



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10289 US-31 North, Charlevoix, MI 49720

Patrick M Donnelly
Plant Manager

May 20, 1994

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 94-003; PHYSICAL SECURITY INSPECTION.

During the period March 14, 1994 through April 5, 1994, Mr. G. L. Pirtle of your office conducted a routine safety inspection at the Big Rock Point facility. NRC Inspection Report 50-155/94003 concluded that certain of Big Rock Point's activities appeared to be in violation of NRC requirements.

The violation concerns an inadequate management review of the monthly vital area access list.

Pursuant to the direction required by the report, find attached a Reply to the Notice of Violation.

Patrick M Donnelly
Plant Manager

CC: Administrator, Region III, USNRC
NRC Resident Inspector - Big Rock Point

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ATTACHMENT

CONSUMERS POWER COMPANY
BIG ROCK POINT PLANT
DOCKET 50-155

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT 94003

MAY 20, 1994

REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 94-003; PHYSICAL SECURITY INSPECTION

VIOLATION 94003

Implementing License Condition No. 3.F of Facility Operating License No. DPR-6 requires that the licensee shall maintain in effect and fully implement all provisions of the Commission approved physical security plan, including amendments and changes made pursuant to authority of 10 CFR 50.54(p).

Section 6.1 of the licensee's security plan requires personnel granted unescorted access to a vital area and/or protected area to have their name appear on the authorized unescorted personnel list maintained by the plant. This section of the security plan also requires plant management to identify on a monthly basis those personnel who have a continuing work related need for access to vital areas and have completed security orientation training.

Contrary to this requirement, on March 16, 1994, a sample selection of about 25 personnel showed that four personnel identified by plant management as having a work related need for access to vital areas did not even have a current security badge issued to them. One of the four personnel had not had access to the plant since 1991. Subsequent review by the security department resulted in about 11 personnel being removed from the monthly access authorization list.

Consumers Power Company's response is provided below.

1) Reason for the violation.

Consumers Power Company agrees with the violation as stated. The access list is circulated to responsible members of plant management on a monthly basis. Accompanying the access list was a note requesting the managers review the list and make any changes necessary. No other guidance was supplied to the managers in determining why an individual should remain or be deleted from the list. Without fully understanding the consequences of this review, only a cursory review was being conducted by some of the managers. There is direction in the plant's Security Plan for the removal of individuals from the list if their access is revoked, they are transferred, or they are terminated. This direction was not utilized.

2) The corrective steps that have been taken and the results achieved.

An immediate review of unescorted access authorization by the Security Department was conducted. This action resulted in approximately one dozen personnel being removed from the list.

3) The corrective steps that will be taken to avoid further violations.

The access list is not utilized to determine if an individual will be granted unescorted access. Plant Security Procedures require the use of the automated Nuclear Plant Admittance System (NUCPAS). This system is utilized by Consumers Power Company to grant or revoke unescorted access. Security personnel will receive instructions to remove an individual from the access list when he is revoked on NUCPAS.

A memo has been distributed to all managers outlining their responsibilities and the need for increased attention to detail in this matter. The memo will be reissued each month to assist the managers in their review of the access list to add, delete or retain an individual on the access list.

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4) The date when full compliance will be achieved.

The facility is currently in full compliance with NRC requirements.