

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

August 21, 1992
LIC-92-284R

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (J. L. Milhoan) to OPPD (W. G. Gates) dated July 22, 1992

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-12 Reply to a Notice of Violation (NOV)

The subject report transmitted an NOV resulting from an NRC inspection conducted May 26-29, 1992 at the Fort Calhoun Station. Attached is the Omaha Public Power District response to this NOV.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/grc

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Acting Project Manager

9208260151 920821
PDR ADOCK 05000285
Q PDR

260013

REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on May 26-29, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 73.21 (d) states, in part, that, while in use, matter containing Safeguards Information shall be under the control of an authorized individual, and, while unattended, shall be stored in a locked security storage container.

Contrary to the above, between approximately April 30, 1992, and May 13, 1992, a copy of the Fort Calhoun Station physical security plan, which contains Safeguards Information, was neither under the control of an authorized individual at all times nor was stored in a locked security storage container when unattended. Specifically, the information was left out during the entire period in a secretarial area in the company's corporate office building in Omaha.

This is a Severity Level III violation.

OPPD RESPONSE

A. The Reason for the Violation

Omaha Public Power District (OPPD) admits the violation occurred as stated. The root cause, as determined by completion of a Human Performance Enhancement System (HPES) evaluation, was failure to follow procedural guidance for proper transmittal, receipt and storage of Safeguards Information (SI), as detailed in procedure NOD-QP-14, Protection of Safeguards Information. This occurred during distribution of a revision of the Fort Calhoun Station (FCS) Site Security Plan.

Through investigation, OPPD determined the following:

- The Site Security Plan revision was transmitted to the corporate office location on or about April 28, 1992.
- The package was improperly addressed.
- The package was received by an individual that was not an SI coordinator and was improperly handled and stored by this individual.
- A contributing cause to this incident was that the Site Security Plan Distribution List was not a controlled document.

B. Corrective Steps That Have Been Taken and the Results Achieved

A comprehensive investigation of this incident was completed to determine the cause and corrective actions. The results were documented in Human Performance Enhancement System Report No. 92-018.

OPPD has reduced the number of Site Security Plan copies maintained to eliminate individuals/offices without a valid requirement. The Site Security Plan Distribution List was revised and now is maintained as a controlled document. Additionally, the list now contains only names of SI coordinators or alternates.

Although NOD-QP-14 was adequate to control SI materials, OPPD determined that parts of the procedure were not followed. To assure future compliance with applicable requirements, OPPD has revised NOD-QP-14 to include enhanced control of SI material during use and transmittal. These controls include requirements for:

- Use of a courier when transmitting SI material between company sites/stations;
- Use of a red and white cover sheet whenever SI material is outside an authorized container, to better identify this material during use;
- Use of a new brightly colored inner envelope or, for drawings, colored SI stickers when transmitting SI material between SI coordinators, for more obvious identification of this material when the outer envelope or wrapping is removed;
- Use of a suspense file to verify receipt of SI material and insure return of the signed receipt form when SI material is transmitted between SI coordinators;
- Annual rebriefing and recertification of all SI cleared personnel.

SI qualified personnel have been retrained and recertified on proper handling of SI materials.

C. Corrective Steps That Will Be Taken to Avoid Further Violations

No additional corrective actions are considered necessary.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance with the regulatory requirements pertaining to this violation.