

# CATEGORY 1

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SUBJECT: Responds to NRC 961206 ltr re violations noted in insp rept  
 50-261/96-13. Corrective actions: entry turnstile "time-out"  
 feature was changed to shorter period of time.

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Robinson File No: 13510E  
Serial: RNP-RA/96-0225

United States Nuclear Regulatory Commission  
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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. 50-261/96-13  
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. 50-261/96-13 for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which was transmitted by NRC letter dated December 6, 1996. The violation involves failure to control access into the protected area. As requested in the letter transmitting the Notice of Violation, the enclosure restates the violation, followed by our reply.

Should you have any questions regarding this matter, please contact Mr. H. K. Chernoff at (803) 857-1437.

Very truly yours,

C. S. Hinnant  
Vice President

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G PDR

Enclosure

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

IEO 11

## REPLY TO A NOTICE OF VIOLATION

### Violation

The licensee's Industrial Security Plan (ISP), Revision 32, dated April 26, 1996, paragraph 1.6.2, states that "turnstiles are located in the Personnel Access Points (east and west) and are controlled by members of the security force within bullet resistant structures."

Security Procedure - 003, Personnel Indoctrination, Revision 9, July 19, 1996, Paragraph 3.1.11 requires that personnel be alert to unauthorized "tailgaters." Paragraph 5.0 of the same procedure states that the security program ensures that unauthorized persons cannot enter undetected into the protected or vital areas.

Security Procedure - 007, Access Control, Personnel Identification, and Badging, Revision 47, dated August 16, 1996, Paragraph 6.1.1.2 states that personnel access to the Protected Area will normally be controlled by electrically operated turnstiles or gates. Access control through the turnstile is normally accomplished by inserting a badge into the cardreader and placing the user's hand in a hand geometry reader for verification. If the security computer indicates that the badge data in the computer matches the user's hand, the locking device on the turnstile will release allowing access. Access into the protected area is monitored by a member of the security force who is located in the Access Control Station.

Contrary to the above, on November 7, 1996, another individual gained unauthorized access to the protected area because the final access control officer was assigned duties that detracted from the primary duties of observing personnel accessing into the protected area.

### Reply

CP&L agrees that the violation occurred as described in that, during a drill conducted at the request of a NRC Inspector, one CP&L employee used the hand geometry equipment and card reader badge to gain access to the Protected Area, and allowed another CP&L employee to access the area.

#### 1. The Reason for the Violation

This violation was caused by failure to provide adequate management oversight of the duties assigned to Access Control Station (ACS) personnel. In addition to that of final access control at protected area gates and turnstiles, ACS personnel have been tasked with administrative duties (e.g., adding and deleting badges, changing of access levels, clearing of advisories, dispatching security force response to certain events, clearing alarms on certain portals) that detracted from their primary responsibility.

As a result, the function of final access control was not optimized. Concerns associated with the additional duties conducted by ACS personnel were recognized earlier; however, a decision was made to delay making the necessary changes until the upcoming security computer replacement project was completed.

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

Upon identification of the unauthorized individual entering the protected area, a compensatory security position was immediately established at the entry turnstiles. As additional interim measures, a temporary barrier between protected area entrance turnstiles was provided to separate turnstile entry lanes, and a demarcation line was painted on the floor in front of the turnstiles to limit access to the turnstiles to one person at a time. Also, the entry turnstile "time-out" feature was changed to a shorter period of time.

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

By February 12, 1997, computer console commands will be moved from the ACS to the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS). This will result in a re-alignment of ACS responsibilities and functions, other than those of final access control, to other positions within the Security organization, and will minimize the possibility of distraction from the primary ACS duties of observing personnel accessing into the protected area.

To maintain management oversight of the primary duties assigned to ACS personnel, a statement will be added to the Industrial Security Plan which will preclude adding duties to the ACS without proper reviews. A revision to the Industrial Security Plan is scheduled to be submitted to the NRC by February 12, 1997. Changes in the ACS console are also being evaluated from a human engineering perspective to determine if a clearer, less obstructed view of the entry turnstiles can be accomplished.

4. The Date When Full Compliance Will Be Achieved

Full compliance was achieved on November 7, 1996, with a compensatory security position established at the entry turnstiles.