

GULF STATES UTILITIES COMPANY



RIVER BEND STATION POST OFFICE BOX 123 ST. FRANCISVILLE, LOUISIANA 70775

AREA CODE 504 EX 66084 504-8551

February 28, 1992

RBG- 36,564

File Nos. G9.5, G15.4.1

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/91-33

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report 50-458/91-33. The inspection was conducted by Messrs. E. J. Ford and D. P. Loveless on December 4, 1991 through January 18, 1992, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's reply to the violation is provided in the attachment.

Should you have any questions, please contact Mr. L. A. England of my staff at (504) 381-4145.

Sincerely,

W. H. Odell
Manager - Oversight
River Bend Nuclear Group

cc: TCC/SLW JHM
LAE/KES/TCC/SLW/JHM/pj

Attachment

cc: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

In the Matter of)

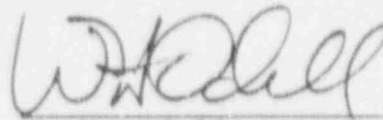
GULF STATES UTILITIES COMPANY)

Docket No. 50-458

(River Bend Station - Unit 1)

AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager-Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.



W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 28th day of February, 1992. My Commission expires with Life.



Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION 50-458/9133-01 LEVEL IV

REFERENCE

Notice of Violation - Letter from A. Bill Beach to J. C. Deddens dated, January 31, 1992.

VIOLATION

- A. Chapter 6 of the River Bend Station Physical Security Plan requires that escorts maintain positive control of visitors when performing escort duties.
1. Contrary to the above, on December 9, 1991, an individual with escort responsibility for four visitors was not in positive control of the visitors.
 2. Also contrary to the above, December 13-16, escorts were not in positive control of their visitors on the south end of the turbine deck in that a cordoned area had uncontrolled doors which could have served as egresses from the area.
- B. Technical Specification 6.8.1.e states that, "Written procedures shall be established, implemented, and maintained covering . . . Security Plan implementation."

Chapter 6 of the River Bend Station Physical Security Plan requires, in part, that unescorted access be limited to those having access authorization and a badge.

Procedure PSP-4-201, "Personal Security Program (Administrative Access Control)," partially implements this requirement and states that, for personnel unescorted access authorization to be granted, the applicant must have successfully completed access authorization screening and the general employee training program to establish their knowledge of safety and security procedures.

Also, Security Position Instruction SPI-4, "Access Control Station/Access Control Officers," partially implements this requirement and requires that only correct key cards are issued and that officers shall compare the facial features of the individual with the key card photo.

Contrary to the above, on January 6, and again on January 7, 1992, visiting regional NRC inspector was issued an emergency site team badge which was not the correct key card because: (1) these cards are only valid during an emergency, (2) comparison of facial features is not possible because emergency site team badges have no pictures, (3) at the time of the EST badge issuance it was not known if access authorization screening was complete, or if general employee training was complete.

REASONS FOR THE VIOLATION

On December 9, 1991 while observing maintenance personnel move scrap construction materials from behind the cold machine shop near the transformer yard to a nearby trash wagon, the NRC resident inspector observed that the escort could not maintain continuous visual contact with all four workers. The workers were moving back and forth between the scrap pile and the trash wagon, and had to turn the corner of a building in order to reach the trash wagon. Even though the escort felt that he had the workers under control in that he knew the workers' route and timing for making the trip to the trash wagon, in fact, he failed to follow procedure in keeping them in full view at all times. When this was brought to the attention of a maintenance supervisor, the situation was immediately rectified and the escort was counseled on his duties as an escort.

During December 1991, River Bend Station was experiencing a major maintenance problem with the turbine generator. As a result, the plant was shut down and repairs to the generator were being performed. During this process, in an effort to expedite the repairs, Chapter 11 of the Physical Security Plan, "Security Measures During Refuel and Major Maintenance Operations" was implemented. The procedure provides for the establishment of temporary cordoned areas to allow workers not cleared for unescorted access to perform activities without being individually observed. Normally when establishing a cordon area, the boundary of the area is established along with just one entry and exit point through which personnel pass. In this case, the general area was so expansive that some entry/exit ways had to have multiple tape strips placed from facing to facing to indicate no passage. Workers being escorted were instructed not to leave the cordon area without being accompanied by an escort.

The resident inspector contends that between December 13 and 16 there were visitors on the south end of the turbine deck in the established cordon area who may not have been in continuous line of site of their escort. This would normally be an acceptable situation if the cordoned area had only one entrance and exit point. However, during this time frame, there were several possible exits that were not always being observed by escorting personnel that were available for use as an entry/exit point. Even

though personnel were instructed to use only the established entry and exit point, and even though the other exits had been taped and personnel had been instructed not to use these doors, these doors would have been accessible, and they could have been successful had personnel chosen to leave the area undetected.

When the inspector's concern regarding control of the cordon area was identified, escorts were positioned at each door to ensure that visitors did not leave the cordoned area undetected.

On January 6, 1992, a visiting NRC Region IV inspector arrived onsite to perform a routine unannounced inspection. The inspector was not aware that his general employee training had expired and that additional processing was required in order to regain unescorted access at River Bend Station. The inspector requested by rack number his previous key card. The attending officer observed that the key card number was no longer valid and that there was no key card in the badge rack. The NRC inspector displayed his identification and in an effort to accommodate the inspector, the officer checked an alphabetic computer printout and noted that a valid emergency site team badge (EST) was active and was in the badge rack. Contrary to procedure, the officer issued the EST non-pictured badge to the visiting inspector, allowing him unescorted access to the protected area and designated vital islands. The officer should not have felt compelled to accommodate the inspector but should have realized there was a reason the inspector's badge was not in the rack and his name was not on the access list.

In his zealously to assist the inspector, the officer pointed out the new number on the EST key card. On the next morning, January 7, 1992, the visiting inspector reported to the site and requested the new badge number given him by the officer on the previous day, which was the number on the EST badge. Again, contrary to procedure, the attending officer at the window complied with the request for a specific numbered badge and issued the EST key card to the inspector.

Several hours after the inspector entered the protected area, the resident inspector noted that the visiting inspector's key card did not have a picture on it as required. After questioning the licensee as to why the visiting inspector's EST key card had been issued, an officer was dispatched to escort the inspector outside the protected area. The inspector later received general employee training and was issued an appropriate key card upon successful completion of GET.

Because the security officers in this case failed to follow procedures, PSP-4-201 "Personnel Security Program (Administrative Access Control)" and Security Position Instruction SPI-4, "Access Control Station/Access Control Officer," the individual was allowed to enter the protected area without proper training and with an inappropriate key card.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

At the time of the December 9, 1991 incident involving the escort losing visual contact of maintenance personnel, the escort was counseled and retrained on his responsibilities as an escort. On December 13, 1991 the Director-Nuclear Station Security published a memo to all personnel reminding them of their responsibilities as an escort. Training was also notified and requested to further emphasize escort responsibilities in the GET training program.

When the concern was raised over the cordoned area of the turbine deck, personnel escorts were positioned to monitor each door. They were instructed to ensure that visitors did not leave the cordoned area through doors other than the established entry and exit point. A roving security patrol was established inside the cordoned area to also ensure the rules were being followed. After this action was taken, several inspections of the area were conducted and no problems identified.

In regards to incorrect issuance of the EST key card, the officers involved in this incident were retrained on their procedural responsibilities and a written reprimand was issued and retained in their personnel file. Even though the EST was active and was in the badge rack, the key card should not have been issued. The EST key cards have since been removed from the revolving card racks located at the issue windows and are now isolated in a separate, properly identified badge rack.

FURTHER STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

On January 20, 1992, a memorandum was published by GSU's Senior Vice President, Mr. J. C. Deddens to all personnel reminding them of their responsibility as escorts. On January 27, 1992 a meeting was held to evaluate the possibility of Security instructing general employee training. A decision was made that Security would instruct the security portion of initial GET training. This action is currently in process and should be complete by March 30, 1992. Security is currently administering a short examination to test an escort's knowledge prior to assigning them any visitors. On February 28, 1992 security will begin conducting remedial training classes for all personnel causing security violations. Security is also in the process of working with Nuclear Training to develop a short video to be shown to visitors prior to entering the protected area which explains their responsibilities during their visit. Security is also in the process of revising plant security procedures regarding access control and revising the visitor access record which provides additional visitor escort instructions.

With regards to the concern involving the cordon area, Chapter 11 of the RBS Physical Security Plan is being reviewed for possible revisions to eliminate any questions regarding establishment and control of cordon areas. Also, procedures regarding establishment and control of cordon areas are being revised to clarify that activity.

With regards to the improper issue of the EST key card, the following corrective actions have been taken or are in progress. The actions are designed to:

- Ensure that NRC EST badges are removed from the current racks and maintained in a separate location.
- Brief each shift regarding this incident emphasizing the correct time and procedure for issuing NRC EST badges. The briefing shall also ensure that unfettered access for NRC personnel to the protected area is accommodated. It should be emphasized that NRC personnel entering the PA, like all others, must meet GET requirements or be escorted. This training shall be documented on the appropriate forms as having been completed by each shift and copies provided to security management.
- Ensure that security procedures and security position instructions (SPIs) that describe key card issue are reviewed and contain adequate, clear and concise information regarding key card issue, and revise if necessary.
- Ensure that the security training lesson plans are reviewed, and if necessary, revised, to incorporate handling of NRC EST badges, emphasizing that they are to be issued during emergencies only.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance to the actions listed in this response should be achieved by no later than March 30, 1992, with the exception of the visitor video which will be complete by no later than April 27, 1992.