

MAR 16 1992

Docket Nos. 50-498
50-499
License Nos. NPF-76
NPF-80

Houston Lighting & Power Company
ATTN: Donald P. Hall, Group
Vice President, Nuclear
P.O. Box 1700
Houston, Texas 77251

This refers to the Technical Meeting conducted at Houston Lighting & Power Company's request at the Region IV Office on February 21, 1992. This meeting related to activities authorized by NRC Licenses NPF-76 and NPF-80 for the South Texas Project and was attended by those individual identified on the attached attendance list.

The subjects discussed at the meeting are described in the enclosed Meeting Summary. The staff was in general agreement with the licensee position in all cases except for the issues of issuance of vital area keys to station management, issuance of vital area keys by shift supervisors, reporting of preposted system or equipment failures, and limitation placed on the review of personnel nuclear files.

The NRC withheld specific judgement on these issues pending the licensee providing additional information.

It is our opinion that the meeting was beneficial and provided a better understanding of several security issues. In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

Original signed by

A. Bill Beach, Director
Division of Reactor Projects

- Attachments:
1. Meeting Summary
2. Attendance List

*RIV:C:FI+S *NRR
BMurray;dm RFSkelton
/ /92 / /92
*Previously concurred.

D:DRSP
LJCallan
2/11/92

D:DRP
ABBeach
3/13/92

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PDR ADOCK 05000498
F PLR

TEXAS

MAR 16 1992

Houston Lighting & Power Company -2-

cc w/attachments:

Houston Lighting & Power Company
ATTN: William J. Jump, Manager
Nuclear Licensing
P.O. Box 289
Wadsworth, Texas 77483

City of Austin
Electric Utility Department
ATTN: J. C. Lanier/M. B. Lee
P.O. Box 1088
Austin, Texas 78767

City Public Service Board
ATTN: R. J. Costello/M. T. Hardt
P.O. Box 1771
San Antonio, Texas 78296

Newman & Holtzinger, P. C.
ATTN: Jack R. Newman, Esq.
1615 L Street, NW
Washington, D.C. 20036

Central Power and Light Company
ATTN: D. E. Ward/T. M. Puckett
P.O. Box 2121
Corpus Christi, Texas 78403

INPO
Records Center
1100 Circle 75 Parkway
Atlanta, Georgia 30339-3064

Mr. Joseph M. Hendrie
50 Bellport Lane
Bellport, New York 11713

Bureau of Radiation Control
State of Texas
1101 West 49th Street
Austin, Texas 78756

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, Texas 77414

Houston Lighting & Power Company

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Licensing Representative
Houston Lighting & Power Company
Suite 610
Three Metro Center
Bethesda, Maryland 20814

Houston Lighting & Power Company
ATTN: Rufus S. Scott, Associate
General Counsel
P.O. Box 61867
Houston, Texas 77208

bcc to DMB (IE-45)

R. D. Martin
DFP
Resident Inspector-OPS
Section Chief, DRP/D
Security/RPEPS File
MIS System
RIV File
Lisa Shea, RM/ALF (4503)
RSTS Operator
R. Bachmann, OGC (15 B18)
DRS
BMurray
Section Chief, NMSIS
LJCallan
JPJaudon
TDexter
Project Engineer, DRP/D

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MEETING SUMMARY

Licensee: Houston Lighting & Power Company

Facility: South Texas Project

License: NPF-76 and NPF-80

Dockets: 50-498 and 50-499

Subject: Meeting to Discuss Several Security Issues

On February 21, 1992, representatives of Houston Lighting and Power Company met with NRC personnel at the Regional Office to discuss several regulatory issues that had been identified in NRC Inspection Reports and by the licensee's internal review and audit program. Representatives from Region IV and the Office of Nuclear Reactor Regulation reviewed existing guidance and regulatory positions on several of the issues. The NRC staff was in general agreement with the licensee's position in all cases except for the following issues:

° Issuance of vital Area Keys to Station Management

The licensee's security plan requires positive access control to vital areas be assured through the use of card readers or the utilization of members of the security organization in nonemergency conditions. If card reader equipment is not located at the door, the licensee's position is that a security officer does not have to be present when the door is unlocked by selected station management who are issued a key for that area. However, since the overall amount of access is minimal and not used for emergencies, we believe the licensee should comply with their security plan and have a security officer present when normally locked and alarmed doors are accessed with "a security metal or hard key." We are willing to discuss potential changes to the security plan that would meet our requirements and let you achieve your goals.

° Issuance of Vital Area Keys to Shift Supervisors

The licensee's plans and procedures do not allow the shift supervisor to issue their assigned vital area security keys to other operations personnel for nonemergency access. The general subject of key control, use of keys on normally locked and alarmed doors and understanding of abnormal or emergency conditions are areas that the licensee needs to clarify before this issue is resolved. The interpretation that an emergency condition means that the provisions of 10 CFR 50.54 apply is far too narrow to resolve our concerns in this area. The availability of vital area security keys for emergency conditions is consistent (and encouraged) with the NRC concern to ensure plant safety is adequately addressed.

° Reporting of Preposted System or Equipment Failures

The licensee is preposting security officers for a potential system failure and then only logging the event if the equipment failed when placed back in service. For example, the licensee will prepost the protected area perimeter if a storm is expected in the area. These detection aids are then taken out of service until the storm passes. The licensee's logging and analysis of events is not providing site management and the NRC with the correct information of their security systems operability under all conditions. While the NRC applauds the licensee's forehandness, it wants all failures and removals from service logged.

° Limited Review of Personnel Nuclear Files

The licensee has criminal history information received from the FBI in the files of individuals granted unescorted access to the protected area. The licensee is required to secure this information in a manner that ensures it is only used to make a determination to grant or deny unescorted access. These criminal history records should not be placed, unsecured, in an individual's personnel records if the criminal history files would be accessible for any other purpose. A simple sealed envelope would be sufficient to satisfy this concern.

The attendance list and licensee presentation are attached to this summary.

Attachments:

1. Attendance List
2. Licensee Presentation (NRC distribution only)

SECURITY MEETING WITH NRC

FEBRUARY 21, 1992

AGENDA

- INTRODUCTION W. H. KINSEY
- SECURITY REGULATION POSITIONS R. L. BALCOM
 - I. ISSUANCE OF VITAL AREA KEYS TO STATION MANAGEMENT
 - II. ISSUANCE OF VITAL AREA KEYS TO SHIFT SUPERVISORS
 - III. FUNCTIONAL TESTING SUBSEQUENT TO POWER INTERRUPTIONS
 - IV. COMPENSATORY ACTIONS FOR CLOSED CIRCUIT TELEVISION (CCTV) FAILURES
 - V. REPORTABILITY OF DEGRADED LIGHTING IN EXTERIOR AREAS WITHIN THE PROTECTED AREA BOUNDARY
 - VI. REPORTING OF PRE-POSTED SYSTEM OR EQUIPMENT FAILURES
 - VII. ILLUMINATION OF PROTECTED AREA STRUCTURE ROOFS
 - VIII. VISIBILITY OF ADJACENT COMPENSATORY GUARD POSTS
 - IX. SAFEGUARDING OF SECURITY POST ORDERS
 - X. THE WACKENHUT CORPORATION RETURN TO WORK POLICY
 - XI. LIMITED REVIEW OF PERSONNEL NUCLEAR FILES
- NUCLEAR SECURITY DEPARTMENT ORGANIZATION R. L. BALCOM
- CLOSING W. H. KINSEY

I. ISSUANCE OF VITAL AREA KEYS TO STATION MANAGEMENT

ISSUE:

ISSUANCE OF VITAL AREA KEYS TO STATION MANAGEMENT PERSONNEL WITHOUT AN ARMED SECURITY OFFICER PRESENT AT THE DOOR.

REQUIREMENTS:

10 CFR 73.55 ADDRESSES:

- LIMITED UNESCORTED ACCESS TO VITAL AREAS DURING NON-EMERGENCY CONDITIONS,
- CURRENT ACCESS AUTHORIZATION LISTS,
- POSITIVE CONTROL OF ALL PERSONNEL ACCESS POINTS,
- LOCKS,
- ACTIVATED INTRUSION ALARM SYSTEMS,
- CONTROL OF KEYS, LOCKS, COMBINATIONS AND OTHER ACCESS CONTROL DEVICES TO PROTECTED AND VITAL AREAS.

THE PHYSICAL SECURITY PLAN ADDRESSES:

- CONTROL OF KEYS, KEYCARDS, LOCKS, ETC.,

SENIOR MANAGEMENT PERSONNEL AND MEMBERS OF THE NUCLEAR SAFETY REVIEW BOARD ARE REQUIRED TO TOUR PLANT AREAS.

POSITION:

- MAINTAIN PROCEDURES AS CURRENTLY STATED,
- CLARIFY AVAILABLE OPTIONS IN THE PHYSICAL SECURITY PLAN.

II. ISSUANCE OF VITAL AREA KEYS TO SHIFT SUPERVISORS

ISSUE:

ISSUANCE OF SHIFT SUPERVISOR'S KEY

REQUIREMENTS:

10 CFR 73.55 REQUIRES:

- LIMITED UNESCORTED ACCESS TO VITAL AREAS DURING NON-EMERGENCY CONDITIONS,
- CURRENT ACCESS AUTHORIZATION LISTS TO ALL VITAL AREAS,
- POSITIVE CONTROL OF ALL PERSONNEL ACCESS POINTS,
- LOCKS,
- ACTIVATED INTRUSION ALARM SYSTEMS ON ALL UNOCCUPIED VITAL AREAS.
- CONTROL OF KEYS, LOCKS, COMBINATIONS AND OTHER ACCESS CONTROL DEVICES.

THE PHYSICAL SECURITY PLAN (PSP) ADDRESSES:

- CONTROL OF KEYS, KEYCARDS, LOCKS, ETC.,
- POSITIVE ACCESS CONTROL TO VITAL AREAS.

10 CFR 73.70 REQUIRES RECORDS OF PROTECTED AND VITAL AREA ENTRIES.

PROCEDURE OPGP03-ZS-0005 CONTROLS TRANSFER OF POSSESSION OF THE SECURITY KEY.

POSITION:

MODIFY THE PROCEDURE TO ALLOW REASONABLE USE BY OPERATIONS PERSONNEL DURING EMERGENCY AND ABNORMAL CONDITIONS.

III. FUNCTIONAL TESTING SUBSEQUENT TO POWER INTERRUPTIONS

ISSUE:

COMPENSATORY POSTING AND FUNCTIONAL TESTING WERE NOT CORRECTLY PERFORMED FOLLOWING SECURITY SYSTEM POWER INTERRUPTIONS.

REQUIREMENTS:

10 CFR 73.55 ADDRESSES OPERABILITY OF ALARMS, COMMUNICATION EQUIPMENT, AND BARRIERS.

THE PHYSICAL SECURITY PLAN:

- REQUIRES PERIMETER DETECTION SYSTEM FUNCTIONAL TESTING,
- TESTING OF VITAL AREA SYSTEMS,
- OPERABILITY TESTING.

REGULATORY GUIDE 5.44 REQUIRES:

- PERFORMANCE TESTING TO DESIGN SPECIFICATIONS,
- PROBABILITY TESTING OF PERIMETER INTRUSION ALARM SYSTEMS.

PER RG 5.44, AN INOPERATIVE STATE EXISTS WHEN:

- POWER IS DISCONNECTED,
- BOTH PRIMARY AND BACKUP POWER SOURCES FAIL TO PROVIDE POWER, AND
- WHEN POWER IS APPLIED AND ONE OR MORE COMPONENTS FAIL TO PERFORM THEIR INTENDED FUNCTION.

POSITION:

AN INOPERATIVE STATE EXISTS WHEN ANY OF THE THREE CONDITIONS ARE MET.

- PROPOSE AN ALTERNATE POSITION REGARDING PROPER TESTING RESPONSE TO A POWER INTERRUPTION.

IV. COMPENSATORY ACTIONS FOR CLOSED CIRCUIT TELEVISION (CCTV) FAILURES

ISSUE:

ADEQUACY OF VIEW FROM POST POSITIONS.

REQUIREMENTS:

10 CFR 73.55 REQUIRES:

- MAINTENANCE OF ISOLATION ZONES,
- ADEQUATE RESPONSE TO DETECTION OF PENETRATION OR ATTEMPTED PENETRATION.

THE PHYSICAL SECURITY PLAN PROVIDES FOR:

- SECURITY FORCE ACTION IN RESPONSE TO LOSS OF ALL OR PART OF THE CCTV SYSTEM,
- UTILIZATION OF THE CCTV SYSTEM FOR PERIMETER BARRIER AND ISOLATION ZONE SURVEILLANCE.

POSITION:

MAINTAIN POSTS AS IS, SO THAT IF THERE IS A BLIND SPOT IN AN APPROACH TO THE OUTER PERIMETER FENCE, OR A BLIND SPOT IN THE ISOLATION ZONE BETWEEN THE FENCES, BUT PENETRATION OF THE INNER FENCE IS VISIBLE, THE OFFICER'S ABILITY TO ASSESS THE PRESENCE OF A THREAT IS NOT HAMPERED.

V. REPORTABILITY OF DEGRADED LIGHTING IN EXTERIOR AREAS WITHIN THE PROTECTED AREA BOUNDARY

ISSUE:

LOGGING OF LIGHTING DEFICIENCIES

REQUIREMENTS:

10 CFR 73.55 REQUIRES THAT:

- MAINTENANCE OF ISOLATION ZONES,
- SECURITY RESPONSE TO DETECTION OF PENETRATION OR ATTEMPTED PENETRATION OF THE PROTECTED AREA AND ITS ISOLATION ZONES,
- PERIODIC CHECKS OF EXTERIOR AREAS WITHIN THE PROTECTED AREA,
- ADEQUATE ISOLATION ZONE AND EXTERIOR AREA LIGHTING LEVELS.

THE STP PHYSICAL SECURITY PLAN (PSP) REITERATES THESE REQUIREMENTS.

10 CFR 73 APPENDIX G IDENTIFIES EVENTS REQUIRING REPORTING.

REGULATORY GUIDE 5.62 PROVIDES ADDITIONAL GUIDANCE ON REPORTING.

POSITION:

LEAVE CURRENT PRACTICE AS IS, BUT PROVIDE MORE DEFINITIVE CRITERIA FOR JUDGMENT ON REPORTING.

VI. REPORTING OF PRE-POSTED SYSTEM OR EQUIPMENT FAILURES

ISSUE:

LOGGING OR REPORTING OF POSTING TO COMPENSATE FOR A POTENTIAL SYSTEM FAILURE.

REQUIREMENTS:

10 CFR 73.71 ADDRESSES:

- REPORTING OF FAILURES OR DEGRADATION IN A SAFEGUARD SYSTEM,
- LOGGING AND REPORTING OF FAILURES THAT COULD HAVE ALLOWED UNAUTHORIZED OR UNDETECTED ACCESS HAD NOT COMPENSATORY MEASURES BEEN TAKEN.

REGULATORY GUIDE 5.62 PARAGRAPH 2.3 STATES THAT LOGGING IS NOT REQUIRED FOR PREPLANNED SITUATIONS THAT REQUIRE COMPENSATORY MEASURES.

POSITION:

WHEN AN EVENT OR CONDITION COULD OCCUR THAT COULD DEGRADE SECURITY EQUIPMENT, THE EQUIPMENT IS REPLACED WITH A COMPENSATORY POST. AFTER THE EVENT PASSES, THE EQUIPMENT IS PLACED BACK IN SERVICE.

THE ONLY LOGGING MADE IS IF THE EQUIPMENT FAILED WHEN PLACED BACK IN SERVICE. ALL SECURITY ACTIONS OF THIS TYPE ARE RECORDED ON A SECURITY INCIDENT REPORT.

VII. ILLUMINATION OF PROTECTED AREA STRUCTURE ROOFS

ISSUE:

LIGHTING LEVELS ON THE SAFETY-RELATED STRUCTURE ROOFS.

REQUIREMENTS:

10 CFR 73.55 SPECIFIES LIGHTING LEVELS FOR EXTERIOR AREAS WITHIN THE PROTECTED AREA.

THE PHYSICAL SECURITY PLAN ADDRESSES REQUIREMENTS FOR LIGHTING ON THE TOPS AND SIDES OF STRUCTURES.

POSITION:

ILLUMINATION OF THE NEAB, FHB, DGB, AND IVC IS NOT CHECKED BECAUSE THE BUILDINGS ARE NOT EASILY ACCESSIBLE AND ARE CONSIDERED IN THE "EXEMPT STRUCTURE" CLASS.

VIII. VISIBILITY OF ADJACENT COMPENSATORY GUARD POSTS

ISSUE:

LACK OF VISIBILITY OF PERIMETER GUARDS TO ADJACENT PERIMETER POSTS.

REQUIREMENTS:

THE PHYSICAL SECURITY PLAN ADDRESSES POSTING FOR A REDUCTION IN THE EFFECTIVENESS OF A PHYSICAL BARRIER.

POSITION:

VISIBILITY OF PERIMETER GUARDS TO ADJACENT PERIMETER POSTS IS NOT AN NRC REQUIREMENT.

IX. SAFEGUARDING OF SECURITY POST ORDERS

ISSUE:

HANDLING OF POST ORDERS AS SAFEGUARDS DOCUMENTS.

REQUIREMENTS:

10 CFR 73.21 REQUIRES THAT LICENSEES PROVIDE PROTECTIVE MEASURES FOR CERTAIN TYPES OF INFORMATION.

POSITION:

SECURITY PROCEDURES AND ORDERS ARE REVIEWED BY THE SAFEGUARDS COORDINATOR AND THOSE WHICH NEED HANDLING AS SAFEGUARDS DOCUMENTS ARE THEN PROTECTED ACCORDINGLY.

X. THE WACKENHUT CORPORATION RETURN TO WORK POLICY

ISSUE:

COMPLIANCE OF THE WACKENHUT CORPORATION (TWC) RETURN TO WORK POLICY WITH REGULATIONS.

REQUIREMENTS:

10 CFR 73 ADDRESSES FITNESS REQUIREMENTS FOR SECURITY PERSONNEL.

THE PHYSICAL SECURITY PLAN REQUIRES THAT MEDICALLY INCAPACITATED INDIVIDUALS PROVIDE MEDICAL EVIDENCE OF RECOVERY AND BE RETESTED ON PHYSICAL ABILITY TO PERFORM SECURITY DUTIES.

POSITION:

FOR SERIOUS ILLNESS OR INJURY

- PLACE PERSON'S BADGE ON HOLD UNTIL DOCTOR PROVIDES A RELEASE TO PERFORM ASSIGNED DUTIES,
- TWC EVALUATES FOR NEED FOR TESTING PRIOR TO RESUMPTION OF DUTIES,
- FINAL DETERMINATION OF TESTING IS HL&P'S RESPONSIBILITY.

XI. LIMITED REVIEW OF PERSONNEL NUCLEAR FILES

ISSUE:

USE OF SECURITY NUCLEAR FILES.

REQUIREMENT:

10 CFR 73.57(b)(8) PROVIDES REQUIREMENTS FOR CRIMINAL HISTORY CHECKS OF INDIVIDUALS GRANTED UNESCORTED ACCESS TO A NUCLEAR POWER FACILITY OR ACCESS TO SAFEGUARDS INFORMATION.

POSITION:

PERSONNEL INFORMATION SHALL NOT BE DISCLOSED TO PERSONS OTHER THAN THE SUBJECT INDIVIDUAL OR DESIGNEE, OR THOSE AUTHORIZED DURING THE COURSE OF THE SCREENING PROCESS.

NUCLEAR SECURITY DEPARTMENT ORGANIZATION

- NEW MANAGER - R. L. BALCOM
- PLANNING TO RESTRUCTURE TO FOCUS ONLY ON ACTIVITIES TO PROTECT THE FACILITY.

ATTENDANCE LIST

Attendance at the Houston Lighting & Power Company - NRC Technical Meeting on February 21, 1992, at the Region IV Office.

NRC Region IV

L. J. Callan, Director, Division of Radiation Safety and Safeguards (DRSS)
J. P. Jaudon, Deputy Director, (DRSS)
B. Murray, Section Chief, Facilities Inspection Program Section (FIPS)
T. W. Dexter, Senior Security Specialist, (FIPS)
A. B. Beach, Director, Division of Reactor Projects (DRP)
A. T. Howell, Section Chief, Project Section D, (DRP)
J. I. Tapia, Senior Resident Inspector, South Texas Project

NRC Office of Nuclear Reactor Regulation

S. C. Black, Director, Project Directorate IV-2, Division of Reactor Projects
III, IV, V
G. F. Dick, Project Manager
R. F. Skelton, Reactor Security Specialist

Houston Lighting & Power Company

W. H. Kinsey, Vice President, Nuclear Generation
W. J. Jump, Manager, Nuclear Licensing
T. J. Jordon, General Manager, Nuclear Assurance
R. L. Balcom, Manager, Security

City of San Antonio

M. T. Hardt, Director, Nuclear Division

City of Austin

P. W. Golde, Manager, Joint Projects