



P. R. Clark
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March 22, 1993
C311-93-2042

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50,
Docket No. 50-289
Status of GPU Nuclear Response to February 7, 1993
Intruder Incident

The purpose of this letter is to provide an overview of the actions taken by GPU Nuclear following the February 7, 1993, intruder incident. GPU Nuclear assembled several independent groups to review various aspects of the incident. Those groups are currently evaluating the GPU Nuclear response and effectiveness during the event, identifying and evaluating measures to enhance existing security systems, and assessing vulnerability to radiological sabotage from outside of the vital areas. The scope and expected product of each review, which will include SAFEGUARDS information, is detailed on the attachment to this letter.

In general, this information has been conveyed to the Incident Investigation Team (IIT) as we proceeded.

Sincerely,

P. R. Clark
President, GPUNC

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DVH/emf

Attachments

cc: TMI-1 Senior Project Manager
Region I Administrator
TMI Senior Resident Inspector
TMI IIT Team Leader

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ATTACHMENT

A. TMI Site Emergency Review Group

The TMI Site Emergency Review Group (SERG) charter was to:

1. Develop a factual description of the sequence of events on February 7, 1993, including a detailed chronology;
2. Evaluate the GPU Nuclear response in accordance with regulatory requirements, plans and procedures and identify corrective actions, where appropriate;
3. Evaluate the effectiveness of GPU Nuclear's plans and procedures in responding to the event and recommend potential enhancements (i.e., areas for improved future response to similar events) to be considered or implemented;
4. Evaluate GPU Nuclear's interactions with external organizations.

The review scope did not include consideration of events with characteristics significantly different from the subject event. Further, the group did not evaluate the effectiveness of any organization external to GPU Nuclear.

This review was conducted by a multi-disciplined group of GPU Nuclear personnel with expertise in the relevant areas of concern and experience in incident evaluation. The group initially defined the functional areas that were the focus of the GPU Nuclear response to the intrusion event as: (1) Security Plan Response, (2) Operational Response, (3) Emergency Plan Response, and (4) Emergency Public Information Plan Response. The TMI SERG developed a chronology of events pertaining to each functional activity based on log reviews and interviews. The TMI SERG performed an event evaluation from two perspectives: a compliance review to evaluate the GPU Nuclear response in accordance with fundamental regulatory and licensing requirements and a "performance-based" or "effectiveness" review. The intent of the latter review was to identify problems that may have impacted the effectiveness of the GPU Nuclear response, notwithstanding full compliance with established regulatory requirements.

A variety of issues surfaced from the compliance and effectiveness reviews. Compliance and effectiveness issues that were judged most significant, based upon regulatory and plan requirements, were subjected to formalized root cause analysis. Other observations were retained for departmental consideration and potential enhancement actions.

The TMI SERG will publish a report of its findings which will capture the details of the review. Recommendations and commitments developed will be assigned to the appropriate functional organizations and tracked by the TMI Licensing Department to ensure timely appropriate action. The TMI SERG report is expected to be finalized by the end of March 1993.

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B. Technical Assessment of Vulnerability to Sabotage in Non-Vital Areas

Based on previous review by GPU Nuclear and the NRC, TMI does meet the existing regulations for Design Basis Threats as specified in 10 CFR 73.1. The current review was conducted to determine if vulnerabilities to sabotage existed in non-vital areas such that sabotage could result in significant offsite radiological consequences and interfere with the safe shutdown of the plant. The assumptions used for this review were: (1) vital areas are protected and remain secure throughout the event; (2) sabotage events could occur during operating or shutdown conditions; (3) intruders are knowledgeable in plant operation and location of key components; and, (4) the intruder force is a single intruder with car bomb or multiple intruders with hand-carried explosives.

The approach was to utilize existing plant studies to the extent reasonable as a basis for the assessment and enlist a team of highly knowledgeable, senior employees with extensive plant experience to walkdown and assess the plant conditions. The report from this group is expected to be finalized before the end of March 1993. Corrective actions are being taken for a number of areas to provide enhanced protection.

C. Possible Security Enhancements

TMI currently meets or exceeds the NRC security regulations. However, as a result of the vehicular intrusion on February 7, 1993, GPU Nuclear formed a task force to determine if industrial security should be enhanced to provide additional protection of corporate assets and respond to concerns expressed by the Governor of Pennsylvania and other local government officials. The task force was comprised of representatives from Technical Functions (Chairman), Plant Operations, Plant Engineering, Security, Facilities, and Procurement. The task force objective was to recommend actions to reduce the potential for vehicular penetration of the protected area boundary and strengthen the north and south gate entries to the owner controlled area. Proposed enhancements are listed in Appendix I. We intend to proceed with enhancements based on this study.

D. Public Information

Ms. Carol Clawson, Director Corporate Communications has been carrying out an extensive program with Commonwealth Officials and local community officials. In particular, the Governor of Pennsylvania and the State Legislature have expressed concerns relative to the February 7, 1993, incident. The Governor appointed a Panel headed by Lt. Governor Mark Singel to review the incident. In part, the Governor's Panel is evaluating actions that could be taken to prevent a similar event at TMI or any other nuclear power plant in Pennsylvania. In addition, the review is focused on an evaluation of the

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response of local and state agencies to the incident. The Legislature conducted hearings on February 23, 1993, under the aegis of the House Consumer Affairs Committee to determine if the incident at TMI could reoccur at TMI or any other nuclear power plant in Pennsylvania. GPU Nuclear was represented at the that hearing; Dr. R. L. Long, Director, Corporate Services made a presentation on the incident.

Outside the scope of the above noted reviews, TMI has been reviewing the ability of Security and Operations personnel to protect the public health and safety and to mitigate a Part 100 release in accordance with the Design Basis Threat 73.1 (External Threat). TMI will continue this effort including scenario development and an assessment of the existing capability to effectively counter a Design Basis Threat independent of the ongoing investigation.

APPENDIX I

TASK FORCE RECOMMENDATIONS

Protected Area Boundary

- . Install guard rails around appropriate areas of the Protected Area fence to impede vehicle penetration.
- . Install hardened gates in addition to existing gates.

Owner Controlled Area Access Points

- . Replace the north and south gates with hardened gates.
- . Alarm the south gate.
- . Provide additional video surveillance of key locations including the south gate/bridge and north parking lot.