

AUG 20 1987

In Reply Refer To:
Docket: 50-458

Gulf States Utilities
ATTN: Mr. James C. Deddens
Senior Vice President, (RBNG)
Nuclear Licensing
P. O. Box 220
St. Francisville, Louisiana 70775

Gentlemen:

This refers to the meeting conducted at your request in the NRC office on July 21, 1987. This meeting related to activities authorized by NRC Operating License NPF-47 for River Bend Station Unit 1. Those persons in attendance are identified in enclosure 1 to this letter.

The meeting was held to discuss security program issues at River Bend Station. Topics of discussion included the evaluation of programmatic deficiencies versus individual events, the performance of contingency drills, the control of access to vital islands, and radio communications. Handouts provided by the licensee are attached as enclosure 2 to this letter.

It is our opinion that this meeting was beneficial and has provided for a better understanding of GSU's position on certain security matters. In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

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

Sincerely,

ORIGINAL SIGNED BY:

J. E. Gagliardo, Chief
Reactor Project Branch

Enclosures:
List of Attendees
Licensee Handouts

cc: (see next page)

RIV:RPSB
JAFKelley
8/19/87

C:RPSB
LAYanderson
8/14/87

C:RPB/A
JPJaudon
8/19/87

C:RPB
JEGagliardo
8/20/87

8708260269 870820
PDR ADDCK 05000458
F PDR

JEH5
11

Gulf States Utilities

-2-

cc w/enclosures:

Gulf States Utilities

ATTN: J. E. Booker, Manager
River Bend Oversight

P. O. Box 2951

Beaumont, Texas 77704

Louisiana State University,

Government Documents Department

Louisiana Radiation Control Program Director

bcc to DMB (IE45)

bcc distrib. by RIV:

RPB

DRSP

Resident Inspector

R. D. Martin, RA

Section Chief (RPB/A)

D. Weiss, RM/ALF

MIS System

RSB

RSTS Operator

RPSB

RIV File

Inspectors

Section Chief

L. A. Yandell

R. L. Bangart

R. E. Hall

Project Inspector, RPB

S. Stern, NRR Project Inspector

List of Attendees

Gulf State Utilities

J. C. Deddens, Senior Vice President, River Bend
W. H. Odell, Manager, Administration
D. L. Davenport, Security Supervisor
E. R. Grant, Director, Nuclear Licensing
J. E. Booker, Manager, River Bend Oversight

NRC

R. L. Bangart, Director, Division of Radiation Safety and Safeguards
L. A. Yandell, Chief, Radiological Protection and Safeguards Branch
J. P. Jaudon, Chief, Project Section A, Reactor Projects Branch
J. A. F. Kelly, Senior Physical Security Specialist
R. A. Caldwell, Physical Security Specialist
D. D. Chamberlain, Senior Resident Inspector, River Bend

OBJECTIVE

OBTAIN NRC GUIDANCE ON METHODS
TO EVALUATE PROGRAMMATIC DEFICIENCIES
AS OPPOSED TO INDIVIDUAL EVENTS

PROGRAMMATIC VS INDIVIDUAL DEFICIENCIES

- RIVER BEND HAS RECORDED 3 CASES OF IMPROPER KEY CARD ISSUE IN AN 18 MONTH PERIOD WITH AN INCIDENT RATE OF LESS THAN 1 PER 200,000 TRANSACTIONS.
- RIVER BEND HAS RECORDED 12 CASES OF DOOR ALARMS BY IMPROPER USE OF KEY CARDS IN AN 18 MONTH PERIOD WITH AN INCIDENT RATE OF LESS THAN 1 PER 500,000 TRANSACTIONS.

PROGRAMMATIC VS INDIVIDUAL DEFICIENCIES

- DESIGN OF SECURITY SYSTEMS REQUIRE EQUIPMENT PERFORM WITH A PROBABILITY OF DETECTION OF 90% WITH 95% CONFIDENCE.
- GSU PROPOSES THAT THESE TYPES OF DEFICIENCIES BE MEASURED IN A PROGRAMMATIC WAY AS OPPOSED TO MAJOR CONCERN ABOUT EACH INDIVIDUAL EVENT.

OBJECTIVE

OBTAIN NRC GUIDANCE ON THE CONDUCT
OF SECURITY RELATED EMERGENCY RESPONSE DRILLS

SECURITY DRILLS

- SECURITY DRILLS CONDUCTED AT RIVER BEND PRIOR TO AUGUST 1986 USED THE CONCEPT OF EMERGENCY RESPONSE TYPE DRILLS WHERE ALL AVAILABLE RESOURCES COULD BE CALLED UPON TO RESPOND AND ASSIST.
- IN AUGUST 1986 A SECURITY DRILL WAS CONDUCTED BY REGION IV INSPECTORS - RESPONSE WAS LIMITED TO ONLY THE ARMED RESPONSE FORCE AS COMMITTED BY THE SECURITY PLAN.

SECURITY DRILLS

- SECURITY DRILLS CONDUCTED AT RIVER BEND SINCE AUGUST 1986 HAVE BEEN LIMITED TO THE ARMED RESPONSE FORCE.

- RIVER BEND IS CONCERNED THAT THIS TYPE OF RESPONSE TRAINING PRODUCES TWO NEGATIVE EFFECTS:
 - SECURITY SUPERVISORS ARE LEARNING NOT TO USE AVAILABLE RESOURCES.

 - OTHER PLANT PERSONNEL ARE NOT BEING TRAINED IN HOW TO RESPOND OR ASSIST.

OBJECTIVE

OBTAIN NRC GUIDANCE ON ACCESS
CONTROL TO VITAL ISLANDS

VITAL ISLAND ACCESS CONTROL

- MARCH 1986 — LEVEL IV VIOLATION ASSIGNED FOR FAILURE TO CONTROL ACCESS TO VITAL ISLANDS; TOO MANY PERSONNEL HAVING UNESCORTED ACCESS TO THE CONTROL ROOM.

- ACCESS CONTROL PROGRAM WAS CHANGED
 - INVOLVED A TEMPORARY CHANGE PROCESS TO CHANGE ACCESS LEVELS AND RESTRICTED ACCESS TO THOSE WITH A FREQUENT NEED.

 - ACHIEVED A 20% REDUCTION IN ACCESS TO THE CONTROL ROOM.

VITAL ISLAND ACCESS CONTROL

- THE TEMPORARY CHANGE PROCEDURE RESULTED IN NEARLY 3,300 CHANGE DOCUMENTS AND INTRODUCED ABOUT 500,000 TRANSACTIONS IN A SIX MONTH PERIOD. POTENTIAL ERRORS ARE INTRODUCED:
 - DETERMINATION OF PROPER VITAL ISLANDS
 - DETERMINATION OF PROPER DOOR COMBINATIONS
 - KEY CARD ENCODING

- IN APRIL 1987 A REGION IV INSPECTOR REVIEWED THE CORRECTIVE ACTION AND DETERMINED THE ACTION INSUFFICIENT TO CLOSE THE VIOLATION. ONE PROBLEM STATED WAS THAT THERE ARE TOO MANY PERSONNEL EXEMPT FROM AUTOMATIC DOWNGRADE.

VITAL ISLAND ACCESS CONTROL

- MAY 1987 THE ACCESS CONTROL PROGRAM WAS AGAIN CHANGED TO FURTHER RESTRICT THE EXEMPT LIST AND TO STRENGTHEN THE AUTOMATIC DOWNGRADE PROCESS. THIS CHANGE HAS NOT SIGNIFICANTLY CHANGED THE NUMBER OF PERSONNEL WHO HAVE UNESCORTED ACCESS TO THE CONTROL ROOM.

- CURRENT STATUS
(DOES NOT INCLUDE SECURITY FORCE):

TOTAL NUMBER BADGED — 1237

TOTAL NUMBER WITH CONTROL ROOM ACCESS — 736 (59%)

TOTAL NUMBER EXEMPT — 318 (26%)

USE OF ACCESS BY EXEMPTS — 85% IN LAST 30 DAYS,
93% IN LAST 90 DAYS

VITAL ISLAND ACCESS CONTROL

- RIVER BEND IS CONCERNED THAT REQUIRING THESE RESTRICTIONS ON VITAL ISLAND ACCESS HAS THE FOLLOWING NEGATIVE IMPACTS.
 - OPERATIONAL SAFETY IS IMPAIRED BY NOT HAVING THE RIGHT PEOPLE WITH CURRENT ACCESS TO RESPOND TO ABNORMAL PLANT CONDITIONS IN A TIMELY MANNER AND POSSIBLY PREVENT AN EMERGENCY.
 - CONSTANT CHANGE IN ACCESS LEVELS TO ADJUST TO CHANGING NEEDS CAUSES CONFUSION AND IS AN ADMINISTRATIVE BURDEN.
 - FREQUENT CHANGES TO ACCESS LEVELS INTRODUCES A SIGNIFICANT POTENTIAL FOR HUMAN ERROR AND MAY RESULT IN IMPROPER ASSIGNMENT OF ACCESS TO A VITAL ISLAND (IN THE MONTH OF JUNE 1987 ALONE, 533 DOCUMENTS WERE SUBMITTED RESULTING IN 68,224 POSSIBLE TRANSACTION ERRORS).

OBJECTIVE

REVIEW STATUS OF THE LICENSE
CONDITION FOR RADIO COMMUNICATIONS

HISTORY OF RADIO COMMUNICATION CONCERN

- APRIL 1980 — NRC IE CIRCULAR 80-09 RAISED CONCERN ON USE OF RADIOS.
- SEPT 1981 — AE RECOMMENDS TO GSU NOT TO INSTALL PLANT ANTENNA SYSTEM.
- DEC 1983 — NRC IE INFORMATION NOTICE 83-83 PROVIDES MORE CONCERNS ON RFI INTERFERENCE.
 - GSU ABANDONS PLANT ANTENNA SYSTEM AND IN PLANT RADIO SYSTEM.
 - PHYSICAL SECURITY PLAN MODIFIED TO REFLECT A MAJOR RESTRICTION ON USE OF RADIOS IN PLANT.
- AUG 1985 — RBS LICENSE ISSUED AND CONTAINS LICENSE CONDITION TO "VERIFY THAT ADEQUATE RADIO COMMUNICATION CAPABILITY EXIST FROM ALL APPROPRIATE PLANT AREAS"
- SEPT 1985 — PLANT MANAGER RESTRICTS THE USE OF HAND-HELD RADIO WITHIN THE POWER BLOCK TO ONLY EMERGENCIES.

HISTORY OF RADIO COMMUNICATION CONCERN

- JAN 1986 — RBS EXPERIENCED COMPLETE LOSS OF OFF-SITE POWER ATTRIBUTED TO RFI FROM HAND-HELD RADIO.
- AUG 1986 — GSU POSITION ON RESTRICTION ON USE OF RADIOS DISCUSSED WITH NRC INSPECTOR WHO FELT TECHNOLOGY WAS AVAILABLE TO PROVIDE ADEQUATE RADIO COMMUNICATIONS.
- DEC 1986 — GSU MANAGEMENT REVIEW AGAIN SUPPORTED THE POSITION THAT HAND-HELD RADIOS SHOULD NOT BE USED IN THE POWER BLOCK.
- MAR 1987 — A COMPLETE REVIEW WAS MADE OF OTHER POWER PLANTS TO DETERMINE CURRENT STATE OF TECHNOLOGY AND CURRENT INSTALLATIONS.

HISTORY OF RADIO COMMUNICATION CONCERN

- MAY 1987 — GSU APPOINTS A TASK FORCE TO RESOLVE RADIO COMMUNICATION ISSUES.
- JUNE 1987 — DEAD ZONE TESTING WAS CONDUCTED USING HIGH GAIN DIRECTIONAL ANTENNAS SOME IMPROVEMENT WAS ACHIEVED.
- JULY 1987 — CONSULTANT PROVIDES A CONCEPTUAL DESIGN FOR A PASSIVE TYPE ANTENNA SYSTEM FOR APPROPRIATE PLANT AREAS.
- JULY 1987 — MAJOR MATERIALS ORDERED.

LICENSE CONDITION CLOSURE PLANS

- CONCEPTUAL DESIGN -- COMPLETE
- ORDER MATERIALS -- PARTIALLY COMPLETE
- RFI TESTING -- FIRST REFUELING OUTAGE
- CABLE ROUTING DESIGN
AND INSTALLATION -- AUGUST 1987 THRU MARCH 1988
- SYSTEM OPERATIONAL IN ACCESSABLE AREAS -- NOV 1987 THRU MARCH 1988
- PERFORMANCE EVALUATION -- FIRST OUTAGE GREATER THAN 7 DAYS AFTER INSTALLATION
- EXPOSURES: ○ SCHEDULE SUBJECT TO MATERIAL
DELIVERY SCHEDULES
 - INSTALLATION SCHEDULE DOES NOT
ALLOW TESTING UNTIL LATE -- SOME
AREAS MAY NOT BE COVERED -- FOLLOW UP
WORK WILL BE REQUIRED

SUMMARY

- GSU STILL HAS A MAJOR CONCERN ABOUT RADIO FREQUENCY INTERFERENCE WITH PLANT SAFETY SYSTEMS.
- INSTALLATION OF SUCH A SYSTEM IS A MAJOR PROJECT THAT MAY NOT BE POSSIBLE TO COMPLETE WITHIN THE REFUELING OUTAGE.
- CHANGE TO THE OPERATING LICENSE IS NEEDED TO REFLECT THE SYSTEM DESIGN, INSTALLATION AND TESTING SCHEDULE.