

# The Light company

Houston Lighting & Power

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

July 2, 1997

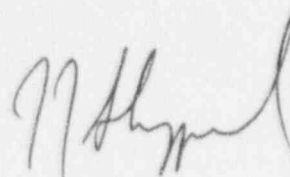
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STI-30326871

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

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 and STN 50-499  
Reply to Notice of Violation 9715-02

South Texas Project has reviewed Notice of Violation 9715-02, dated June 3, 1997, and submits the attached reply. The events described in the Notice of Violation did not have an adverse effect on the health and safety of the public.

If there are any questions regarding these replies, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-8757.



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WEM/wem

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U.S. Nuclear Regulatory Commission  
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I. Statement of Violation:

License Condition 2.F of the South Texas Project Unit 1, Operating License NPF-76 and Unit 2, Operating License NPF-80, dated March 22, 1988, requires that the licensee fully implement and maintain in effect the Commission-approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

South Texas Project Physical Security Plan, Revision 7A, dated January 14, 1997, Chapter 4, paragraph 4.2, states, in part, "If a person is terminated for cause, that individual's access is revoked and his/her assigned badge is deactivated through the security computer system prior to or simultaneously with notification of termination."

South Texas Project Procedure OPGPO9-ZA-0002, "Fitness For Duty Program," Revision 7, dated October 24, 1996, paragraph 6.11, "Confirmed Positive Test Results," states, in part, "A 'Confirmed Positive' notification letter (Form 2) is delivered to the department manager, or designee, notifying them the individual is denied site access. The HL&P employee will be terminated... Notification of the above positive test results shall be made using the guidelines contained in OPGPO3-ZX-0002, Condition Reporting Process."

South Texas Project Procedure OPGPO3-ZX-0002, "Condition Reporting Process," Revision 13, dated September 12, 1996, paragraph 4.1, "Condition Identification," states, in part, "For conditions where security concerns are obvious or perceived, contact Plant Protection immediately and deliver the CR form to Plant Protection, or if database entry was made, promptly inform the Security Force Supervisor of the Condition Report number."

Contrary to the above, on May 7, 1997, the inspector discovered that the licensee had failed to comply with their procedures on February 3, 1997, concerning a positive for-cause fitness-for-duty test. Specifically, the inspector identified that a condition report and Form 2 were not properly initiated on February 3, 1997.

This is a Severity Level IV violation (Supplement III)(50-498;499/9715-02).

ii. South Texas Project Position:

South Texas Project concurs that the violation occurred.

III. Reason for the Violation:

The reason for this violation was a procedure deficiency that did not specify a time requirement to revoke the badge. In addition, the programmatic requirements in effect were not properly integrated.

During the last refueling outage on Unit Two an individual was preparing to get access to the plant for work. The individual had completed the badging process and returned to the Central Processing Facility. A station staff employee noticed the smell of what might be alcohol on the worker's breath. In accordance with the plant Continual Behavioral Observation Program the worker was taken to Fitness For Duty for a "For Cause Test." This test showed an unacceptable level of alcohol present. The worker's Project Manager and Badge Coordinator were notified of the failure. The Badge Coordinator maintained the worker's access badge in her possession and the worker's employment was terminated. Contrary to procedural requirements the worker's manager did not complete the required Badge Transaction Form while processing the worker off site. Approximately 36 hours after the Fitness For Duty failure, a review of the Fitness for Duty records revealed that the involved worker's badge was still in an active status. Security was informed and the badge was revoked.

The Fitness for Duty Procedure required that a Condition Report be written only if the failure was reportable under 10CFR50.26. This event was not reportable under 10CFR50.26. The Condition Reporting Procedure only required Security be notified if a Condition Report described a Security related event. The involved individuals did not recognize this as a Security related event. The existing procedural guidance relied upon the processing of the Badge Transaction Form to result in Security being notified of the Fitness for Duty failure.

#### IV. Corrective Actions:

- Security personnel promptly placed the employee's badge on hold when notified the employee was on the denial list. Security personnel revoked the badge about an hour after it was placed on hold.
- The Fitness For Duty Program procedure was revised to instruct the Industrial Safety & Health Division Manager, or designee, to have an individual's access revoked upon verification the individual has a positive Fitness For Duty test result. This change requires the first individual aware of the failure to notify Security prior to any delays.
- The Fitness for Duty Program procedure was revised to instruct the Industrial Safety & Health Division Manager, or designee, to initiate a Condition Report as a result of a Fitness for Duty failure. The Condition Report would insure that Security reviewed the event to determine if 10CFR50.73 was applicable.
- Fitness For Duty personnel have been trained on the procedure revisions to the Fitness For Duty Program.

#### V. Date of Full Compliance:

The South Texas Project is in full compliance.

VI. Additional Information

Although the employee's badge had been issued, it was never given to the employee. The employee's badge was in custody of the employee's Badge Coordinator from the time it was issued until the employee's access was revoked.