



ENTERGY

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A4.05  
QA

August 19, 1991

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

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
NRC Inspection Report 91-20  
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact B.R. Loetzerich at (504) 731-1126.

Very truly yours,

*James J. Zaitchuk for RFBurski*

RFB/BRL/ssf  
Attachment

cc: R.D. Martin, NRC Region IV  
D.L. Wigginton, NRC-NRR  
R.B. McGehee  
N.S. Reynolds  
NRC Resident Inspectors Office

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 91-20

VIOLATION NO. 9120-02

Inadequate Protection of Safeguards Information

10 CFR Part 73.21 (d) 2 requires, in part, that while unattended, safeguards information be stored in a locked security storage container.

Contrary to the above, the inspector determined through a review of licensee records that a safeguards document safe was left unsecured on May 12, 1991. The safe contained safeguard information and was in an unsecured office outside the protected area.

This is a Severity Level IV violation (Supplement III) (382/9120-01).

This is a repeat violation.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause was personnel error in that an employee failed to follow procedure for the securing of safeguards information. Nuclear Operations Procedure, NOP-007, "Handling of Safeguards Information" establishes guidelines for controlling, distributing and transmitting safeguards documents. Specifically, Section 5.12.1 of NOP-007 states that safeguards information "shall be secured in an approved Security Storage Container when not under the positive control of an authorized person".

During a routine patrol of Security Storage Containers on May 12, 1991, a security officer noticed an unsecured filing cabinet whose locking bar had been removed. The security officer decided to check the contents of the filing cabinet and discovered two documents in the cabinet which were stamped as safeguards information.

A subsequent investigation determined that the unsecured filing cabinet was previously used as a locked Security Storage Container for safeguards information, but had been decommissioned as such when a replacement Security Storage Container with a combination lock was activated for the control of safeguards information in that department. The unsecured filing cabinet had been emptied on May 10, 1991, of its safeguards contents which were transferred to the replacement Security Storage Container. The locking mechanism had been removed from the filing cabinet, along with the markings identifying the filing cabinet as a safeguards container.

Further investigation determined that an unidentified employee had taken inappropriate action by depositing safeguards information in the decommissioned filing cabinet. In doing so, the employee violated the instructions of NOP-007 which state that unattended safeguards information must be stored in locked Security Storage Containers.

Waterford 3 acknowledges that the violation is repetitive to previous violations cited in NRC Inspection Report 89-28 in that personnel error was involved in a failure to follow procedure and properly secure safeguards information. It is recognized that the scope of corrective actions taken upon identification of the failures with respect to the responsible departments was narrowly focused and broader corrective actions are required in an effort to prevent similar failures with the respect to the handling of safeguards information.

(2) Corrective Steps That Have Been Taken and the Results Achieved

Immediate corrective actions were initiated upon discovery of the unattended safeguards information in the unsecured filing cabinet. The security patrol officer who made the discovery kept the safeguards information in his possession until a Safe Controller arrived to secure the safeguards information in the designated Security Storage Container.

The security department initiated an investigation (Security Report E-40-91) and a Quality Notice (QA-91-101) was issued to the responsible department to identify and track corrective action and actions taken to prevent recurrence. The decommissioned filing cabinet was labeled ("Not a Safeguards Container") to inform personnel that the file cabinet was no longer an approved Security Storage Container. In addition, supervisors within the responsible department discussed the incident with their employees to stress the importance of handling and storing safeguards information in accordance with NOP-007. Employees in the responsible department were required to review NOP-007 on an individual basis.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

The security department will review the present number, purpose and location of Security Storage Containers in an effort to reduce the number of safeguard containers, thereby reducing the probability of other similar safeguards incidents.

To increase sitewide awareness of the proper handling of safeguards information, the Events, Analysis, Reporting and Response Department will issue an informative summary for site employees which emphasizes personnel responsibilities involved in the control of safeguards information in accordance with NOP-007.

The training department will expand the current presentation on the control of safeguards information provided in General Employee Training (GET 1), which is conducted prior to initial badging of all site employees and on an annual basis for the requalification of badged employees. Through GET 1, each employee will be informed of the importance of properly controlling, transmitting, and securing safeguards information in accordance with the procedure governing safeguards information.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is currently in full compliance with regulations involving the handling and storage of safeguards information. The corrective actions discussed in Part 3 of this response shall be implemented by September 30, 1991.