

# CATEGORY 1

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ACCESSION NBR: 9606030272      DOC. DATE: 96/05/28      NOTARIZED: NO      DOCKET #  
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 HINNANT, C.S.      Carolina Power & Light Co.  
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SUBJECT: Responds to NRC 960425 ltr re violation noted in insp rept  
 50-261/96-03. Corrective actions: Security Procedure (SP)-012  
 revised & hand geometry units successfully tested in  
 accordance w/SP-012 on 960301.

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**CP&L**

MAY 28 1996

Carolina Power & Light Company  
3581 West Entrance Road  
Hartsville SC 29550  
Robinson File No: 13510E  
Serial: RNP-RA/96-0090

C. S. Hinnant  
Vice President  
Robinson Nuclear Plant

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23  
NRC INSPECTION REPORT NO. 50-261/96-03  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

This provides the Carolina Power & Light (CP&L) Company reply to the Notice of Violation identified in NRC Inspection Report No. 50-261/96-03 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated April 25, 1996. The Violation involves a failure to test properly and document the test results prior to operating newly installed security equipment. The letter transmitting the Notice of Violation requires our response to be submitted under oath or affirmation. As discussed during a telephone conversation on May 28, 1996, between Mr. M. B. Shymlock of NRC Region II and Mr. R. M. Krich of my staff, it is not necessary to submit this reply under oath or affirmation. As requested in the letter transmitting the Notice of Violation, the enclosure restates the Violation, followed by our reply. This reply is required to be submitted to the NRC by May 28, 1996.

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

Very truly yours,

*C. S. Hinnant*  
C. S. Hinnant  
Vice President

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PDR ADOCK 05000261  
Q PDR

Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II  
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP  
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

Tel 803 857-1499 Fax 803 857-1319

## REPLY TO A NOTICE OF VIOLATION

### Violation

The NRC exemption letter dated December 20, 1995, paragraph III, issued under 10 CFR 73.55(d), Access Requirements, requires the licensee's hand geometry equipment to meet the detection probability of 90 percent with a 95 percent confidence level, and to revise the physical security plan to include implementation and testing of the hand geometry access control system.

Paragraph 12.1, of the licensee's Industrial Security Plan (ISP), Revision 31, dated January 24, 1996, states, "Hand geometry reader testing to assure a probability ratio of 90% with 95% confidence shall be performed annually, after repairs, major maintenance, re-calibration of equipment, and after each inoperative state."

Contrary to the above, from November 28, 1995 to March 9, 1996, the licensee allowed access to the protected area using the hand geometry system without having conducted tests to ensure that the equipment met the 90 percent detection probability with a 95 percent confidence level.

### Reply

Carolina Power & Light (CP&L) agrees that the violation occurred. The NRC exemption approval was dated December 20, 1994. Revision 31 to the Industrial Security Plan (ISP) was issued on January 29, 1996. The Notice of Violation states that from November 28, 1995 to March 9, 1996, the access to the protected area was allowed using the hand geometry system without having conducted the required tests. Our review has identified that the hand geometry system was declared operable on December 19, 1995, without having conducted the required post-modification testing.

#### 1. The Reason for the Violation

The cause of this failure was personnel error. Individuals involved with the design and installation of the hand geometry access control system failed to properly interpret the requirements of 10 CFR 73, including the exemption from 10 CFR 73.55(d), as documented in NRC letter dated December 20, 1994. The incorrect interpretation was to take credit for the testing reported by the Sandia National Laboratory and not perform post-modification testing to ensure that the equipment met the detection probability ratio of 90% with 95% confidence.

Failure to apply sufficient attention to detail contributed to this event. The individuals in the Security organization that reviewed the modification documentation failed to recognize that the proper post-modification testing requirements had been omitted.

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

Security Procedure (SP)-012, "Verification of Security System Component Operation," was revised on February 29, 1996, to include the 30 consecutive tests for hand geometry. The hand geometry units were successfully tested in accordance with SP-012 on March 1, 1996, and the test results were included in the modification installation documentation.

The individuals involved with the engineering aspects of this issue have been counseled regarding the adequacy of reviews of modifications which involve changes to the licensing basis for the plant.

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

Engineering personnel will be instructed to utilize the resources necessary to ensure licensing requirements are adequately considered in the modification process. Additionally, individuals in the Security organization have been counseled regarding their expectations to ensure procedure changes associated with revisions to the ISP are appropriately implemented.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 1, 1996, with the completion of the testing required by 10 CFR 73 and the ISP.