



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064**

June 8, 2000

EA 00-093

Charles M. Dugger, Vice President  
Operations - Waterford 3  
Entergy Operations, Inc.  
17265 River Road  
Killona, Louisiana 70066-0751

**SUBJECT: QUESTIONS REGARDING THE WATERFORD-3 SECURITY IMPROVEMENT  
PLAN**

Dear Mr. Dugger:

Following NRC Inspection 50-382/2000-03 and in preparation for the May 30, 2000, pre-decisional enforcement conference, you submitted a Security Improvement Plan (SIP) (reference W3 F1-2000-0076 dated May 23, 2000). The intent of the SIP was to "document and track those short-term actions that are required to support implementation" of your enhanced defensive strategy.

During a pre-decisional enforcement conference in the Region IV offices on May 30, 2000, the Region IV staff informed you that we would provide you with a number of detailed comments and questions regarding the SIP scope, content, action item priorities, and action item planned completion dates. The purpose of this letter is to transmit those comments and questions to you and request a response. The comments and questions are provided in the enclosure to this letter.

We request that you submit your response to the questions and requested information in writing by June 23, 2000. As discussed between Ms. Gail Good of my staff and Mr. E. Perkins of your staff on June 8, 2000, we understand that following your review and evaluation of the enclosure you will determine whether the SIP should be revised and resubmitted to NRC for further review.

Should you have any questions regarding this letter or its enclosure, please contact Ms. Gail Good at (817) 860-8215 or Mr. Bruce Earnest at (817) 860-8146.

Sincerely,

**/RA/**

Arthur T. Howell III, Director  
Division of Reactor Safety

Enclosure: As stated

Charles M. Dugger

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Docket No.: 50-382

License No.: NPF-38

cc:

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DOCUMENT NAME: R:\\_WT\QUESTIONS IN REFERENCE TO THE WAT-3 SIP.wpd

RIV:PSB	C:DRS/PSB	D:DRS		
ABEarnest:nh	GMGood	ATHowell III		
/RA/	/RA/	/RA/		
06/08/00	06/08/00	06/08/00		

## ENCLOSURE

1. The SIP describes a mixture of goals and strategies that encompass areas not directly related to the ability to protect the plant against the design basis threat. Although many of these areas are necessary to ensure a lasting resolution is established and maintained, it is not clear which of the items you perceive as necessary to correct the apparent violation identified during the March 2000 inspection. We request that you provide an itemized and prioritized list of those actions and completion dates which you have determined as being needed to correct the apparent violation.
2. During the May 30, 2000, pre-decisional enforcement conference, you described the enhanced defensive strategy and indicated that it was essentially complete with only minor adjustments expected. Based on the following reasons, the November 17, 2000, SIP date to complete current security response force training appears excessively prolonged because: (1) operations personnel will be trained on the enhanced defensive strategy by August 31, 2000; (2) the current security staff is already familiar with the plant environs; (3) staffing levels will be increased and vacancies will start to be filled by May 11, 2000; (4) training can begin before the defensive fighting positions are installed and other barrier upgrades are completed; and (5) the need to maintain the compensatory measures taken in response to the March 2000 inspection is placing a strain on the existing response organization due to the need to work overtime.

We request that you provide a justification for the November 17, 2000, date to complete this training and explain why other actions, such as performing an organizational effectiveness study and developing a program to exercise the site on integrated contingency response, are scheduled to be completed earlier.

3. Your presentation during the May 30, 2000, pre-decisional enforcement conference contained a commitment to use a systems approach to training process. We request that you provide the basis for excluding from the SIP an action to develop a systems approach to training process.
4. Similarly, your presentation during the May 30, 2000, pre-decisional enforcement conference contained a commitment to include 20 hours of weapons training per training cycle. We request that you provide the basis for excluding from the SIP an action to conduct 20 hours of weapons training per 10-week schedule.
5. Although it is reasonable to expect the intrusion detection upgrade to take until December 2000 to complete, it is not clear why it will take until December 15, 2000, to implement engineering requests for hardening 7 security access doors and installing 3 grenade nets. Several engineering requests appear to be more complicated but are scheduled to be completed sooner. We request that you provide a basis for the prioritization of the subject engineering requests.
6. Your presentation during the May 30, 2000, pre-decisional enforcement conference indicated that there were numerous missed opportunities in which the depth of the security program degradation could have and should have been identified. Goal 5, Strategy A.3 of the SIP provides for the conduct of self assessments of the security program. Given these missed opportunities, we request that you provide details

regarding the independence and scope of these self-assessment activities in order to provide assurance that: (1) your corrective actions are complete, (2) your corrective actions are effective, and (3) other elements of the security program that may warrant increased attention are identified.

7. What specific actions have been taken to improve the implementation effectiveness of the problem identification and resolution process as it pertains to the security program?
8. The SIP's performance measures lack specificity. We request that you provide the definition of each performance measure and the goals associated with each, including a discussion of the relationship between the performance measures and the corresponding SIP goals and strategies.
9. When will the security organization be ready to demonstrate, for example, by means of force-on-force exercises, the enhanced defensive strategy and the ability to protect the plant against the design basis threat?