



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

September 6, 2006

MEMORANDUM TO: Harry Freeman, Senior Allegations Coordinator  
THRU: Michael P. Shannon, Chief, Plant Support Branch (PSB)  
FROM: David Holman, Senior Physical Security Inspector, PSB  
SUBJECT: CLOSURE OF ALLEGATION 2005-A-0061, CONCERNS EIGHT AND TEN

Concern 8

There are inconsistencies, from shift to shift, on how compensatory measures for multiple failed zones are implemented. Sometimes the shift's only use one person to compensate in situations that management has stated requires two people. This compensatory expectation was communicated by management in a letter.

Evaluation

The inspector accompanied an OI investigator to Columbia Generating Station the week of February 13, 2006. During this time, interviews of security officers, security sergeants and lieutenants, and the security operations captain were conducted. The inspector was not able to obtain a copy of the referenced management letter from any source. However, during the interviews, no officers could remember multiple failed zones not being compensated for with two people if required. Supervisors clarified that multiple zones are sometimes properly compensated for by one officer, if he can be positioned where he can see both at the same time.

Recommendation

PSB determined that this concern was not substantiated and recommends that it be closed with no further action.

Concern 10

Sometimes, when work is being done in manholes or other similar locations inside the PA, the workers secure the area themselves when done. In the past a security inspection of the work area was always done to insure nothing questionable was left behind.

C/8

Evaluation

The inspector was unable to locate a requirement to conduct these work area inspections in the licensee's procedures, and the inspections are not otherwise a regulatory requirement.

Recommendation

PSB determined this concern was not substantiated, and recommends closure with no further action.



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August 11, 2006

MEMORANDUM TO: Harry Freeman, Senior Allegations Coordinator  
THRU: Michael P. Shannon, Chief, Plant Support Branch (PSB)  
FROM: David Holman, Senior Physical Security Inspector, PSB  
SUBJECT: CLOSURE OF ALLEGATION 2005-A-0061, CONCERNS ONE THROUGH SIX

Due to the extended period of time that this allegation was open, ACES has requested an overall synopsis of all six of the concerns involved.

Concern 1

Officers are inconsistent in conducting the testing of the intrusion detection system. That is, the steps in the testing procedure are not always followed the same from test to test.

Evaluation

The inspector accompanied an OI investigator to Columbia Generating Station the week of February 13, 2006. During this time, interviews of security officers, security sergeants and lieutenants, and the security operations captain were conducted. These interviews revealed that for a long period of time between October 27, 2004 to approximately December 5, 2005, officers were inconsistent when conducting testing of the Intelli-Field portion of the intrusion detection system.

Recommendation

PSB determined that this concern was substantiated based upon on-site inspection conducted February 13-17, 2006, and April 17-21, 2006, and it will be closed out with a proposed NOV in IR 05000397/2006006.

Concern 2

Officers will either snap the wires or make contact with the wires using the test platter to get an alarm, so no compensatory measures are needed. Supervisors have been known to say things like, "do whatever is needed to get an alarm."

Evaluation

The inspector accompanied an OI investigator to Columbia Generating Station the week of February 13, 2006. During this time, interviews of security officers, security sergeants and lieutenants, and the security operations captain were conducted. These interviews revealed that for a long period of time between October 27, 2004 to approximately December 5, 2005, officers did intentionally touch sensor wires, and sometimes they were told it was an acceptable practice by security supervisors.

#### Recommendation

This concern was linked to RIV-2004-A-0149, Concern #1, and it was substantiated by the RIV Office of Investigations, as recorded in OI report, Case No.: 4-2005-021, Dated March 29, 2006, and it will be closed out with a proposed NOV in IR 05000397/2006006.

#### Concern 3

Sometimes, when walking up to the Intelli-Field for testing, testing officers are told by CAS that a good alarm was received, resulting in no further testing. The officer is sent to the next zone without completing the steps in the procedure.

Evaluation The Intelli-Field IDS is an electric field sensor which is designed to alarm when approached. The fact that the alleged was confused by this can be attributed to the lack of proper initial training on the system, as discussed in Concern 1 above.

#### Recommendation

PSB determined that this concern was not an allegation and recommends closure of this concern.

#### Concern 4

There have been instances when IDS testing procedures were revised without distributing the new version to all needed locations. This has resulted in some instances when officers were using outdated testing procedures.

#### Evaluation

The inspector determined that the IDS operability testing procedure, SPIP-SEC-09, was revised five times between October 27, 2004 and December 5, 2005. SPIP-SEC-09 was never designated as a continuous use procedure that was required to be on location during operability testing. Although editorial inaccuracies were not uncommon from revision to revision, there were no indications that the new revisions were not made available for use if a particular officer or supervisor needed it.

#### Recommendation

PSB determined that this concern was not substantiated based upon on-site inspection conducted February 13-17, 2006, and April 17-21, 2006, and recommends closure of this concern.

Concern 5

By procedure, testing of the IDS installed on the roof of the primary access point (PAP) building requires the use of a safety harness (fall protection). However, management has not provided an anchor point to hook the harness to even though officers are actively doing this testing. This issue has been brought to management's attention without results.

Evaluation

At the direction of the ARB, this issue was turned over to the Regional State Liaison Officer for coordination with the Office of Safety and Health Administration. Furthermore, the inspector personally used the safety harness attached to an appropriate anchor during the week of April 17, 2006.

Recommendation

PSB determined this allegation was turned over to OSHA for consideration and recommends closure of this concern.

Concern 6

If an adversary were to gain access, through the small pedestrian gate located to the right of the PAAP building, he might be able to gain undetected access into the protected area through the vehicle access point.

Evaluation

The inspector determined there was no vulnerability posed by the alleged's scenario, and there were no regulatory requirements violated.

Recommendation

PSB determined this is not an allegation and recommends closure of this concern.

Concern 7

The licensee permits the use of cameras and officers in bullet resistant enclosures (BRE) to monitor workers instead of having an officer present at the work area. This has happened both in the OCA and the PA. Next, the inspector verified via a phone call with the alleged that there were no specific examples of un-badged workers being allowed unescorted access to the PA.

Evaluation

There are no regulatory requirements to preclude observing escorted visitors via closed circuit cameras or officers posted in elevated positions within view of the location.

Recommendation

PSB determined this is not an allegation and recommends closure of this concern.



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March 6, 2006

MEMORANDUM TO: Harry Freeman, Senior Allegations Coordinator  
THRU: Michael P. Shannon, Chief, Plant Support Branch (PSB)  
FROM: David Holman, Senior Physical Security Inspector, PSB  
SUBJECT: CLOSURE OF ALLEGATION 2005-A-0061, CONCERN 9

In response to the ARB requirement that a PSB inspector accompany an Office of Investigation investigator to Columbia Generating Station to inspect allegation 2005-A-0061, concern #9.

Concern 9

There is a requirement for a specific number of armed responders to be in a specified staging room for immediate response. Sometimes these armed responders are used for other duties, such as escorting, and are not in the staging room.

Evaluation

The inspector determined through interviews, and review of the Physical Security Plan, that there are two specified lunch break rooms that officers being relieved use. There are three groups of officers that may be in these rooms.

The first group is called "TRs" (tower relief), there is a TR1 and a TR2 specified on the duty roster. The TRs go to the elevated bullet resistant enclosures (BREs) and provide meal or latrine breaks for the officers posted in the BREs. When the person in the BRE is relieved, he/she then becomes the TR and goes to one of the rooms for a break. Any security officer with a TR call sign is not a required responder. Therefore, if this person were given an occasional (they said it happens rarely) escort, it would not be a regulatory issue.

The second group is called "Escorts" or Echo shift. These officers are designated on the duty roster specifically to provide escort functions throughout the day shift. They do in fact leave these rooms to do escorts, but they are not required responders and this is not a regulatory issue.

The third group is made up of personnel from the vehicle search area who don't happen to have any vehicles to search at the moment. They are not generally used as escorts, but if they were, it would not be a regulatory issue.

Recommendation

PSB determined that this concern was unsubstantiated based upon on-site inspection conducted February 13-17, 2006, and recommends closure of this concern.