

# New Hampshire Yankee

Ted C. Feigenbaum  
President and  
Chief Executive Officer

NYN-91183

November 8, 1991

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443  
(b) USNRC Letter dated October 9, 1991, "Inspection No. 50-44. (26)",  
J. H. Joyner to T. C. Feigenbaum


Subject: Reply to Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the New Hampshire Yankee response to the cited violation is provided as Enclosure 1. This letter and the Enclosure do not contain safeguards information.

Should you have any questions concerning our response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



Ted C. Feigenbaum

TCF:JMP:TGP/act

Enclosure

cc: Mr. Thomas T. ...  
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New Hampshire Yankee  
November 8, 1991

ENCLOSURE TO NYN-9115.

REPLY TO VIOLATION

Violation:

As a result of the inspection conducted on September 3 - 6, 1991, and in accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (10 CFR Part 2, Appendix C (Enforcement Policy 1991)) the following violation was identified:

Chapter 12 of the NRC-approved Physical Security Plan, Revision 12, dated November 21, 1990, states, in part, that any time frequent access is permitted to containment, positive access control to ensure that only authorized personnel and materials are permitted into the containment is achieved by posting a security officer at the portal.

Contrary to the above, on September 4, 1991, during a refueling outage in which frequent access was being permitted to containment, the inspector found that the security officer posted at the containment portal was not ensuring that only authorized materials were permitted into the containment, nor had the officer been instructed to do so.

This is a Severity Level IV Violation (Supplement III).

Response:

New Hampshire Yankee (NHY) has determined that the cause of this violation is attributed to inadequate implementation of the Physical Security Program with regards to ensuring that contraband material was not allowed into the Containment. At Seabrook Station positive material control is provided by the Security Program and additional programs which provide a level of protection to ensure only authorized materials are permitted into the Containment. These programs include:

- a) Security Program - ensures that only authorized personnel are allowed entry into the protected area and eliminates the introduction of contraband into the protected area.
- b) Radiation Protection Program - controls and limits the amount of material taken into the Radiological Control Area (RCA) and the Containment.
- c) Maintenance Program - controls tools and materials used to perform a maintenance task and identifies type of material that can be used for a particular task.
- d) Chemistry Program - controls chemicals that are allowed into the Containment.

Upon discovery, the Security Officer posted at the Containment entrance was immediately instructed to visually observe materials entering Containment to ensure that contraband, as defined in the Security Program, was not introduced into containment. These

instructions were conveyed to the Security Supervisors and implemented for the remainder of the refueling outage.

The following additional corrective actions were taken:

- 1) Security Supervisors were instructed to ensure that materials entering Containment during frequent access periods are inspected prior to entry, so that contraband is not introduced.
- 2) Security Supervisors were instructed to include a review of material control measures at Containment entry during routine supervisory post checks.

New Hampshire Yankee is fully implementing the requirements of the Physical Security Plan. NHY believes that the implementation of these corrective actions was effective during the refueling outage and that they will preclude a reoccurrence of the violation.