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AUTH. NAME AUTHOR AFFILIATION
PARRISH, J.V. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 940726 ltr re violation noted in insp rept
50-397/94-22. Corrective actions: security post instruction
will be revised & security officers will receive training.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

August 23, 1994
G02-94-201

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D. C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21
NRC INSPECTION REPORT 94-22
REPLY TO A NOTICE OF VIOLATION**

The Washington Public Power Supply System hereby replies to the Notice of Violation contained in your letter dated July 26, 1994. Our reply, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, consists of this letter and Appendix A (attached).

The Supply System shares your concern that an incident of this nature could have resulted in serious injuries to plant workers. We have conducted a "time out" with our employees to discuss the lessons learned from this event to prevent similar incidents in the future. During this time out, we emphasized that any prank, horse-play, or incident that might affect WNP-2 security can escalate quickly and have very serious consequences. Employees were further reminded that such unprofessional and careless behavior is not acceptable, regardless of intent. We pointed out that all employees contribute to and are a part of the Security Program. We have also incorporated the lessons learned from this event into the General Employee Orientation training program provided to individuals with protected or vital area access.

Of the two individuals involved in this incident, one of them works full-time for the Supply System. The "temporary" is not currently employed with us. The Maintenance Services manager counseled the full-time employee on his poor judgement and conduct. During this counseling, the manager emphasized that horseplay is not tolerated. This individual was also given time off from work without pay and was warned that further instances of similar behavior on his part may result in termination of his employment.

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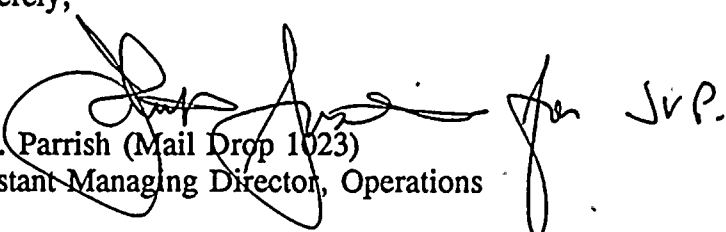
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NRC INSPECTION REPORT 94-22
REPLY TO A NOTICE OF VIOLATION

The inspection report indicated that the security officer who initially observed the two individuals traveling in the battery-operated cart did not effectively challenge them to stop. The security officer later said that he had only "seconds" to initially observe, assess, and react to the incident; however, the officer's verbal challenge should have been more effective. Security supervisors have briefed the security staff on more effective techniques for challenging individuals during an incident.

Should you have any questions or desire additional information regarding this matter, please call me or D. A. Swank at (509) 377-4563.

Sincerely,


J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

CDM/bk
Attachments

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

Appendix A

VIOLATION

During an NRC inspection conducted on June 27-30, 1994, a violation of NRC requirements was identified. In accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, "10 CFR Part 2, Appendix C," the violation is listed below:

Washington Public Power Supply System's Physical Security Plan states, in part, in the introduction, "This plan states the Supply System's policy and commitments which meet the requirements of 10 CFR 73.55. Security Operating Procedures and Contingency Plans enumerate the detailed requirements necessary to implement the Physical Security Plan."

Security Plan Implementing Procedure 14.3.6, "Security Posts," Revision 12, July 12, 1993, Section 4.11.3, "Primary Duties of Area Patrol Officers," requires, in part, that security officers report all observations of suspicious activities, unauthorized individuals, or degraded physical barriers.

Security Post Instruction 2.21, "Exterior Walk Patrols," Revision 1, May 24, 1994, Section 5.1.3(9) requires, in part, that security officers notify the Central Alarm Station in the following cases: Prior to challenging any unidentified person and prior to responding to any unusual incident. Section 5.1.3(13), requires, in part, that security officers observe the actions of plant personnel, look for unusual activity, furtive movements, or possessions of unauthorized items. Immediately advise the Central Alarm Station of unusual activity.

Contrary to the above, the inspector identified on June 17, 1994, that a security officer on patrol within the protected area did not immediately notify the Central Alarm Station, other security officers in the area, and did not effectively challenge two unidentified individuals riding in an electric cart and wearing hood-type ski masks as they drove past him. In addition, another security officer and a security sergeant also observed the two individuals but did not notify the Central Alarm Station.

This is a Severity Level IV violation (Supplement III) (397/9422-01).

RESPONSE TO VIOLATION

The Supply System accepts this violation. Security identified this violation during their investigation which was on-going when the NRC inspector began his inspection.

REASON FOR THE VIOLATION

The cause for this violation was overly restrictive security post instructions requiring notification of the Central Alarm Station (CAS) "prior to challenging an unidentified person and prior to responding to any unusual incidents." Contrary to this instruction there could be situations in which an officer may be required to challenge or respond before notifying the CAS due to time, distance, perceived threat, or use of force. For example, when the first security officer initially assessed and reacted to the two individuals riding in the electric cart, he did not have time to notify the CAS prior to challenging the individuals. The second officer and his security sergeant also reacted appropriately under the circumstances when they first observed the individuals within their proximity: 1) Unaware that the first security officer had previously observed the individuals, the sergeant directed the second officer to support him; 2) The sergeant assessed the individuals' behavior, observed no furtive movements, and saw no objects in their hands; 3) Concluding the threat to be low, the sergeant then promptly approached and confronted the individuals. Compounding the problem with these restrictive instructions were other post instructions allowing officers to detain persons involved in unusual situations prior to CAS notification.

The Supply System acknowledges that our communications with the CAS during this event should have been more effective. For example, subsequent to the first security officer's initial challenge, he saw the cart change direction and concluded the driver might have been avoiding contact with another patrol. In this case, there was enough "time and distance" for the security officer to notify the CAS of the situation, but instead, he first radioed a patrol officer for assistance. He did so because: 1) He knew the patrol officer was in the immediate area and was patrolling in a vehicle that could overtake the cart; and 2) He knew that the patrol officer was the designated "response team leader" who would assist in this incident if required. When the patrol officer did not respond to the radio message, the first security officer subsequently made contact with the CAS. However, the security officer did not follow through and effectively describe the immediate situation. Similarly, once the security sergeant had terminated the incident, neither the sergeant nor the patrol officer promptly briefed the CAS. In conclusion, security performance was generally appropriate, but communications should have been better.

CORRECTIVE STEPS TAKEN/RESULTS ACHIEVED

The Security Programs manager emphasized to his managers and supervisors the importance of performing thorough reviews of security post instructions to ensure the instructions support appropriate work practices.

CORRECTIVE STEPS TO BE TAKEN

1. Security post instructions will be revised by September 30, 1994, to specify appropriate and consistent notification of the CAS.
2. Security officers and supervisors will receive training on the revised security post instructions by October 16, 1994. Emphasis will be placed on appropriate notification of the CAS.
3. Security will develop and implement training drills emphasizing notifications and communications skills during events unusual in nature. This will be completed by November 30, 1994.

DATE OF FULL COMPLIANCE

The Supply System was in full compliance with security post instructions when the security sergeant notified the CAS of this incident shortly after it was terminated.

