

## APPENDIX A

### NOTICE OF VIOLATION

Houston Lighting & Power Company  
South Texas Project, Units 1 and 2

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

During an NRC special followup team inspection conducted March 9-13, March 23-27, and April 14, 1992, the team identified violations of NRC requirements. In accordance with 10 CFR Part 2, Appendix C, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violations are listed below:

Condition 2 of the facility operating license requires that Houston Lighting & Power Company fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority granted under 10 CFR 50.90 and 10 CFR 50.54(p).

Technical Specification (TS) 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures in Appendix A, Regulatory Guide 1.33, Revision 2, February 1978, and the security plan implementation. Regulatory Guide 1.33, Appendix A, Item 1.a, requires administrative procedures for security and visitor control.

- A. The TS 6.8.1.a requirement is accomplished, in part, by Department Procedure OSDPO2-ZS-0027, Revision 6, "Access Control," dated August 1, 1991.

Paragraph 4.5.2 of the procedure states, in part, an escort will maintain view and control of the visitor at all times.

Contrary to the above, during the period of January 15 to February 19, 1992, escorts did not always maintain view and control of visitors. This is based on a review of various records and interviews with licensee and contract personnel.

This is a Severity Level IV Violation (Supplement III) (50-498/9207-02; 50-499/9207-02).

- B. The TS 6.8.1.a requirement is also accomplished by Station Procedure OPGPO3-ZS-0001, Revision 7, "Personnel Access Control," dated July 3, 1991.

Paragraph 4.2.3 of the procedure states, in part, an escort shall notify security before transferring the visitor to another escort. Paragraph 4.4.5 of the procedure states, in part, that a visitor shall proceed through the turnstile before the escort (if the escort is exiting the protected area).

Contrary to the above, during the period of January 15 to February 19, 1992, escorts did not always notify security before transferring visitors to other escorts and an escort preceded an assigned visitor out of the protected area. This is based on a review of various records and interviews with licensee and contract personnel.

This is a Severity Level IV Violation (Supplement III) (50-498/9207-03; 50-499/9207-03).

Pursuant to the provisions of 10 CFR 2.201, Houston Lighting & Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is subject to this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps which have been taken and results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or Demand for Information as to why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this *1st* day of *June* 1992