

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

January 11, 1982

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission, Region II
P.O. Box 2203
Atlanta, Georgia 30301

Dear Mr. O'Reilly:

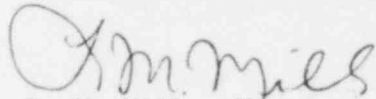
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/81-28 AND 50-328/81-36 - REVISED RESPONSE TO VIOLATIONS

At the request of your staff in a telecon on November 2, 1981, we are providing you with additional information to security violations Nos. -01, -02, and -03 to inspection report 50-327/81-28 and 50-328/81-36. Initial responses to these violations were submitted to you on September 28, 1981 from my office.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc: Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ENCLOSURE
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO VIOLATIONS

Violation 50-327/81-28-01, and 50-328/81-36-01

10 CFR 50.54(p) requires that the licensee make no change which would decrease the effectiveness of a security plan pursuant to 50.34(c) or Part 73 without prior Commission approval.

Contrary to the above, without prior Commission approval, the licensee changed the physical systems and procedure for issuing assigned identification badges and key-cards in such a way which decreases the effectiveness of the security plan in that a new access control building was built and so designed that badges and key-cards for certain types of employees (construction, power offsite, and non-power offsite) are issued in such a manner as not to preclude an individual from receiving a badge with key-card and leaving the area.

Admission or Denial of Violation

TVA admits the violation occurred as stated.

Reason for Violation

Failure to recognize that the procedure change was violating the requirements of the plant's security plan.

Corrective Action Taken and Results Achieved

Although it was not properly documented, TVA performed a review of the changes under the provisions of 10 CFR 50.54(p). Following this review, TVA concluded that the changes in question did not decrease the effectiveness of the Sequoyah security plan.

The visitor booth which housed the employees' keycards and ID badges has been moved to a point adjacent to one of the entrance doors of the access portal and is attached to the wall. Individuals concerned are processed in this area outside the access portal at windows but are not issued badging at this time. After completing processing, persons concerned are sent inside the access portal for further processing. After passing through detection equipment and pat-down procedures, badging is then issued for entry from inside the access portal. Badges are maintained in the visitor booth and are passed through a window to authorized security personnel who issue badges after processing. Security personnel working the visitor booth have immediate radio communication to response personnel.

The Sequoyah security plan is being revised to resolve inconsistencies between the plan and operating practices and will incorporate the above changes. The generic section (Part I) and the

site specific section (Part II) of the Sequoyah security plan are scheduled for submittal by January 22, 1982.

Action Taken to Prevent Further Noncompliance

All changes to nuclear plant security plans will be reviewed in accordance with 10 CFR 50.54(p) by the Nuclear Security Section before implementation. The results of this review will be documented by memorandum to the nuclear plant. Changes which will result in a decrease of safeguards effectiveness will be submitted as a license amendment application in accordance with 50.54(p).

A report describing those changes not resulting in a decrease in safeguards effectiveness will be submitted to the Director of Nuclear Material Safety and Safeguards with a copy to the Regional Office.

TVA is developing a division security manual which will provide detailed procedures and instructions for implementing the security program. This manual is scheduled for completion in mid-1982.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 20, 1981.

Violation 50-327/81-28-02, 50-328/81-36-02

10 CFR 73.55 required the licensee to implement a physical security plan (PSP) as required pursuant to 10 CFR 50.34(c).

Contrary to the above, actual buildings, security posts, and operational procedures are not the same as those committed to in the licensee's approved PSP such that:

1. Paragraph 3.2.1.1 of the PSP states that the main access control building (gatehouse) is arranged as shown in attachments C5 through C5.4; however, the licensee has designed and built a new main access control building (temporary egress and access control portal) which is not arranged as the gatehouse in attachments C5 through C5.4.
2. Paragraph 3.2.1.4.9 of the PSP states that Post 9 is for identification and access control of the construction/outage portal; however, Security Instruction Letter 16, dated February 3, 1981, designates Post 9 as a foot patrol and alarm response for the turbine and control buildings.
3. Paragraph 3.2.1.4.10 of PSP states that Post 10 is for personnel searches at the construction/outage portal; however, SIL-16 designates Post 10 as a badge drop attendant at the gatehouse.
4. Paragraph 3.2.1.7 of the PSP states that the issue and return of security badges and card-keys at the beginning and end of each

shift shall be controlled by the public safety officers; however, the licensee utilizes security clerk-monitors for the issuance of security badges and keycards to construction, power offsite, and non-power offsite workers without the control of a public safety officer.

5. Paragraph 5.2.1.3 of the PSP states that card-keys will not be permitted to leave the protected area; however, the licensee has established no controls to preclude key-cards which are issued to construction, power offsite, and non-power offsite workers from leaving the plant since these badges are issued outside the protected area and are not under control from the time of issuance until entrance is made into the protected area.
6. Paragraph 3.1.1 of the PSP states that an isolation zone will be maintained clear of visual obstruction 20 feet outside and 20 feet inside the security barrier with the following exceptions: the gatehouse, construction/outage portal access control portal, water intake structure, essential raw cooling water pumping station, a limited number of cctv camera supports, and lighting standards; however, four pipes (24', 6' (2), and 2' - temporary demineralizer and plant drainage) penetrate the protected area barrier and provide a visual obstruction in the isolation zone outside the barrier.

Additionally, 10 CFR 50.54(p) changes to the PSP to reflect the physical and procedural system changes were not made as required, before the changes were implemented.

Admission or Denial of Violation

TVA admits the violation occurred as stated.

Reason for Violation

A complete revision to the Sequoyah Nuclear Plant Physical Security Plan has not been submitted to the NRC.

Corrective Actions Taken and Results Achieved

This violation is being corrected through a complete revision of the Sequoyah Nuclear Plant Physical Security Plan. The generic section (Part I) and the site specific section (Part II) of plan are scheduled for submittal by January 22, 1982. This revision process of all of TVA's nuclear plant physical security plans was discussed with Region II personnel in January 1981 in Atlanta, Georgia, and in July in Silver Springs, Maryland. We have acknowledged these minor inconsistencies between the approved plan and operating practices and felt your understanding of our program to completely revise the security plans would mitigate the identified inconsistencies. We acknowledge that technically we did not operate totally within the written word of the approved security plan in the examples which you have identified. However, submitting changes to the security plan under the provisions of 10 CFR 50.54(p) would dilute the efforts to totally revise the security plan. It should also be noted that

contrary to your additional comment, 10 CFR 50.54(p) changes do not require submission before being implemented. We were technically wrong in implementing changes to the approved plan and not reporting the changes within 60 days; but the changes, providing security is not degraded, are not required to be submitted to the NRC before being implemented. *we did not say this*

Action Taken to Prevent Further Noncompliance

Same as stated in Violation 1. *look at previous response*

In addition, a complete revision of the security plan and subsequent audits by in-house auditors should avoid further noncompliances.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance upon approval by NRC of revised PSP.

Violation 50-327/81-28-03, 50-328/81-36-03

10 CFR 73.55(c)(3) requires that isolation zones shall be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and shall be of sufficient size to permit the observation of activities of people on either side of the barrier in the event of its penetration. As implemented by the licensee's security plan, paragraph 3.1.1 states that an isolation zone will be maintained clear of visual obstruction 20 feet outside and 20 feet inside the security barrier.

Contrary to the above, the licensee was not maintaining a 20 foot isolation zone free of obstructions which could obstruct observation of activities on either side of the barrier in that (1) zone 1-S was obstructed with grass, high weeds, and construction materials; (2) zone 2-S was obstructed with high grass (3 feet high); (3) zone 4 was obstructed with dirt piles from trenching activities and a portable toilet; (4) zone 5 was obstructed with high weeds and grass growing in between the temporary demineralizer drainage pipes in the isolation zone and the protected area fence and; (5) zone 9 was obstructed with a tool locker. Additionally, both zone 9 and 10 were obstructed in that the construction activities adjacent to the barrier had resulted in a large pipe trench approximately 7 feet deep and 6-10 feet wide which extended along the length of the barrier for several hundred feet. Light-meter readings in the bottom of the trench were below 0.2 footcandle. Additionally, the cctv cameras for those zones were camera 2 - out of service, and cameras 1 and 3 - very poor quality.

Admission or Denial of Violation

TVA admits the violation occurred as stated.

Reason for Violation

- While inspections that patrolmen routinely made have identified isolation zone problems and maintenance needs, there was a failure to have a procedure to ensure that timely followup work required was accomplished.

Corrective Action Taken and Results Achieved

Item (1) - zone 1-S - the obstructions have been removed; item (2) - zone 2-S - the obstructions have been removed; item (3) - zone 4 - the obstructions have been removed; item (4) - zone 5 - obstructions have been removed with the exception of the temporary demineralizer drainage pipes. The pipes are compensated by the installation of extra height on the fence and alarms. The incorporation of a change to the security plan, addressed in the aforementioned plan revision, will satisfy the drain pipe problem; item (5) - zone 9 and 10 - the obstruction has been removed with the exception of the large trench adjacent to the barrier on the outside. The compensatory measures for the trench problem, which are delineated in the inspector's report, were immediately implemented at the time of identification during the inspection.

Action Taken to Prevent Further Noncompliance

A Plant Operations Surveillance Instruction (SI) is in the plant approval cycle, which sets forth a weekly supervisor inspection program of the isolation zone. The inspection results and action taken will be a documented item. With this action, there is a backup to the inspections that patrolmen make on shift and action may be taken to correct any isolation zone problems.

Date When Full Compliance Will Be Achieved

TVA was in full compliance on November 1, 1981.