

Northeast  
Nuclear Energy

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385-0128  
(203) 447-1791  
Fax (203) 444-4277

The Northeast Utilities System

APR - 4 1997

Docket Nos. 50-245

50-336

50-423

B16316

Re: 10CFR2.201

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
Reply to Notice of Violations  
NRC Combined Inspection 50-245/96-09; 50-336/96-09; 50-423/96-09

In a letter dated February 24, 1997,<sup>(1)</sup> the NRC transmitted the results of an inspection conducted at the Millstone Station. On December 31, 1996, the NRC completed an inspection at the Millstone site. Based on the results of this inspection, the NRC has determined that three violations of NRC requirements occurred. //

The first violation concerned an unauthorized entry into the Millstone Station protected area, demonstrating a failure to comply with security requirements. The second violation concerned the failure to perform a comprehensive evaluation and disposition of regulatory requirements to support recent Millstone site organizational changes. This resulted in implementing several organizational changes which resulted in a technical specification non-compliance. Lastly, a violation was identified associated with the failure to calibrate an ionization chamber used to monitor source checking of thermoluminescent dosimeters irradiator. Leo/

On behalf of Millstone Unit No. 1, 2, and 3, Attachment 1 provides NNECO's responses to the Notice of Violations.

<sup>(1)</sup> John R. White letter to Bruce D. Kenyon, "NRC Combined Inspection 50-245/96-09; 50-336/96-09; 50-423/96-09; and Notice of Violation," dated February 24, 1997.

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Commitment

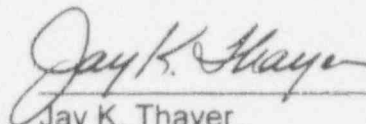
The following is NNECO's commitment associated with this response:

B16316-1 NNECO will reorganize the Nuclear Licensing Department into separate regulatory compliance departments that report directly to the units and one corporate nuclear licensing department by April 30, 1997.

Please contact Mr. R. Walpole at (860) 440-2191 should you have any questions regarding this submittal.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Jay K. Thayer  
Recovery Officer,  
Nuclear Engineering and Support

Attachments (1)

cc: H. J. Miller, Region I Administrator  
S. Dembek, NRC Project Manager, Millstone Unit No. 1  
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2  
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3  
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1  
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2  
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3  
W. D. Travers, PhD, Director, Special Projects Office

Docket Nos. 50-245  
50-336  
50-423  
B16316

Attachment 1

Millstone Unit Nos. 1, 2, and 3

Reply to Notice of Violations

March 1997

### **Restatement of Violation (Violation A)**

Unit 1 Technical Specification 6.8.1, "Procedures," requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A to Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operations)," dated February 1978. Section 1.a. of Appendix A to RG 1.33 states that administrative procedures should be written to cover security and visitor control activities.

The "Millstone Nuclear Power Station Physical Security Plan," Section 6.1 "Access Control," states entry into the Protected Area is authorized only for specifically approved purposes and only after appropriate searches, identification, and access authorizations are accomplished.

Section 6.4.1.2 "Authorized Individuals," states, in part, that all authorized individuals must have their identification badge with keycard, as well as have their hand geometry confirmed to gain access to the Protected Area.

Contrary to the above, on August 5, 1996, at about 8:00 a.m., an individual working for an administrative contractor gained access to the Protected Area (PA) without having her access authorized or hand geometry confirmed. Specifically, the unauthorized individual, that had not surrendered her badge and key card upon termination on July 19, 1996, arrived at the station to report for a new work assignment. A co-worker used her own valid key card and hand geometry to allow the unauthorized individual to enter the PA. The co-worker followed the individual into the PA by keying in a second time. The two individuals worked in the PA until the end of the day shift, about 3:40 p.m.

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

### **Reason for the Violation**

Northeast Nuclear Energy Company (NNECO) does not dispute the cited Technical Specification (TS) violation. The security computer system did not provide adequate warning of a non-authorized individual attempting to enter the protected area.

### **Cause**

The cause of the unauthorized individual entering the PA was the result of an individual's failure to comply with the requirements and conditions of Unescorted Access authorization. In addition, the computerized controls for personnel access to the facility were not adequate to prevent a personnel error of this nature.

### Contributing Factors

The individual had previously been authorized unescorted access to Millstone from April 11, 1996, through July 19, 1996. The individual was returning to Millstone on the date of this event for a different job assignment. The individual still had the security badge from the previous assignment, which was inactive and unauthorized. Because of the new assignment at Millstone, the individual assumed that their security badge would allow access to the station.

When the unauthorized individual attempted to enter the PA, the Millstone Security Computer System did not identify the keycard as unauthorized because it never received the keycard number from the hand geometry system. This is because the hand template had been removed from the hand geometry system. The hand geometry system, not finding a match, did not transfer a valid key number to the security computer for processing.

### **Corrective Steps That Have Been Taken and Results Achieved**

The two individuals were immediately taken under Security control and interviewed. PA access for both individuals was suspended. An accountability of all personnel in the PA was conducted which verified that everyone was authorized. A transaction history review of the authorized individual's badge was conducted and showed that no vital areas were entered. During normal work hours each Security Officer was posted at each set of turnstiles due to the high traffic. During off hours (backshifts, weekends, and holidays), when traffic is low, all turnstiles were locked out to in-bound traffic, except one at each access point. This configuration enabled the access point officers to stand as the only compensatory measure. The turnstiles were monitored to ensure that this event would not be repeated until design changes to the security computer were completed.

An article was published in the station news letters describing the event as "a very serious breach of station security" and reiterated that any intentional act of allowing circumvention of physical security directly reflects on the reliability and trustworthiness of an individual and his or her suitability to maintain unescorted access. NNECO has implemented a design enhancement for the security system applications software. An attempt to double key at a site entry key reader will result in an alarm notifying security.

Administrative work practices have been modified so that the last hand template and name are left in the hand geometry system. Additionally, the entire hand geometry system data base has been reviewed and missing hand templates were added. Hence, the hand geometry system will always contain the name and hand template of the last person issued the keycard. The hand geometry reader will process the previous hand



template allowing the Security Computer System to identify the individual is unauthorized, deny access, and report the event to the alarm station.

#### **Corrective Steps That Will Be Taken**

All corrective actions are complete for this issue.

#### **Date When Full Compliance Will Be Achieved**

NNECO is currently in compliance for site security control practices.

#### **Restatement of Violation (Violation B)**

Technical Specifications Section 6.2.1 "Onsite and Offsite Organizations," states, in part, that onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant including the Senior Vice President - Millstone Station (Section 6.2.1.b), and Executive Vice President - Nuclear (Section 6.2.1.c).

Contrary to the above, as of October 1, 1996, the onsite and offsite organizations did not include the positions of the Senior Vice President - Millstone Station and the Executive Vice President - Nuclear, for activities affecting the safety of the nuclear power plant. The organizational changes implemented at that time introduced discrepancies between the titles and functions of the new organization, and the organization as described in Technical Specifications Section 6, "Administrative Control."

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

#### **Reason for the Violation**

NNECO does not dispute the cited Technical Specification (TS) violation. The management expectations for onsite and offsite organization changes were not established.

#### **Cause**

The cause of the discrepancies between the titles and functions of the new organization, and the organization as described in Technical Specifications was organizational breakdowns. The root causes included inadequate communication within the organization, inadequate attention to emerging problems, and an inadequate accountability system. The communication and attention to emerging problems

occurred due to poor communications between line management and Nuclear Licensing.

#### Contributing Factors

No additional contributing factors were identified.

#### **Corrective Steps That Have Been Taken and Results Achieved**

The President and Chief Executive Officer has issued a memorandum specifying the manner in which changes to the organization will be supported and documented. The requirement has been established to conduct the reviews required by 10CFR50.54(a), 10CFR50.54(p), and 10CFR50.54(q) to ensure that no degradation has occurred in the licensee's performance for quality assurance, safeguards contingency, or the site emergency plans prior to implementing organizational changes. The PTSCR must be issued to the NRC prior to implementing the organization changes. The management expectations were met for this violation when a PTSCR was submitted on February 3, 1997.

#### **Corrective Actions That Will Be Taken**

The Nuclear Licensing department will be re-organized into separate regulatory compliance departments that report directly to the units and a nuclear licensing department that reports to the Recovery Officer, Nuclear Engineering and Support.

#### **Date When Full Compliance Will Be Achieved**

NNECO changes to the site organization will be in full compliance after the implementation of the NRC approved amendments to the Technical Specifications for Millstone Unit Nos. 1, 2, and 3.

#### **Restatement of Violation (Violation C)**

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained for activities referenced in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements" (Operation), Revision 2, February 1978 (RG 1.33). Item 8.a. of Appendix A to RG 1.33 recommends, in part, that procedures for control of measuring and test equipment and for surveillance tests, procedures, and calibrations be provided to ensure tools, gauges, instruments, controls, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Procedure ES #142, "Thermoluminescent Dosimeter Irradiation," line 2 states, "Place a calibrated ionization chamber which is fully charged (accuracy  $\pm 5\%$  traceable to NIST) in one of the designated locations on the source table. This chamber will be used to verify the calculated dose rate after the exposure."

Contrary to the above, the licensee did not use an ionization chamber which had been calibrated (accuracy  $\pm 5\%$  traceable to NIST) to verify the calculated dose rate after the exposure of thermoluminescent dosimeters to the source of the Shepherd panoramic irradiator. The ionization chamber which was used (Victoreen Condenser-R Meter) had not been calibrated since 1988 to verify its accuracy as traceable to NIST.

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

#### **Reason for the Violation**

NNECO does not dispute the cited Technical Specification (TS) violation. The Technical Specification 6.8.1 requirement to develop a procedure in accordance with RG 1.33 was met. The process was controlled by Procedure ES #142, "Thermoluminescent Dosimeter Irradiation," as stated by the NOV. The procedure controls for control of measuring and test equipment used during Thermoluminescent Dosimeter (TLD) irradiation were not adequate.

#### **Cause**

The cause of the non-calibrated ionization chamber during the exposure of thermoluminescent dosimeters (TLD) was inadequate procedural controls. The procedure used to control this activity specified the use of calibrated measuring and test equipment, but failed to specifically identify the calibration period for the ionization chamber.

#### **Contributing Factors**

No additional contributing factors were identified.

#### **Corrective Steps That Have Been Taken and Results Achieved**

The ion chamber used during the source checking of the environmental TLD irradiator has been calibrated. A calibration sticker has been placed on the ion chamber to identify the date when the calibration will expire. The controlling procedure ES #142, "Thermoluminescent Dosimeter Irradiation," has been revised to require calibration of the ion chamber on an annual basis. A review of the work performed by this determined that all other test equipment was calibrated.



**Corrective Actions That Will Be Taken**

All corrective actions are complete for this issue.

**Date When Full Compliance Will Be Achieved**

NNECO is currently in compliance with the requirements of the Station Environmental Monitoring Program.