



# PECO NUCLEAR

A UNIT OF PECO ENERGY

Walter G. MacFarland, IV, P.E.  
Vice President  
Limerick Generating Station

PECO Energy Company  
PO Box 2300  
Sanatoga, PA 19464-0920  
610 718 3000  
Fax 610 718 3008  
Pager 1 800 672 2285 #8320

July 15, 1996

Docket Nos. 50-352  
50-353

License Nos. NPF-39  
NPF-35

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

SUBJECT: Limerick Generating Station, Units 1 and 2  
Response to An Apparent Violation  
NRC Inspection Report Nos. 50-352/96-03 and  
50-353/96-03

This letter provides PECO Nuclear's response to an apparent violation for Limerick Generating Station (LGS), Units 1 and 2, that was contained in your letter dated June 13, 1996, which forwarded the subject NRC Inspection Report. The apparent violation concerns improper control of safeguards information in that an electronic copy of the LGS Physical Security Plan was discovered on the PECO Energy Company local area computer network (LAN). The reason for the apparent violation, the immediate corrective steps taken, and the corrective steps taken to avoid future violations were previously described in a Special Report that was submitted to the NRC by letter dated May 13, 1996, pursuant to the requirements of 10CFR73.71(a)(4). Compliance was achieved on April 11, 1996, when the computer file containing the copy of the Physical Security Plan and the associated system recovery backup file were deleted.

Overall, LGS has implemented an effective Security program as evidenced by our positive relationship with the NRC over the past two years. This apparent violation was non-willful in that it was caused by an inadvertent error while typing a proposed revision to the LGS Physical Security Plan.

The apparent violation was identified by a LGS licensed operator, who is authorized to review safeguards information, before the problem resulted in an

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Docket Nos. 50-352 and 50-353  
July 15, 1996  
Page 2

event of any adverse consequence. In addition, prior opportunities to identify the problem were unlikely considering that the name of the file on the LAN did not indicate any relationship to safeguards information, and LAN users typically store information on their own data drives rather than the applications drive where the subject file was located. For these same reasons the probability of individuals purposely accessing the file was extremely low.

The corrective actions in response to the apparent violation were prompt and comprehensive. Upon discovery, immediate actions necessary to restore safety and compliance with NRC requirements were taken. When the licensed operator discovered the file, the LGS Security Section was immediately notified. PECO Energy computer personnel were then contacted. The file was immediately encrypted so the information could not be read, and was subsequently deleted. A comprehensive review was performed and verified that no other safeguards information was stored on the LAN. In addition, precautionary measures involving a heightened state of LGS security were taken. Regarding actions to prevent recurrence, the generation and revision to safeguards information maintained by the LGS Security Section are now performed on a designated stand-alone PC that is controlled by the LGS Security Section. Also, the LGS Security Section secretary was retrained on the requirements and procedures for control of safeguards information prior to being allowed access to any additional safeguards information. With respect to generic implications, this event was reviewed by the Nuclear Security Section at PECO Nuclear Headquarters and the Security Section at Peach Bottom Atomic Power Station for applicability of similar actions.

During preparation of this response to the apparent violation, a separate issue concerning the control of drawings containing safeguards information was identified at an offsite PECO Energy Company location and notification was made to the NRC on July 2, 1996, in accordance with 10CFR73. A followup notification was made to the NRC on July 10, 1996, based on updated information from the ongoing investigation of this other issue.

As a result of these combined issues, the overall control of safeguards information is currently being evaluated. The NRC will be notified of the results of this evaluation in a Special Report that is scheduled to be submitted to the NRC by August 1, 1996.

Docket Nos. 50-352 and 50-353

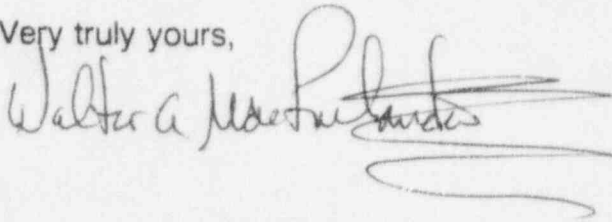
July 15, 1996

Page 3

If you have any questions or require additional information, please contact us.

Very truly yours,

Walter A. MacFarland

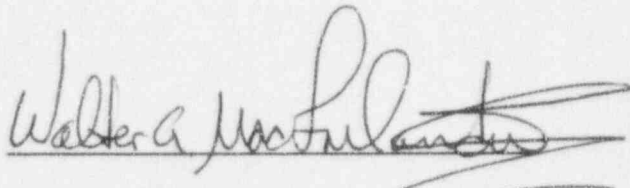
A handwritten signature in cursive script, appearing to read "Walter A. MacFarland". The signature is written in dark ink and includes several horizontal flourishes at the end.

cc: T. T. Martin, Administrator, Region I, USNRC  
N. S. Perry, USNRC Senior Resident Inspector, LGS

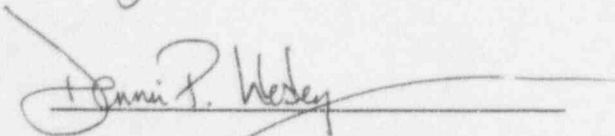
COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF MONTGOMERY :

W. G. MacFarland, being first duly sworn, desposes and says:

That he is Vice President of PECO Energy Company; that he has read the attached response to an Apparent Violation for Limerick Generating Station, Units 1 and 2, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
Vice President

Subscribed and sworn to  
before me this 15<sup>TH</sup> day  
of July 1996.

  
Notary Public

Notarial Seal  
Dennis P. Wesley, Notary Public  
Limerick Twp., Montgomery County  
My Commission Expires April 7, 1997  
Member, Pennsylvania Association of Notaries