

February 29, 2000

Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE SECURITY INSPECTION REPORT 50-373/2000001(DRS);
50-374/2000001(DRS)

Dear Mr. Kingsley:

On February 4, 2000, the NRC completed an inspection at your LaSalle Nuclear Generating Plant. The enclosed report presents the results of that inspection.

Areas examined within your security program are identified in the report. Within those areas, the inspection consisted of a selective examination of procedures and representative records, observation of performance, and interviews with staff. The objective of the inspection effort was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, the NRC has determined that a previously unresolved item involving the failure to adequately implement your Fitness-for-Duty (FFD) program is a Non-Cited Violation for which no response is necessary (Section S8.2). The corrective action you took was adequate to prevent future violations. Consequently, in accordance with Section VII.B.1.a of the NRC enforcement policy, the matter will be dispositioned as a Non-Cited Violation.

If you contest the violation or severity level of the Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Except for the Non-Cited Violation noted above, your physical security program was determined to have met regulatory requirements, with security force performance continuing to be a strength. Maintenance support for protected area perimeter security equipment improved significantly since the previous inspection. Transition to a different security contractor, and implementation of a new plant protection strategy were effective.

O. Kingsley

-2-

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

James R. Creed, Safeguards Program Manager
Division of Reactor Safety

Docket Nos. 50-373; 50-374
License Nos. NPF-11; NPF-18

Enclosure: Inspection Report 50-373/2000001(DRS);
50-374/2000001(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President, Nuclear Operations
H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
J. Benjamin, Site Vice President
J. Meister, Station Manager
F. Spangenberg, Regulatory Assurance Supervisor
M. Aguilar, Assistant Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

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Distribution:

AJM (E-Mail)
WES (E-Mail)
DMS6 (Project Mgr.) (E-Mail)
J. Caldwell, RIII w/encl
B. Clayton, RIII w/encl
SRI LaSalle w/encl
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DATE	02/25/00	02/29/00	02/29/00		

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-373; 50-374
License Nos: NPF-11; NPF-18

Report No: 50-373/2000001(DRS); 50-374/2000001(DRS)

Licensee: Commonwealth Edison Company

Facility: LaSalle Nuclear Generating Plant, Units 1 and 2

Location: 2601 No. 21st Road
Marseilles, IL 61341

Dates: January 24-28, 2000, onsite
February 3-4, 2000 in-office review

Inspector: G. Pirtle, Physical Security Inspector

Approved by: James R. Creed, Safeguards Program Manager
Division of Reactor Safety

EXECUTIVE SUMMARY

LaSalle Nuclear Generation Plant
NRC Inspection Report 50-373/2000001(DRS); 50-374/2000001(DRS)

This inspection included a review of the physical security program. It was an announced inspection conducted by a regional security specialist. Security areas evaluated during this inspection included: security procedures and documentation; staff knowledge and performance; security force training and qualification; quality assurance in security; and alarm stations and communications.

- ! A previous unresolved item involving a failure to adequately implement the Fitness-for-Duty (FFD) program is a Non-Cited Violation for which no response is necessary (Section S8.2).
- ! Security equipment observed during the inspection functioned as designed. Compensatory measures for security lighting and perimeter alarm system have been significantly reduced (Section S.2).
- ! Security procedures reviewed were generally well written. Security events warranting reporting and logging were properly identified and recorded (Section S.3).
- ! The security force performance was considered a strength (Section S.4).

Report Details

IV. Plant Support

S2 Status of Security Facilities and Equipment

a. Inspection Scope (81700)

The inspector reviewed the condition of security equipment and facilities required by the security plan. The equipment observed included, but was not limited to, search equipment, intrusion alarm equipment, alarm assessment equipment, and equipment within the alarm stations and Main Access Facility.

b. Observations and Findings

Search equipment at the MAF and equipment at the alarm stations functioned as designed. The security force members at those locations had the required communication equipment and weapons.

The security staff has recently implemented a new plant protection strategy. The effectiveness of this strategy and its implementation has been evaluated by an outside consultant and the security staff. The strategy appears to have been effectively implemented.

Maintenance support for protected area intrusion detection equipment has significantly improved which has resulted in a significant reduction of compensatory post requirements for the perimeter alarm system. The compensatory measures for the last four months have been less than the compensatory measures required for the single month of August 1999. Only a three work request backlog for security equipment was noted during the inspection. During the previous inspection, it was noted that security lighting was and historically has been the major equipment problem for the security force. Lighting has also improved significantly, but still has required compensatory measures, at times, since the last inspection.

c. Conclusions

Security equipment observed during the inspection functioned as designed. Compensatory measures for security lighting and perimeter alarm system have been significantly reduced.

S3 Security and Safeguards Procedures and Documentation

a. Inspection Scope (81700)

The inspector reviewed selected procedures pertaining to the areas inspected and also reviewed appropriate logs, records, and other documents pertaining to the areas inspected.

b. Observations and Findings

An error was noted during review of the Corporate Nuclear Security Guideline (CNSG No.1) for reporting and logging of security events. The reporting matrix portion of the procedure showed that having the minimum number of armed responders available would be a logged event if the period of unavailability did not exceed two hours and ten minutes. Such events are required to be reported to the NRC within one hour if the period of unavailability exceeds ten minutes. There were no occasions when the minimum number of armed responders were not available so the issue was primarily a procedure adequacy issue. The issue was entered into the licensee's Corrective Action Program (PIF No.L2000-00410).

Events warranting a Security Event Report (SER) were correctly identified and recorded. During review of security incident reports, no incident report issues that should have been recorded as SERs were identified.

c. Conclusions

Security procedures reviewed were generally well written. Security events warranting reporting and logging were properly identified and recorded.

S4 Security and Safeguards Staff Knowledge and Performance

a. Inspection Scope (81700)

The inspector toured various security posts, including the alarm stations and Main Access Facility. The inspector also observed performance of duties to determine if the security officers were knowledgeable of post requirements. Records pertaining to security force performance were also reviewed.

b. Observations and Findings

Security force performance was a strength. No deficiencies were noted during checks of security officers on post. Personnel were familiar with post requirements and security equipment on the posts. Only one security event report was attributed to security force error within the past year.

c. Conclusions

The security force performance was considered a strength and has improved since the previous inspection.

S5 Security and Safeguards Staff Training and Qualification

a. Inspection Scope (81700)

The inspector reviewed 11 randomly selected armed response force personnel training records. The inspector also reviewed the training video and training test given to non-security personnel who complete package search responsibilities.

b. Observations and Findings

Records review showed that the security officers had completed all requirements identified in the security force Training and Qualification Plan. Document review showed that non-security personnel performing package searches within the protected area were currently trained for such functions.

c. Conclusions

Training records reviewed were complete and accurate.

S7 Quality Assurance in Security and Safeguards Activities

a. Inspection Scope (81700)

The inspector reviewed security program audits completed within the past year and other self-assessment efforts used by the security staff to assess performance, identify problems, and correct deficiencies noted.

b. Observations and Findings

The security department has an effective self-assessment program. The nuclear oversight audit of the security program was thorough and well documented. The security department uses the Problem Identification Form (PIF) program as part of the self-assessment effort. Self-identified goals are monitored on a monthly and quarterly basis. The new security contractor is currently identifying goals and objectives for monthly monitoring and trending.

The scope of the audits reviewed was adequate. The security staff reviewed their performance results on a quarterly basis with the Site Vice President, Plant Manager, and Director of Corporate Security.

c. Conclusions

The security self-assessment effort was varied and effective.

S8 Miscellaneous Security and Safeguards Issues

- S8.1 (Closed) Unresolved Item (Report No. 50-373/99010-02; 50-374/99010-02): The bullet resistance of the Heating, Ventilation, and Air Conditioning (HVAC) duct work at a

specific location within the plant was identified as a security issue in the licensee's security Unit 2 Restart Readiness Assessment Report. (The specific location and vulnerability of the duct work is considered safeguards information and exempt from public disclosure.) The corporate security staff is coordinating with NRC Nuclear Reactor Regulation (NRR) staff on the options available to address the issue as a result of the same concern at other licensee plants. This issue is being closed as a site specific issue and will be part of the generic resolution of the concern for all of the affected licensee sites.

S8.2 (Closed) Unresolved Item (50-373/99010-03; 50-374/99010-03): An unresolved item identified during the previous inspection questioned the basis to take administrative action on an individual (placed on the licensee's denied access list on November 9, 1998), prior to the medical review officer (MRO) completing the review required by 10 CFR Part 26. The MRO did not complete the review until November 16, 1998, and confirmed that the Fitness-for-Duty (FFD) test result was positive.

10 CFR 26.20 states in part, "Each licensee subject to this part shall establish and implement written policies and procedures designed to meet the general performance objectives and specific requirements of this part."

Section 2.9(a) of Appendix A to 10 CFR Part 26 states in part, "...An individual with a detailed knowledge of possible alternate medical explanations is essential to the review of (FFD positive test) results. This review shall be performed by the Medical Review Officer prior to the transmission of results to licensee management officials."

Contrary to the above, on November 9, 1998, administrative action in the form of a "temporary hold" was initiated for an individual upon receipt of a positive laboratory test result prior to the Medical Review Officer contacting the individual and confirming the positive laboratory test result. Such actions were not addressed in the licensee's FFD policies or procedures.

The inappropriate temporary hold administrative action included placing the individual on a licensee Personnel Denied Access (PDA) list on November 9, 1998, and entering data into the industry wide Personnel Access Data System.

This issue was entered into the licensee's Corrective Action Program (PIF No. 000-26554). The practice of initiating administrative holds prior to the MRO making a confirmed positive FFD test determination was discontinued. This Severity Level IV violation is being treated as a Non-Cited Violation (NCV), consistent with Section VII.B.1a of the NRC Enforcement Policy (NCV 50-373/20001-01; 50-374/20001-01).

S8.3 Emergent Security Issue: During the onsite inspection, a security officer was reported being inattentive on post. The inspector reviewed the licensee's security staff's actions in reference to the reported incident. An immediate investigation was initiated to address the issue. The scope and depth of the investigation was adequate to obtain all pertinent information and support the security staff's initial determination that the officer may have been or appeared to be inattentive, but the officer was able to respond to and perform his intended functions. The investigation conclusions were pending further

licensee management review at the conclusion of the inspection. The issue was entered into the licensee's Corrective Action Program (PIF No. L2000-00358).

V. Management Meetings

X1 Exit Meeting Summary

The inspector presented the onsite inspection results to members of the licensee management on January 28, 2000. The licensee management representatives acknowledged the findings presented. The inspector asked the licensee if any inspection findings discussed during the exit meeting should be considered as proprietary or safeguards information. No proprietary or safeguards information was identified. On February 22, 2000, the licensee corporate security and licensing staff were advised that the unresolved item pertaining to administrative actions being taken before the Medical Review Officer confirmed a positive Fitness-For-Duty test result was determined to be a non-cited violation of 10 CFR Part 26 (Refer to Section S8.2 for details).

PARTIAL LIST OF PERSONS CONTACTED

Licensee:

J. Meister, Station Manager
J. Barichello, Assistant Station Security Administrator
B. Bartlett, Assistant Station Security Administrator
A. Duncan, Regulatory Assurance
V. Gengler, Station Security Administrator
B. Harvey, Training Instructor, TWC
J. Hughes, Assistant Station Security Administrator
S. Johnson, Nuclear Oversight
R. Kavinsky, Security Operations Coordinator, The Wackenhut Corporation (TWC)
S. Kirven, District Support, TWC
J. Kodrick, Maintenance Department
K. Kuciuba, Support Services Superintendent
R. Lane, Corporate Security Manager
H. Pontious, Regulatory Assurance
P. Quealy, RP Technical Support Superintendent
B. Riffer, Manager, Nuclear Oversight
B. Saunders, Nuclear Generating Group Security
R. Stachniak, Nuclear Oversight
W. Washkowiak, Training Coordinator, TWC
C. Wilson, Security Force Manager, TWC

NRC

P. Krohn, NRC Region III Resident Inspector

INSPECTION PROCEDURES USED

IP 81700: Physical Security Program For Power Reactors
IP 92904: Followup-Plant Support

ITEMS OPENED AND CLOSED

Opened

50-373/2000001-01	NCV	Administrative Actions Taken Before the Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result
50-374/2000001-01	NCV	Administrative Actions Taken Before the Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result

Closed

50-373/99010-03	URI	Administrative Actions Taken Before Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result
50-374/99010-03	URI	Administrative Actions Taken Before Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result
50-373/99010-02	URI	Bullet Resistance of Heating, Ventilation, and Air Conditioning Duct Work
50-374/99010-02	URI	Bullet Resistance of Heating, Ventilation, and Air Conditioning Duct Work
50-373/2000001-01	NCV	Administrative Actions Taken Before the Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result
50-374/2000001-01	NCV	Administrative Actions Taken Before the Medical Review Officer Confirmed a Positive Fitness-For-Duty Test Result

LIST OF ACRONYMS USED

DRS	Division of Reactor Safety
FFD	Fitness-for-Duty
IP	Inspection Procedure
MAF	Main Access Facility
MRO	Medical Review Officer
NCV	Non-Cited Violation
PIF	Problem Identification Form
NRR	Nuclear Reactor Regulation
SER	Security Event Report
URI	Unresolved Item

PARTIAL LISTING OF DOCUMENTS REVIEWED

Security Event Reports for the Period Between July 1 and December 31, 1999
Security Incident Reports for the Period Between July 1 and December 31, 1999
Eleven Randomly Selected Training Records for Armed Response Personnel
Security Department Self Assessments for the Period Between July 1 and December 31, 1999
Problem Identification Form No. L2000-00410, dated January 28, 2000 (Guidance on Reporting Security Incidents)
Problem Identification Form No. L2000-00358, dated January 26, 2000, (Inattentive Security Guard)
Problem Identification Form No. L2000-00345, dated January 25, 2000, (Security Perimeter Performance)
Summary of 24 Hour Loggable/Reportable Events for 1999
NGG Procedure AD-AA-103, "NGG Self-Assessment Procedure," Revision 2e
Listing For Non-Security Cargo Search Trained Station Personnel
The Wackenhut Corporation "Monthly Management Report for the Month of December 1999," dated January 6, 2000
LaSalle County Station Post Order LPO 113, "Security Equipment Testing," Revision 48, approved January 20, 2000
LaSalle County Station Post Order LPI 108, "Search Lane Equipment Testing," Revision 37, approved December 22, 1999
LaSalle County Station Post Instruction LPI 103, "SCC Operator General Duties," Revision 27, approved November 29, 1999
LaSalle County Station Post Order LPO 111, "Vehicle Search Entry/Exit Control," Revision 24, approved August 3, 1999
LaSalle County Station Post Order LPO 112, "Designated Vehicle Control & Lists," Revision 2, approved September 14, 1998
LaSalle County Station Post Instruction LPI 114, "Vehicle Escort," Revision 19, approved June 21, 1999
LaSalle County Station Post Order LPO 125. "Entry Control (Badging)," Revision 62, approved July 21, 1999
Viewed Training Video Used to Train Non-Security Personnel to Conduct Package Searches and Control of Material Until Searched
Nuclear Oversight Assessment Report No. A-01-99-033, "Security/Fitness-For-Duty," dated June 7, 1999