



Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

May 30, 1996

3F0596-21

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Notice of Violation (NRC Inspection Report No. 50-302/96-02)
NRC to FPC letter, 3N0596-01, dated May 1, 1996

Dear Sir:

In the subject Inspection Report and Notice of Violation, Florida Power Corporation (FPC) received four cited violations for inadequate compensatory measures for an inoperable vehicle barrier, inadequate illumination, failure to protect safeguards information, and improper Security Plan revision. This correspondence provides our response to the first three of these violations. Per the cover letter to the inspection report, no response is required for the fourth violation.

Additionally, you expressed a concern regarding FPC's understanding and timely compliance with new regulations. FPC is also concerned with the need to understand and comply with new regulations. Additional management assistance from a Licensing perspective will be provided to the Nuclear Security group. The situation will be closely monitored to ensure proper attention is being given to regulations.

Sincerely,

P. M. Beard, Jr.

P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

040005

Attachment

PMB:AEF

xc: Regional Administrator, Region II
Senior Resident Inspector

NRC Project Manager

JEON

Florida Power Corporation
NRC INSPECTION REPORT NO. 50-302/96-02
REPLY TO NOTICE OF VIOLATION

VIOLATION 50-302/96-02-01

The licensee's Physical Security Plan, Rev. 6-8, dated July 5, 1996, states, "This Plant states FPC's policy and commitment to meet the requirements of 10 CFR 73.55. Written procedures are implemented and maintained + the detailed requirements necessary to implement the Security Plan for plant operation."

10 CFR 73.55(g)(1) states in part, "...physical barriers, and other security related devices or equipment shall be maintained in operable condition. The licensee shall develop and employ compensatory measures including equipment, additional security personnel and specific procedures to assure that the effectiveness of the security system is not reduced by failure of [sic.] other contingencies affecting the operation of the security related equipment or structures."

Contrary to the above, from February 29 to March 11, 1996, and from March 13 to March 22, 1996, the licensee failed to maintain the main vehicle barrier gate in operable condition and failed to implement compensatory measures to assure that the effectiveness of the vehicle barrier gate was not reduced.

ADMISSION OF DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation

REASON FOR THE VIOLATION

The cause of the violation is an error in judgement on the part of FPC Nuclear Security Management. Previous practice was to compensate for security breaches with an armed security guard. An armed security officer had been posted to compensate for the inoperable vehicle barrier; however, the officer had insufficient weapons capabilities to prevent the effectiveness of the vehicle barrier gate from being reduced.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Following discussions about the violation with the NRC inspector, a vehicle was placed in front of the gate to provide a more effective barrier.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Guidance has been issued to ensure sufficient capability to deny access to the design basis vehicle threat. This guidance is consistent with NEI 96-01, "Guidelines for Operational Planning and Maintaining Integrity of Vehicle Barrier Systems."

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 22, 1996.

VIOLATION 50-302/96-02-02

Chapter 6, Section 6.3 of the licensee's Physical Security Plan, Rev. 6-8, dated July 5, 1996, states in part, "Illumination shall be at least 0.2 footcandles measured horizontally at ground level."

Contrary to the above, on March 20, 1996, an area approximately 60 feet long by 6 feet wide failed to meet the illumination level of at least 0.2 footcandles when measured horizontally at ground level.

ADMISSION OF DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation

REASON FOR THE VIOLATION

The reason for the violation was equipment failure. The breaker supplying the temporary lighting in the area tripped.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The breaker was satisfactorily reset and the lighting was restored in accordance with the Physical Security Plan commitment.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Guidance has been issued to all security officers to more clearly define the responsibility of the roving protected area patrol officer to observe the condition of outside lighting during hours of darkness. Security Procedure SS-201, Security Force Personnel General Orders, Duties and Responsibilities, will be revised to ensure this guidance is carried into officer training programs. Additionally, FPC is evaluating a periodic, comprehensive program to assess outside lighting areas.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 20, 1996 when the breaker was reset and the illumination restored.

VIOLATION 50-302/96-02-03

10 CFR 73.55(d)(2) states in part, "While unattended, Safeguards Information shall be stored in a locked security storage container."

Contrary to the above, on March 21, 1996, Safeguards Information, to include the Physical Security Plan, was left unattended in an unlocked security storage container.

ADMISSION OF DENIAL OF THE ALLEGED VIOLATION

Florida Power Corporation (FPC) accepts the violation

REASON FOR THE VIOLATION

The reason for the violation is human error. The individual involved failed to lock the container or transfer responsibility for awareness of its unlocked status to another individual prior to leaving the area.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The contents of the security container were reviewed and it was determined that nothing had been removed during the period the container was unattended. The container was subsequently locked.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

This is considered to be an isolated occurrence. The individual was aware of the requirements but in haste to respond to an NRC inspector's request, the individual forgot to close the safeguards container. The individual has no history of previous safeguards violations, therefore additional corrective action is unwarranted at this time.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 21, 1996 when the safeguards container was locked.