

Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

August 5, 1994
BECO Ltr. #94-083

L. J. Olivier
Vice President Nuclear Operations
and Station Director

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

License No. DPR-35
Docket No. 50-293

Subject: **RESPONSE TO NOTICE OF VIOLATION**
Reference: **NRC INSPECTION REPORT NO. 50-293/94-13**

Please find enclosed the response to the Notice of Violation contained in the referenced Inspection Report.

Please contact me if there are any questions regarding this response.


L. J. Olivier

Enclosure

MTL/nas/Rap94/NRC94-13

Then personally appeared before me, L. J. Olivier, who being duly sworn, did state that he is Vice President Nuclear Operations and Station Director of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires:

April 15, 1999
DATE

Marie T. LeMay
NOTARY PUBLIC



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ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION

BOSTON EDISON COMPANY
PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293
LICENSE NO. DPR-35

Notice of Violation

During an NRC inspection conducted on June 20-24, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

The Pilgrim Nuclear Power Station Physical Security Plan, dated December 22, 1992, Issue 2, Revision 11, Section 5.3.4, states in part that licensee designated vehicles (licensee-owned or contractor-owned vehicles limited in use to on-site functions) remain in the protected area except for operational, maintenance, repair, security and emergency purposes. Additionally, Security Plan Section 5.3.4 specifies that all vehicles except licensee designated vehicles shall be escorted while on site.

Contrary to the above, on June 21, 1994, the licensee was not controlling designated vehicles as required, in that several licensee designated vehicles were allowed to remain outside the protected area for other than the specified purposes, with these vehicles nonetheless being granted unescorted access into the protected area.

This is a Severity Level IV violation (Supplement III).

Reason for the Violation

This violation was due to several human performance issues. Primarily, individuals involved did not appreciate the importance of minimizing the amount of time licensee designated vehicles may remain outside the protected area.

There was also a misunderstanding that it was acceptable for vehicles on this list to remain parked outside the protected area as long as they were on Boston Edison property (especially inside the fenced area near the Trash Compaction Facility), since all vehicles are subject to inspection upon entry into the protected area.

Corrective Steps Taken and Results Achieved

Our immediate corrective action was to review the Licensee Designated Vehicle List and remove from the list any vehicles not in the Protected Area. Our existing procedures require security management approval to add a vehicle to the list.

We now require all vehicles on the Licensee Designated Vehicle List to be within the protected area by midnight. Any vehicle not within the protected area is removed from the list and requires security management approval to be reinstated.

Finally, all levels of security personnel who have responsibility associated with Licensee Designated Vehicles (security guards to management personnel) have been counseled in the requirements for Licensee Designated Vehicles and have been made aware of the new midnight requirement.

Corrective Steps to Preclude Further Violations

Requiring the removal from the Licensee Designated Vehicle List of any designated vehicles not within the protected area by midnight coupled with existing security management approval to add or reinstate a vehicle to the list, precludes further Licensee Designated Vehicle violations. Counseling security force personnel on Licensee Designated Vehicle requirements and their responsibilities in enforcing the requirements also precludes further Licensee Designated Vehicle violations.

We are revising security procedure 2.01 to include the new requirement for Licensee Designated Vehicles to be on-site by midnight.

We have included a review of the Licensee Designated Vehicles in our Self-Assessment for the Security Section.

Date When Full Compliance Was Achieved

Compliance was achieved on June 21, 1994 with the removal from the list of any vehicles not within the Protected Area. The requirement for Licensee Designated Vehicles to be on site by midnight became effective June 22, 1994. Full compliance has been achieved.

The revision to procedure 2.01 will be completed by November 30, 1994