



**ENTERGY**

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March 2, 1995

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

Subject: River Bend Station - Unit 1  
Docket No. 50-458  
Revision To River Bend Station Security Commitments: Reply To Notice of  
Violation 50-458/93-08-01, "Failure to Maintain Proper Accountability of  
Keycards"  
File Nos: G9.5, G9.23

RBF1-95-0061  
RBG-41241

Gentlemen:

Entergy Operation, Inc. is dedicated to improving overall operations and performance at the River Bend Station (RBS). A central element of this effort is the establishment and implementation of effective processes to accomplish required tasks. We have engaged in an effort to streamline processes in the Security Department in order to provide for optimization of personnel without decreasing the effectiveness of measures established for protection against radiological sabotage.

We have formed a Security Management Team whose charter is to review commitments previously submitted to the Staff in response to Notices of Violation and other regulatory documents cited in the area of Security. The primary focus of the team is to review current licensing commitments to ensure that processes implemented as a result of these commitments reflect allocation of resources commensurate with its safety significance. After careful consideration, we identified certain commitments that exceed the requirements of 10CFR73.55 and the RBS Physical Security Plan (PSP) and are not necessary for the physical protection of the site. We propose to delete these commitments and believe that this action will not result in a reduction in the effectiveness of the security program, or otherwise impact plant safety.

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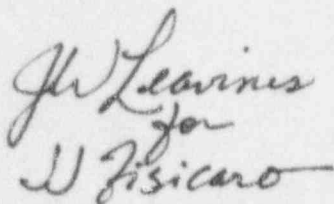
In our letter to the Staff dated May 3, 1993 (Reference: RBG-38441, "Reply to Notice of Violation 93-08-01"), RBS addressed a Level IV violation issued for failure to maintain proper accountability of keycards. The visiting inspectors identified that on August 23, 1992, and March 1, 1993, keycards were thought to be in the protected area when, in fact, the badges were in the security badge racks. Therefore, the inventory did not properly account for all of the keycards.

RBS implemented several actions in response to this incident, including steps to 1) require that each access control supervisor conduct and document pre-briefings prior to initiating the accountability process, and 2) require that once the manual keycard accountability check is performed, the officers are to switch roles and perform a second accountability check. These particular actions have been determined to be cumbersome, time consuming and, in retrospect, an inefficient use of personnel. Our review of the response to this violation revealed that this event occurred because of an inadequate procedure, for which programmatic controls have since been implemented to prevent recurrence. For these reasons, and the justification provided in the attachment, RBS plans to discontinue the above actions.

Entergy Operations is confident that current controls in place to prevent recurrence of the incident above will not be offset by the proposed changes. Our increased emphasis on procedural adherence, personnel accountability, and other plant initiatives will ensure continued compliance with the Physical Security Plan. We plan to implement the changes noted above if we do not receive questions or comments from the staff within 30 days of the date of this document.

If you have any questions or require additional information, please contact Jewel Summers at (504) 336-6345.

Sincerely,



JJF/js

attachment

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### Revision To RBS Security Commitments

Document No: RBG-38441 dated May 3, 1993. Reply To Notice Of Violation 50-458/93-08-01, "Failure to Maintain Proper Accountability of Key Cards."

#### Currently Reads:

##### Corrective Steps Taken And Results Achieved

1. Implementing Procedure PSP-4-300 has been revised to incorporate the requirement to perform keycard accountability.
2. The senior access control supervisor's Security Position Instruction (SPI-12) has been revised to include the following:  
  
The Senior Access Control Supervisor shall conduct and document a pre-accountability briefing prior to the accountability being initiated.
3. The access control officer's Security Position Instruction (SPI-4) has been revised to include the details necessary on how to conduct a proper manual keycard accountability at the end of the day. The SPI also specifies that once the keycard manual accountability is performed, the officers are to switch roles and perform a second keycard accountability check.

#### Changed to Read:

##### Corrective Steps Taken And Results Achieved

1. Implementing Procedure PSP-4-300 has been revised to incorporate the requirement to perform keycard accountability.
2. **The access control officer's Security Position Instruction has been revised to include the details necessary on how to conduct a proper manual keycard accountability normally at the end of the day.**
3. **Deleted.**



**Justification:**

The root cause of this violation was human error on the part of one individual who failed to properly supervise the accountability process and the absence of specific instructions in the Security Position Instruction (SPI) on how to perform accountability checks. The SPI currently used to perform accountability checks clearly defines how to perform a proper accountability check

Additionally, Senior Access Control Supervisors conducting pre-accountability briefings prior to the beginning of each shift, or officers switching roles and performing a second keycard check, have very little bearing on performing a proper accountability check. Since appropriate procedural controls are in place to ensure personnel will conduct proper keycard accountability, the aforementioned commitments are no longer required.