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

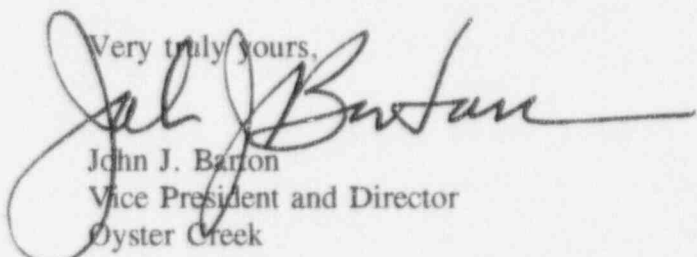
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 50-219/94-28
Reply to a Notice of Violation

NRC Inspection Report 50-219/94-28 contained two Notices of Violation. Attachments I and II to this letter contain the replies to the Notices of Violation, as required by 10 CFR 2.201.

Should you have any questions, please contact Mr. Terry Sensue, Oyster Creek Licensing Engineer, at 609-971-4680.

Very truly yours,


John J. Barton
Vice President and Director
Oyster Creek

JJB/TS:jc
Attachments
cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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ATTACHMENT I

VIOLATION:

1. The Oyster Creek Generating Station Physical Security Plan, Revision 31, dated June 14, 1993, Section 3.1.3.1.1, states in part that the outdoor lighting system provides an illumination level of not less than 0.2 foot candles along the entire isolation zone, perimeter barrier, and all exterior areas within the protected area (PA).

Contrary to the above, on December 6, 1994, between approximately 5:00 p.m. and 7:15 p.m., while conducting a lighting survey of the PA and isolation zone, five exterior areas within the PA were illuminated to less than the required 0.2 foot candles. No associated compensatory measures were in place.

GPUN REPLY:

GPU Nuclear concurs with the violation.

REASON FOR THE VIOLATION

The cause of the violation was personnel error in identifying a Protected Area (PA) lighting deficiency and subsequently implementing compensatory measures.

A contributing cause to the violation was insufficient attention given to these deficiencies by Security management.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

Four of the five exterior areas were corrected within two hours of being identified by the NRC inspectors. A burned-out spotlight was replaced, electrical power was reconnected to two previously installed temporary lights, and the small section of trailer skirting that had been removed during maintenance was replaced.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED - Cont'd

The other exterior area within the PA was immediately placed on the list of "low light" areas and was physically checked by a roving patrol at approximately half-hour intervals during the hours of darkness. A barrier was installed to prevent access to this area to correct the deficiency.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Security management conducted meetings with all Security personnel to discuss PA lighting issues. Management expectations for timely identification of lighting deficient areas and implementing compensatory measures in accordance with the Physical Security Plan were reiterated. Interim actions being taken include increasing the frequency of site tours to identify lighting deficient areas. The weekly tour was performed daily for over a month. Presently the tour is being performed twice each week. Additional Security personnel have been tasked with updating the site lighting maps and ensuring deficient areas are properly addressed in a timely manner. Also, a dedicated Security officer will be assigned to complete the lighting patrols if the list of "low light" areas exceeds five. These interim actions will remain in effect until Security management determines they are no longer needed.

Security management met with Plant Maintenance management to ensure PA lighting deficiencies are given an appropriate priority level in the maintenance work schedule. Also, relamping Security related lighting is scheduled to occur once each week. As of January 27, 1995, all 18 deficiencies on the list of "low light" areas have been corrected through the use of temporary lighting or the installation of barriers that prevent access to the area.

A PA lighting assessment was conducted by Security, Engineering, and Maintenance. The goal of this assessment is to minimize the need for temporary lighting. This effort to increase the efficiency of the existing lighting system by upgrading existing lighting and installing additional permanent lighting is ongoing and is expected to continue through 1995. To the extent possible, temporary trailers that are not in use will be removed from the PA by the end of the second quarter 1995. As of January 27, 1995, sixteen temporary trailers have been removed from the PA and another dozen are scheduled for removal. Additionally, by the third quarter 1995 a Security self-assessment will be conducted and will review the corrective actions taken to resolve lighting deficiencies and assess their effectiveness.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on **December 7, 1994** when the barrier was installed to prevent access to the fifth exterior area with deficient lighting.

ATTACHMENT II

VIOLATION:

2. The Oyster Creek Generating Station Physical Security Plan, Revision 31, dated June 14, 1993, Section 3.2.1.6, states in part that the search program consists of subjecting all persons to both metal and explosives detection equipment upon entry into the protected area and a physical pat-down search of each individual for whom there is cause to suspect that the individual is attempting to introduce firearms, explosives, or incendiary devices into the protected area.

Oyster Creek Generating Station Procedure OSEC-IMP-1530.06, Revision 6, dated April 14, 1994, Section 4.4.1, states in part that the search program consists of subjecting all persons to both metal and explosives detection equipment upon entry into the protected area. Additionally, if a detector indicates the presence of explosives vapor, the individual(s) are to be hands-on searched, and each individual who cannot pass through the metal detector without causing an alarm is to be "hands-on" searched, or searched using the hand-held metal detector, in order to determine the cause of the alarm.

Contrary to the above, on December 8, 1994, as observed by NRC inspectors, required personnel searches were improperly performed, in that an individual alarmed a metal detector that indicated the presence of metal and an inadequate hands-on-search was performed on that individual. The search was inadequate because the cause of the alarm was not determined prior to granting the individual access to the Protected Area.

GPUN REPLY:

GPU Nuclear concurs with the violation as written.

REASON FOR THE VIOLATION

The cause of the violation was personnel error in conducting the search.

CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

A thorough search of the individual attempting to gain access to the PA was conducted by Security personnel upon notification of the NRC inspectors concern. Also, Security management immediately discussed this event with the Security officer who inadequately conducted the search. The officer was re-instructed on proper search techniques.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Security management conducted meetings with all Security personnel to discuss PA access control requirements. Management expectations for conducting personnel searches in accordance with the Physical Security Plan were reiterated. Also, a Security directive has been developed and issued to make the "hand-held metal detector" the primary search method used to resolve "walk-through metal detector" alarms. This directive will minimize the need for hands-on searches and its implementation date is **February 13, 1995**.

Security training lesson plans for personnel access control have been revised to provide detailed instructions for conducting "hand-held metal detector" and "hands-on" searches. Also, the T&Q proficiency exams have been revised to reflect these changes. All Security personnel will be familiarized with these enhancements by **March 31, 1995**.

Site personnel have been notified that Security will be modifying its personnel search procedures. Greater emphasis will be placed on the use of electronic search equipment to reduce the number of "hands-on" searches. The purchase of "walk-through metal detectors" that use updated technology is being pursued to improve metal detection efficiency. These new detectors are scheduled to be purchased and installed by the end of the second quarter 1995.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on **December 8, 1994** when the individual attempting to gain access to the PA was properly searched.