



Entergy Operations, Inc.
River Bend Station
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June 7, 1994

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

Subject: River Bend Station - Unit 1
Docket No. 50-458
Inspection Report Nos. 85-67 and 91-33
File No.: G9.5, G4.25

RBG-40633

Gentlemen:

In Gulf States Utilities' responses to Notices of Violation contained in NRC Inspection Reports 50-458/85-67 (RBG-28592) and 50-458/91-33 (RBG-36564), certain commitments were made involving visitor and escort processing and control. These commitments have been re-evaluated by River Bend Station (RBS) security management and found to exceed the requirements of 10CFR73.55 and the RBS Physical Security Plan. We have concluded that the original corrective actions taken resulted in a cumbersome, time consuming process and did not provide additional assurance for control of visitors. The attachment to this letter identifies the original commitments, changes to the original actions and the justification for these changes. We have discussed this issue with the Senior Resident Inspector and Mr. Tom Dexter of NRC Region IV security staff.

In conclusion, we believe that increased emphasis on procedural compliance, personnel accountability, simplified visitor processing and input from security on the general employee training will provide a program that meets regulatory requirements. It is our intent that these changes be implemented 30 days from the date of this letter. If you have any comments concerning these changes, please do not hesitate to contact us.

Sincerely,

James J. Fisicaro
Director - Nuclear Safety

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Attachment

cc: U.S. Nuclear Regulatory Commission
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Mr. Edward T. Baker
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ATTACHMENT

REVISIONS TO COMMITMENTS

NRC INSPECTION REPORTS 85-67, 91-33

Item #1 Exchange Process (Inspection Report 85-67 Response, RBG-28592)

Currently reads:

"GSU is revising Plant Security Procedure (PSP)-4-300 to outline details for controlling the exchange process of visitor escort requirements whereby escort responsibility for assigned visitors may be changed within the protected area (PA). The procedure revision now requires the existing escort to identify himself/herself, the visitor(s), and the new escort to the Supervisor Access Control Station (SACS). The new escort informs the SACS that he/she assumes responsibility for the visitor(s), acknowledges an understanding of those responsibilities and that he possesses the original security forms. The new escort is instructed by the SACS to assure his/her name is now on the security form at the time escort responsibilities change. Since the revised procedure requires the security forms to always identify the escort, security is knowledgeable of who has escort responsibility for any given visitor."

Changed to read:

"An escort may transfer visitors to another person with unescorted access. The escort will ensure the other person understands their responsibilities for escorting before transferring the visitors."

Justification:

The violation dealt with a visitor being sent unescorted to the other side of a wall and resulted in the visitor being momentarily out of sight of the escort. The response went beyond the scope of the violation in addressing corrective action. 10CFR73.55 and the Physical Security Plan require that a visitor register upon entry and be assigned an escort who has unescorted access. Escorting responsibilities are taught in general employee training and personnel are being held accountable for their actions. This change will allow escort responsibilities to be changed in the protected area without having to contact security to make the change.

Item #2 General Employee Training (Inspection Report 91-33 Response, RBG-36564)

Currently reads:

"A decision was made that Security would instruct the security portion of initial GET training."

Changed to read:

"Personnel assigned to the Nuclear Training department may instruct the security portion of initial GET training."

Justification:

A survey of other Entergy Operations, Incorporated sites indicates that GET is normally taught by their GET instructors. The conclusion is that having security teach this portion has no impact on the outcome of the training. The adequacy of the material presented is what results in proper training. Security will still provide input into the content of the training program.

Item #3 Escort Exam (Inspection Report 91-33 Response, RBG-36564)

Currently reads:

"Security is currently administering a short examination to test an escort's knowledge prior to assigning them any visitors."

Changed to read:

"Escort duties and responsibilities are covered in the GET training, and a handout is given to the escort as he assumes responsibility for visitors, containing salient points of his responsibilities."

Justification:

The violation dealt with an individual losing visual contact with his visitors and with an improperly applied cordon. Having Security give an exam does not decrease or increase the probability of these events or probability that these events will occur. However, personnel accountability, procedural compliance and a refresher handout will prevent these types of events. These elements are currently part of the escort program.

Item #4 Visitor Video (Inspection Report 91-33 Response, RBG-36564)

Currently reads:

"Security is also working with Nuclear Training to develop a short video to be shown to visitors prior to entering the protected area which explains their responsibilities during their visit."

Changed to read:

"A handout will be given to the visitors upon initial entry which explains their responsibilities."

Justification:

Most visitors cannot retain and recall all of the information provided by the video. But they can retain a handout for reference as needed. Elimination of the video will improve visitor processing into the protected area and increase efficiency. The handout will provide a ready reference to the visitor when they are unsure of the correct procedure to follow.

Item #5 Escort Instructions (Inspection Report 91-33 Response, RBG-36564)

Currently reads:

"Security is also in the process of revising plant security procedures regarding access control and revising the visitor access record which provides additional visitor escort instructions."

Changed to read:

"A handout will be given to the escort whenever visitors are assigned which provides instructions concerning visitor escort duties."

Justification:

This handout will be given to the escort who is responsible for the visitor. The old escort ensures the new escort is given this handout when responsibilities for the visitors is exchanged. Additionally, the visitor entry record is being simplified to a multi-line form. Information currently on the back of the old form is used on the new handouts.

Item #6 Cordon Areas (Inspection Report 91-33 Response, RBG-36564)

Currently reads:

"With regards to the concern involving the cordon area, Chapter 11 of the RBS Physical Security Plan is being revised for possible revisions to eliminate any questions regarding establishment and control of cordon areas. Also, procedures regarding establishment and control of cordon areas are being revised to clarify that activity."

Changed to read:

"Physical Security Plan Revision 14A, Chapter 11 description of cordons will be used"

Justification:

In referencing cordons, Chapter 11 implies they are associated with Vital Islands. However, it may be beneficial at times because of activities associated with one time, short term projects to establish cordons in areas other than vital islands. Should this occur, the area will be established in such a manner that there is only one physical entry/exit portal. If other portals exist, they will either be physically barricaded or an authorized escort will be located at that portal. In the event that a cordon becomes necessary, special instructions will be prepared detailing specific responsibilities of the escort(s).