

December 13, 1995

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U. S. Nuclear Regulatory Commission  
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Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Response To Inspection Report  
50-313/95-25; 50-368/95-25

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the notice of violation identified during the inspection activities associated with the Arkansas Nuclear One (ANO) physical protection system.

The individuals who are authorized to grant unescorted access to ANO are subject to the requirements of 10CFR73.56, *Personnel Access Authorization Requirements for Nuclear Power Plants*. ANO believes that the implementation of 10CFR73.56 for access authorization personnel satisfies 10CFR73.1(a)(1), *Radiological Sabotage*. However, we also believe that verification of access authorization data is a good practice and have enhanced the access authorization program to specifically require independent verification of access information prior to granting an individual unescorted access to ANO.

We understand the NRC's premise for discerning that a violation occurred is based on a 1981 NRC memorandum issued prior to the 1992 promulgation of the 10CFR73.56 rulemaking. This internal memorandum was limited in scope and only addressed the potential vulnerability of insider assistance in changing, adding, or deleting access authorization information. At most, the enhancement is considered to have a neutral effect on safety. ANO's previous operational and security performance suggests that current controls and observations have been successful in managing data entry processes in access authorization. In consideration of the above, it does not seem appropriate to extend the applicability of this memorandum further than the interpretation related to the specifics of this violation when due consideration

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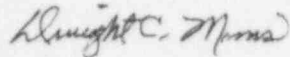
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is given to the multiple barriers in place to protect against the design basis threat of radiological sabotage.

Our complete response to the subject Notice of Violation is attached. Should you have questions or comments, please call Mr. Dwight Mims at 501-858-4601.

Very truly yours,



Dwight C. Mims  
Director, Nuclear Safety

DCM/RMC

Attachments

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## NOTICE OF VIOLATION

Entergy Operations Inc.  
Arkansas Nuclear One (ANO)

Docket: 50-313, 50-368  
License: DPR-51, NPF-6

During an NRC inspection conducted on October 16-20, 1995, two violations of NRC requirements were identified. These violations involved: (1) the failure of a portion of the licensee's physical protection system to protect against the design basis threat; and, (2) granting unescorted access to an individual that failed a fitness-for-duty test. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), 60 FR 34380, June 30, 1995, the violations are listed below:

### A. Design Basis Threat

License Condition 2.c(4) (Unit 1) and License Condition 2.0 (Unit 2) of the licensee's facility operating licenses require, in part, that the licensee fully implement and maintain in effect all provisions of the Commission-approved Physical Security Plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p) and 10 CFR 50.90.

Section 9.0 of the licensee's Industrial Security Plan requires, in part, that the physical security program meets the general performance requirements stated in 10 CFR 73.55(a) (see below).

10 CFR 73.55(a) requires, in part that the licensee's physical protection system be designed to protect against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a) (see below).

10 CFR 73.1(a) states, in part, that the design basis threat of radiological sabotage at fixed (power reactor) sites is a determined violent external assault on the plant by several well trained persons, with inside assistance from a knowledgeable individual (insider), participating in an active role (e.g., facilitating entrance and exit).

Contrary to the above, on October 19, 1995, the inspectors determined that a portion of the licensee's physical protection system (System) failed to protect against the design basis threat of radiological sabotage. Specifically, the licensee's System afforded six knowledgeable individuals (insiders) the opportunity to actively facilitate entrance and exit to the plant to unauthorized persons, by allowing these individuals (insiders) to independently enter bogus unverified access authorization data (name, badge number, and access levels) into the security computer.

This is a Severity Level IV violation (Supplement III) (313/9525-01;368/9525-01).

A. Response to Notice of Violation 313/9525-01; 368/9525-01

(1) Reason for the violation:

The requirements of 10CFR73.1(a)(1) *Radiological Sabotage* were implemented by Entergy in various security programs and procedures. ANO believes that the rule for the individuals who grant unescorted access was satisfied by implementing the requirements of 10CFR73.56, *Personnel Access Authorization Requirements for Nuclear Power Plants*. The six individuals who are singularly authorized to grant unescorted access have passed an extensive background investigation and a psychological assessment designed to evaluate the possible impact of any noted psychological characteristics which may have a bearing on trustworthiness and reliability. Additionally, these six individuals are subject to the ANO behavioral observation program which is designed to detect individual behavioral changes which could potentially lead to acts detrimental to the public health and safety.

The identified weakness has not resulted in the granting of any unauthorized access to Arkansas Nuclear One (ANO). Therefore, based on existing controls and observations, ANO believes that it is highly improbable that one of these six individuals would facilitate the entrance of an unauthorized person for the purpose of conducting radiological sabotage.

(2) Corrective steps taken and results achieved:

In an effort to continue our performance improvements we agree that the verification of access authorization data is a good practice. As an enhancement to the ANO access authorization program, temporary revisions were implemented on October 23, 1995 to require:

- Independent verification of access information prior to the granting of unescorted access
- Verification of security data base and access approval form information by the ANO Central Alarm Station (CAS) operator prior to enabling the keycard for access

(3) Corrective steps taken to avoid further violations:

Access control computer software will be modified by June 14, 1996 to require the verification of access control computer entries by two individuals, prior to downloading the access authorization information to the plant security computer. This process will replace the temporary manual process described above.

As a result of the very limited scope of the 1981 internal NRC memorandum regarding vulnerability to changing, adding or deleting access authorization information, and a careful reading of NRC regulations, ANO does not believe that there are generic implications associated with this issue.

(4) Date when full compliance will be achieved:

ANO is in compliance with 10CFR73.1.

B. No response required