

December 14, 2000

Mr. 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: QUAD CITIES - NRC INSPECTION REPORT 50-254/00-19(DRS);
50-265/00-19(DRS)

Dear Mr. Kingsley:

On November 17, 2000, the NRC completed an inspection at your Quad Cities Units 1 and 2 reactor facilities. The enclosed report documents the inspection findings which were discussed on November 17, 2000, with Mr. Dimmette and other members of your staff.

This inspection examined activities conducted under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commissions' rules and regulations and with the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of the inspection, one issue of very low safety significance (Green) was identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA James L. Belanger Acting for/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

Docket No. 50-254; 50-265
License No. DPR-29, DPR-30

Enclosure: Inspection Report 50-254/00-19(DRS);
50-265/00-19(DRS)

See Attached Distribution

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. Dimmette, Jr., Site Vice President
G. Barnes, Quad Cities Station Manager
C. Peterson, Regulatory Affairs Manager
M. Aguilar, Assistant Attorney General
State Liaison Officer, State of Illinois
State Liaison Officer, State of Iowa
Chairman, Illinois Commerce Commission
W. Leech, Manager of Nuclear
MidAmerican Energy Company

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REGION III

Docket Nos: 50-254, 50-265
License Nos: DPR-29, DPR-30

Report No: 50-254/00-19(DRS); 50-265/00-19(DRS)

Licensee: Commonwealth Edison Company

Facility: Quad Cities Nuclear Generating Plant

Location: 22712 206th Avenue N.
Cordova, IL 61242

Dates: November 13 - 17, 2000

Inspectors: Terry Madeda, Physical Security Inspector
Donald E. Funk, Physical Security Inspector

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

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas) reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety

- Occupational
- Public

Safeguards

- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR05000254/00-19(DRS); IR05000265/00-19(DRS), on 11/13/00-11/17/00, ComEd, Quad Cities Nuclear Generating Plant, Units 1 and 2. Access authorization, access control, performance indicator verification, and security plan changes. This inspection was conducted by two regional security specialists.

The inspection identified one Green finding, which was a Non-Cited Violation. The significance of the finding is indicated by the color (Green, White, Yellow, Red) using IMC 0609 "Significant Determination Process" (SDP).

A. Inspector Identified Findings

Cornerstone: Physical Protection

No findings of significance were identified.

B. Licensee Identified Findings

Green. An unattended security storage container containing Safeguards Information was found unlocked and open for approximately two hours (Section 40A3). The inspector reviewed the risk significance of this finding and determined the risk to be very low since no Safeguards Information was compromised and there have not been greater than two similar findings in four quarters.

Report Details

3. SAFEGUARDS

Cornerstones: Physical Protection

3PP1 Access Authorization (AA) Program (Behavior Observation Only) (71130.01)

a. Inspection Scope

The inspectors interviewed five supervisors and five non-supervisors (both licensee and contractor employees) to determine their knowledge level and practice of implementing the licensee's behavior observation program responsibilities. Selected procedures pertaining to the Behavior Observation Program and associated training activities were also reviewed. Also licensee fitness-for-duty semi-annual test results were reviewed. In addition, the inspectors reviewed a sample of licensee self-assessments, audits, and security logged events. The inspectors also interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

No findings of significance were identified.

3PP2 Access Control (Identification, Authorization and Search of Personnel, Packages, and Vehicles) (71130.02)

a. Inspection Scope

The inspectors reviewed the licensee's protected area access control testing and maintenance programs. The inspectors observed licensee testing of all protected area access control equipment to determine if testing and maintenance practices were performance based. On at least three occasions, during peak and routine ingress periods, the inspectors observed the in-process search of personnel, packages, and vehicles to determine if search activities were conducted in accordance with regulatory requirements. Interviews were conducted and records were reviewed to verify that security staffing levels at protected area entry points were consistently and appropriately implemented. Also, the inspectors reviewed the licensee's process for limiting access to only authorized personnel to the protected area and vital equipment by a review of personnel access lists and interviews with cognizant security management personnel. The inspectors reviewed the licensee's program to control hard-keys and computer input of security related personnel data.

The inspectors reviewed a sample of licensee self-assessments, audits, maintenance request records, and security logged events for identification and resolution of problems. In addition, the inspectors interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

Section 7.3.3 of the Quad Cities Security Plan requires that all points of personnel access to vital areas are controlled and that access to those areas is restricted to authorized personnel who require such access in the performance of their duties.

The inspectors identified through review of licensee records and interviews of licensee security management personnel that three contractor personnel were authorized unescorted access to a specific vital area even though their duties (work-related need) did not require them to access that area. The licensee's security manager agreed that none of the three individuals had a work-related need to access the identified vital area.

In about May 2000, the licensee reconfigured their vital area status definition allowing personnel granted work related access into one vital area, unescorted access to most or all other vital areas. This determination that a person granted access to one vital area could be granted access to all vital areas, was made based on the licensee's interpretation, of an NRC rule change. The licensee's decision was based on the statement of consideration contained in the Federal Register Volume 62, No. 231 dated December 2, 1997. The statement of consideration stated:

“Maintenance of Access Lists for each Vital Area 73.55(d)(7)(I)(A).

Maintaining separate access lists for each vital area and reapproval of these lists on a monthly basis is of marginal value. At many sites, persons granted access to one vital area also have access to most or all vital areas. Licensees presently derive little additional benefit from maintaining discrete lists of individuals allowed access to each separate vital area in the facility. Also, licensee managers or supervisors are required to update the access lists at least once every 31 days to add or delete individuals from these lists as appropriate. There is also a requirement to reapprove the list every 31 days. However, reapproval of all individuals on the list at least every 31 days, to validate that the lists have been maintained accurately is unnecessarily burdensome.

This rulemaking replaces separate access authorization lists for each vital area of the facility with a single list of all persons who have access to any vital area. It also changes the requirement to reapprove the list at least every 31 days to quarterly. Reapproval consists of a review to ensure that the list is current and that only those individuals requiring routine access to a vital area are included. Because a manager or supervisor must update the list, conducting this comprehensive reapproval every 31 days is of marginal value.”

The licensee further indicated that at Quad Cities personnel granted access to one vital area also have access to most or all other vital areas. The licensee believed that they were in compliance with Section 7.3.3 of the Security Plan regarding granting access to the vital areas based on an individual's work-related need for the performance of their duties.

The inspectors agreed that the licensee's action of **maintaining one access list** for all individuals granted authorized access for each vital area was acceptable. However, the licensee's practice of granting access to areas in which individuals had no need to

perform duties raised a potential problem and identified a potential misinterpretation of the rule change. In fact, three personnel were authorized unescorted access to vital area even though their duties did not require them to access that area.

The access control issue was discussed with NRR security staff personnel during the inspection period. It was determined that the vital area personnel access control issue would be referred to NRC Headquarters to evaluate the licensee's interpretation and further evaluation for potential generic implications. Therefore, resolution of this issue is considered an unresolved item (URI) pending further NRC review (URI 50-254; 50-265/00-19-01(DRS)). No licensee action is required at this time.

3PP4 Security Plan Changes (71130.04)

a. Inspection Scope

The inspectors reviewed Revision 49 of the Quad Cities Security Plan which was submitted by licensee letter dated October 19, 2000, to verify that the change did not decrease the effectiveness of the security plan. The security plan revision was submitted in accordance with 10 CFR 50.54(p).

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors selectively verified for accuracy and completeness the data for the Physical Protection Indicators (PI) pertaining to Fitness-For-Duty Personnel Reliability, Personnel Screening Program, and Protected Area Security Equipment. Specifically, a sample of plant reports related to security events, fitness-for-duty reports, and other applicable security records were reviewed for the period between October 1999 and October 2000.

b. Findings

No findings of significance were identified.

4OA3 Event Follow-up (71153)

Licensee Event Reports

(Closed) Security Event Report (SER) 99-S01, dated November 3, 1999. The SER pertained to a licensee identified failure to protect safeguards information not considered to be significant while the information was located outside the protected area. An unattended security storage container was found unlocked and open for a

period of approximately two hours. The risk significance of this issue was determined to be very low since no security information was compromised, the information was not considered to be significant, and there have not been greater than two similar findings in four quarters. The finding was entered into the licensee's corrective action program (Action Request (AR) No. 17234-03). The significance of the issue is indicated by its color (green) and was determined by the Significance Determination Process.

The finding is also a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as Non-Cited Violations (NCV). 10 CFR 73.21(d)(2) requires that, while unattended, Safeguards Information shall be stored in a locked security storage container (NCV 50-254; 265/00-19-02).

Unresolved Items

(Closed) Unresolved Item (50-254; 265/00-11-03). The unresolved item involved the language of a security plan change (Revision 46) that did not adequately describe the protective measures related to the transportation of secured materials being transported from a licensee site to another licensee site. This item was closed based on our review of Revision 49 of the licensee's security plan (refer to section 3PP4a).

40A6 Management Meeting

Exit Meeting Summary

The inspectors presented the inspection results to Mr. J. Dimmette, Site Vice President, and other members of licensee management at the conclusion of the onsite inspection on November 17, 2000. The licensee representatives acknowledged the inspector's remarks. No proprietary information was discussed.

Supplemental Phone Call

On December 12, 2000, a follow up call was made to the station security manager. He was informed that a Green finding had been associated with a licensee identified finding that involved a failure to adequately protect Safeguards Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

G. Barnes, Plant Manager
K. Bethard, NRC Coordinator
J. Dimmette, Site Vice President
M. Karney, Corporate Security Manager
J. Kudalis, Business Operations Manager
K. Leech, Site Security Manager
J. Otten, Exelon Security
C. Peterson, Regulatory Assurance Manager
B. Rittmer, Exelon Security
J. Siroji, Nuclear Oversight

IDNS

R. Ganser, Resident Inspector

NRC

C. Miller, Senior Resident Inspector
J. Adams, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Open

50-254; 265/00-19-01(DRS)	URI	Personnel Authorization to Vital Areas
50-254; 265/00-19-02(DRS)	NCV	Inadequate Control of Safeguards Information

Closed

99-S01	LER	Inadequate Control of Safeguards Information
50-254; 265/00-19-02	NCV	Inadequate Control of Safeguards Information
50-254;0265/00-11-03	URI	Security Plan Change

Discussed

None

LIST OF DOCUMENTS REVIEWED

Quad Cities Assessment Report, Nuclear Oversight Assessment NOA-04-00-PS05 Security Fitness-For-Duty, dated April 28, 2000
Training Administration System - Fitness-For-Duty, dated November 14, 2000
Security Event Reports, July 1999 - October 2000
Condition Reports, January - November 2000 (Security Related)
Nuclear - General Employee Training - Fitness-For-Duty, dated August 7, 2000
Nuclear - General Employee Training - Study Guide, dated June 2000
ComEd's Nuclear Fitness-For-Duty Program, SY-AA-102, Revision 3
Security Focus Area Self-Assessment Report, August 29 - October 23, 2000
Focus Area Self-Assessment, Safeguards Control, January - February 2000
Focus Area Self-Assessment, Search of Personnel, Packages, and Vehicle, September 20-30, 2000
Security Incident Reports, January - October 2000
Security Operations Log, October 1999 - October 2000
Weekly Access Control Equipment Log, July 1999 - October 2000
Security Work Requests, July 1999 - October 2000
S.29 Performance Indicator Information, January - October 2000