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SUBJECT: Responds to NRC 950519 ltr re violations noted in insp rept
50-261/95-12. Corrective actions: safeguards info immediately
relocated to controls area of CR complex & review of need
for safeguards info matl in CR conducted. O

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10 CFR 2.201

Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510E
Serial: RNP-RA/95-0111

JUN 18 1995

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/95-12
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides the Carolina Power & Light (CP&L) Company reply to Violation C of the Notice of Violation identified in NRC Inspection Report 50-261/95-12, which was transmitted by letter dated May 19, 1995. Violation C involves a failure to maintain control of Safeguards Information. This reply is required to be submitted to the NRC by June 19, 1995. The enclosed reply does not contain Safeguards Information.

Should you have any questions regarding this matter, please contact Mr. R. M. Krich at (803) 857-1802.

Very truly yours,

C. S. Hinnant
Vice President

DTG:dtg
Enclosure

9506290194 950618
PDR ADDCK 05000261
Q PDR

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
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260081

Highway 151 and SC 23 Hartsville SC

REPLY TO A NOTICE OF VIOLATION

Violation C

10 CFR 73.21 (d) requires that matter containing Safeguards Information shall be under the control of an authorized individual while in use, and stored in a locked security container while unattended.

Contrary to the above:

On April 5, 1995, it was determined that the licensee did not preserve control of the Safeguards Information stored in the Shift Supervisor's Office in that the licensee did not store the Safeguards Information in a locked security storage container when the Safeguards Information was unattended.

Reply

Carolina Power & Light (CP&L) Company agrees that a violation occurred, but considers that the control of the Safeguards Information (SGI) exercised in the Control Room Shift Supervisor's office followed the requirements of 10 CFR 73.21, "Requirements for the Protection of Safeguards Information," and associated guidelines within NUREG 0794, "Protection of Unclassified Safeguards Information," with respect to control while in use or storage. Paragraph 4.2, "Control While in Use" of NUREG 0794 states in part, "This requirement is satisfied if the matter is attended by an authorized individual even though the information is in fact not constantly being used. Safeguards Information, therefore, within alarm stations, continuously manned guard posts or ready rooms need not be locked in security storage containers. . ." and, "Under certain conditions the general control exercised over protected or controlled access areas would be considered to meet this requirement. The primary consideration is limiting access to those who have a need-to-know. Some examples would be . . .

- Certain nuclear power plant vital areas such as the control room . . ."

Notwithstanding this information, the control exercised by CP&L of SGI in the Control Room Shift Supervisor's Office did not satisfactorily limit access to SGI only to those authorized individuals who have a need to know, as defined by 10 CFR 73.2, and as required by 10 CFR 73.21(d)(2).

1. The Reason for the Violation

This violation was the result of a failure to ensure that the requirements of 10 CFR 73.21(d)(2) were met regarding limiting access to SGI to authorized individuals who have a need to know when the SGI was moved from its original continuously attended location in the Control Room controls area into the Control Room Shift Supervisor's office. The SGI material had been moved to accommodate a modification to the Control Room that was in progress. Because the Control Room Shift Supervisor's office is not continuously attended by an individual authorized use of SGI, access to the SGI by only those authorized individuals who have a need to know could not be assured.

2. The Corrective Steps That Have Been Taken and the Results Achieved

Upon identification of this concern, the SGI was immediately relocated to the controls area of the Control Room complex, where the SGI was maintained under the continuous control by the Control Room operators who are authorized access to SGI and have a need to know. Subsequent to this action, a review of the need for SGI material in the Control Room was conducted, and a determination was made that maintaining SGI in the Control Room was no longer necessary. The SGI was then relocated to the Secondary Alarm Station where the SGI would be under the continuous control of the Security organization. Written instructions were provided to the Security staff for delivery of the SGI material to the Control Room upon request.

3. The Corrective Steps That Will Be Taken to Avoid Further Violations

Comprehensive programmatic improvements have been initiated to strengthen control of SGI. These improvements have been incorporated into Administrative Procedure (AP)-028, "Safeguards Information" which includes the following elements.

1. The Security Unit has assumed complete responsibility for control of SGI.
2. Control of access to SGI has been strengthened to assure access of SGI only to individuals with a need to know through the use of briefings conducted by the Security staff for current SGI custodians and individuals requesting access to SGI. These briefings include the requirements for control of SGI and the requirements of 10 CFR 73.21(d).

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 16, 1995.

In addition to the actions taken to achieve full compliance, the following additional improvements are being taken to strengthen controls over SGI material.

- Instructions and precautions on the use of computers for handling SGI documents and drawings have been proceduralized.
- Instructions for transporting SGI have been proceduralized.
- Orientation of SGI custodians will now include key points from corporate and site procedures, as well as, recent CP&L experience (i.e., history of recent CP&L SGI events, SGI definition, eligibility for access of SGI, and requirements for control of SGI).
- The Security Unit's self-assessment program has been enhanced by incorporating a more performance-based approach to self-assessment.
- A "stand alone" word processing computer has been provided to the Security Unit, and is dedicated for processing SGI Security procedures, Security Plan revisions, and other general SGI correspondence.
- The Security Unit is conducting a review of SGI documents in an effort to confirm that they are appropriately classified as SGI. Those documents determined not to be SGI are being declassified.