

FEB 12 1988

In Reply Refer To:  
Dockets: 50-498  
50-499  
EA 87-236

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Houston Lighting & Power Company  
ATTN: J. H. Goldberg, Group Vice  
President, Nuclear  
P.O. Box 1700  
Houston, Texas 77001

Gentlemen:

This refers to the enforcement conference conducted in the NRC Region IV office on January 19, 1988, with you and other members of your staff and Region IV staff members to discuss findings of the NRC inspections conducted during the periods of August 24-28, September 8-11, September 21-25, October 5-9, and October 19-23, 1987, which were documented in NRC Inspection Reports 50-498/87-52; 50-499/87-52, 50-498/87-54; 50-499/87-54, 50-498/87-59; 50-499/87-59, and 50-498/87-66; 50-499/87-66.

The topics covered are described in the enclosed meeting summary.

It is our opinion that this meeting was beneficial and provided a better understanding of the concerns identified during the inspections.

The material enclosed herewith contains safeguards information as defined by 10 CFR Part 73.21 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended. Therefore, the meeting summary and HL&P's handout material will not be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

**Original Signed By**

**L. J. Callan**

L. J. Callan, Director  
Division of Reactor Projects

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PDR ADOCK 05000498  
Q PDR

Enclosure:  
Meeting Summary

cc: (see next page)

RIV:C:RPSB  
LAYandelicz  
2/9/88

D:DRS  
RLBart  
02/09/88

C:DRP/D  
GLConstable  
2/10/88

EO  
DAPowers  
2/10/88

D:DRP  
LJCallan  
2/10/88

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Houston Lighting and Power Company -2-

cc w/enclosure w/o licensee handouts which are safeguards:

Houston Lighting & Power Company

ATTN: M. Wisenberg, Manager

Nuclear Licensing

P.O. Box 1700

Houston, Texas 77001

Houston Lighting & Power Company

ATTN: Gerald E. Vaughn, Vice President

Nuclear Operations

P.O. Box 1700

Houston, Texas 77001

Central Power & Light Company

ATTN: R. L. Range/R. P. Verret

P.O. Box 2121

Corpus Christi, Texas 78403

City Public Service Board

ATTN: R. J. Costello/M. T. Hardt

P.O. Box 1771

San Antonio, Texas 78296

City of Austin

ATTN: M. B. Lee/J. E. Malaski

P.O. Box 1088

Austin, Texas 78767-8814

Texas Radiation Control Program Director

bcc w/copy of licensee handouts:

RIV Security File

P. A. Starcher, RSGB/NRR

Resident Inspector (2)

R. D. Martin, RA

R. L. Bangart, DRSS

Security Inspector

Chief, RPSB

RPSB Security File

D. A. Powers, EO

J. Lieberman, D/OE

bcc w/o copy of licensee's handouts which are safeguards:

✓ OMB IE-45

Lisa Shea, RM/ALF

RIV File

RSTS Operator

DRS

H. F. Bundy, Project Engineer, DRP/D

R. Bachmann, OGC

DRP

MIS

G. L. Constable, Section Chief, DRP/D

RPSB

R. E. Hall, DRSS

P. Kadambi, NRR Project Inspector

R. G. Taylor, DRP/D

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MEETING SUMMARY - JANUARY 19, 1988

Licensee: Houston Lighting & Power Company (HL&P)

Facility: South Texas Project (STP), Unit 1

Docket: 50-498

Operating License: NPF-71

Subject: Enforcement Conference Covering NRC Inspection Findings (NRC Inspection Reports 50-498/87-52; 50-499/87-52, 50-498/87-54; 50-499/87-54, 50-498/87-59; 50-499/87-59, and 50-498/87-66; 50-499/87-66) and Related Concerns

On January 19, 1988, representatives of HL&P met with NRC Region IV and OE personnel in the NRC office in Arlington, Texas, at the request of Region IV to discuss safeguards findings documented in the NRC inspection reports referenced above. The attendance list and a copy of HL&P's handout material are attached.

The NRC reviewed the apparent violations as outlined below, and the licensee discussed the root causes, corrective actions taken to preclude recurrence, and the results achieved to date.

1. Failure to Provide Access Control

This issue contained 22 examples from the four reports of the licensee's failure to provide access control, particularly in the badge/keycard system. Examples included misissuance of badges, keycards and badges being switched, improper access codes on badges, people not wearing badges when required, lost keycards and badges, and badges and keycards being taken offsite. All of these events were licensee-identified, and the NRC expressed concern that a programmatic breakdown had occurred. The licensee acknowledged that these events did represent a programmatic breakdown, but that corrective action instituted in late 1987 had reduced the number of such events to almost zero. The NRC inspectors commented that the licensee's new badging system had been observed during an inspection conducted January 4-8, 1988, and appeared to be better organized and running well.

2. Failure to Control Personnel Access and Provide Proper Escort

This issue contained six examples from the four reports of the licensee's failure to properly control personnel access and to provide a proper escort. The NRC expressed concern that licensee CAS/SAS operators were able to inadvertently activate the emergency unlock function on all the doors because it demonstrated a lack of understanding of the computer system capabilities. The licensee has retrained their personnel and provided a verification requirement to the program. The NRC expressed a more general concern about the overall computer program because of experiences with this particular vendor at other plants and asked what the licensee was doing to prevent other unexpected and hidden computer program problems. HL&P indicated that a computer system expert had been brought in under contract to evaluate the program, make required modifications, and then test the system out thoroughly to ensure these kinds of problems have been eliminated. With regard to the matter of inadequate escorts,

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the licensee stated that the temporary access arrangement that caused the problem has been eliminated and all STP personnel are now qualified as escorts.

3. Inadequate Vital Area Barrier

These two man-sized openings were found by HL&P and resulted from an error in the review of the design change package. HL&P explained that an evaluation for the security requirements of the vital area barrier was performed, but that the engineering review failed to identify correctly the size of the hole that would be caused by the maintenance work. The licensee has corrected this procedure to include additional security involvement in the design change process.

4. Failure to Perform Required Suitability Screening

HL&P indicated that the required tests have been performed and the appropriate records are now on file. The NRC has reviewed the files being maintained by the security contractor and found them to be acceptable.

5. Failure to Report Under 10 CFR Part 73.71(c)

The licensee contended that the event under discussion did not constitute a loss of security effectiveness and therefore, did not need to be reported. HL&P pointed out that in the NRC discussion of that item in NRC Inspection Report 50-498/87-52; 50-499/87-52, (Event 87-0054-C on page 9), the NRC inspector had determined that both persons involved in the misissued badge event "had the same vital area access, so security effectiveness was not reduced."

6. Failure of Access Control Equipment (Explosive Detectors)

The NRC inspectors questioned the effectiveness of the licensee's maintenance program and method of testing that prevented HL&P from finding this deficiency. The licensee indicated that the test sample had lost its potency and that proper test samples are now available.

7. Failure to Protect Safeguards Information

The licensee indicated that a review process of the three LERs in question was performed and the evaluation process resulted in the declassification of the documents. The NRC inspector pointed out that repeats of similar events indicated an uncorrected vulnerability that requires the LER be classified as safeguards. The licensee stated that all security LERs are now being classified as safeguards.

8. Loss of Self-Checking Capability of the Computer Monitoring System

The NRC expressed concerns similar to Item 2 regarding the security computer program that allowed a portion of the system to be in a nonannunciating/nonoperative condition for a period of about 30 minutes. The licensee reiterated their commitment to evaluate the security computer system and completely rework and test it as necessary to eliminate these problems.

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9. Failure to Perform Required Training

It was determined that two watchpersons had been placed on shift without completing the required training in first aid. The NRC recognized that first aid training by itself did not constitute a serious shortcoming, but expressed the concern regarding recordkeeping that allowed someone to be placed on shift without completing all the required training. The licensee has upgraded the training records review to include a checklist and verification that all training requirements have been met prior to allowing anyone to go on shift as a watchperson.

10. Failure to Perform Test of Intrusion Detection System (IDS)

When requested by the NRC inspector to demonstrate a test of the IDS E-field, the licensee failed twice to demonstrate that capability. Later that same day, on the third try, the licensee did demonstrate a satisfactory test of the E-field. The NRC inspector pointed out that as a result of these two inadequate tests and interviews with HL&P personnel, there was reason to believe that previous tests had not been performed adequately using varying techniques of crawling, rolling, stepping, or running. The licensee was requested to review this portion of their testing and maintenance program, and HL&P indicated that the test procedure has been revised to clarify the testing criteria.

The licensee was commended for the thorough presentation and candid discussion of the issues identified above.

Attachments:

1. Attendance List
2. HL&P Handouts (Safeguards)

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### ATTENDANCE LIST

Attendance at the Houston Lighting and Power Company - NRC enforcement conference on January 19, 1988.

<u>Name</u>	<u>Title</u>	<u>Organization</u>
<u>Houston Lighting and Power Company</u>		
M. A. McBurnett	Support Licensing Manager	HL&P
M. T. Hardt	Director, Nuclear Division	City Public Service San Antonio
G. E. Vaughn	VP Nuclear Operations	HL&P
W. A. Randlett	Opn Div Mgt Security Dept	HL&P
N. S. Tasker	Consultant	HL&P
J. H. Goldberg	Group VP Nuclear	HL&P
C. L. Kern	Acting Security Department Manager	HL&P
<u>NRC, Region IV</u>		
R. L. Bangart	Director, Division of Radiation Safety and Safeguards	NRC/RIV
L. A. Yandell	Chief, Radiological Protection & Safeguards Branch	NRC/RIV
R. A. Caldwell	Physical Security Inspector	NRC/RIV
R. E. Hall	Deputy Director, Division of Radiation Safety and Safeguards	NRC/RIV
L. J. Callan	Director, Division of Reactor Projects	NRC/RIV
A. B. Earnest	Physical Security	NRC/RIV
D. Powers	Enforcement Officer	NRC/RIV
J. A. F. Kelly	Security Inspector	NRC/RIV
H. Scott	Enforcement Staff	NRC/RIV
H. F. Bundy	Project Engineer	NRC/RIV
<u>NRC, Headquarters</u>		
R. Rosano	Enforcement Specialist	NRC/OE

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