

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

September 30, 1985

IE INFORMATION NOTICE NO. 85-79: INADEQUATE COMMUNICATIONS BETWEEN MAINTENANCE,
OPERATIONS, AND SECURITY PERSONNEL

Addressees:

All nuclear power reactor facilities holding an operating license (OL) or construction permit (CP), research and nonpower reactor facilities, and fuel fabrication and processing facilities using or processing formula quantities of special nuclear material.

Purpose:

This information notice is provided to alert addressees of the need to ensure that actions of a temporary or permanent nature taken by operations, maintenance, or other personnel that may affect the integrity of the physical barriers used to control access to protected, material access, and vital areas, or other portions of the overall security program, are coordinated with the organization directly responsible for security before being implemented. It is expected that the recipients will review the information for applicability to their facilities and consider actions, if necessary, to preclude a similar problem occurring at their facilities. Suggestions contained in this information notice do not constitute NRC requirements; therefore, no specific action or written response is required.

Description of Circumstances:

During plant walkdowns and/or inspections, NRC and licensee personnel have identified instances where actions by plant organizational elements other than security have resulted in the degradation of protected and vital area barriers and other security/safeguards measures without proper compensation. Some examples are:

- o removal of portions of protected and vital area barriers, including fences, hatches, or other portals that allow unauthorized access to the protected area or vital areas
- o removal of equipment that had formed part of the barrier, such as piping or valves that would allow passage of small objects into or out of a material access area or vital area
- o creation of holes in protected and vital area barriers to facilitate construction

- o leaving vital area door alarms in access mode after work is completed
- o removal of essential telephone lines from an independent power source
- o building or placing equipment, structures, or vehicles within the isolation zone of the protected area or within exterior "clear" zones of sensitive facilities, such as storage vaults

The incidents that lead to the issuance of this information notice have resulted in the degradation of protected and vital area barriers and access controls necessary for protection of vital equipment and, in one case, the loss of the means to communicate with local law enforcement officials or emergency response personnel. In many cases, the loss of this protection has been accompanied by the failure of the licensee to notify the NRC in accordance with the applicable provisions of 10 CFR 73.71, depending on the degree to which the security system has been degraded.


Discussion:

A review of each incident has indicated that the modification or repairs that degraded the protected and vital area barriers and communications systems were made without an adequate, or in some cases any, notification of the facility's security organization by the organization planning or performing the modifications or repairs.

The likelihood of degradation may be substantially lessened at sites where the organization responsible for security is part of the planning or scheduling phase of any facility modifications or repairs. In such facilities, the barriers and equipment necessary to provide security to the facility are identified and the proper compensatory measures planned and scheduled to allow for the efficient implementation of the planned modifications or repairs. An integrated planning system allows for all facility organizations to have input to the planning and scheduling phase of maintenance and facility modifications, especially when the actions taken can negatively impact on the effectiveness of other essential programs.

The reporting requirements of 10 CFR 73.71 may apply to security incidents of the type described above, depending on the degree to which the security system has been degraded.

No specific action or written response is required by this information notice. If you have any questions about this matter, please contact the Regional Administrator of the appropriate NRC regional office or this office.


Edward V. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

Technical Contact: R. Rosano, IE
(301) 492-4006

Attachment: List of Recently Issued IE Information Notices

LIST OF RECENTLY ISSUED
IE INFORMATION NOTICES

Information Notice No.	Subject	Date of Issue	Issued to
85-78	Event Notification	9/23/85	All power reactor facilities holding an OL or CP
85-77	Possible Loss Of Emergency Notification System Due To Loss Of AC Power	9/20/85	All power reactor facilities holding an OL or CP
85-76	Recent Water Hammer Events	9/19/85	All power reactor facilities holding an OL or CP
85-75	Improperly Installed Instrumentation, Inadequate Quality Control And Inadequate Post-modification Testing	8/30/85	All power reactor facilities holding an OL or CP
85-74	Station Battery Problems	8/29/85	All power reactor facilities holding an OL or CP
84-70 Sup. 1	Reliance On Water Level Instrumentation With A Common Reference Leg	8/26/85	All power reactor facilities holding an OL or CP
85-73	Emergency Diesel Generator Control Circuit Logic Design Error	8/23/85	All power reactor facilities holding an OL or CP
85-72	Uncontrolled Leakage Of Reactor Coolant Outside Containment	8/22/85	All power reactor facilities holding an OL or CP
85-71	Containment Integrated Leak Rate Tests	8/22/85	All power reactor facilities holding an OL or CP
85-70	Teletherapy Unit Full Calibration And Qualified Expert Requirements (10 CFR 35.23 And 10 CFR 35.24)	8/15/85	All material licensees

OL = Operating License
CP = Construction Permit