



UNITED STATES
ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

A. RO Inspection Report No. 050-331/73-10

Transmittal Date : August 31, 1973

Distribution:
RO Chief, FS&EB, w/encl
RO:HQ (5)
DR Central Files, w/encl
Regulatory Standards (3)
Licensing (13)
RO Files, w/encl

Distribution:
RO Chief, FS&EB
RO:HQ (4)
L:D/D for Fuel & Materials
DR Central Files
RO Files

B. RO Inquiry Report No. _____

Transmittal Date : _____

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RO Chief, FS&EB
RO:HQ (5)
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Regulatory Standards (3)
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RO:HQ
DR Central Files
RO Files

C. Incident Notification From: _____
(Licensee & Docket No. (or License No.))

Transmittal Date : _____

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Licensing (4)
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UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

August 31, 1973

Iowa Electric Light and Power Company
ATTN: Mr. Charles W. Sanford
Vice President, Engineering
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Docket No. 50-331

Gentlemen:

This refers to the inspection conducted by Mr. James F. Donahue of this office on August 7-8, 1973, of activities at the Duane Arnold site, authorized by AEC Construction Permit No. CPPR-70 and to the discussion of our findings held by the inspector with Messrs. Barnum, Root, Wallace, Hunt and Hammond of your staff at the conclusion of the inspection on August 9, 1973.

Areas examined during this inspection included review of the Industrial Security Plan and implementing procedures, progress made on the procurement and installation of security devices, (fencing, lighting, intrusion alarms, key controls), as well as discussion of plans for obtaining plant protection personnel, instituting the identification badge system, providing redundant means of communication, assuring alternate means of power for lighting, alarms and communications devices, conducting periodic tests of these devices and maintaining test records. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with plant personnel, and observations by the inspector.

No items of noncompliance with AEC requirements were identified within the scope of this inspection.

Based on the discussion with corporate office personnel and site representatives, it is our understanding that the Duane Arnold Industrial Security Plan and implementing procedures will be fully in effect prior to authorization for core loading. The attachment to this letter identifies the items which we understand are to be completed. We will examine your action on these matters during a subsequent inspection.

Iowa Electric Light and
Power Company

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August 31, 1973

The areas examined during this inspection concern a subject matter which is exempt from disclosure according to 10 CFR Part 2.790(d). Consequently, the attachment to this letter and our report of this inspection will not be placed in the Public Document Room.

We request that you advise us when the items identified in the attachment have been completed so that the final preoperational inspection of your plant protection measures can be conducted. Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Boyce H. Grier
Regional Director

Attachment:

List of items to be implemented
(Exempt from Disclosure)

bcc: RO Chief, FS&EB, w/encl
RO:HQ (4)
Licensing (4)
DR Central Files, w/encl
RO Files, w/encl
PDR
Local PDR
NSIC
DTIE
OGC, Beth, P-506A

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Iowa Electric Light and Power Company
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To assure the physical protection of the Duane Arnold Energy Center, we understand the following items and procedures will be completed and/or implemented as noted:

1. Erection of the security fence surrounding the protected area will be completed and will conform to the standard as defined in 10 CFR 73.3(f)(1). The base of the fence line will be backfilled and graded to offset effects of erosion. The fence line will be posted at intervals with "No Trespassing" signs.
2. The Security Control Point will be completed and equipped with communications capabilities and an intrusion alarm annunciator panel.
3. Key control procedures will be formalized and access lists containing the names of individuals authorized key access in connection with their specific duties and responsibilities will be established. Presently used key cores for portals of vital areas will be changed. Exterior doors and doors of vital areas, whose hinges are accessible from the outside, will have the hinge pins tack welded or pinned to preclude removal.
4. A photo identification badge system for employees and badge issuance procedures for non-site employees and visitors will be placed in effect.
5. A plant protection force will be hired, equipped and trained. Written instructions covering duties and responsibilities will be prepared and plant protection personnel familiarized with them. The qualifications, character and stability of such personnel will be certified to by the guard contractor prior to assignment to the site.
6. An intrusion alarm system will be installed which will meet the level of performance and reliability indicated by GSA Interim Federal Specification W-A-0045DA (GSA-FSS). Annunciator panels will be installed in the Control Room and Security Control Point. Alarms will protect doors or portals of vital buildings or areas within the protected area. Procedures for responding to activated alarms will be established.
7. Redundant communications capabilities between the Control Room and Security Control Point as well as to off-site assistance groups will be established.
8. A protective lighting system will be installed to provide adequate lighting of the perimeters of protected areas as specified in the Industrial Security Plan.

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9. Emergency or alternate power sources will be provided for all security systems (alarms, radio and lighting) to assure continuing operability in the event of power loss from the primary source.
10. Procedures and records will be established and maintained to reflect the conducting of visual and physical tests of all security devices.

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U. S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

RO Inspection Report No. 050-331/73-10

Licensee: Iowa Electric Light and Power Company
Security Building
P. O. Box 351
Cedar Rapids, Iowa 52405

Duane Arnold Energy Center
Palo, Iowa

License No. CPPR-70
Category: B

Type of Licensee: BWR, 538 Mwe
Type of Inspection: Special, Announced Physical Security Inspection

Dates of Inspection: August 7 - 9, 1973

Dates of Previous Inspection: N/A

Principal Inspector: *J. F. Donahue*
J. F. Donahue, Investigation Specialist

9/12/73
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *J. A. Hind*
J. A. Hind, Chief
Materials and Plant
Protection Branch

9/12/73
(Date)

Attachment:
Findings (Exempt from Disclosure)

SUMMARY OF FINDINGS

The initial physical security inspection was conducted on August 7 - 9, 1973, to determine whether the applicant has or is prepared to implement the Duane Arnold Energy Center Industrial Security Plan, undated, which was submitted to the Directorate of Licensing as part of the application.

Present status of plant construction is about 97% complete and the current inventory of the initial core load is approximately 90% with expected delivery of the balance by early September. Proposed core load date is late October but this is an admittedly optimistic date. During this inspection it was disclosed that the Security Plan is not as yet in effect but implementing procedures are being drafted and circulated to management for review and approval. Responsibility for overall site protection is still vested with the construction contractor, Bechtel, which employs protective personnel to control site access, man building posts and conduct periodic site patrols.

FINDINGS

The following matters were identified as requiring implementation prior to issuance of the operating license:

1. The physical barrier (security fence) to encompass the protected areas was not completed. The proposed fence will conform to the standard as defined in 10 CFR 73.3(f)(1). The final configuration of the protected area is yet to be decided since certain temporary structures must be removed to provide an adequate buffer zone between the fence line and the buildings within the protected area. Grading and backfilling of the fence line will be necessary to prevent erosion of the base. The fence line will be posted at intervals with "No Trespassing" signs.
2. The Security Control Point has not been completed and has not been equipped with communications capabilities or an intrusion alarm annunciator panel.
3. Key control procedures had not been formalized to assure restrictive key issuance to authorized personnel. Presently-used key cores for portals of vital areas have not been changed. Also, exterior portals and doors of vital areas have exposed hinges which are accessible from the outside requiring tack welding or pinning of hinge pins to prevent removal.

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4. The identification badge system, described in the Security Plan, has not been placed in effect to provide a means for identifying employees and visitors.
5. The licensee does not employ or contract for a plant protection force at the present time. Hiring, equipping and training of a protective force is yet to be accomplished. Plant protection instructions and orders have not been written. Certifications of the qualifications, character and stability of assigned plant protection personnel should be obtained from the selected contractor.
6. An intrusion alarm system has not been installed to meet this level of performance and reliability indicated by Interim Federal Specifications W-A-00450-B (GSA-FSS). Annunciator panels should be installed at two continuously manned points, the Control Room and Security Control Point. Intrusion alarms should be installed on exterior ground floor portals and portals of vital buildings or areas within the protected area. Procedures for responding to activated alarms are to be established.
7. Redundant communications capabilities between the Control Room and Security Control Point and with offsite assistance groups are lacking.
8. A protective lighting system for the perimeter of the protected area and certain of the outlying vital buildings has not been installed as specified in the Industrial Security Plan.
9. No provisions have been made to assure alternate or emergency power for security systems in the event of power loss from the primary source.
10. Procedures are lacking for the maintenance of records to reflect the conduct of visual and physical tests of security devices.

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REPORT DETAILSIntroduction

The Duane Arnold Energy Center (DAEC) is situated in a rural area consisting of five hundred acres of company-owned land which is located near the town of Palo in Linn County, Iowa. The site is adjacent to the west bank of the Cedar River and lies approximately eight miles northwest of Cedar Rapids, Iowa. The land surrounding the site is devoted primarily to agricultural purposes and therefore the periphery of the site is sparsely populated. Entering the site are a company-maintained road and a railroad siding which is a spur of the Rock Island Railroad. There are no private residences on the company property and no camping grounds.

The DAEC Chief Engineer, G. G. Hunt, has overall responsibility for the Industrial Security Program. The Assistant Chief Engineer, Ellery Hammond, is responsible for implementation of the security program and for assuring assignment of alternate security officers for back shifts, weekends, and holidays. Normally, respective shift supervisors fulfill the role as security officer in the absence of Messrs. Hunt and Hammond. Responsible for security at the corporate level is Mr. Walter Barnum, Assistant to the President of the Iowa Electric Light and Power Company (IEL&P). Mr. Barnum is responsible for assuring that the DAEC site is provided with protective personnel and security devices as described in the DAEC security plan.

During this inspection, primary escort was provided by Mr. Hammond. Discussion of the results of this initial inspection was held with responsible DAEC site and IEL&P corporate office personnel.

Physical Barriers

The DAEC plant is situated in the south central section of the company-owned and controlled land. The outer property line is neither fenced nor posted. At the time of this inspection, the only fully fenced area was the switchyard-blockhouse section wherein the initial core load fuel is presently stored in tarpaulin covered crates which are under the surveillance of a watchman who is stationed within the fence line to provide around-the-clock protection.

The sole access road to the site enters a parking area immediately outside the temporary fenced perimeter whose openings are manned by protective personnel contracted for by the construction contractor, Bechtel. A temporary Gate House is continuously manned by Pinkerton personnel who control access of employees, construction workers and visitors.

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It was determined that the final configuration of the physical barrier (security fence) surrounding the protected area has not been finally determined and, therefore, construction of the security fence surrounding the plant proper and intake structure has not been completed. Assurances were provided that the security fence, when completed, will conform to the standard as defined in 10 CFR 73.3(f)(1). Also, it was agreed that the base of the fence line will be backfilled and graded to offset the effects of erosion and that the fence line will be posted with "No Trespassing" signs at specified intervals. (See Finding No. 1)

Upon completion of plant construction and its final turnover to the operating group, security responsibility for the site will be vested with Messrs. Hunt and Hammond. Temporary fencing and the temporary Gate House will be removed and control of access for employees and visitors will be handled at the Security Control Point (SCP) which is situated in the northwest corner of the Administration Building. This entry will be continuously manned by a member of the plant protection force. The SCP will also serve as a secondary point for alarm annunciations and emergency communications. The SCP had not been equipped with communications equipment or with an intrusion alarm annunciator panel. (See Finding No. 2)

The majority of employees, of a projected complement of 73, will be on the first shift operation from 7 a.m. to 3 p.m. for operating and maintenance personnel and 7:30 a.m. to 4 p.m. for Administrative personnel, the latter working only from Monday through Friday. Second and third shift complements will average about five personnel each. The heaviest pedestrian and vehicular traffic will occur during the first shift operation during the normal work week.

Within the protected area are the Reactor Building, Turbine Building, Pump House, In-take Structure, Radwaste Building and the Administration Building. These buildings except the Pump House and In-take Structure are interconnected. Within the interconnected buildings are the Control Room and the Cable Spread Room as well as Emergency Diesel Generators. A rudimentary key control system has been initiated by Mr. Hammond. Keys to portals will be kept in key lockers at the SCP and in the shift supervisors office. A charge out system for keys has been established. It was agreed with DAEC management that key control procedures will be formalized and access lists of names of individuals authorized key access in connection with their specific duties and responsibilities will be established. It was agreed that presently-used key cores for portals of vital areas will be changed and also that exterior building doors and doors of vital areas whose hinges are accessible from the outside will have the hinge pins tack welded or pinned to preclude removal. (See Finding No. 3)

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Personnel Identification and Control

The DAEC Industrial Security Plan describes plant admittance procedures. It defines four categories of personnel for admittance to the plant; DAEC permanent employees, other IEL&P employees, contractors and manufacturers' representatives, and general visitors and business agents. An approved access list located in the SCP will contain the names of all permanent plant employees. The list may also include other IEL&P employees who have specific and frequent business within the plant as well as certain contractors or manufacturers' representatives who have a continuing need for entry. The watchman at the SCP will admit personnel on the approved list on sight or, if identity is not known, he will compare the person's badge with the approved list or request appropriate personal identification.

All permanent employees and IEL&P employees on the approved access lists will be issued a numbered permanent green identification badge which is required to be worn at all times while within the protected area. Additionally, such employees will be issued personnel dosimetry equipment as directed by the Radiation Protection Office. A yellow badge issued at the SCP requires obtaining of prior approval for entry and the acquiring of an escort.

All persons approved for admittance to the protected area who are not on the access lists are classified as visitors. Prior approval for entry must be obtained from the authorizing supervisor who will instruct the watchman regarding the type of badge to be issued. Each visitor will register in a log showing the visitor's name, company affiliation, person visited, name of escort, number of badge issued, time in and time out. Packages and brief cases are subject to search or retention at the SCP during the length of the visit. Visitor badges are returned to the SCP at the conclusion of the visit.

Salesmen and other visitors requiring entry to the Administration Building only will be issued red visitor badges and an escort provided. Group tours or visits must be prearranged and coordinated by IEL&P headquarters. Advance notification will be provided to the site supervisor to assure that adequate controls are exercised. No more than 10 visitors at any one time will be permitted.

All DAEC employees will be instructed to challenge any noted visitors wearing yellow or red badges who are not escorted or individuals who do not have in their possession a visitor badge.

Normally, most delivery of goods will be made to the warehouse which will be outside the protected area. For delivery or service vehicles which require entry into the protected area, the drivers will be handled as visitors and escort provided by the intended recipient of the goods and/or services. The watchman in the SCP will obtain prior approval for admittance of vehicles. Private vehicles and those not necessary for plant business are not permitted within the protected area. Vehicles permitted in the protected area will be inspected upon entry and departure.

As of the date of this inspection, the identification badge system for employees and the badge issuance procedures for non-site employees and visitors had not been placed in effect. Assurances were provided that the badge system and its implementing procedures will be placed in effect prior to core load authorization. (See Finding No. 4)

Protective Personnel

At the present time, the construction contractor, Bechtel, provides the plant protection force for DAEC. The force consists of Pinkerton personnel who are responsible for controlling access to the site proper and to specific buildings within the plant grounds. Verbal and written instructions for the protective force, at present, are channeled through Bechtel for implementation.

In addition to controlling personnel and vehicular access to the site at the main gate, Pinkerton personnel man 24 hour-a-day posts at the switchyard (temporary fuel storage), the cooling towers, recirculating pumps, pump house, and intake structure. These individual posts are maintained since the security fence has not been completed. Also, in addition to posts being manned, hourly vehicular and walking patrols are made for property protection purposes.

Selection of plant protection personnel presently utilized is made by Pinkerton and includes two female guardettes. DAEC representatives have had no role in the selection or assignment of protective personnel but do have the prerogative of requesting Bechtel to assure implementation of prudent measures for property protection and access control purposes during this construction period. The protective force has telephone capability and watchmen may communicate with the Gate House by use of two-way handy talky radios. A radio-equipped patrol vehicle is utilized during the hours of darkness to patrol the periphery of the site, the out buildings and access road. The patrol vehicle is also utilized to provide transportation for relief and replacement personnel to the out buildings.

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When all construction has been completed and the plant turned over to the DAEC operating group, providing plant protection personnel will be the responsibility of the operating group. Mr. Walter Barnum, Assistant to the IEL&P President, acknowledged that no action had been taken to date to acquire a permanent plant protection force for DAEC. Mr. Barnum indicated that selection of the DAEC plant protection force will be based on competitive bids and the ability of guard service contractors to provide a desired number of carefully selected and qualified personnel.

It was also acknowledged that not too much thought had been given to the development of plant protection orders or to the training of the force. It was agreed with Messrs. Barnum, Hunt and Hammond that a plant protection force will be hired, equipped and trained. Also, that written instructions covering the duties and responsibilities of the plant protection force will be generated and assigned protective personnel familiarized with the orders. It was also agreed that the guard service contractor would be requested to certify to the qualifications, character and stability of personnel assigned to the DAEC site. (See Finding No. 5)

Mr. Barnum stated that it is IEL&P policy to not arm personnel assigned plant protection responsibilities. Unless compelled to do so, no plans are being made to provide weapons for the DAEC site. He expounded on the hazards of arming the protective force and the legal ramifications for misuse of weapons. He agreed that protective personnel assigned to the DAEC site would be uniformed and be trained, not only by the guard service contractor, but by the DAEC Security Officer. It is proposed that protective personnel will continuously man the SCP but will have no patrol responsibilities. Patrol of the fence line and periodic checking of the Pump House and Intake Structure will be assigned to operating personnel as part of their periodic surveillance check list. It was pointed out that response procedures to check out activated alarms are lacking. Assurances were provided that such responsibilities would be duly assigned and incorporated in the procedures which implement the security plan.

Protective Alarms

The DAEC Security Plan speaks to the installation of intrusion alarms on all doors or portals of vital buildings, including exterior doors on the power block building, Pump House, Intake Structure and the Off-gas Stack. To date, however, the intrusion alarm system has not been procured. Neither has a subcontractor for installation of the system been selected. It is proposed to place magnetic contact alarms on portals requiring protection and to install annunciator panels within the Control Room and SCP. The writer provided DAEC representatives with a copy of Interim Federal Specification

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W-A-00450B(GSA-FSS) dated February 16, 1973. It was pointed out that all intrusion alarms, emergency exit alarms, alarm systems and line supervisory systems should meet the level of performance and reliability as indicated by the Interim Federal Specification. (See Finding No. 6)

It was estimated that response time to activated alarms would be within four minutes. The Control Room would summon local law enforcement agencies to provide backup in the event of an emergency.

To provide visual surveillance of the SCP, it is proposed to install a closed circuit television camera which will view the activities at the SCP. This CCTV will be monitored at the Control Room to assure immediate knowledge of any unusual circumstances in the SCP.

Protective Communications

- Communication capability at the DAEC is presently limited to onsite and offsite commercial telephone service with underground telephone lines to Palo, Ohio, plus a microwave link to the System Control Center of IEL&P in Cedar Rapids. For onsite use is a public address system and sound powered phones. There is no present radio communication link between the Control Room, Security Control Point, Emergency Coordination Center and with offsite assistance agencies. It was learned that the two way radio system has not been ordered to date but assurances were provided that it would have a sufficient output to reach all necessary offsite assistance agencies through the Control Room and SCP. (See Finding No. 7)

Protective Lighting

Since the final configuration of the security fence has not been determined to date, necessarily the installation and utilization of a protective lighting system has been delayed. Assurances were provided by DAEC management that a protective lighting system will be installed to provide adequate illumination of the perimeter of protected areas as specified in the DAEC Security Plan. (See Finding No. 8)

Presently, light poles are placed at various intervals on the perimeter of the switchyard to provide illumination for protective personnel who maintain surveillance of the temporary fuel storage area. Light poles also have been placed at the main pedestrian and vehicle entrance as well as at various points within the plant grounds to assist in the detection of intruders during the hours of darkness. The lighting system, as it now exists, is only a temporary measure pending completion of construction. It is planned that additional lighting will be installed above certain of the building portals to provide adequate illumination for surveillance purposes.

Discussed at the closeout with DAEC and IEL&P management personnel was a need to provide emergency or alternate power sources for all security systems (alarms, radio communications and protective lighting) to assure their continuing operability in the event of power loss from the primary source. (See Finding No. 9) Also discussed was the need for establishing implementing procedures and maintaining relevant records to reflect the conducting of visual and physical tests of all security devices utilized. (See Finding No. 10)

Personnel Selection

IEL&P maintains a pre-employment program to assist in the determination of the character, qualifications and fitness of applicants for employment at its constituent facilities. This pre-employment inquiry program extends to the DAEC employment complement. Mr. Hunt indicated that about 20% of the DAEC complement is comprised of IEL&P employees who have worked for the utility for a number of years, primarily at their fossil fuel plants. Such employees were selected on the basis of their past experience and potential for growth in a nuclear power plant. The present complement is augmented by former naval reactor personnel and from maintenance and administrative employees recruited from local environs.

All applications are carefully scrutinized in making employment determinations. Applicants are interviewed by DAEC and IEL&P management and by the prospective supervisor. In the screening process, applicants being seriously considered for employment are subject to verification of employment and educational claims through contact, either by letter or telephone, with former supervisors, educators and personal references. Responses are evaluated and selections made.

Each new employee is placed on a six month probationary period during which 60 day evaluation reports are generated. At the completion of the probationary period employees, depending on the position involved, are evaluated annually or semi-annually in connection with pay step rate evaluations or merit increases.

There is a strict policy that employees reporting for work intoxicated or displaying unusual behavior will be suspended from duty and sent home. Mr. Hunt stated that union negotiations now taking place will provide greater latitude to DAEC management for taking corrective or disciplinary actions, with the concurrence of the union, in the area of employee conduct and behavior. An annual physical examination will be performed on all licensed operators.

Personnel Training

The responsibility for providing training and the holding of security drills for DAEC employees has been assigned to Mr. Hammond. In addition to conducting indoctrination of newly assigned employees covering their security responsibilities, Mr. Hammond conducts periodic security drills and training courses to develop, evaluate and maintain security controls and preparedness. The drills and courses are designed as a continuing program held in conjunction with other personnel, safety and safety related matters. In addition, on the job instructions are provided by the employee's supervisor to assure continuing familiarity with safety, security and emergency policies and procedures. All indoctrination and training efforts will be documented to assure that employees are accorded sufficient training to enable them to be effective, diligent and familiar with their job responsibilities.

Visitor Control

All visitors not on the authorized access list are to be subject to registration by the watchman in the SCP. Prior approval for entry will be solicited from the responsible visatee and personal identification will be requested at the time of registration. Escort will be provided from point of entry to departure from the site. Color coded badges will be issued to reflect the areas to which access is to be authorized. A challenge procedure is in existence to assure that visitors are limited to the area of authorized access. Group tours, limited to no more than 10 persons, will be approved only by IEL&P Headquarters and prior arrangements for conducting the tour and escorting the group will be made. Such visitors will not be allowed to carry packages or brief cases within the plant during the tour.

General

DAEC is in the process of developing and refining emergency plans which include actions involving civil disturbances, overt threats and bomb threats. These plans are to be compatible with developed security plans and implementing procedures. Liaison has been established with local law enforcement agencies to provide backup in the event of security threats. With respect to internal plant security matters, primary responsibility for initiating protective and corrective action is assigned to the Security Officer and to respective shift supervisors in his absence. Responsibility for conducting investigations of incidents which may have a bearing on the industrial security program and for recording the findings and actions taken as a result of an investigation is also assigned to the Security Officer.

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Comments

By letter dated August 31, 1973, the licensee was advised of the results of this initial security inspection and was requested to advise RO:III when actions on the ten findings have been completed so that a final inspection may be conducted prior to core load authorization.

Discussion of these findings was held on August 9, 1973, with IEL&P and DAEC management representatives. Also discussed were Regulatory Guide 1.17 and ANSI-N18.17 "Industrial Security for Nuclear Power Plants." Written procedures designed to implement the Security Plan and the findings of this inspection are in process of development. It is concluded that the Security Plan submitted to the Directorate of Licensing as part of the license application, the findings developed during this inspection, and the implementing procedures for the Security Plan will be fully or substantially completed and in effect prior to core load date, tentatively scheduled for late October 1973.

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