

**North  
Atlantic**

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The Northeast Utilities System

June 27, 1997

Docket No. 50-44 3  
NYN-97072

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C.

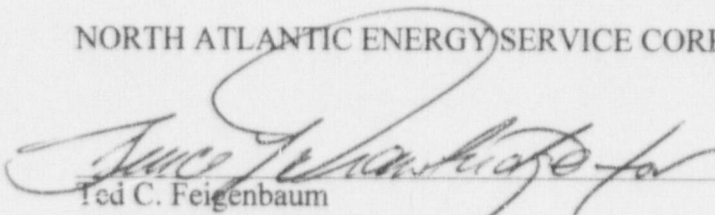
Seabrook Station  
Reply to a Notice of Violation

This letter responds to the Notice of Violation described in Inspection Report 50-443/97-02. The response is provided in the enclosure along with commitments made in response to the violation.

Should you have any questions concerning this response, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 773-7765.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

  
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Ted C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer

cc: H. J. Miller, Region I Administrator  
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ENCLOSURE TO NYN-97072

## REPLY TO A NOTICE OF VIOLATION

NRC Inspection Report 97-02 describes a violation regarding North Atlantic's failure to control licensee designated vehicles in accordance with Security Plan requirements. North Atlantic's response to this violation is provided below.

### I. Violation

During an inspection conducted on March 3-6, 1997, a violation of NRC requirements was identified. The following is a restatement of the violation:

The Seabrook Station Physical Security Plan, Revision 21, dated November 11, 1996, Section 6.7, "Vehicle Access," states, in part, "Licensee designated vehicles...remain in the protected area except for operations, maintenance, repair, security and emergency purposes...After initial entry these vehicles only leave the protected area for the purpose of servicing, repairs, emergencies, moving supplies from the warehouse or other directly related activities."

Contrary to the above, on March 3, 1995, there were 35 Licensee Designated Vehicles in use outside the protected area for purposes other than servicing, repairs, emergencies, moving supplies from the warehouse or other directly related activities.

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

### II. Reason for the Violation

North Atlantic agrees with this violation. The Seabrook Station Physical Security Plan (SSPSP) describes, "licensee designated vehicles" (LDV) as those vehicles that shall be limited in their use to onsite (inside the protected area), and are not required to be escorted by the security organization while inside the protected area. The SSPSP requires that LDVs remain inside the protected area except for servicing, maintenance, repairs and emergency purposes. 10 CFR 73.55(d)(4) states that "the licensee shall exercise positive control over all such designated vehicles to assure that they are used only by authorized persons and for authorized purposes".

Contrary to the above, North Atlantic did not provide sufficient oversight of this programmatic requirement. The SSPSP addressed LDVs, but the LDV requirements were not clearly addressed in the implementing documents. The Seabrook Station Security Manual, (SSSP) does not include requirements to ensure that LDVs only leave the protected area for purposes of servicing, repairs, emergencies, moving supplies from the warehouse or other directly related activities.

The number of LDVs may increase as a result of the seasons and plant conditions (i.e., refueling outage support). During the winter months the number of LDVs increases to support snow removal. The Security Manual did not include an effective monitoring program to track the location of the LDVs.



### III. Corrective Actions

North Atlantic has initiated the following corrective actions:

1. On March 6, 1997, North Atlantic initiated a self assessment of the LDV processes. The list of LDVs was reviewed with the affected department managers and supervisors and those vehicles that no longer required LDV status were removed from the list. The departments managers and supervisors were briefed on the requirements of 10 CFR 73.55(d)(4) and the Seabrook Station Physical Security Plan. In addition, they were informed that if a LDV is out of the protected area for greater than an established time period for an approved activity (i.e., operational needs, maintenance, repair, security or emergency purposes), the vehicle will be removed from the LDV list and the department must re-apply to re-establish the vehicle on the LDV list.
2. Security Department Instruction, SDI0002.00, "Control of Vehicles," was revised to instruct the Vehicle Trap Security Officer to determine the reason for an LDV departing the protected area, such as operational need, maintenance, repairs, security or emergency purposes. If the vehicle is departing for other reasons, or if the vehicle is going to be out of the area for greater than an established period of time, the vehicle will be removed from the LDV list. Reestablishing a vehicle on the LDV list must be approved by Security Department Management.
3. The Seabrook Station Security Manual will be revised to include the requirements for the positive control of LDVs. It is anticipated that this revision will be completed by July 31, 1997.
4. Security Department Instruction SDI0002.00, "Control of Vehicles," will be revised to require a periodic LDV accountability. It is anticipated that this revision will be completed by June 30, 1997

### IV. Date When Full Compliance Will Be Achieved

North Atlantic is currently in compliance with 10 CFR 73.55(d)(4) and the SSPSP.