

## NOTICE OF VIOLATION

Florida Power Corporation  
Crystal River Nuclear Plant  
Unit 3

Docket No.: 50-302  
License No.: DPR-72  
EA 97-161

During a Nuclear Regulatory Commission (NRC) inspection conducted during the period March 17 - 21, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

10 CFR 73.21(d)(2) requires, in part, that while unattended, Safeguards Information shall be stored in a locked security storage container.

- A. Contrary to the above, on January 16, 1997, outdated Physical Security and Training and Qualification Plans; 1990 NRC Safeguards Information Inspection Reports; and 1990 Safeguards Information Licensee Event Reports were left unattended and not locked in a security storage container in a locked, security office, a location outside of the protected area, for approximately 16 hours; and (01013)
- B. Contrary to the above, on March 15, 1997, 152 aperture cards containing Safeguards Information were left unattended and not locked in a security container in the document control area of the Nuclear Administration Building, a location outside the protected area, for approximately 16 hours. (01023)

This is a repeat Severity Level III problem (Supplement III).

Pursuant to the provisions of 10 CFR 2.201, the Florida Power Corporation (Licensee) is required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D. C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Crystal River facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Enclosure 1

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia  
this 29th day of May 1997

List of Conference Attendees  
May 22, 1997

Florida Power Corporation

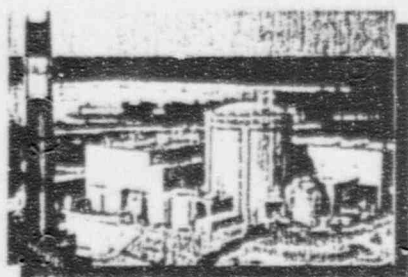
J. Cowan, Vice President, Nuclear Production  
M. Marano, Director, Nuclear Site and Business Support  
R. Grazio, Director, Nuclear Regulatory Affairs  
D. Watson, Manager, Nuclear Plant Security  
J. Campbell, Supervisor, Nuclear Plant Security  
W. Pike, Manager, Nuclear Regulatory Assurance

Nuclear Regulatory Commission

L. Reyes, Regional Administrator, Region II (RII)  
R. Crljenjak, Acting Deputy Director, Division of Reactor Projects (DRP), RII  
B. Uryc, Director, Enforcement and Investigations Coordination Staff (EICS),  
RII  
K. Landis, Chief, Reactor Projects Branch 3, DRP, RII  
P. Fredrickson, Chief, Special Inspection Branch, DRS, RII  
C. Evans, Regional Counsel, RII  
K. Clark, Public Affairs Officer, RII  
L. Stratton, Safeguards Inspector, DRS, RII  
A. Boland, Enforcement Specialist, EICS, RII

Public

One member of the public was in attendance.



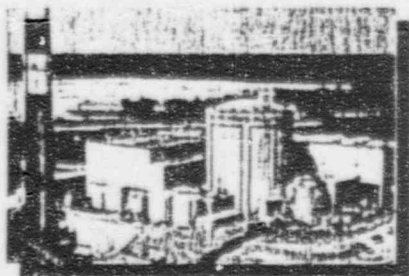
**FLORIDA POWER CORPORATION  
CRYSTAL RIVER - UNIT 3**

**Security Issues  
NRC Inspection Report 97-03**

**Pre-Decisional Enforcement  
Conference**

**NRC Region II  
Atlanta, Georgia  
May 22, 1997**

Enclosure 3

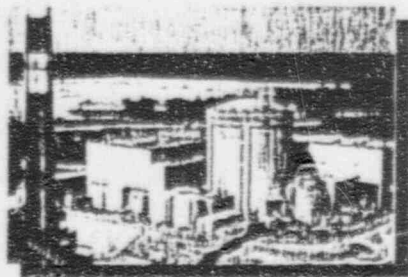


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CR-3

# Agenda

- **Opening Remarks** **J. P. Cowan**
- **Summary of Safeguards Issues** **M. W. Marano**
- **Corrective Actions &  
Results Achieved**
- **Current Security Improvements**
- **Future Direction**
- **Closing Remarks** **J. P. Cowan**

5/22/97



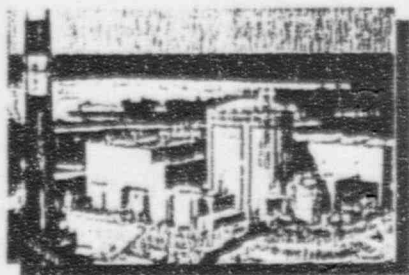
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# Opening Remarks

- Reviewed Inspection Report 97-03
- Agree With the Information
- Program Responsibility is With the Manager of Security

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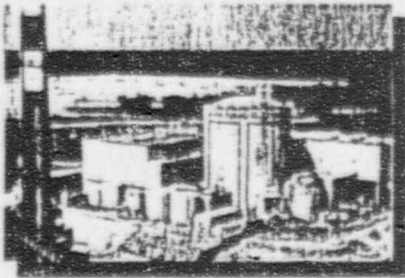


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# Opening Remarks

- **Our Goal is to Achieve Superior Performance in Security**
- **New Director Responsible for Security, Will Ensure Forward Momentum**

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# **Summary of Safeguards Issues**

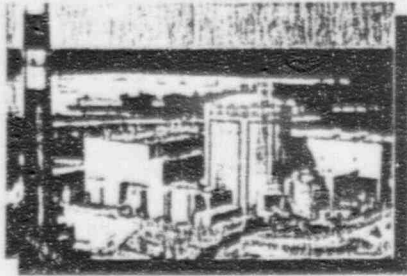
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## **Summary of Apparent Violation**

- **Cited Examples Involved the Failure to Adequately Protect Safeguards Information**
- **FPC Took Immediate Corrective Action for Cited Examples**
  - **Secured the Material**
  - **Counseled and/or Disciplined**
  - **Increased Site Awareness**

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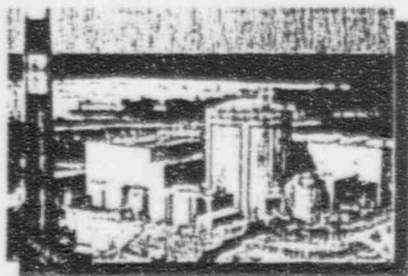


# Summary of Safeguards Issues

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- **FPC Identified an Additional Event not Cited**
- **FPC Self Identified all but one of the Cited Examples**

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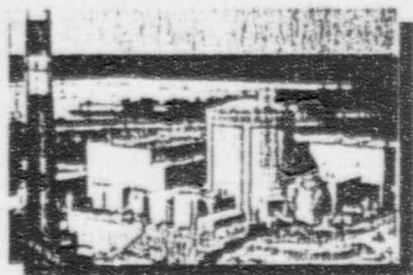


# Summary of Safeguards Issues

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- **The Root Cause for the Apparent Violation is Lack of Centralized Control**
- **The Corrective Actions Addressing This Root Cause are Completed**

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# Safeguards Time Line

Mar Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar Apr May

----- 1996 ----- 1997 -----

SGE  
NRC  
Identified

5/1 NOV SGE (March)  
5/30 FPC Response (March)

SGE \*  
SGE \*

SGE \*

9/4 NOV SGEs (June)  
SGE \*  
SGE \*  
SGE \*

10/4 FPC Response (June)  
10/21 Root Cause CAP Completed  
Actions Planned Until 12/97

12/31 Training Completed  
SGE \*

SGE \*  
CAP  
(Accelerated 12/97  
Corrective Actions)

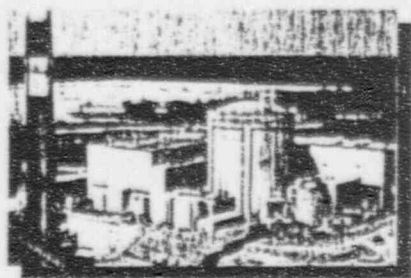
4/7 SGE \*

4/18 NOV SGEs (Jan., March)

(Single Point of Control established  
in Protected Area (5/5/97). Re-  
classification ongoing (planned  
complete 9/30/97).)

SGE = Safeguard Event  
\* = Self-Identified

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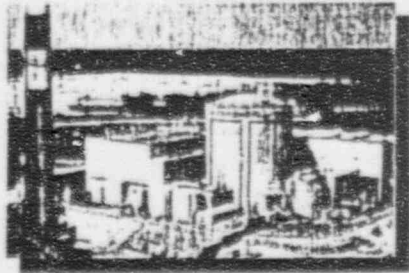


## **Summary of Safeguards Issues**

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- **Initial Approach to Long Term Corrective Actions Were Focused on Personnel Error and Training**
- **Corrective Action Follow-Up**

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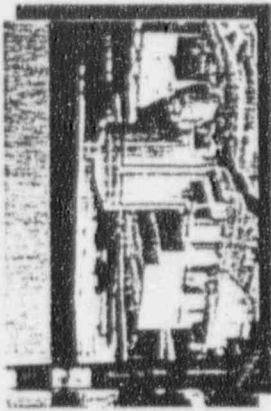


# Summary of Safeguards Issues

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- **FPC Performed a Root Cause in October 1996. Key Corrective Actions Included:**
  - **Reviewing the Appropriateness of Previously Classified Material**
  - **Destroying Safeguards Material no Longer Needed**
  - **Consolidating the Material in Fewer Locations**
  - **Limiting Access to Safeguards Material**

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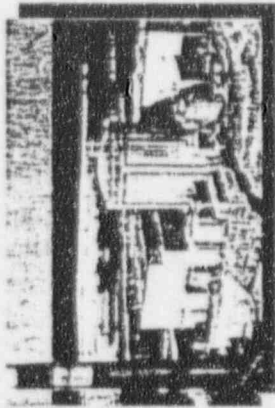
# Summary of Safeguards Issues

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- Key Corrective Actions Originally Planned for Completion by 12/97
- Management Directed Acceleration
- Specific Action Taken:
  - Centralized Safeguards Information Within the Protected Area

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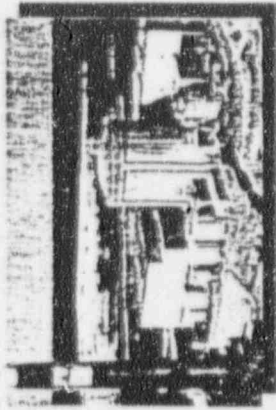
# Summary of Safeguards Issues

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- Security now Utilizes the Corrective Action Process
- The Current CA Process, via the Corrective Action Review Board (CARB), Would not Allow Prolonged Corrective Actions
- The new CAP Procedural Revision Requires Effectiveness Reviews
- CARB will Review the Safeguards Corrective Actions for Effectiveness

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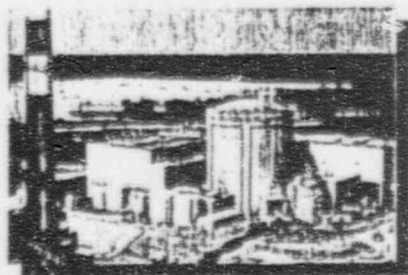
# **Specific Corrective Actions and Results Achieved**

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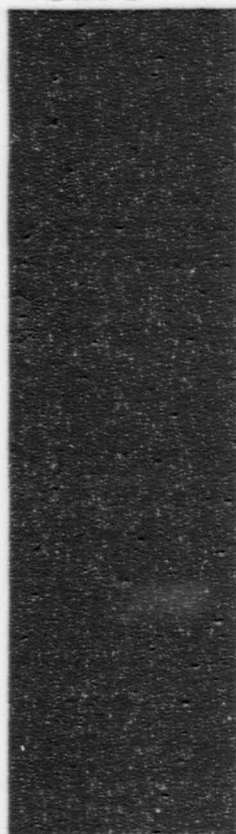
- Safeguards Information now Limited to two Locations, Inside the Protected Area and the EOF (Used Only in an Emergency)
- Security Directly Controls Safeguards Information

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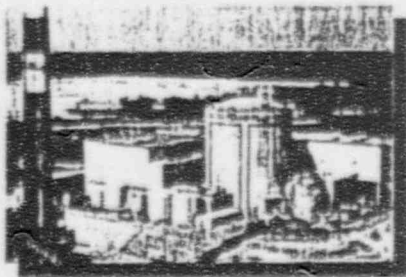
## **Specific Corrective Actions and Results Achieved**

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- **Documents Which do not Constitute Safeguards Information are Being Reclassified**
- **Safeguards Information Which is no Longer Needed is Being Destroyed**
- **Microfilm and Aperture Cards are Being Re-designated Where Appropriate as Non-Safeguards Material**

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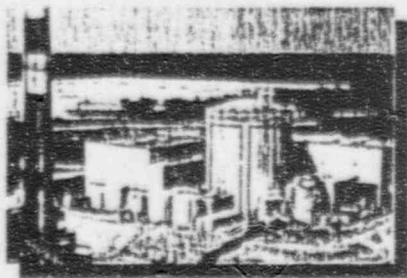


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# Summary

- **Security has Program Ownership**
- **Control of Safeguards Information is Significantly Improved**
- **Control of Safeguards Information is Only one Aspect of the Security Improvement Program**

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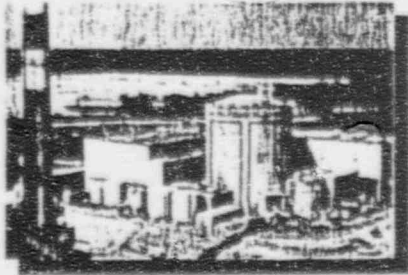
# Current Security Improvements

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- **Status of Items Identified in Our Conference of February 14, 1997**

- 50.54p Changes Completed February
- Procedures
- SS-205 - Alarm Stations Completed March
- SS-303 - Compensatory Posts
- Armory (Cage) Completed April
- Procedure
- SS-307 - Configuration Completed May
- Management Procedure
- Barrier Breach/Administrative Controls (Cabled Padlocks) Completed May

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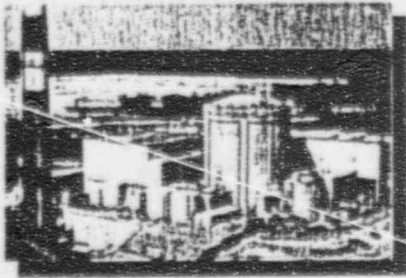


# **Current Security Improvements**

- **Increased Training (Regulatory Awareness, Security Specific, Drills, Weapons)**
- **Improved Training Quality (Systematic Approach-Job and Task Analysis)**

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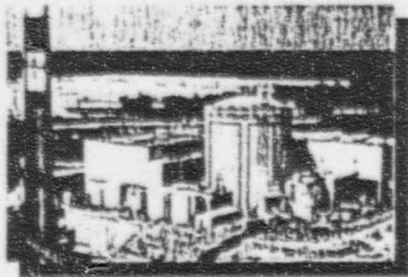


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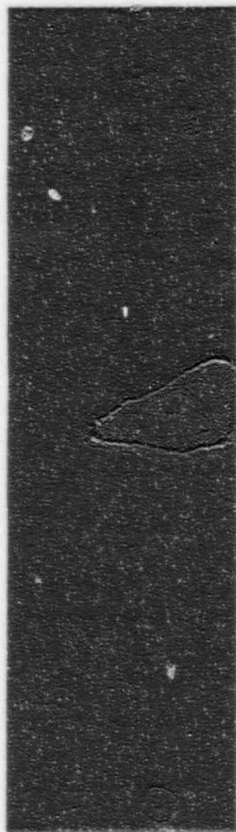
# **Future Direction**

- **Security Program Will Achieve Superior Performance**
- **Hired new Security Manager, Effective June 2**
  - **16 Years' Security Experience**
  - **4 Years as Security Manager at SALP 1 Plant**

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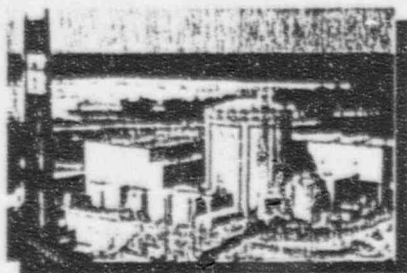
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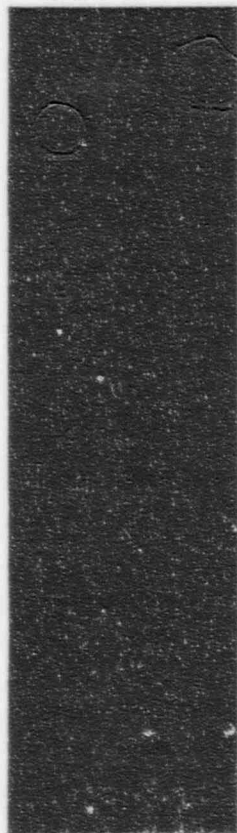
# Future Direction

- **Comprehensive Security Improvement Plan (SIP) is Being Developed Internally to:**
  - **Address Equipment, People, and Process (Including Hand Geometry [Planned 6/97] and Video Capture [Planned 8/97])**
  - **Identify and Categorize Short Term and Long Term Actions**

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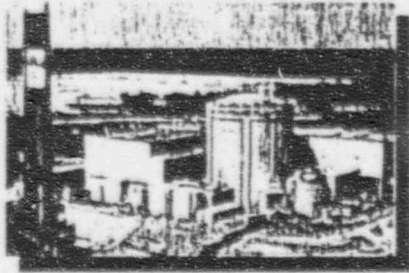
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# Future Direction

- **Senior Management Approval**
  - SIP to be Developed by July 31, 1997
- **Basis for the Plan:**
  - Utility Peer Assessments
  - Self-Assessment
  - QA Audit Reports
  - Lessons Learned From Prior Issues
  - Industry Peer Groups

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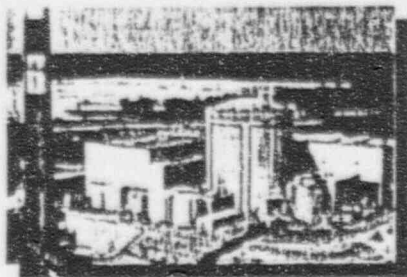


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# Future Direction

- **Progress Will be Measured:**
  - Internal (Security and Quality Assurance)
  - External (Cooperative Management Audit Program [CMAP], Utility Peer Assessment Re-visit)
- **Security Management Will Demonstrate Proactive Leadership at CR-3**

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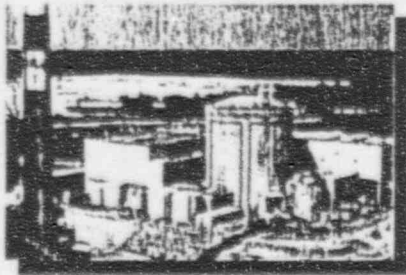


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# Closing Remarks

- **Corrective Actions for the Root Cause are Complete**
- **All but one Example Self Identified**
- **Cited Examples Were not Considered Examples of Significant Safeguards Information Outside the Protected Area**

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# Closing Remarks

- **We Understand the Importance of the Issues**
- **We are Making Significant Changes**
- **We are Committed to the Solution**

5/22/97



# ENFORCEMENT CONFERENCE AGENDA

## CRYSTAL RIVER

MAY 22, 1997, AT 10:00 A.M.

NRC REGION II OFFICE, ATLANTA, GEORGIA

- I. OPENING REMARKS AND INTRODUCTIONS  
L. Reyes, Regional Administrator
- II. NRC ENFORCEMENT POLICY  
B. Uryc, Director  
Enforcement and Investigation Coordination Staff
- III. SUMMARY OF THE ISSUES  
L. Reyes, Regional Administrator
- IV. STATEMENT OF CONCERNS/APPARENT VIOLATIONS  
P. Fredrickson, Chief  
Special Inspection Branch  
Division of Reactor Safety
- V. LICENSEE PRESENTATION
- VI. BREAK/NRC CAUCUS
- VII. NRC FOLLOWUP QUESTIONS
- VIII. CLOSING REMARKS  
L. Reyes, Regional Administrator

## ISSUE TO BE DISCUSSED

10 CFR 73.21(d)(2) states in part, "While unattended, Safeguards Information shall be stored in a locked security storage container."

1. On January 16, 1997, outdated Physical Security and Training and Qualification Plans; 1990 NRC Safeguard Information Inspection Reports, and 1990 Safeguards Licensee Event Reports were left unattended and not locked in a security storage container for approximately 16 hours outside the protected area.
2. On March 15, 1997, 152 aperture cards containing Safeguards Information were left unattended and not locked in a security container for approximately 16 hours outside the protected area.

NOTE: The apparent violation discussed in this predecisional enforcement conference is subject to further review and is subject to change prior to any resulting enforcement action.