIMINATE THIS CONTAINER LOCATION.
4. DISPATCHED NEL STAFF TO EVALUATE THE SCS REPRODUCTION FACILITY PROGRAM - DECIDED TO ELIMINATE THIS CONTAINER LOCATION.
5. ANOTHER CONTAINER LOCATION AT SCS WAS DEEMED UNNECESSARY AND THE CONTENTS CONSOLIDATED WITH VEGP PROJECT STORAGE.
6. SEVERAL PROGRAMMATIC CHANGES WERE IMPLEMENTED:
  - CUSTODIAN APPOINTED
  - NUMBER OF PERSONNEL WITH COMBINATION WAS REDUCED
  - AN IMPROVED LOG OF THE SAFE'S CONTENTS WAS INITIATED
  - SIGN IN AND SIGN OUT OF SAFEGUARDS
  - PROCEDURE CHANGES TO EXPLICITLY REQUIRE REPORTING OF SAFEGUARDS INCIDENTS TO THE MANAGER OF LICENSING

DATE

AUGUST 29, 1990

EVENT

UNSECURED SAFEGUARDS CONTAINER INCIDENT AT SCS

DESCRIPTION

- CONTENTS DETERMINED TO BE SIGNIFICANT
- NRC NOTIFIED BY RED PHONE AND LER
- DURATION WAS 65 MINUTES
- CONTAINER WAS IN A LOCKED ROOM IN A CONTROLLED ACCESS BUILDING

CORRECTIVE ACTION

- CONTENTS AUDITED, NOTHING MISSING
- CLERK WAS GIVEN WRITTEN REPRIMAND
- BACKUP CUSTODIAN WAS APPOINTED
- DUTCH DOOR WAS INSTALLED

DATE

OCTOBER 17 - NOVEMBER 9, 1990

EVENT

EARLY VERSIONS OF SAFEGUARDS DRAWINGS FOUND UNCONTROLLED

DESCRIPTION

- SCS DESIGN ENGINEERING SUPERVISOR IDENTIFIED 2 DRAWINGS WHICH WERE EARLIER VERSIONS OF DRAWINGS HE KNEW TO BE SAFEGUARDS.
- THESE 2 DRAWINGS HAD BEEN REVISED IN FEBRUARY, 1989, TO UPGRADE THEM TO SAFEGUARDS STATUS.
- DRAWINGS SHOWED THE ELEMENTARY DIAGRAM FOR SECURITY POWER SUPPLY BREAKERS.

CORRECTIVE ACTION

- PURGED THESE DRAWINGS FROM ALL KNOWN LOCATIONS.
- REVIEWED SAFEGUARDS DRAWINGS TO FIND ANY OTHERS THAT HAD BEEN REVISED FOR PURPOSES OF CLASSIFYING AS SAFEGUARDS.
- SEARCHED FOR ANY OTHER UNCONTROLLED DRAWINGS. FOUND SEVERAL NON SIGNIFICANT AND TWO SIGNIFICANT DRAWINGS.
- REVIEWING PROGRAMMATIC CONTROLS FOR CLASSIFYING AND DECLASSIFYING SAFEGUARDS DOCUMENTS.



SITE EVENTS

T. V. GREENE, JR.



DATE

JUNE 13, 1990

EVENT

UNCLASSIFIED SAFEGUARDS INFORMATION IN  
ATTACHMENT TO FIRE PROTECTION PROCEDURE

DESCRIPTION

- TABLE LISTING OF SECURITY MULTIPLEXER  
LOCATIONS
- FOUND DURING IMPLEMENTATION OF MAY 22,  
1990, CORRECTIVE ACTIONS

CORRECTIVE ACTIONS

- RECALLED PROCEDURE WITHIN 24 HOURS
- REVISED AND REISSUED PROCEDURE (6/15)  
WITHIN 48 HOURS

EVENT DETERMINED NOT SIGNIFICANT AND  
THUS PROPERLY LOGGED.

DATE

JULY 27, 1990

EVENT

UNLABELED DISKS CONTAINING SAFEGUARDS  
INFORMATION

DESCRIPTION

- FOUND DURING QA AUDIT
- PROCEDURAL VIOLATION ONLY
- PROPER STORAGE AND CONTROL OF DISKS  
AT ALL TIMES

CORRECTIVE ACTION

LABELED INDIVIDUAL DISKETTES

EVENT DETERMINED NOT SIGNIFICANT AND  
THUS PROPERLY LOGGED

DATE

AUGUST 28, 1990

EVENT

UNCLASSIFIED DRAWINGS IN DESIGN CHANGE PACKAGE  
FOUND BY SECURITY ENGINEER

DESCRIPTION

- DISCOVERY MADE BY SECURITY ENGINEER WITH  
HEIGHTENED SAFEGUARDS AWARENESS
- INITIAL DETERMINATION CLASSIFIED DOCUMENTS  
AS SAFEGUARDS (CONSERVATIVE DECISION BY  
SECURITY MANAGER)

CORRECTIVE ACTIONS

- FURTHER REVIEW DETERMINED DRAWINGS WERE  
NOT SAFEGUARDS
- LOG ENTRY CORRECTION MADE

OVERLY CONSERVATIVE INTERPRETATION

DATE

OCTOBER 11, 1990

EVENT

SAFEGUARDS DOCUMENTS FOUND UNATTENDED IN  
SECURITY TRAINING SECTION

DESCRIPTION

- OUT OF DATE LESSON PLANS FOR TRAINING AND  
QUALIFICATION PLAN DETERMINED TO BE SIGNIFICANT
- NRC NOTIFIED BY RED PHONE AND LER
- DOCUMENTS FOUND IN UNMARKED FOLDER, INSIDE  
PROTECTED AREA, BEHIND 2 NORMALLY LOCKED DOORS
- SEARCH OF TRAINING FILES IN IMMEDIATE AREA  
REVEALED 74 ADDITIONAL DOCUMENTS STAMPED  
SAFEGUARDS
- PERFORMED AN INDEPENDENT INVESTIGATION  
(10/19/90) AND FOUND 4 NON-VEGP DOCUMENTS  
STAMPED SAFEGUARDS IN TRAINER'S DESK

## CORRECTIVE ACTIONS

- PERFORMED ONSITE REVIEW AND DECLASSIFIED THE 74 JOB TASK ANALYSES DOCUMENTS
- PERFORMED PAGE BY PAGE SEARCH OF SECURITY TRAINERS' FILES/DESKS
- SEGREGATED NON-RELATED, NON-SAFEGUARDS DOCUMENTS FROM CONTAINERS
- KEY PERSONNEL WITH FREQUENT USAGE OF SAFEGUARDS INFORMATION PERFORMED RECHECKS OF FILES AND DESKS
- PERSONNEL ACTIONS TO BE TAKEN ARE CURRENTLY UNDER REVIEW
- CONDUCTING CONSOLIDATION REVIEW FOR DECLASSIFICATION AND REDUCTION OF SAFEGUARDS DOCUMENTS



## ADDITIONAL CORRECTIVE ACTIONS

### PROGRAMMATIC

- o OFF-SITE PROCEDURES REVISED TO REPORT COMPROMISED SAFEGUARDS TO THE CORPORATE OFFICE MANAGER OF LICENSING
- o ANNUAL AUDIT OF SCS BY SAER GROUP WITH EMPHASIS ON SAFEGUARDS INFORMATION CONTROL
- o CONSOLIDATED DOCUMENTS AND REDUCED THE NUMBER OF SAFEGUARDS CONTAINER LOCATIONS IN ATLANTA, LOS ANGELES, AND TWO IN BIRMINGHAM
- o SEARCHED ARCHIVED RECORDS AT CORPORATE OFFICE
- o SEVERAL ADMINISTRATIVE CHANGES MADE (PROCEDURES, REDUCED NUMBER OF PERSONNEL WITH COMBINATION, IMPROVED LOGS, ETC.)
- o REVIEWING ALL SAFEGUARDS DRAWINGS TO FIND ANY THAT HAVE BEEN REVISED TO CLASSIFY AS SAFEGUARDS WITHOUT PURGING EARLIER REVISIONS
- o REVIEWING PROGRAMMATIC CONTROL FOR CLASSIFYING AND DECLASSIFYING SAFEGUARDS DOCUMENTS

### TRAINING

- o ADDITIONAL TRAINING IN HANDLING AND CONTROL OF SAFEGUARDS INFORMATION
- o ADDITIONAL TRAINING MATERIAL AIMED AT PROMOTING A BETTER UNDERSTANDING OF SAFEGUARDS INFORMATION WAS SENT TO EMPLOYEES IN THE CORPORATE OFFICE

### ACCOUNTABILITY

- o PERSONNEL ACCOUNTABILITY