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P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

MPC&D 07-020

February 27, 2007

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

Docket No. 72-11

Rancho Seco Independent Spent Fuel Storage Installation
License No. SNM-2510

**SPECIAL REPORT REGARDING UNAUTHORIZED UNESCORTED ACCESS
INTO THE ISFSI PROTECTED AREA**

Attention: Randy Hall

On January 10, 2007, SMUD security officers allowed an unauthorized SMUD engineer unescorted access into the Rancho Seco Independent Spent Fuel Storage Installation (ISFSI) Protected Area. Security also allowed the engineer to act as an escort for a visitor who gained access to the ISFSI Protected Area. This incident is a violation of the Rancho Seco ISFSI security plan and ISFSI access control implementation procedures.

Appendix G to 10 CFR Part 73 provides the requirements for reporting safeguards events. Appendix G, Paragraph I(b) states that an actual entry of an unauthorized person into a protected area is required to be reported within one hour of discovery followed by a written report within 60 days. Accordingly, we notified the NRC Operations Center and are submitting the attached special report.

If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

E. J. Redeker for Steve Redeker

Steve Redeker
Manager, Plant Closure & Decommissioning

Cc: NRC, Region IV

Attachment

IE72

SPECIAL REPORT REGARDING UNAUTHORIZED UNESCORTED ACCESS TO THE ISFSI PROTECTED AREA

Description of the Incident

Rancho Seco security maintains an access authorization list, which lists the individuals who are allowed unescorted access into the Independent Spent Fuel Storage Installation (ISFSI) Protected Area. Security also maintains a list of individuals who are authorized to clear visitors into the Rancho Seco Industrial Area and into the ISFSI Protected Area. Security Plan Implementing Procedures (SPIPs)¹ require that security officers check these lists prior to authorizing unescorted access into the ISFSI Protected Area and when granting visitors escorted status within the Industrial Area or ISFSI.

On January 10, 2007, a SMUD security officer at the site Industrial Area visitor's entrance allowed a SMUD engineer to clear a contractor into the ISFSI Protected Area as an escorted visitor. In accordance with the access control procedure, security issued the contractor a red "Escort Required" badge with the engineer to act as his escort. However, the engineer was not authorized to clear visitors for access into the ISFSI Protected Area or to escort visitors into the ISFSI.

Subsequently, a second SMUD security officer at the ISFSI entrance allowed the engineer unescorted access into the ISFSI Protected Area even though the engineer was not authorized for unescorted access. Security also granted ISFSI access to the contractor who was escorted by the engineer. As stated above, the contractor had the proper Escort Required badge; however, he had been cleared as a visitor by the engineer who was not authorized to clear individuals into the ISFSI.

The ISFSI access control procedure requires that security verify that an authorized SMUD employee has authorized the visitor's access into the Protected Area. The procedure also requires that security check the access authorization list to verify that an individual is authorized for unescorted access into the ISFSI. Allowing unauthorized individuals unescorted access into the ISFSI Protected Area is a violation of the Rancho Seco ISFSI security plan and ISFSI access control procedures.

After being in the Protected Area for approximately an hour, the two individuals left the ISFSI and returned approximately ½-hour later to resume their work². When they attempted to regain entry into the Protected Area, the security officer informed the engineer that he was not on the access list and that he was not allowed unescorted access into the ISFSI. The two individuals were denied unescorted access into the ISFSI.

Appendix G to 10 CFR Part 73 provides the requirements for reporting safeguards events. Appendix G, Paragraph I(b) states that an actual entry of an unauthorized person into a

¹ In this case, SPIP-003 "Access Control Procedure – Protected Area," Revision 1.

² The contractor was a locksmith who was on site to repair the lock on the door to the ISFSI electrical building.

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protected area is required to be reported within one hour of discovery followed by a written report within 60 days. Accordingly, SMUD notified the NRC Operations Center and is submitting this special report.

Cause of the Incident

The cause of the incident was personnel error. The security officer at the Industrial Area visitor's entrance allowed the engineer to clear the contractor into the ISFSI as a visitor and erroneously issued the contractor a red Escort Required badge.

The engineer was authorized to clear visitors onto the Rancho Seco Industrial Area; however, he was *not* authorized to clear visitors into the ISFSI Protected Area. Had the security officer at the site visitor's desk reviewed the list of individuals authorized to clear visitors onsite, as required by procedure, he would have determined that the engineer was not authorized to clear visitors into the ISFSI Protected Area.

In addition, the officer at the entrance to the ISFSI, in violation of procedure, allowed the engineer unescorted access into the ISFSI Protected Area without verifying whether the engineer was on the Protected Area unescorted access list. The officer also allowed the contractor (wearing the red Escort Required badge that had been issued in error) access to the ISFSI under escort by the engineer. Had the security officer reviewed the access authorization list, he would have determined that the engineer was not authorized for unescorted access, nor was he authorized to escort visitors.

The incident investigation revealed that the security officers on both occasions (see "Extent" below) understood the Protected Area access requirements and procedures. Training did not appear to be a factor in the procedure violation. It appears that, based on the familiarity of the long-time engineer to the security officers and his frequent authorized escorting of visitors in the Industrial Area, they assumed that engineer was also authorized for unescorted access to the ISFSI Protected Area.

The engineer was not aware of his security access status and incorrectly assumed that he was authorized for unescorted access into the ISFSI Protected Area. He did not advise or query the ISFSI officer regarding his access status.

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Extent

Based on a review of entries into the ISFSI Protected Area for 2005 and 2006, there was one other unauthorized entry into the ISFSI Protected Area. On December 13, 2006, the same SMUD engineer was allowed unescorted access into the ISFSI. The engineer was accompanied by the ISFSI Supervisor, who is cleared for unescorted access into the ISFSI. The engineer should have been badged as a visitor with the ISFSI Supervisor designated as his escorted.

Significance of the Event

Although the security officers, on all occasions, were not in compliance with security procedures regarding access control into the ISFSI, there are mitigating factors that may be taken into consideration regarding the severity of the non-compliance:

1. The SMUD engineer is a long-time SMUD employee at Rancho Seco and is in full compliance with background investigation requirements for unescorted access into the ISFSI. It was an administrative oversight that he was not placed on the unescorted access list. On January 11, 2007, he was placed on the list and is now granted unescorted access into the ISFSI Protected Area.
2. Both the engineer and the visitor were under line-of-sight observation by the ISFSI security officer while in the Protected Area, except for brief periods when the two individuals were obscured while working on the lock on the electrical building door.
3. The SAS would have received an alarm if security system components were tampered with. No such alarm was received. Following the discovery of the unauthorized entry, Security conducted a physical inspection of the electrical building. They identified no visible evidence of tampering.
4. Both the SMUD engineer and the visitor were physically searched prior to entry into the Protected Area in accordance with procedure. No unauthorized material or items were allowed inside the Protected Area; hence, the probability for sabotage or damage to the facility was not significant.

Actions Taken to Restore Compliance

1. On January 10, 2007, when the two individuals attempted to regain entry into the Protected Area, the security officer informed the engineer that he was not on the access list and the two individuals were denied unescorted access into the ISFSI.
2. Upon determining that unauthorized individuals were allowed unescorted access into the ISFSI, security officers conducted a physical search of the ISFSI pad, including the electrical building, to verify that there was no visible evidence of

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tampering within the ISFSI electrical building. They identified no visible evidence of tampering.

Actions Taken to Prevent Recurrence

1. Security officers that have responsibilities at the Rancho Seco ISFSI have been retrained on access control requirements. Training was completed on January 24, 2007.
2. The access control procedure (SPIP-003) was revised to add a second verification prior to allowing access into the ISFSI. In addition to the security officer at the entrance to the ISFSI Protected Area, the security officer in the Secondary Alarm Station (SAS) now independently verifies that an individual requesting unescorted access is on the access authorization list. In the interim, this practice was implemented based on written instructions. The procedure revision was completed on February 27, 2007.
3. On January 11, 2007, the engineer was placed on the authorized access list and is now granted unescorted access into the ISFSI Protected Area.
4. All site personnel were issued a one-time reminder (See memo MPC&D 07-018, dated February 15, 2007) of which individuals are authorized for unescorted access into the ISFSI Protected Area and which individuals are allowed to clear visitors into the Industrial Area and ISFSI Protected Area.
5. Appropriate disciplinary action was taken for the security officers involved.