

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

August 05, 1992

ST-HL-AE-4164

File No.: G02.04

10CFR73

10CFR2

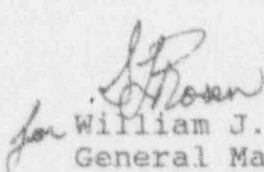
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

South Texas Project
Units 1 and 2

Docket Nos. STN 50-498, STN 50-499
Reply to Notice of Violation 9220-01 Regarding Failure
to Properly Classify Safeguards Information

Houston Lighting & Power Company (HL&P) has reviewed Notice of Violation 9220-01 dated July 10, 1992 and submits the attached reply.

If you have any questions on this matter, please contact Mr. C. A. Ayala at (512) 972-8628 or me at (512) 972-7205.


for William J. Jump
General Manager,
Nuclear Licensing

RDP/ag

Attachment: Reply to Notice of Violation 9220-01

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A Subsidiary of Houston Industries Incorporated

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Houston Lighting & Power Company
South Texas Project Electric Generating Station

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File No.: G02.02
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CC:

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Revised 10/11/91

L4/NRC/

I. Statement of Violation:

10 CFR 73.21(a)(3) states, in part, that each person who produces, receives, or acquires safeguards information shall insure that safeguards information is protected against unauthorized disclosure.

Contrary to the above, in December 1991, the licensee forwarded to NRC, and several other addressees, two letters containing safeguards information that were not classified as safeguards and, consequently, was not protected against unauthorized disclosure. In addition in April 1992, the licensee's plant engineering department distributed to several departments an office memorandum titled "System Health Report-Security System" that contained safeguards information but was not protected properly against unauthorized disclosure.

The safeguards information contained in the three documents was not significant enough to assist an individual in an act of radiological sabotage of [sic] theft of special nuclear material.

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

II. Houston Lighting & Power Position:

HL&P concurs that the violation occurred.

III. Reason for Violation:

The root cause of this violation was lack of familiarity with Safeguards Information requirements by personnel who generate security related documents. A contributing cause was inadequate procedural guidance.

IV. Corrective Actions:

The following corrective actions are being taken:

1. The two letters forwarded to the NRC, ST-HL-AE-3942 dated December 10, 1991, and ST-HL-AE-3943 dated December 13, 1991, and the "System Health Report - Security System" were classified as Safeguards Information in April 1992. Subsequent actions were taken to account for and control additional copies of the documents which were made.

IV. Corrective Actions: (Con't)

2. The responsibility of the Safeguards Information Program is being transferred from Nuclear Security to Records Management Systems and Administration (RMS&A). Nuclear Security and RMS&A will review the adequacy of training requirements of personnel who process Safeguards Information (SGI) and potential SGI as a part of the transfer. The process for classification of SGI will also be reviewed. These actions will be completed by September 1, 1992, which will include development of a new procedure for control of Safeguards Information.
3. The new procedure will be required reading for selected individuals, from each department, who handle SGI. This will be completed by September 15, 1992.
4. Safeguards Information training within General Employee Training (GET) will be enhanced. This will ensure personnel who may potentially receive, handle or generate SGI understand the basic requirements for control of SGI. This will be completed by November 6, 1992.
5. Training will be developed for individuals responsible for classification of SGI. This will be completed by November 6, 1992.

V. Date of Full Compliance:

HL&P is in full compliance.

VI. Additional Information:

The Safeguards Information contained in the three documents would not significantly assist an individual in an act of radiological sabotage or theft of special nuclear material. Additionally, the "System Health Report" and ST-HL-AE-3942 regarding "Phase II Security Measures During Remodeling of the Maintenance Operations Facility" have subsequently been declassified as it has been determined that the documents no longer contain Safeguards Information.