



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

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Vice President

May 23, 1997

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

Subject: Docket Nos. 50-361 and 50-362  
Reply to a Notice of Violation  
San Onofre Nuclear Generating Station, Units 2 and 3

- References: (1) Letter, Mr. A. T. Howell III (USNRC)  
to Mr. Harold B. Ray (Edison), dated May 8, 1997
- (2) Letter, Mr. D. E. Nunn (Edison) to USNRC Region IV  
(Attn: Mr. R. Wise), dated October 21, 1996

Reference 1 transmitted the results of NRC Inspection Report No. 50-361/97-04 and 50-362/97-04, conducted February 24-28, 1997, at the San Onofre Nuclear Generating Station, Units 2 and 3. The enclosure to Reference 1 also transmitted a Notice of Violation containing two violations (9704-02 and 04). These violations involved: (1) the failure to change out the security lock and key system after the termination for cause of an individual with access to the keys of that system; and (2) a failure to follow physical security plan and procedural requirements prior to allowing a vehicle to access the area behind the vehicle barrier system.

In accordance with Reference 1, the enclosure to this letter provides Edison's reply to the Notice of Violation. However, as described in the enclosure, Edison took prompt corrective action while the inspector was on site or had completed the corrective actions prior to the inspection. Edison believes this information should have been reflected in the inspection report to accurately reflect the inspection.

If you have any further questions, please contact me.

Sincerely,

Dwight E. Nunn

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Enclosure

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cc: E. W. Merschoff, Regional Administrator, NRC Region IV  
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J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

## ENCLOSURE

### VIOLATION A

The enclosure to Mr. A. T. Howell's letter dated May 8, 1997, states in part:

"10 CFR 73.55(d)(9) states, in part, 'Whenever an individual's unescorted access is revoked due to his or her lack of trustworthiness, reliability, or inadequate work performance, keys, locks, combinations, and related access control devices to which that person had access must be changed or rotated.'

"Paragraph 4.4 of the licensee's physical security plan states, in part, 'In addition, whenever an individual's unescorted access is revoked due to his or her lack of trustworthiness, reliability, or inadequate work performance, keys, locks, combinations, and related access control devices to which that person had access are changed or rotated within five days.'

"Paragraph 6.4.2 of Security Procedure SO123-IV-4.4, Revision 1, states, in part, 'Evaluate termination to determine individual's reliability and trustworthiness. Direct a Security Specialist, Lock and Alarm to change applicable locks, keys, and combinations within five days from day of employee's termination for cause, if required.'

"Contrary to the above requirements, on December 18, 1995, a security officer, with access to security keys, was terminated for cause. The licensee determined the security officer was untrustworthy and unreliable in that she failed to report an arrest for driving under the influence of alcohol. However, the inspector determined that the licensee did not rotate or change the locks and keys after her termination.

"This is a Severity Level IV violation (Supplement III) (50-361;-362/9704-02)."

### RESPONSE TO VIOLATION A

#### 1. Reason for the Violation

The reason for the violation was an inadequate procedure (SO123-IV-4.4), which incorrectly allowed Security the flexibility to make a determination if the locks and keys needed to be changed when they terminated the individual in December 1995. The locks were changed in March 1996 (annual changeout).

#### 2. Corrective Actions Taken and Results Achieved

As corrective action, Procedure SO123-IV-4.4 was changed the day of the NRC inspection exit (February 28, 1997) to not allow Security to make an independent determination of an individual's reliability and trustworthiness. Instead, now upon

Central Processing Facility notification of an employment termination for cause, or if unescorted access is permanently revoked for cause, the procedure requires all appropriate locks, keys, and combinations to be changed within five days.

3. Corrective Actions That Will Be Taken

No additional corrective actions are planned.

4. Date When Full Compliance Will be Achieved

Full compliance was achieved on March 10, 1996, when the locks were changed.

VIOLATION B

The enclosure to Mr. A. T. Howell's letter dated May 8, 1997, states in part:

"Paragraph 4.6.5 of the licensee's physical security plan requires that active barriers remain in the denial position and be removed only after the authorization for entry has been confirmed. It further states that access control measures for the vehicles provide assurance that the vehicle is not transporting a design basis threat explosive device.

"Paragraph 6.7.1.4.4 of licensee Security Procedure SO123-IV-5.3.3 requires a visual search, at the vehicle barrier system, of the vehicle for design basis threat explosives, weapons, and personnel.

"Paragraph 6.7.1.6.1 of licensee Security Procedure SO123-IV-5.3.3 states that, after the search, the active vehicle barrier system can be lowered and the vehicle allowed to enter the area behind the vehicle barrier system.

"Contrary to the above, on September 9, 1996, the inspector observed a security officer lower the vehicle barrier system prior to a search of a vehicle stopped at the barrier. Further, the security officer did not perform an adequate search of the vehicle prior to allowing it to proceed inside the barrier.

"This is a Severity Level IV violation (Supplement III) (50-361;-362/97-04)."

## RESPONSE TO VIOLATION B

### 1. Reason for the Violation

As noted in Reference 2, the reason for the violation was personnel error for inadequate attention to detail. The security officer did not maintain proper observation over the subject vehicle because he was distracted while in-processing a tractor-trailer, and was unaware of brief periods when the vehicle was outside his direct visual range.

### 2. Corrective Actions Taken and Results Achieved

Prior to this inspection, disciplinary action had been taken for the security officer involved, which included counseling and subsequent retraining. Also, Procedure SO123-IV-5.3.3, "Search and Inspection," had been revised on December 2, 1996, to clarify the vehicle search process.

### 3. Corrective Actions That Will Be Taken

No additional corrective actions are planned.

### 4. Date When Full Compliance Was Achieved

Full compliance was achieved on December 2, 1996, upon issuance of SO123-IV-5.3.3, Revision 3.