



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

November 1, 1999  
NOC-AE-000690  
File No.: G29  
10CFR73.71  
STI: 30978245

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Safeguards Event Report 99-S04  
Unauthorized Entry into the Protected Area

Pursuant to 10CFR73.71, South Texas Project submits the attached Unit 1 Safeguards Event Report 99-S04 regarding an unauthorized entry into the Protected Area. This failure did not have an adverse effect on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. S. M. Head at (361) 972-7136 or me at (361) 972-8757.

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Vice President,  
Engineering & Technical Services

JRM

Attachment: SER 99-S04 (South Texas, Unit 1)

IE74

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information

FACILITY NAME (1)

South Texas Unit 1

DOCKET NUMBER (2)

05000 498

PAGE (3)

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TITLE (4)

Unauthorized Entry into the Protected Area

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	30	1999	1999	S04	00	11	01	1999	South Texas Unit 2	05000 499
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)
POWER LEVEL (10)	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input checked="" type="checkbox"/> 73.71
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	

**LICENSEE CONTACT FOR THIS LER (12)**

NAME

Scott Head - Licensing Supervisor

TELEPHONE NUMBER (Include Area Code)

(361) 972-7136

**COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

**SUPPLEMENTAL REPORT EXPECTED (14)**

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

YES (If yes, complete EXPECTED SUBMISSION DATE).

X NO

**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)**

On September 30, 1999, Unit 1 was in Mode 1 at 100% power, and Unit 2 was in Mode 1 at 96% power. On September 30, 1999, at approximately 1429 hours, a recently terminated contract employee entered the protected area. A plant employee ascertained that the individual was no longer authorized for unescorted access and had the individual escorted offsite at 1442 hours and reported the event to the Security Force Supervisor. The root cause of this event is the lack of clear direction by the contract manager to an administrative technician to take specific badge action. A contributing cause to this event is that the current access control procedure allows the practice of transferring the protected area unescorted access of a terminated employee from one company to another company without positive action by the releasing employer. Corrective actions include enhancement of the expectations for contract management with respect to taking appropriate badge action for terminated employees and revision to the access control procedure.

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South Texas, Unit 1	05000 498	1999	S04	00	2 OF 5

DESCRIPTION OF EVENT:

On September 30, 1999, Unit 1 was in Mode 1 at 100% power, and Unit 2 was in Mode 1 at 96% power.

On September 30, 1999, at approximately 1429 hours, a recently terminated contract employee entered the protected area, subsequently proceeded to the office of the Plant General Manager, located inside the Maintenance Operations Facility, and requested to speak to the Plant General Manager. A plant employee informed the former contract employee that the Plant General Manager was unavailable. At this time the former contract employee stated that she had been terminated on September 23, 1999, and had come in to pick up her paycheck and to talk to the Plant General Manager. The plant employee inquired of the former contract employee as to how she obtained unescorted access. The former contract employee stated that she had not turned in her security badge. The plant employee had the individual escorted offsite and immediately reported the event to the Security Force Supervisor.

Event Detailed Time-line:

- 9/30/1999 / 1429 hours: The unauthorized individual entered the protected area via the east gate.
- 9/30/1999 / 1442 hours: The individual was escorted from the protected area via the east gate.
- 9/30/1999 / 1450 hours: The plant employee who discovered the individual discussed the event with the Security Force Supervisor.
- 9/30/1999 / 1459 hours: The individual's access badge was placed on hold.
- 9/30/1999 / 1545 hours: The Security Force Supervisor determined that the event was reportable.
- 9/30/1999 / 1550 hours: The Security Force Supervisor notified the Unit 1 Shift Supervisor.
- 9/30/1999 / 1636 hours: The Nuclear Regulatory Commission was notified of the event in accordance with 10CFR73.71.
- 9/30/1999 / 1643 hours: The individual's access badge was revoked.

Background:

On September 15, 1999, the subject contract individual notified her employer via "Voluntary Resignation Form" that she was resigning, effective September 23, 1999. The subject contract company manager turned the resignation form over to an administrative technician for processing on September 16, 1999, along with unclear verbal instructions regarding notification of security. Based on her understanding of the unclear verbal direction, the administrative technician believed the subject employee had accepted employment with another on-site contract firm, and included the subject individual's form with the transfer paperwork for two other contract employees that had accepted employment with another site contractor.

The subject individual was terminated from employment on September 22, 1999. The administrative technician did not complete an Employee Check-Out Form because the employee was unavailable. The administrative technician did not complete an Unescorted Access/Badge Transaction Form because she believed the employee was transferring to another site contractor. The administrative technician based this action on

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DESCRIPTION OF EVENT (Continued):

0PGP09-ZA-0001, Plant Access Authorization Program, Step 8.9.1, which states: *“The receiving company or department, shall complete a Unescorted Access/Badge Transaction Form (Form 3), and forward it to the Nuclear Plant Protection badging office no later than 4:00 p.m. (1600 hours) of the final day of employment with the person's old employer or department. When possible the Unescorted Access/Badge Transaction Form should be delivered to Nuclear Plant Protection badging office at least twenty-four hours prior to the planned termination, or transfer of employment with the person's old employer or department”*. The fact that this procedure does not require any positive action by the employee's releasing company, regarding the protected area unescorted access badge, contributed to this event.

CAUSE OF EVENT:

The root cause of this event is the lack of clear direction by the contract manager to the administrative technician to take specific badge action. Instead, the contract manager assumed the administrative technician would perform a series of actions, based on poorly communicated facts.

Contributing Causes of this event were:

- The current access control procedure, 0PGP09-ZA-0001, Plant Access Authorization Program, allows the practice of transferring the protected area unescorted access of a terminated employee from one company to another company without positive action by the releasing employer. As a result, if there is miscommunication between employers, if the new employment does not occur, or if the employee decides to not seek the planned employment, there may be no knowledge of appropriate site personnel of the change and no clearly defined responsibility to terminate the individual's unescorted access.
- Ineffective monitoring by contractor management: The manager believed that neither monitoring the task progress, nor following up to ensure successful completion, should be necessary.
- Self-checking was not applied to ensure the expected result: The administrative technician made assumptions and did not follow up to ensure that the terminated employee had actually gained employment with another site contract company, and that the receiving company had processed an Unescorted Access/Badge Transaction Form.
- Relevant information was omitted: The resigning employee omitted the reason for her resignation on the “Voluntary Resignation Form”. The administrative technician thought that the manager had told her that the individual was moving to a different contractor company on site.
- Ineffective STPNOC management expectations: The Contract Technical Coordinator had a verbal understanding with the contractor manager that he would be provided detailed information about each termination. At the time of this termination, the Contract Technical Coordinator was off-site and there had been no provision made that the termination details be provided to a designee.

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#### ANALYSIS OF EVENT:

This event did not result in any personnel injury, equipment damage, acts of sabotage, radiological problems, or environmental impacts. However, this event is significant due to it being reportable to the Nuclear Regulatory Commission per 10CFR73.71(b) for an actual entry of an unauthorized person into a protected area, material access area, controlled access area, vital area, or transport.

There were no additional adverse consequences as a result of this event; however, the event represents the failure of a barrier designed to prevent a broad range of potentially significant consequences. Factors that mitigated the potential severity of this event are the lack of malicious intent by the unauthorized individual and the questioning attitude of the plant employee who immediately took control of the situation had the individual escorted outside the protected area.

#### CORRECTIVE ACTIONS:

The following corrective actions have been or will be taken as a result of this occurrence:

1. On September 30, 1999, the individual was escorted from the protected area at 1442 hours, the badge was placed on hold at 1459 hours, and the badge was revoked at 1643 hours.
2. As an interim measure, STP Nuclear Operating Company management expectations for the subject contract company management were enhanced to include the following:
  - The subject contract company shall ensure that each terminated employee's unescorted access is either placed on hold or revoked, regardless of the circumstances. This action is to be completed no later than 1600 hours on the effective date of termination.
  - The subject contract company shall report terminations to the STP Nuclear Operating Company Contract Technical Coordinator or his designee on the effective date of termination. This report shall include a reason(s) for the termination.

These actions were completed on October 4, 1999.

3. Procedural requirements and STPNOC management expectations were reviewed with applicable personnel of the subject contract company. This action was completed on October 4, 1999.
4. OPGP09-ZA-0001, Plant Access Authorization Program, will be revised to require badge action by the releasing employer for any terminated employee. This action will be completed by December 30, 1999.

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ADDITIONAL INFORMATION:

There have been no Safeguards Event Reports submitted by the South Texas Project to the Nuclear Regulatory Commission in the past three years in which an unauthorized individual gained access to the protected area.