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Nuclear Operations

ELV-02507
0826

Docket Nos. 50-424
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
SAFEGUARDS DOCUMENT REVIEW STATUS

This letter is a summary of our progress in the safeguards information review program implemented to minimize future safeguards information violations as discussed in our November 13, 1990, Enforcement Conference and detailed in our letter dated November 20, 1990. In our November 20 letter, Georgia Power Company (GPC) described the four elements of our review program and committed to provide a more defined scope and status by February 15, 1991. You will find below a description of the scope and schedule for completion of each element.

I. Documentation Categorization Review

This review is intended to ensure the proper control and classification of safeguards information made by Vogtle Electric Generating Plant (VEGP) personnel. This review is being directed by a safeguards information review task force chaired by the VEGP Manager, Nuclear Engineering and Licensing (Birmingham) and co-chaired by the VEGP Assistant General Manager of Support (Site) and the Southern Company Services Vogtle Project Engineering Manager (Birmingham). The task force also includes the following members:

- o Manager Licensing - Vogtle Project
- o Manager Licensing - Hatch Project
- o Supervisor of Document Control - Vogtle Project
- o Project Engineer - Farley Project

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This task force was appointed on November 30, 1990, and serves as a review and advisory group to the Vice President, Nuclear, Vogtle Project in the implementation of a safeguards program for VEGP designed to establish a baseline for the VEGP safeguards information control program. This includes determination of whether documents are properly classified and properly stored.

The task force directed and improved the implementation of all four elements of the review program, but has been most actively involved in the classification effort. Guidelines for safeguards document classification have been developed for use in conducting this review. In addition, the task force has also appointed two subcommittees, led by members of the task force, to implement and conduct the review and classification effort. The subcommittees' responsibilities and progress are discussed below:

A. Review Team Members

VEGP Supervisor of Document Control - Team Leader
2 Electrical Design Engineers
1 Civil Design Engineer
1 Mechanical Design Engineer
1 Technical Writer

All of the Review Team members are dedicated solely to this task until completion, and each has been trained with the safeguards information "checklist" approach developed and approved by the task force to ensure consistency of classification. Any item which does not clearly fall in or out of the safeguards information classification guidelines is forwarded to the Classification Team for proper disposition. The Review Team is responsible for the bulk of the review, including categorical exclusions, sampling plans, and documentation of all results. As of February 1, 1991, the Review Team has been able to categorically exclude approximately 202,000 drawings, 75,750 calculations, and 700 specifications from the scope of review because of obvious disassociation with VEGP security. This leaves the Review Team with approximately 60,000 drawings, 250 calculations and 200 specifications needing review. Other areas such as purchase orders, requisitions, procedures, FSAR, Technical Specifications, startup documents, magnetic media, indices, and NORMS correspondence are still being reviewed. The emphasis of the Review Team to date has been on drawings, calculations, specifications, purchases orders, and vendor documents. The overall schedule for this effort is shown on Figure 1.

B. Classification Team Members

VEGP Manager of Licensing - Team Leader
VEGP Nuclear Engineering and Licensing, Security Engineer
VEGP Security Specialist
SCS Senior Design Engineer

The Classification Team is responsible for classifying questionable material presented by the Review Team and providing guidance to the Review Team. The Classification Team also consults with the task force on matters where the guidance of the full task force is needed.

As of February 1, 1991, the Classification Team has reviewed 18 items/packages for proper disposition. Of these 18 items, only 2 have been determined to contain safeguards information and therefore will be reported in the Quarterly Security Event Log. These two items were the Security Diesel Loading Calculation and copies of an old purchase order for security equipment. Fourteen items were deemed not to contain safeguards information, and two other items are still in the review process. Any items forwarded to the Classification Team for disposition by the Review Team are immediately controlled and secured as safeguards information, pending a formal decision by the Classification Team.

II. Security Vendor Safeguards Information Control Audits

The purpose of these audits is to ensure that VEGP Security System vendors are properly controlling and securing all VEGP safeguards information and have adequate reporting procedures in cases of suspected compromise of safeguards information.

The scope of vendors to be audited has been narrowed from 39 to a few large contractors which assembled the security system through many subcontractors. The subcontractors are suppliers of standard off the shelf components that are available to the general public. The large contractors appear to be the only vendors possessing VEGP safeguards information. The main contractor is Johnson Yokogawa Corporation (JYC) in Carrollton, Texas.

An audit of JYC was conducted during the week of February 4, 1991. The audit team was composed of the VEGP Manager of Safety Audit and Engineering Review (SAER), a SAER Senior Engineer, and a Quality Assurance Engineer from Southern Nuclear Operating Company Corporate Quality Services. The audit determined that JYC is in compliance with 10 CFR 73.21 requirements. Additionally since the scope of JYC's work has been greatly reduced since startup of the security system at VEGP, the quantity of safeguards materials on hand is kept

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to a minimum. Recently all old safeguards materials at JYC had been destroyed. Several enhancements were suggested by the audit team to improve safeguards controls at the facility. The management of JYC appeared receptive.

The remaining contractors will be audited as necessary by March 31, 1991. Any findings or problems identified by these audits will be resolved with the vendor and included in our report to the NRC of the results of our safeguards information review program.

III. Walkdowns of Common Storage Areas for Uncontrolled Safeguards Information

The purpose of this element has been to search areas not previously searched. This has included walkdowns and searches of files in warehouses, common work areas at the offices of the Architect Engineers, Corporate offices, and various locations on site. The search of inactive files located on site at the construction warehouse and field office buildings is complete; other walkdowns are in progress. Appropriate department personnel have been assigned the task of completing these walkdowns by March 31, 1991. As of this date only one document has been found marked as safeguards information and it will be reported on the Quarterly Security Event Log.

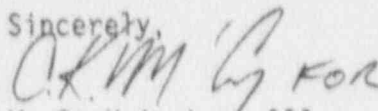
IV. Personal Accountability Letters

A letter from the Vice President Nuclear, and A/E Project Managers in which the responsibilities for proper safeguards information control were described has been sent to all employees at the site, and at corporate and A/E offices. This letter also emphasized that individuals will be held personally accountable for any safeguards information control incidents.

The review team is planning to finish the document reviews by March 31, 1991. However, due to the magnitude of the effort, and the follow up actions that may be required, the overall program is not expected to be complete until June 30, 1991. A final report describing the results of these reviews will be transmitted to the NRC within 30 days after completion of this program.

Please contact this office if you have any questions or need further information.

Sincerely,


W. G. Hairston, III

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WGH,III/AFS/gm

c(w): Georgia Power Company

Mr. C. K. McCoy
Mr. W. B. Shipman
Mr. P. D. Rushton
Mr. R. M. Odom
NORMS

U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

FIGURE 1

SAFEGUARDS REVIEW TEAM SCHEDULE

