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U.S. Nuclear Regulatory Commission
Document Control Desk, OP1-17
Washington, DC 20555

Subject: Reply to Notice of Violation in IR 97-011
River Bend Station - Unit I
License No. NPF-47
Docket No. 50-458

File Nos.: G9.5, G15.4.1

RBG-44152
RBF1-97-0302

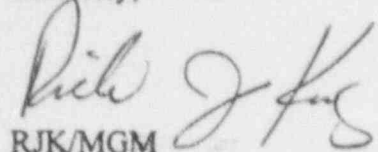
Gentlemen:

Pursuant to the provisions of 10CFR2.201, Attachment A provides the Entergy Operations, Inc. response to the Notice of Violation (NOV) described in NRC Inspection Report (IR) 50-458/97-011.

The subject violation, 50-458/97011-01, involves failure to carry forward a design feature (i.e., an audible alarm) during a security system upgrade which had previously been used as a justification for a security plan change.

Should you have any questions regarding the attached information, please contact Mr. David Lorring of my staff at (504) 381-4157.

Sincerely,


RJK/MGM
attachments

IEDI/

9708250345 970820
PDR ADOCK 05000458
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ATTACHMENT A
REPLY TO NOTICE OF VIOLATION 50-458/9711-01
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Violation:

During an NRC inspection conducted on June 23-27, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Condition 2.D of the River Bend Station Operating License NPF-47, requires the licensee to maintain in effect and fully implement all provisions of the Commission approved physical security plan. This includes amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Paragraph 2.6.8.5 of the River Bend Station Physical Security Plan states, in part, "Temporary security positions are normally established to provide compensatory measures for degraded barriers or malfunctioning security equipment..... Because the Video Capture System provides detection and assessment capabilities, it may be used in lieu of temporary security perimeter positions during computer failures or transfers."

The licensee's justification to use the video capture system as an acceptable compensatory measure, in the event of a computer failure, was that an audible video capture system alarm was automatically activated upon the loss of the security computers.

Contrary to the above, on June 26, 1997, the inspector identified that the video capture system did not have the capability of generating an audible alarm.

This is a Severity Level IV violation (458/97-11-01).

Reasons for the Violation:

In February, 1995, a change was implemented to the Physical Security Plan. Part of this change was the ability to use the video capture system in lieu of a Security Officer as a compensatory measure. The justification for this, which was docketed in the change submittal for use of this process, was that the video capture system had an audible alarm. This was a statement of fact about an actual system configuration, and not identified in the licensing basis documents normally reviewed during the River Bend Station 10 CFR 50.54(p) change review process.

In September, 1996, the security computer system was replaced. Prior to installation of this new computer system, a 10 CFR 50.54(p) change review was performed to verify requirements for the security system. This review did not identify a requirement for an audible alarm on the video capture system. Therefore, during replacement of the new computer system, the audible alarm for the video capture system was not carried forward.

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The primary cause of this occurrence is that insufficient guidance exists to ensure that the relevant information contained within docketed correspondence for changes to the Physical Security Plan is bounded within the licensing basis documents which are reviewed during the 10 CFR 50.54(p) change review process.

Corrective Actions That Have Been Taken:

Upon identification of the deficiency, immediate measures were taken to preclude the use of the video capture system as a compensatory measure.

Corrective Actions That Will Be Taken to Avoid Further Violations:

Specifically, the audible alarm will be installed in the video capture system. Security personnel will be notified that use of the video capture system as a compensatory measure is again valid. The licensing basis documents which are reviewed during the 10 CFR 50.54(p) change review process will be changed to include the audible alarm, thereby bounding this condition within the scope of future change reviews.

The 10 CFR 50.54(p) review process will be evaluated and appropriately enhanced to ensure that the relevant information contained within docketed correspondence for changes to the Physical Security Plan is bounded within the licensing basis documents. In addition, an administrative review of docketed security correspondence since 1994 will be performed to determine if any similar concerns exist.

During the interim period, until these generic corrective actions are complete, measures will be taken to ensure that future 10 CFR 50.54(p) change reviews will include a review of applicable security plan related docketed correspondence.

Other 10 CFR 50.54 change review processes will be evaluated to determine if any enhancements are needed to prevent a similar occurrence in their respective areas.

Date When Full Compliance Will Be Achieved:

River Bend Station is currently in full compliance.

Additional Information:

Please note that the use of the video capture system is as a compensatory measure. The audible alarm was not reinstalled upon replacement of the security computer system in September 1996. The video capture system has not been used as a compensatory measure since that time.