MAY 03 1994

Docket Nos. 50-317, 50-318
EA 94-060

Mr. Robert E. Denton
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 20657 - 4702

Dear Mr. Denton:

Subject: **Enforcement Conference**

This letter refers to the April 20, 1994 enforcement conference held at the NRC Region I Office, King of Prussia, Pennsylvania. The purpose of the conference was to discuss apparent violations identified during a March 2-3, 1994 inspection (Report 50-317,-318/94-12) of the Calvert Cliffs facility. The conference was attended by you and other members of the Baltimore Gas and Electric Company staff and by members of NRC management and staff. A list of conference attendees is provided as Enclosure 1.

During the conference, the items discussed included the apparent violations, your evaluation of the potential root causes of the apparent violations, your short and long term corrective actions, and the issues and processes involved. NRC personnel used the conference to further their understanding of the issues. The handout you provided to describe your presentation is included as Enclosure 2.

We appreciate the information you provided during the conference and believe that the associated discussion was mutually beneficial to improved understanding of the issues. Our decision regarding enforcement action will be transmitted to you by separate correspondence. Thank you for your attendance at and inputs during the conference.

Sincerely,

Original Signed By:
Charles W. Hehl

Charles W. Hehl, Director
Division of Radiation Safety
and Safeguards

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OFFICIAL RECORD COPY

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IE:04

Enclosures:
1. Enforcement Conference Attendee Listing
2. Licensee Presentation Document

cc w/encl:
G. Detter, Director, Nuclear Regulatory Matters (CCNPP)
R. McLean, Administrator, Nuclear Evaluations
J. Walter, Engineering Division, Public Service Commission of Maryland
K. Burger, Esquire, Maryland People's Counsel
R. Ochs, Maryland Safe Energy Coalition
K. Abraham, PAO
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Maryland (2)

bcc w/encl:
Region I Docket Room (with concurrences)
C. Cowgill, DRP
L. Nicholson, DRP
R. Fuhrmeister, DRP
P. Wilson - Calvert Cliffs
R. Capra, NRR
D. McDonald, NRR

bcc w/encl: **(VIA E-MAIL)**
M. Shannon, NRR (MXS1)
V. McCree, OEDO (VMM)

RI:DRSS	RI:DRSS	RI:DRSS	RI:DRSS
Albert	McCabe	Joyner	Henry
RJA			
04/26/94	04/26/94	04/ 5/94	04/ /94

IE:04

ATTENDEES

LICENSEE

R. Denton, Vice President - Nuclear Energy
L. Gibbs, Director - Nuclear Security
J. Lemons, Manager - Nuclear Support Services
M. Milbradt, Nuclear Regulatory Analyst
M. Neyman, Nuclear Security Program Specialist
L. Russell, Manager - Nuclear Safety and Planning

U. S. NUCLEAR REGULATORY COMMISSION, REGION I

M. Banerjee, Senior Enforcement Specialist, Office of the Regional Administrator
A. Della Ratta, Physical Security Inspector, Safeguards Section (SS), Facility Radiation Safety and Safeguards Branch (FRSSB), Division of Radiation Safety and Safeguards, DRSS
C. Hehl, Director - DRSS
J. Joyner, Chief, FRSSB, DRSS
E. King, Physical Security Inspector, SS, FRSSB, DRSS
B. Letts, Director - Office of Investigations Field Office, Region I
D. Limroth, Senior Reactor Engineer, SS, FRSSB, DRSS
E. McCabe, Chief, SS, FRSSB, DRSS
L. Nicholson, Chief, Reactor Projects Section 1A, Division of Reactor Projects

U. S. NUCLEAR REGULATORY COMMISSION, HEADQUARTERS

D. McDonald, Project Manager for Calvert Cliffs, Office of Nuclear Reactor Regulation (NRR)
E. McPeek, Safeguards Reviewer, NRR

CALVERT CLIFFS NUCLEAR POWER PLANT

SECURITY
SECURITY PLAN REVISION
ENFORCEMENT CONFERENCE

BGE

King of Prussia, PA
April 19, 1994

Enclosure 2

AGENDA

INTRODUCTION	R. E. DENTON
ISSUES	J. R. LEMONS
BACKGROUND	L. P. GIBBS
SAFETY SIGNIFICANCE	J. R. LEMONS
REGULATORY SIGNIFICANCE	J. R. LEMONS
ROOT CAUSE/CORRECTIVE ACTIONS	J. R. LEMONS
GENERIC CONCERNS	L. B. RUSSELL
CONCLUSION	R. E. DENTON

ISSUES

POTENTIAL VIOLATIONS:

- 50.9 - INACCURATE INFORMATION PROVIDED IN SECURITY PLAN REVISION 29 SUBMITTAL
- PARKING OF SUPPLEMENTARY DESIGNATED LICENSEE VEHICLES (SDLVs) OUTSIDE OF THE PROTECTED AREA (PA) CONTRARY TO SECURITY PLAN

ADDITIONAL CONCERN:

- SEARCH EXEMPTION FOR ARMED GUARDS

ISSUES (Continued)

SECURITY PLAN REVISION WAS NOT INTENDED TO:

- DECREASE THE EFFECTIVENESS OF THE SECURITY PLAN
- DECREASE LEVEL OF SAFETY
- PROVIDE INACCURATE OR MISLEADING INFORMATION

GOAL: WORK TOGETHER TO ENSURE APPROPRIATE SECURITY REQUIREMENTS ARE IMPLEMENTED

BACKGROUND - REVISION 29

1992 NUCLEAR SECURITY FACILITY, EQUIPMENT UPGRADE, EXPANDED PERIMETER AND SECURITY COMPUTER REPLACEMENT INITIATED

1993 TWO MAJOR GOALS SECURITY PLAN REVISION 29:

- REFLECT UPGRADE CHANGES
- CLARIFY AND CONSOLIDATE REDUNDANT INFORMATION

INFORMATION PROVIDED IN REVISION 29 CONTAINED SIMILAR LEVEL OF DETAIL AS PREVIOUS SUBMISSIONS

DEC 93 AT THE TIME THE CAS WAS ACTIVATED, REVISION 29 WAS SUBMITTED TO NRC UNDER 50.54(p) PROCESS

BACKGROUND - SUPPLEMENTAL DESIGNATED VEHICLES

NOV 79	NRC REVIEW GUIDELINE #5, REVISION 3 ALLOWED FOR SUPPLEMENTARY VEHICLES
MAR 80	THE SECURITY PLAN PROVIDED FOR SUPPLEMENTARY PLANT SERVICE VEHICLES TO BE TREATED AS PLANT SERVICE VEHICLES
JAN 82	LARGE NUMBER OF ESCORTED VEHICLES GENERATES INTERNAL REQUEST TO EVALUATE OPTIONS
AUG 82	PLAN REVISION CONCERNING SUPPLEMENTARY VEHICLES:

" ... BUT WILL REMAIN IN THE PROTECTED AREA UNTIL THE COMPLETION OF THE WORK ASSIGNMENT."

INTENT WAS TO ALLOW REMOVAL OF VEHICLES FROM PA AT THE END OF THE DAILY WORK ASSIGNMENT.

BACKGROUND - SUPPLEMENTAL DESIGNATED VEHICLES (Continued)

AUG 86 SPIP REVISED TO REFLECT PRACTICE IMPLEMENTED BY SECURITY PLAN IN 1982:

" ... THEY (SUPPLEMENTARY VEHICLES) SHALL BE PARKED OUTSIDE OF THE PROTECTED AREA UPON COMPLETION OF USE."

(END OF DAILY WORK ASSIGNMENT)

1993 REVISION 29 CHANGE TO ENSURE WORDING CONSISTENCY BETWEEN SECURITY PLAN AND IMPLEMENTING PROCEDURE:

"THESE VEHICLES TYPICALLY WILL REMAIN IN THE PROTECTED AREA UNTIL THE COMPLETION OF THE WORK ASSIGNMENT AND MAY BE PARKED OUTSIDE THE PROTECTED AREA."

50.9 BACKGROUND

JUL 93	SECURITY PROGRAM SPECIALIST PREPARES DRAFT OF REVISION 29 TO SECURITY PLAN
AUG 93	INTERNAL TECHNICAL REVIEW OF DRAFT PERFORMED BY SECURITY
AUG 93	MEETING HELD WITH REVIEWERS TO DISCUSS ENTIRE DRAFT; SDLV PARKING OUTSIDE OF PA WAS PART OF DISCUSSION
SEP 93	SPECIALIST REVIEWS SECURITY PLAN REVISION 28 PACKAGE FOR SDLV PARKING CONCERN
SEP 93	SECOND DRAFT PREPARED AND REVIEWED. SUMMARY OF CHANGES PREPARED - INACCURATE INFORMATION
OCT 93	SECURITY PLAN REVISION 29 AND SUMMARY OF CHANGES APPROVED BY DIRECTOR-NUCLEAR SECURITY
NOV 93	SUMMARY OF CHANGES REVIEWED AND RECOMMENDED FOR APPROVAL BY POSRC
DEC 93	SECURITY PLAN REVISION 29 AND SUMMARY OF CHANGES SUBMITTED TO NRC

ARMED SECURITY OFFICER
EXEMPTION FROM SEARCH BACKGROUND

- THE INTENT WAS TO EXEMPT THOSE PERSONNEL NEEDED FOR EMERGENCY RESPONSE OR LLEA "ON OFFICIAL DUTY"

- NUCLEAR SECURITY OFFICERS ARE SUBJECT TO SEARCH UNLESS PERFORMING SPECIFIC ACTIVITIES DEFINED IN THE SECURITY PLAN
  - WHEN ON DUTY IN THE NUCLEAR SECURITY FACILITY OR WHO ARE PERFORMING SEARCH FUNCTIONS RELATED TO ACCESS AND VEHICLE PROCESSING
  - WHEN ESCORTING VEHICLES AND/OR PERSONNEL FROM THE NUCLEAR SECURITY FACILITY TO REMOTE GATES OR PROTECTED AREAS

- IF THE INTENT OF REVISION 29 WAS TO EXEMPT OFFICERS FROM SEARCH, SPECIFIC CIRCUMSTANCES EXEMPTING SEARCH WOULD NOT HAVE BEEN MAINTAINED IN THE PLAN

SAFETY SIGNIFICANCE

- NO IMPACT ON PLANT EQUIPMENT OR HEALTH AND SAFETY OF THE PUBLIC

- CALVERT CLIFFS SECURITY PROGRAM HAS REMAINED EFFECTIVE THROUGHOUT THE PERIOD

REGULATORY SIGNIFICANCE

- REVISION 29 PROCESSED IN ACCORDANCE WITH PROCEDURE
- ACTUAL SECURITY PRACTICES WERE UNAFFECTED
- CONCERNED ABOUT PROVIDING INACCURATE INFORMATION
  - ISOLATED CASE
  - PAST SUBMITTALS ACCURATE

POTENTIAL SDLVs VIOLATION

ISSUE: SDLVs ALLOWED TO PARK OUTSIDE OF PA UPON COMPLETION OF WORK ASSIGNMENT; APPEARS AS THOUGH SECURITY PLAN PRIOR TO REVISION 29 REQUIRED SDLVs TO REMAIN IN PA

FACTS: SDLVs PARKED OUTSIDE OF PA DUE TO POTENTIAL SECURITY LIABILITY, PRIOR SECURITY PLAN REVISIONS LACKED SIMILAR WORDING FOUND IN IMPLEMENTING PROCEDURE

- CONCERNS WITH LARGE NUMBER OF VEHICLES PARKED IN PA
- SDLVs CONSIDERED SHORT-TERM VEHICLES
- COMPLETION OF WORK ASSIGNMENT NOT DEFINED IN PLAN OR SPIP, BUT UNDERSTOOD TO BE END OF DAILY WORK ASSIGNMENT

CORRECTIVE ACTIONS

IMMEDIATE:

- UPON NOTIFICATION OF CONCERN - REQUIRED SDLVs TO REMAIN PARKED IN PA
- PREPARED AND SUBMITTED REVISION 30 TO NRC TO "RESTORE SECURITY PLAN UNDER 10 CFR 50.54(p)"

LONG-TERM:

- PREPARE AND SUBMIT FUTURE REVISION ALLOWING SDLVs TO BE PARKED OUTSIDE OF PA UNDER 10 CFR 50.90

POTENTIAL 50.9 VIOLATION

ERROR: INACCURATE INFORMATION PROVIDED IN SECURITY PLAN REVISION 29 SUMMARY OF CHANGES; THE ADDED STATEMENT FOR ALLOWING PARKING OF SDLVs OUTSIDE OF THE PA WAS NOT OMITTED IN A PREVIOUS REVISION

ROOT CAUSE: INATTENTION TO DETAIL AND LACK OF SUFFICIENT GUIDANCE FOR TECHNICAL REVIEWERS. FAILURE TO CONFIRM WORDS EXISTED IN PREVIOUS REVISIONS; CONSIDERED ENHANCEMENT, NOT A CHANGE

- INFLUENCED BY CURRENT PRACTICE
- EMPHASIS DURING TECHNICAL REVIEW OF SECURITY PLAN CHANGES VERSUS SUMMARY OF CHANGES

CORRECTIVE ACTIONS

IMMEDIATE:

- INITIATED ROOT CAUSE ANALYSIS EVALUATION TO DETERMINE HOW INACCURATE INFORMATION WAS PROVIDED
- WRITTEN EXPECTATIONS PROVIDED TO SECURITY TECHNICAL REVIEWERS FROM DIRECTOR-NUCLEAR SECURITY
- IN THE INTERIM, ALL SECURITY LICENSE DOCUMENTS WILL BE REVIEWED BY OUTSIDE SECURITY CONSULTANT

LONG-TERM:

- INCORPORATE ADDITIONAL GUIDANCE IN SECURITY PROCEDURE USED TO PREPARE CHANGES TO SECURITY DOCUMENTS
  - EXPECTATIONS FOR PREPARERS AND TECHNICAL REVIEWERS
  - EXPECTATIONS REGARDING ACCURACY OF ALL INFORMATION PROVIDED TO NRC

ACCURACY OF SUBMITTALS

- TWO RECENT CASES OF INACCURATE INFORMATION
  - SECURITY PLAN REVISION SUBMITTED IN DECEMBER, 1993
  - LICENSE AMENDMENT REQUEST 50.9 IDENTIFIED IN FEBRUARY, 1994
- ALTHOUGH UNRELATED, ROOT CAUSE SIMILAR FOR BOTH
  - PREPARATION ERROR
  - TECHNICAL REVIEW FAILED TO CATCH ERROR
- IMPROVE CURRENT PROCESSES TO ENSURE ALL NRC SUBMITTALS MEET SAME STANDARDS FOR PREPARATION AND TECHNICAL REVIEW
- PERFORM INTERNAL ASSESSMENT OF ADEQUACY FOR PREPARING AND REVIEWING ALL CHANGES MADE TO LICENSING, DESIGN, AND OPERATING BASES

CONCLUSIONS

- NO IMPACT ON PUBLIC HEALTH/SAFETY
- NO DECREASE IN SECURITY PLAN EFFECTIVENESS
- NO INTENT TO PROVIDE AMBIGUOUS OR INACCURATE INFORMATION
- IMPROVEMENTS TO PROCESSES USED FOR PREPARING AND REVIEWING NRC SUBMITTALS
- INITIAL CORRECTIVE ACTIONS PROMPTLY INITIATED
- PROCESS USED CONSISTENT WITH PAST SUBMITTALS
- SDLV AND ARMED GUARD SEARCH CHANGES WERE SEEN AS CLARIFICATIONS - REFLECTION OF CURRENT PRACTICE
- EFFECTIVE SECURITY PROGRAM AS NOTED IN SALP REPORTS - STILL ROOM FOR IMPROVEMENT