The Light company

CORNDARY
Houston Lighting & Power South Texas Project Electric Gev. ting Station P. O. Box 289 Wadsworth, Texas 77483

August 05, 1992 ST-HL-AE-4164 File No.: G02.64 10CFR73 10CFR2

Regional Administrator, Region IV Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Reply to Notice of Violation 9220-01 Regarding Failure to Properly Classify Safeguards Information

Houston I onting & Power Company (HL&P) has reviewed Notice of Violation 9220-01 dated July 10, 1992 and submits the attached reply.

If you have any questions or this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.

William J. Jump General Manager, Nuclear Licensing

RDP/ag

Attachment: Reply to Notice of Violation 9220-01

110033

1R\92-205.001 9208110273 920805 PDR ADOCK 05000498 G FDR

A Subsidiary of Houston Industries Incorporated

JE41.

Houston Lighting & Power Company South Texas Project Electric Generating Station

cc:

ST-HL-AE-4164 rile No.: G02.02 Page 2

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

George Dick, Project Manager U.S. Nuclear Regulatory Commission Washington, DC 20555

J. I. Tapia
Senior Resident Inspector
C/O U. S. Nuclear Regulatory
Commission
P. O. Box 910
Bay City, TX 77414

J. R. Nawman, Esquire Newman & Holtzinger, P.C. 1615 L Street, N.W. Washington, DC 20036

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

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

K. J. Fiedler/M. T. Hardt City Public Service Board P. O. Box 1771 San Antonio, TX 78296 Rufus S. Scott Associate General Counsel Houston Lighting & Power Company P. O. Box 61867 Houstor, TX 77208

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

Dr. Joseph M. Hendrie 50 Bellport Lane Bellport, NY 11713

D. K. Lacker
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78736-3189

I. Statement of Violation:

10 CFR 73.21(a)(3) states, in part, that each person who produces, receives, or acquires safeguards information shall insure that safeguards information is protected against unauthorized disclosure.

Contrary to the above, in December 1991, the licensee forwarded to NRC, and several other addressees, two letters containing safeguards information that were not classified as safeguards and, consequently, was not protected against unauthorized disclosure. In addition in April 1992, the licensee's plant engineering department distributed to several departments an office memorandum titled "System Health Report-Security System" that contained safeguards information but was not protected properly against unauthorized disclosure.

The safeguards information contained in the three documents was not significant enough to assist an individual in an act of radiological sabotage of [sic] theft of special nuclear material.

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

II. Houston Lighting & Power Position:

HL&P concurs that the violation occurred.

III. Reason for Violation:

The root cause of this violation was lack of familiarity with Safeguards Information requirements by personnel who generate security related documents. A contributing cause was inadequate procedural guidance.

IV. Corrective Actions:

The following corrective actions are being taken:

1. The two letters forwarded to the NRC, ST-HL-AE-3942 dated December 10, 1991, and ST-HL-AE-3943 dated December 13, 1991, and the "System Health Report - Security System" were classified as Safeguards Information in April 1992. Subsequent actions were taken to account for and control additional copies of the documents which were made.

IV. Corrective Actions: (Con't)

- 2. The responsibility of the Safeguards Information Program is being transferred from Nuclear Security to Records Management Systems and Administration (RMS&A). Nuclear Security and RMS&A will review the adequacy of training requirements of personnel who process Safeguards Information (SGI) and potential SGI as a part of the transfer. The process for classification of SGI will also be reviewed. These actions will be completed by September 1, 1992, which will include development of a new procedure for control of Safeguards Information.
- 3. The new procedure will be required reading for selected individuals, from each department, who handle SGI. This will be completed by September 15, 1992.
- 4. Safeguards Information training within General Employee Training (GET) will be enhanced. This will ensure personnel who may potentially receive, hundle or generate SGI understand the basic requirements for control of SGI. This will be completed by November 6, 1992.
- 5. Training will be developed for individuals responsible for classification of SGI. This will be completed by November 6, 1992.

V. Date of Full Compliance:

HL&P is in full compliance.

VI. Additional Information:

The Safeguards Information contained in the three documents would not significally assist an individual in an act of radiological sabotage or theft of special nuclear material. Additionally, the "System Health Report" and ST-HL-AE-3942 regarding "Phase II Security Measures During Remodeling of the Maintenance Operations Facility" have subsequently been declassified as it has been determined that the documents no longer contain Safeguards Information.