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# GULF STATES UTILITIES COMPANY

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August 5, 1992  
RBG- 37309  
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. 50-458/92-15

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report 50-458/92-15 and inspection follow-up item 9215-02. The inspection was conducted by Messrs. A.B. Earnest and T.W. Dexter on April 20-24, 1992, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's reply to the violation and the inspection follow-up item is provided in the attachments.

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

Sincerely,

*J.C. Deddens*  
J.C. Deddens  
Sr. Vice President  
River Bend Nuclear Group

*LAK/KES/TCC/SLW/JHM*  
LAK/KES/TCC/SLW/JHM/kvm

Attachment

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

180012

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

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## **ATTACHMENT 2**

### **RESPONSE TO CONCERN ITEM 50-458/IR 9215-02**

#### **CONCERN ITEM**

With regard to Concern Item 458/9215-02 involving the excessive overtime hours worked by nuclear security officers just prior to and after the start of RF-4, a review of shift time sheets indicates that River Bend had a total of 41 people who worked in excess of 72 hours during the period 12/05/91 through 03/19/92. However, if consideration is given for time spent on shift change and training, the number of personnel who actually worked on position for more than 72 hours in a given week is reduced to 16 person. The total number of hours actually worked on position over 72 hours for those 16 persons during the reviewed period was 43.60.

#### **CORRECTIVE ACTION**

Beginning 07/14/92, Burns' timekeeping personnel will provide security shift supervisor with a total hours worked list on a daily basis Monday through Thursday. Starting from top to bottom, the list will indicate the number of hours worked to date by individual security officers. Supervision and security personnel will be required to check the list prior to signing up for overtime or being assigned overtime. Authorization by senior Burns or GSU personnel will be required for any officer to work hours in excess of 72 hours.

STATE OF LOUISIANA )  
PARISH OF WEST FELICIANA )  
In the Matter of )  
GULF STATES UTILITIES COMPANY )  
(River Bend Station - Unit 1)

# AFFIDAVIT

*J. C. Deddens*  
J. C. Deddens

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

**ATTACHMENT 1**  
**REPLY TO NOTICE OF VIOLATION 50-458/9215-01**  
**LEVEL IV**

**REFERENCE**

Notice of Violation - Letter from A. Bill Beach to J.C. Deddens dated July 6, 1992

**VIOLATION** - Inadequate Access Controls - Vital Areas

Section 2.D of the River Bend Station Operating license NPF-47, requires the licensee maintain in effect and fully implement all provisions of the Commission approved physical security plan. This includes amendments and changes made pursuant to the authority of 10CFR50.54(p).

Paragraph 6.6.2.2 of the physical security plan states, "The design features of the entry control system and the related security procedures reduce the potential for tailgating. Paragraph 6.6.2.1 states, "All Vital Island portals are locked and alarmed."

Contrary to the above, the inspectors determined that during outages excessive numbers of tailgating and vital islands door degradations occurred. For example, during March 1992, the licensee reported approximately four times the normal numbers of vital island doors being left unsecured by personnel. While the licensee recorded the increased problems with tailgating and unsecured doors, they did not institute adequate corrective actions to preclude continued recurrence.

**REASON FOR THE VIOLATION**

The numbers of tailgating and vital island door degradations do not meet GSU's standards of excellence and further improvements are possible, therefore GSU accepts the level IV violation.

However, GSU would like to provide additional clarifying information regarding the following NRC statements in the report.

1. Corrective actions implemented as a result of previous violation (IR 8938-01) were ineffective to prevent recurrence.

In 1989 (IR 89-38), NRC identified a violation involving Security's failure to properly control access to vital islands. As a result of the corrective action taken in response to the violation, the number of time out alarms, unsecured doors and thumbblatch incidents decreased substantially during RF-3, see Attachment 1-A.

IR 89-38 also stated that GSU did not amend the security computer data base to reflect when personnel entered or exited vital islands without using card readers. The computer data base changes initiated in response to that inspection finding has since enabled Security to more

accurately track tailgate and other key card errors, i.e. lost key cards, bad status, used key card twice and other miscellaneous errors. GSU is unable to appropriately compare the number of tailgates between RF-2 and RF-3 because during RF-2 the numbers were based on quarterly log entries only. During RF-3 the computer tracked the numbers more accurately. GSU believes that the data base changes account for much of the increase in the number of tailgates and other key card errors listed under RF-3. (See Attachment 1-A).

2. It appears that the Licensee was not using trending information to implement corrective action.

Additional corrective action for IR 89-38 included GSU management establishing a multi-step corrective action program to identify personnel who violate security procedures, a program that contained a policy for escalated disciplinary action, up to and including the loss of unescorted access. General employee training (GET) and requalification training programs relating to security procedures were also upgraded.

In March 1992, security management identified through trending and analysis that human error rates were high. As a result, in March 1992 security management expanded the multi-step corrective action program to include remedial training classes to retrain employees who cause violations involving unescorted access. On the first offense the employee has to attend a remedial training class. On the second offense the employee and his immediate supervisor together must attend the remedial training class. On the third offense the employee's supervisor meets with the Director Nuclear Station security (DNSS) for further consideration of disciplinary action. GSU believes the program has been effective for the following reasons. From March to July 1992, there were 240 human error incidents that caused employees to attend remedial training. Thirteen of those 240 people have had to attend a second remedial training class with their immediate supervisor. Out of the 13 second offenders, only 2 have been scheduled to meet with DNSS for further action. The dramatic reduction in the number of second and third offenders indicates the program's effectiveness.

In addition to the above, effective April 7, 1992, security training instructors now teach the security portion of GET initial. The results of this effort will take some time to assess. However, security management believes that this will result in enhanced security awareness by both new and long term employees.

Trending and analysis also identified an adverse trend in lost key cards. As a result of this analysis, personnel who lose their key card are denied access until they have attended a face-to-face counseling session with the Plant Manager. In addition, special emphasis has been placed on using a beaded lanyard to maintain control of key cards.

3. The inspector's rationale used to determine that failures prior to and during this outage were four times higher than under normal conditions.



In the fall of 1991, GSU began preparation for refueling outage number four (RF-4), its longest and most extensive outage to date. The service water chemical cleaning and pipe replacement activities along with the normal refueling outage work presented substantial challenges to GSU security management that have been successfully met thus far.

The additional contract personnel required to perform the RF-4 outage work increased the normal key card transactions from approximately 180,000 a month to over 380,000. The number of personnel with active key cards increased from approximately 1,200 to 2,900 during the same outage period. The additional 1,600 active key card holders' primary duties involve performing work within the vital islands. In non-outage conditions, less than half of the 1,200 regularly assigned unescorted personnel enter the vital islands. For example, during the non-outage month of June 1991, the number of key card transactions was 181,000. There were 75 key card and door alarms in June 1991. This equals an error rate of .0004143. During the RF-4 outage month of March 1992, there were 389,713 key card transactions. In March of 1992 there were 325 key card and door alarms. This equals a human error rate of .0008339. By comparing error rates based on actual key card transactions, the rate of human errors increased by a factor of 2.0 times the rate when there was an increase in population of 2.4. The number of key card transactions were not available to the inspectors for consideration in their analysis of the security events reported in the two quarters they reviewed.

In reviewing the summation of quarterly log information provided by the NRC, it appears that during outages, most plants do experience an increase in unsecured door and tailgating events. Even though River Bend's statistics do not conform to security management's standards of excellence, and there is certainly room for improvement, GSU believes that they are not drastically different than other nuclear power plants when they are in an outage mode. The data from which the inspectors drew their conclusions was the information that was compiled and reviewed from raw data provided by security management to evaluate adverse trends. Many of those figures are inflated and are a result of errors not reportable to the NRC in the quarterly log. Attachment 1-A has been prepared to show the difference in the numbers of events that have been logged and those used to evaluate the existence and extent of a problem which requires management attention. As indicated by the two tables in Attachment 1-A, GSU analyzes much more trend data than is required by the NRC. Comparisons between GSU and other licensees should consider the differences in the data being analyzed. For instance, in the figure of 171 events of "Other Key Card" (KC) errors for March of 1992, only 14 of them were determined to be reportable in the quarterly log.

#### CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The multi-step policy pertaining to security violations was restructured in March 1992 to include remedial training in a classroom setting. As of April 7, 1992 security training instructors were made available to the Training Department to teach the security portion of GET I initial. So far, these corrective actions have achieved a better security awareness by incoming personnel, a reduction in the number of tailgate infractions, and a method of retraining personnel who cause security violations.

A newly created video is being shown to escort and visitor personnel at the time they take on those duties. This should also help reduce human errors involving door entries. Security management is currently evaluating and is planning to revise visitor entry procedures to simplify paperwork and in so doing, will print on the reverse side of escort's copy a set of instructions describing the processing through door and turnstile entries. This action should reduce visitor/escort caused door alarms.

Security management has met with the major contractors in groups to discuss processing through security doors and the need for control and use of key cards, and single entries through security doors.

#### **FURTHER STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

The configuration of vital islands will be evaluated for ways to reduce unnecessary door alarms. A change to the Physical Security Plan will be submitted, if appropriate.

GSU security management and representatives from the GSU training department are in the initial planning stages of installing key card readers on two of the GET facility doors for the purpose of actually simulating security door entries with the use of special training key cards. GSU security management feels that this type of "hands-on" training will reduce the number of door alarms at River Bend Station.

The inspectors observed that card readers at RBS do not always read the key cards of employees on the initial pass of the key card through the reader. Security management is aware of this and believes that it does not represent a security degradation but recognizes that it can contribute to tailgating incidents by new plant personnel. It is not unusual for new personnel to experience difficulty in running their key card correctly through a card reader and an occasional alarm will occur. Correct use of the card is a learned technique that comes with experience. Also, the card being damaged or worn out, or the card reader being out of adjustment can cause alarms. These conditions do occur and are routinely corrected by the key card holder and security technicians as appropriate. The cards and card reader equipment will be further evaluated to improve "first time" reads.

#### **DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Corrective action will be completed and full compliance will be achieved by October 1, 1992. The key card readers to be installed in the training facility will be operable and available for training use by December 15, 1992.

## TOTAL SYSTEM PERFORMANCE (HUMAN ERRORS)

Population Sz (appx)	2000			2000			1200			2900		
HUMAN ERROR	1989 RF2 OUTAGE Mar. Apr. May			1990 RF3 OUTAGE Sept. Oct. Nov.			1991 NORMAL OPS May June July			1992 RF4 OUTAGE Mar. Apr. May		
Timeouts	213	126	86	25	49	32	8	12	10	47	80	50
Unsecured Doors	144	56	33	19	21	8	9	3	4	23	16	15
Thumbblatch	46	38	23	5	11	5	0	3	3	4	12	5
Tailgate	28*	36*	18*	35	99	36	14	15	12	60/31	67/18	48/21
Other KC Error**	67	60	58	112	156	140	32	42	36	171	137	99
TOTALS	518	316	218	196	336	221	67	75	74	325	312	217
**Lost keycards, bad status, used KC twice, misc. errors.	*Based on Quarterly Log			Tailgates were more accurately tracked during RF-3 due to computer changes from 1989 inspection which would account for increase.						Tailgate figures above include some doors with accountability (only) card readers which are not true delegations and are figures below the slash		

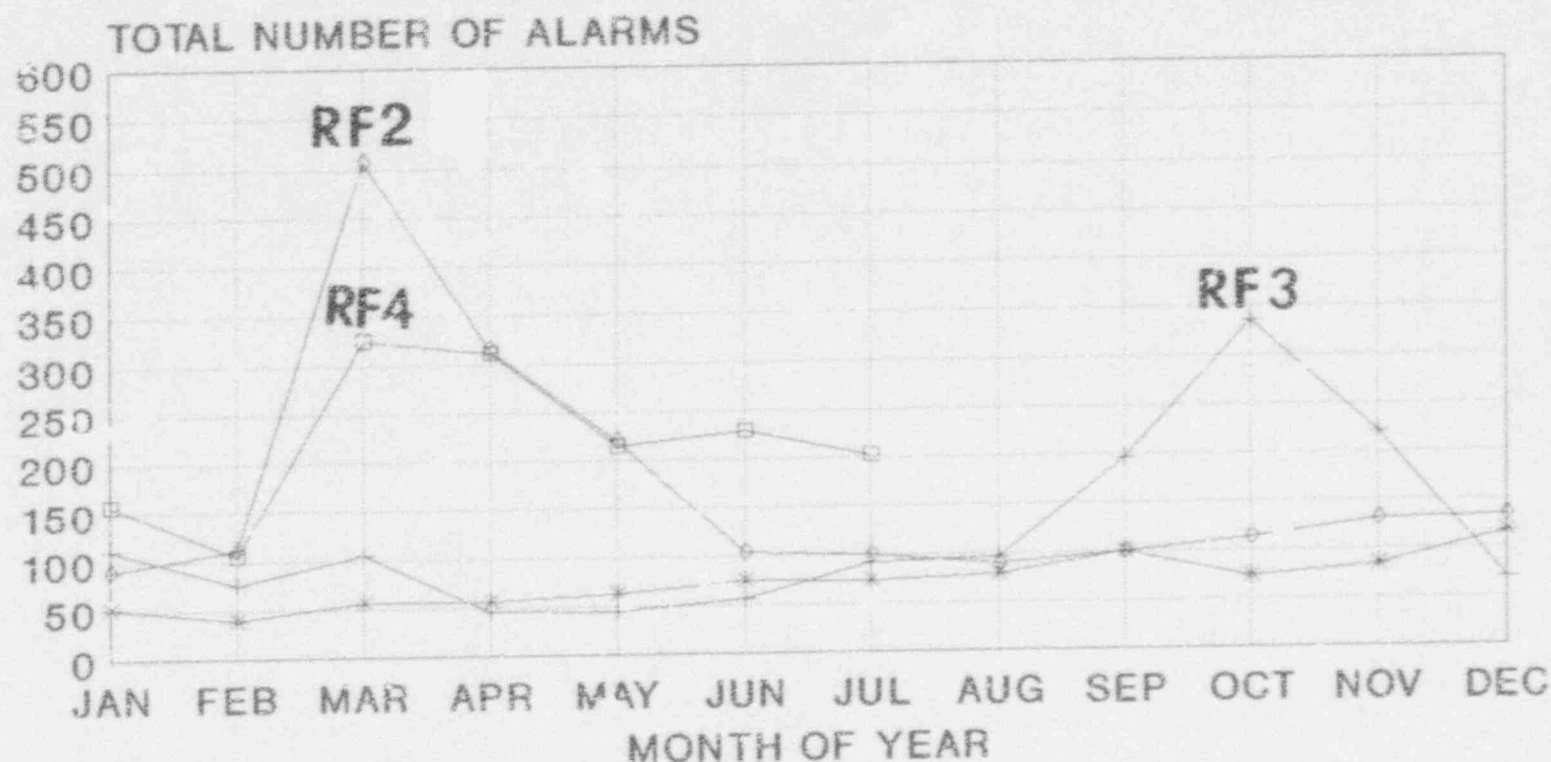
## QUARTERLY LOG DATA

Population Sz (appx)	2000			2000			1200			2900		
HUMAN ERROR	1989 RF2 OUTAGE Mar. Apr. May			1990 RF3 OUTAGE Sept. Oct. Nov.			1991 NORMAL OPS May June July			1992 RF4 OUTAGE Mar. Apr. May		
Unsecured Doors	120	50	30	14	2	7	6	1	4	23	16	15
Thumbblatch	0	1	3	1	1	1	0	1	0	2	0	0
Tailgate	28	36	18	4	6	4	4	6	4	26	24	16
Other KC Errors												
Lost KC's	7	16	15	8	25	17	0	0	1	10	5	11
KC left PA	3	3	3	2	1	1	0	1	1	0	1	2
Mis-issued KC's	3	1	1	3	2	2	0	0	1	4	2	3

NOTE: TIMEOUT FIGURES AND 90% (APPROX) OF "OTHER" KC ERRORS ARE NOT REQUIRED BY THE NRC TO BE REPORTABLE. YET DURING OUTAGES THESE FIGURES INCREASE CONSIDERABLY WHEN WORKERS ARE HAND CARRYING TOOLS AND SUPPLIES THROUGH VI DOORS, COMPARE MARCH 1992 FIGURES TO MAY 1991. THE 90% OF "OTHER" KC ERRORS INVOLVE BAD STATUS, RUNNING THE KEY CARD THROUGH READER TWICE, CARDING IN BUT NOT ACTUALLY ENTERING AND ETC.



# ANALYSIS OF SECURITY DOORS PERSONNEL CAUSED ALARMS- 1989 THRU 1992



—◇— TOTAL ALARMS-1989

—+— TOTAL ALARMS-1990

—\*— TOTAL ALARMS-1991

—□— TOTAL ALARMS-1992

RF-2 3/15/89 - 6/8/89

RF-3 9/29/90 - 12/4/90

RF-4 3/12/92 - 9/5/92 (estimated)