

# The Light company

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

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July 2, 1997  
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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

South Texas Project  
Units 1 and 2  
Docket No. STN 50-498 and 499  
Reply to Notice of Violation 9715-01

South Texas Project has reviewed Notice of Violation 9715-01, dated June 3, 1997, and submits the attached reply. The events described in the Notice of Violation did not have an adverse effect on the health and safety of the public.

If there are any questions regarding these replies, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8757.

*J. J. Sheppard*

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Assistant to Executive Vice  
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TCK/tck

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U.S. Nuclear Regulatory Commission  
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I. Statement of Violation:

License Condition 2.F of the South Texas Project Unit 1, Operating License NPF-76 and Unit 2, Operating License NPF-80, dated March 22, 1988, requires that the licensee fully implement and maintain in effect the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

- A. South Texas Project Physical Security Plan, Revision 7A, dated January 14, 1997, Chapter 4, paragraph 4.4, "Vital Area Access - Personnel," states, in part, "Access to Vital Areas shall be controlled by the security system or by an armed security officer referencing an access authorization list. Personnel entry/exit is documented for all vital area access except the control room."

Contrary to the above, on April 2, 1997, the licensee identified that access to the isolation valve cubicle, a vital area, was not controlled by the security system or by an armed security officer. Specifically, from the afternoon of April 1, 1997, to the morning of April 2, 1997, the vital area door was left in the access mode which negated the security system controls and required compensatory measures were not in place. The licensee had not implemented corrective actions for this violation.

This is a Severity Level IV violation (Supplement III)(50-498;-499/9715-01).

II. South Texas Project Position:

South Texas Project concurs that the violation occurred.

While we do not take exception to the violation, we would like to clarify that the door was placed in the "monitored" access mode. When a door is placed in the monitored access mode the intrusion alarm is disabled. However, in this mode access the door was still physically controlled by the security system (A key card or key was still required to open the door from the outside.)

III. Reason for the Violation:

The reason for the violation was the less than adequate implementation of management's expectations for verifying device status prior to securing a compensatory post. A contributing cause is that Security Force Instructions did not adequately describe the expanded attributes of the upgraded security system.

At the time this event occurred, a security system upgrade was in progress. During this upgrade, three Alarm Stations were in operation, although only two were responsible for the subject door.

These were the Transition Alarm Station (functioning as the Central Alarm Station) and the Secondary Alarm Station.

On April 1, 1997 at approximately 0706 hours, security door 2I3101 in the Unit 2 Isolation Valve Cubicle, was posted due to work activity in the area. At 0801 hours, per instructions from the Security Force Supervisor, the Transition Alarm Station Operator placed the door in the monitored access mode which disables the intrusion alarm. This action was taken to facilitate work activity in the area.

At approximately 1700 hours, the workers in the area completed work activities for the day and the Security Officer on duty called the Transition Alarm Station for permission to secure the post. Although the new system has been in service since November of 1996 and training on the upgraded system had been provided, the Transition Alarm Station Operator failed to recognize the need for an operability check on the door intrusion alarm prior to securing the compensatory post. The Security Force Instructions did not contain steps that fully describe the testing requirements for the expanded attributes of the upgraded security system. As a result, the Transition Alarm Station Operator did not believe an operability check was required to secure the compensatory post at the door.

The Transition Alarm Station Operator requested permission from a Security Force Supervisor to secure the compensatory post at the door. The Security Force Supervisor gave permission to secure the compensatory post without questioning the Transition Alarm Station Operator on the door status or the operability requirement to return the door to operable status. This action by the Security Force Supervisor did not meet existing management expectations. The Transition Alarm Station Operator also requested and received concurrence from the Secondary Alarm Station Operator to secure the post. The Transition Alarm Station Operator then notified the Security Officer on duty that the post could be secured at 1708 hours.

The Security Officer acknowledged that he understood that the post could be secured. The Security Officer then carded into the door to see if the door was operating properly. Since the Security Officer did not expect to generate an alarm and he was not notified an alarm had been generated, the Security Officer exited the door and left the area. This action by the Security Officer did not meet existing management's expectations for securing a post. The Security Officer was expected to contact the Transition Alarm Station Operator and verify the door was operating properly prior to leaving his post.

At 0644 hours, on April 2, 1997, a Security Supervisor was viewing Syseca Computer System graphics and discovered that security door 2I3101 was in the monitored access mode. A Security Officer was dispatched to the security door to compensate for this failed compensatory measure. A search of the Isolation Valve Cubicle was initiated at 0658 hours. The search of the Isolation Valve Cubicle was completed at 0710 hours, with no discrepancies noted. The security door was placed in the secure mode at 0722 hours, which would allow all intrusion alarms to be registered if the door was opened. The security door was operability tested at 0727 hours and successfully passed the operability test. The security door was secured at 0730 hours and the compensatory measures secured.

IV. Corrective Actions:

As a result of this event, the following immediate actions were taken.

- 1) A Security Officer was dispatched to secure the door.
- 2) A search of the Isolation Valve Cubicle was completed with no discrepancies.
- 3) The security door was placed in the secure mode and successfully tested.
- 4) Department Management conducted meetings with security officers following this event. At these meetings management's expectations for all personnel involved in these types of activities were reviewed. This review included lessons learned from this and related events. Additionally, the upgraded security system attributes were again reviewed and the need to perform an operability test for any "mode" change were discussed with all security officers during these team meetings.

As a result of this event, the following corrective actions have been initiated.

- 1) The Alarm Station Operator Security Force Instruction will be revised to require the Alarm Station Operator to verify device status by reviewing device status graphics prior to securing compensatory measures for devices that have been in any mode other than secure. This action will be completed by July 31, 1997.
- 2) Security Force Instructions will be revised to include a requirement that all security devices which have been removed from the secure mode require a return to service (operability) test. This action will be completed by July 31, 1997.

V. Date of Full Compliance:

The South Texas Project is in full compliance.