10 CFR 2.790 INFORMATION

DR Central Files

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

TELEPHONE
(312) 858-2660

JAN 1 6 1975

Harold D. Thornburg, Chief, Field Support and Enforcement Branch
Directorate of Regulatory Operations, Headquarters

IOWA ELECTRIC LIGHT AND POWER COMPANY
DUANE ARNOLD ENERGY CENTER
DOCKET NO. 50-331
LICENSE NO. DPR-49

Attached are a copy of the enforcement letter and the inspection report covering the physical protection inspection at Duane Arnold Energy Center conducted on October 30-31 and November 1, 1974.

The Duane Arnold Industrial Security Plan, and revisions as requested by Licensing, was approved by Licensing by letter dated September 18, 1974. Following are our comments on certain items lacking in the plan:

1. An enclosure to Licensing letter to IELP dated August 22, 1974 states in Item No. 5, "Surveillance of the protected area by routine guard patrols should be supplemented preferably by a system which, in principle, provides continuous monitoring of the entire physical barrier surrounding the protected area." Revisions to the security plan which were submitted to Licensing do not contain any plans or commitments to provide such surveillance.

2. Section 3.4 of the security plan states that security drills and training courses will be conducted to develope, evaluate and maintain security control and preparedness. It is noted that no time frames are specified in the plan as to what frequency these drills or training courses will be conducted.

We request that these matters be discussed further with Licensing.

J. A. Hind, Chief
Materials and Plant
Protection Branch

Enclosure:
RO Inspection Report No. 050-331/74-19

cc w encl:
RO Files
DR Central Files
RO III Coordinator
RO Chief, MPPB

10 CFR 2.790 INFORMATION

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JAN 16 1975

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

Docket No. 50-331

Gentlemen:

This refers to the inspection conducted by J. F. Donahue of this office during the period October 30-November 1, 1974, of activities at the Duane Arnold Energy Center authorized by AEC License No. DPR-49 and to the discussion of our findings with Messrs. Hunt, Hammond, York, Vanous and Rinderman of your staff at the conclusion of the inspection.

The area examined during this inspection was your program for protecting against industrial sabotage and safeguarding special nuclear material pursuant to applicable provisions of 10 CFR Part 50, "Licensing of Production and Utilization Facilities;" Part 73, "Physical Protection of Plants and Materials;" and specific requirements of AEC License No. DPR-49. Within this area, the inspection consisted of selective examinations of procedures and records, interviews with personnel and observations by the inspector.

During this inspection, it was found that certain of your activities appear to be in violation of AEC requirements. The items and reference to the pertinent requirements are listed in the enclosure to this letter.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within 20 days of your receipt of this notice, a written statement or explanation in reply, including: (1) steps which have been or will be taken by you to correct the violation, and the results achieved; (2) steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Such a statement or explanation in reply should be provided for each of the items listed and should be submitted as a separate enclosure to your transmittal letter.

In addition to the above violations, a program weakness was found in your existing physical protection program which warrants your attention. This item is listed in the enclosure to this letter. Please provide comments as to action taken or planned to correct the program weakness and the date of such action.

Areas examined during this inspection concern a subject matter which is exempt from disclosure according to Section 2.790 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Consequently, our report (No. 050-331/74-19) of this inspection, the enclosure to this letter and your response to the items listed in the enclosure will not be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations Branch

Enclosure:
As stated above
(10 CFR 2.790 Information)

bcc: RO Chief, FS&EB
RO Chief, M&PPB
RO:HQ (4)
L:D/D for Reactor Projects
DR Central Files
RO Files
PDR, w/o encl
LPDR, w/o encl

ENCLOSURE

Iowa Electric Light and Power Company
Duane Arnold Energy Center
Docket No. 50-331

The following apparent violations are considered to be of Category II severity:

1. Section 2.1.1.2 of the Duane Arnold Industrial Security Plan submitted as part of the FSAR states in part, "The security fence . . (is) designed to forestall a breach by an irresolute intruder . . . the fence is laid out to minimize the chance of an intruder remaining concealed . . . the fence area is lighted from sundown to sunrise for a distance of at least 10 feet inside and 25 feet outside the fence and this critical area is maintained clear of all objects that could conceal a person."

   Contrary to the above, the main vehicular gate on the west perimeter did not fully engage the locking mechanism, thereby creating a gap which could afford undetected personnel ingress or egress. Also, at the northwest corner of the fence mounds of earth and weeds were evident that could aid in concealing the presence of an intruder. Further, on the south perimeter fence of the main protected area, and the south perimeter of the intake structure, immediately inside these fence lines there were standing wooden poles which could conceal an intruder or enable an intruder to climb over these fences.

2. Section 3.3.1.2(1) of the Duane Arnold Industrial Security Plan submitted as part of the FSAR states, " . . . Physical barriers shall be maintained in operable and effective condition." Section 1.0 states, "Administrative and physical controls are established to limit access to the Reactor Building, Control Room, Turbine Building and other plant areas vital to plant security." Section 2.1.3 states, "The Off-Gas Stack, Intake Structure and Pump House are also security areas. Access is controlled by locked doors."

   Contrary to the above, the following deficiencies were disclosed during the inspection:

   1. Essential Switchgear Room - The main access door was not locked.

   2. Pump House - Exterior door hinge pins are accessible and susceptible to removal.

3. Off-Gas Recombiner Building - The sole portal was not locked.

4. Off-Gas Stack - While the main entry gate was locked and placed under intrusion alarm protection, there are three square openings within reach of ground level which could provide means of personnel entry or introduction of industrial sabotage devices.

5. Intake Structure - Exterior door hinge pins are accessible and susceptible to removal.

The following condition is considered a program weakness which, if not corrected, could result in a violation of AEC requirements.

At the time of the RO:III inspection on January 29-30, 1974, it was agreed that key cores of vital areas would be changed prior to or immediately upon completion of construction. In an IELP letter dated April 25, 1974 to RO:III it was stated, "Key cores are to be changed after construction as agreed." Also IELP letter dated October 21, 1974 to RO:III states that rather than changing key cores, the entire lock system will be changed on doors of vital areas and high radiation areas. It is also stated that locks selected will follow standards in Regulatory Guide 5.12.

During our recent inspection, it was determined that new locks were ordered on October 6, 1974, for delivery by November 22, 1974, but installation date and implementation of key control procedures were not firmed up. Since the matter of locks and keys for vital areas was identified as a problem area during our previous inspections, priority should be assigned to correct this matter.

U. S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS

REGION III

RO Inspection Report No. 050-331/74-19

Licensee: Iowa Electric Light and Power Company
P. O. Box 351
Cendar Rapids, Iowa

License No. DPR-49
Category: B

Duane Arnold Energy Center
Palo, Iowa

Type of Licensee: BWR, 538 Mwe

Type of Inspection: Physical Protection

Dates of Inspection: October 30-31 and November 1, 1974

Dates of Previous Inspection: October 22-25, 1974 (Operations)

Lead Inspector: J. F. Donahue — 1/7/75 (Date)

Other Accompanying Personnel: None

Reviewed BY: J. A. Hind, Chief
Materials and Plant
Protection Branch — 1/14/75 (Date)

Attachment:
Findings (10 CFR 2.790 Information)

SUMMARY OF FINDINGS

Enforcement Actions

The following apparent violations are considered to be of Category II severity:

1. Section 2.1.1.2 of the Duane Arnold Industrial Security Plan submitted as part of the FSAR states in part, "The security fence. .(is) designed to forestall a breach by an irresolute intruder. . .the fence is laid out to minimize the chance of an intruder remaining concealed . . .the fence area is lighted from sundown to sunrise for a distance of at least 10 feet inside and 25 feet outside the fence and this critical area is maintained clear of all objects that could conceal a person."

   Contrary to the above, the main vehicular gate on the west perimeter did not fully engage the locking mechanism, thereby creating a gap which could afford undetected personnel ingress or egress. Also, at the northwest corner of the fence mounds of earth and weeds were evident that could aid in concealing the presence of an intruder. Further, on the south perimeter fence of the main protected area and the south perimeter of the intake structure immediately inside these fence lines there were standing wooden poles which could conceal an intruder or enable an intruder to climb over these fences. (See Page 25 Report Details)

2. Section 3.3.1.2(1) of the Duane Arnold Industrial Security Plan submitted as part of the FSAR states, ". . .Physical barriers shall be maintained in operable and effective condition." Section 1.0 states, "Administrative and physical controls are established to limit access to the Reactor Building, Control Room, Turbine Building and other plant areas vital to plant security." Section 2.1.3 states, "The Off-Gas Stack, Intake Structure and Pump House are also security areas. Access is controlled by locked doors."

   Contrary to the above, the following deficiencies were disclosed during the inspection:

   a. Essential Switchgear Room - The main access door, while lockable, was not locked.

   b. Pump House - Exterior door hinge pins are accessible and susceptible to removal.

   c. Off-Gas Recombiner Building - The sole portal, while lockable, was not locked.

d. Off-Gas Stack - While the main entry gate was locked and placed under intrusion alarm protection, there are three square openings within reach of ground level which could provide means of personnel entry or introduction of industrial sabotage devices.

e. Intake Structure - Exterior door hinge pins are accessible and susceptible to removal. (See Page 27 - Report Details)

The following condition is considered a program weakness which, if not corrected, could result in a violation of AEC Requirements.

At the time of the RO:III inspection on January 29-30, 1974, it was agreed that key cores of vital areas would be changed prior to or immediately upon completion of construction. In an Iowa Electric Light and Power Company (IEL&P) letter dated April 25, 1974 to RO:III it was stated, "Key cores are to be changed after construction as agreed." Also IEL&P letter dated October 21, 1974 to RO:III states that rather than changing key cores, the entire lock system will be changed on doors of vital areas and high radiation areas. It is also stated that locks selected will follow standards in Regulatory Guide 5.12.

During our recent inspection, it was determined that new locks were ordered on October 6, 1974 for delivery by November 22, 1974 but installation date and implementation of key control procedures were not firmed up. Since the matter of locks and keys for vital areas was identified as a problem area during our previous inspections, it is our position that priority should be assigned to correct this matter as soon as possible. (See Page 32 - Report Details)

Licensee Actions on Previously Identified Matters

Following are the "Findings" developed during an RO:III preoperational inspection of Duane Arnold Energy Center (DAEC) conducted on January 29-30, 1974. These Findings were reported in a letter dated March 27, 1974 to IEL&P headquarters.

Finding No. 1, RO:III Letter - March 27, 1974

The DAEC Security Plan, Section 2.1.1.2, paragraph 3, states that the isolation zone (10 feet inside and 25 feet outside the fence) is maintained clear of all objects that could be used to conceal a person. At the west and north sections of the security fence there are trailers, a warehouse and scrap material situated within this isolation zone.

Response, IEL&P Letter - April 25, 1974

The trailers southwest of the Security Control Point have been moved and it was agreed that the remaining structures will be moved as the need diminishes for them.

Inspection Results:

The inspection of the isolation zone revealed that temporary trailers have been removed and that work was being completed to move the security fence away from existing structures to provide the prescribed clear area. At the far northwest corner of the isolation zone, mounds of earth and weeds were evident which could provide concealment of an intruder. This matter is being referred to the licensee for corrective action as part of Violation No. 1 of this report.

Finding No. 2, RO:III Letter - March 27, 1974

In connection with Finding No. 3 in the attachment to our letter of August 31, 1973, it was our understanding that key cores of vital areas would be changed.

It was established that no keys have been lost to date or were otherwise out of the key control system. It is understood, however, that the key cores of vital areas will be changed prior to or immediately upon completion of construction.

Response, IEL&P Letter - April 25, 1974

Key cores are to be changed after construction as agreed.

Inspection Results:

Although construction has been completed, key cores were not changed to date. According to DAEC personnel, after a thorough evaluation of the existing locks, it was decided to replace all key locks on doors of vital areas and high radiation areas with locks which conform to standards outlined in Regulatory Guide 5.12. Review of records indicated that seventy (70) new locks were ordered from a supplier on October 6, 1974 but delivery date promised was not until November 22, 1974. It was pointed out to DAEC representatives that two previous RO:III inspections identified the need to change the locks for vital areas and because of the lapse of time since calling this matter to the attention of DAEC management, it is RO:III's position that this program weakness should be corrected as soon as possible.

Finding No. 3, RO:III Letter - March 27, 1974

With respect to plant protection personnel, discussion was held covering Regulatory Guide 1.17, Section C.1. which states, "The plant security forces should have onsite, armed and uniformed individuals whose primary duties are protection of facilities from acts that could endanger the health and safety of the public."

It was understood during discussions that IEL&P is reluctant to arm DAEC protective personnel. The providing of an armed force would improve the security program at DAEC since a deterrent to forced entry would be readily available. Also, an armed force would be better equipped to delay intruders pending arrival of local law enforcement agencies. It is our position, consonant with Regulatory Guide 1.17, that an onsite, uniformed and armed security force would enhance the security program at DAEC.

Response, IEL&P Letter - April 25, 1974

The subject of arming the guards was discussed at length with Directorate of Licensing personnel, prior to the issuance of DPR-49, and our position as stated in the Industrial Security Plans was accepted. As discussed with your representative, Iowa Electric is reluctant to arm the guard force because in our view the additional security, if any, afforded by this action is more than offset by the significant hazards created.

Inspection Results

Effective February 11, 1974, the Security Control Point at DAEC was manned by unarmed protective personnel. After negotiations with Licensing, it was decided to arm the protective force. It was necessary to train and qualify personnel on weapons and such initial training was completed and arms issued on June 13, 1974. A minimum of two armed guards are assigned to each shift. RO:III has no further questions on this item.

Finding No. 4, RO:III Letter - March 27, 1974

With further reference to Regulatory Guide 1.17, Section C.1.b. states that alarms should annunciate in two continuously manned stations. There are two alarm stations at DAEC, the Control Room and Security Control Point. While the Control Room will invariably be continuously manned, the same may not be realized within the Security Control Point unless there are at least two protective personnel assigned to each shift.

In DAEC Security Procedure SP-5, "Security Alert", several references are made relating to utilization of security guards for several duties (refer to 6.1.1.2, through 6.1.1.6; 6.1.1.8 (1), (2) and (4); 6.1.2.2. (1); 6.1.2.5; (4).) It is understood that plans are to have at least two protective personnel on the day shift during the work week but only one per shift at other times. If a security guard is required to conduct patrols, respond in emergency conditions or perform tests on back shifts, a question is raised as to the ability to provide continuous manning of the Security Control (secondary alarm station.) It appears that the proposed size of the plant protection force may not be adequate to fulfill the duties and responsibilities outlined in Security Procedure SP-5, SP-9, 6.2, and SP-10, 5.1 and 5.3.

Response, IEL&P Letter - April 25, 1974

We have the following comments regarding the matter of compliance with Regulatory Guide 1.17, Section C.1.b. The conclusions reached by your inspector appear to have been based on early draft versions of certain security procedures (SP-5, 9, 10). Since that time these procedures have been revised to properly reflect the commitments made in the Security plan. Specifically, the procedures now properly reflect that operations personnel will perform those duties necessary to supplement the guard force when a single guard is on duty. Accordingly, we believe that the requirements of Regulatory Guide 1.17, Section C.1.b have been met.

Inspection Results

Subsequent to the above stated position, Licensing held the position (Letter dated August 22, 1974) that "The size of the guard force does not appear adequate. The staff considers that the onsite guard force should consist of not less than two per shift." In order to conform, DAEC hired a total guard staff of nine men. This staff provides coverage of two guards per shift. One mans the Security Control Point in the lobby of the Administration Building, the other conducts vehicular and foot patrols each two hours. Response to activated alarms is by armed guard. RO:III has no further questions on this matter.

Finding No. 5, RO:III Letter - March 27, 1974

Emergency power is available to provide necessary power to intrusion alarms and the off-site two way radios. Such power is not available for protective lighting should the primary source of power fail. It was agreed that if protective lighting is lost, exterior protective patrols would be conducted more frequently or portable generators provided for spot lighting pending resoration of site protective lighting.

IEL&P Response

No specific response or comment was made to this item in the IEL&P letter dated April 25, 1974 and none was requested by the RO:III letter of March 27, 1974. Alternate measures for providing emergency power generators for lighting or increasing the frequency of guard patrols were agreed to by DAEC to be implemented should the need arise.

Inspection Findings

Portable emergency power generators are available for use. Guards have been instructed to increase the frequency of protected area fence patrols should protective lighting be lost.

Design Changes: None

Other Significant Findings: None

Management Interview

Present at the close-out management interview were Messrs. Hunt, Hammond, York, Vanous and Rinderman of DAEC. The items of noncompliance and pertinent reference data were discussed in detail and no substantive rebuttals were made.

REPORT DETAILS

INTRODUCTION AND SCOPE

Persons Contacted

G. G. Hunt, Chief Engineer, DAEC
Ellery Hammond, Assistant Chief Engineer, DAEC
Bobby York, Operations Supervisor, DAEC
Kenneth Vanous, Security Training Officer, IEL&P, HQ
Delmar L. Hammond, Quality Assurance, IEL&P, HQ
Robert Rinderman, Quality Supervisor, DAEC

In addition, several guards, technicians and control room personnel were interviewed.

Scope

This inspection covered the Duane Arnold Energy Center Industrial Security Plan submitted to Licensing as part of the FSAR, approved by Licensing on September 13, 1974; the IEL&P/DAEC implementing security procedures; and the position set forth in Regulatory Guide 1.17.

Introduction:

The physical protection inspection under the accelerated inspection program was conducted at Duane Arnold Energy Center (DAEC) during the period of October 30-31 and November 1, 1974. RO:III had conducted previous physical security inspections at DAEC on August 7-9, 1973 and January 29-30, 1974 to determine security preparations prior to issuance of Operating License DPR-49.

By Licensing letter dated April 30, 1974, the licensee, Iowa Electric Light and Power Company (IEL&P) was requested to re-evaluate, and if necessary upgrade the security plan with respect to amended regulations and the regulatory position set forth in Regulatory Guide 1.17. Accordingly, on May 29, 1974, IEL&P submitted revised pages to the security plan. On August 22, 1974, Licensing requested IEL&P to respond to twelve suggested revisions in the security plan. The requested revisons, in substance, were submitted to Licensing on August 29, 1974. Subsequently, by letter dated September 18, 1974, IEL&P was advised by Licensing that the security plan is approved.

I. GENERAL

1. Facility authorization limits for SNM:

   (A) Kgs U-235 — 1320

   (B) Kgs U-233 — -

   (C) Kgs Pu — -

   (D) Other — -

2. SNM currently possessed at the site:

	Quantity		Type
(A)	1197.49 (as of 11/1/74)	kg's	U-235
(B)		kg's	
(C)		kg's	
(D)		kg's	
(E)		kg's	

3. Obtain facility plot plan (if needed).
   Does the plot plan indicate that changes in the physical aspects of the security program, since the previous inspection, are in accordance with TI-9000, Appendix A (NR)?

4. Who is the site security officer? (NR). Ellory Hammond

5. Does the site security officer have additional responsibilities? If so, what are these additional responsibilities and how much time is spent on these additional responsibilities (NR)?

   Assistant Chief Engineer (Assistant Plant Superintendant) 90%

   Regular duties, 10% Security. Corporate Security Officer spends about 80% of time at plant assisting in supervising security program.

6. Who is responsible for protective practices employed to protect the site against industrial sabotage (NR)? Ellory Hammond

7. Who is responsible for providing (written or oral) instructions to individuals used to protect the site against industrial sabotage (NR)? Ellory Hammond, assisted by Kenneth Vanous, Corporate Security Officer,

8. [RG-1.17(c)(3), (N18.17.5.4)] [N18.17 Heareafter designated (N)] Does the licensee protect details of his security measures from public disclosure? Yes

A. How? Limited distribution and access within plant and Corporate Headquarters. Submittals to Licensing held exempt from disclosure.

9. [(N)(3.1)] Has the licensee designated the following security areas?

A. Owner controlled access area (OCA), Yes

B. Protected Areas (PA), and Yes

C. Vital Areas (VA)? Yes

10. [(N)(3.1)] Do the licensee's administrative controls provide an increasing degree of protection as one approaches vital equipment (VE) and facilities of the plant? Yes

11. [(N)(3.4.4)] Do administrative controls for VA's contain provisions for enforcement of access controls and surveillance requirements which include:

A. Immediate response, to:

(1) Control unauthorized persons, and Yes

(2) Neutralize potential threats by unauthorized persons, and Yes

B. Records and reports of:

(1) Admissions, Yes

(2) Searches, Yes

(3) Inspections, Yes

(4) Patrols, Yes

(5) Alarms, Yes

(6) Tests of alarms, Yes

(7) Tests of intrusion detection devices, and Yes

C. Corrective measures for violations? Yes

12. [(N)(4.0)] Is the overall responsibility for facility security program assigned specifically to a management position? Yes

A. Who? Gerald Hunt

B. Title? Chief Engineer (Plant Superintendent)

13. [(N)(4.0)] Is the individual responsible for the overall security program at the facility also responsible for:

A. Formulating hiring policies for the security force, either:

(1) Employees, or Yes

(2) Contract individuals, Yes

B. Organizational policies to ensure uniformity of items for all security forces, Delegated

C. Establishing liaison with:

(1) LLEA, Delegated

(2) State LEA, and Delegated

(3) Federal LEA, Delegated

D. The General training program, Delegated

E. The recordkeeping system, Delegated

F. The reporting requirements, and Delegated

G. Investigations of security violations? Delegated

H. Issuing temporary security instructions Delegated

14. [(N)(4.0)] Is the plant manager responsible for control of day-to-day security activities? No

A. Are the details of day-to-day security activities delegated to a security specialist? Yes

(1) If yes, are delegated responsibilities clearly delineated? Yes

(A) Security Supervision — Yes

(B) Security Foremen — Yes

15. [(N)(4.5.2] Has the licensee assigned one or more persons knowledgeable in security matters the responsibility for supervision of the security force? — Yes

16. [(N)(4.1)] Are the responsibilities and authorities of those vested with the formulation, approval, review, supervision and implementation of the plant security program delineated in writing? — Yes

A. Is an organizational chart and/or description available of reactor management structure identifying all positions having responsibility for the physcal security program? — Yes

B. Is the management representative responsible for security policy clearly delineated? — Yes

17. [(N)(4.1)] Is the security organization so structured that the order of supervision for the overall security program and the authority to implement any action to ensure the security of the plant, is as follows:

A. The plant manager, — Yes

B. Designated alternate, or — Yes

C. Senior shift supervisor on duty? — Yes

18. [(N)(5.1)] How does the design of the plant facilitate security practices employed to protect against industrial sabotage?

Few accessible window surfaces - all behind security fence and foil tape alarmed. Exterior doors are metal. Sole access control point manned by armed guards.

19. [(N)(5.1)] Does the licensee periodically review plant design for:

A. Possible corrections that would benefit the security program, and — Yes

B. Corrections necessary to circumvent potential security threats or violations? — Yes

20. [(N)(5.2), (5.2.2)] Are plant structures situated and arranged with considerations for security? — Yes

A. Are all unoccupied outbuildings containing VE located within the PA? — No
The intake structure is outside of the protected area fence but is completely surrounded by a separate security fence.

B. Is location of non-vital equipment in VA's avoided? — Yes

(1) If no, explain _____

21. [(N)(5.2.2)] Are vital areas located adjacent to areas where there is a flow of visitors and other non-work related activities? — No

22. [(N)(4.1)] Is the overall security program reviewed and updated on a periodic basis? — Yes

23. [(N)(4.1)] Is the overall security program reviewed after each security threat or incident? Yes

24. [(N)(4.9)] Does the licensee conduct audits of all phases of the industrial security program at intervals not exceeding two years? Yes

25. [(N)(4.9)] Was the audit of all phases of the security program conducted independently of plant management? Yes

A. Who performed audit? - Quality Assurance Representatives

B. To whom was the audit reported? Corporate Headquarters

C. Did the results of the audit require corrections? Yes

(1) Have all corrections been implemented? Yes

(2) If not, explain: _____

26. Are the results of all audits and reviews of the security program documented? Yes

II. SECURITY PLAN

1. [50.34(c)/50.54(q)] Does the licensee possess an approved Physical Security Plan (PSP)? Yes

2. [50.54(p)] Did any change in the PSP decrease its effectiveness? No

   If yes, explain: _____

   _____

   _____

   _____

   A. Did the licensee secure AEC approval prior to making changes in the PSP which decreased its effectiveness? DNA

      (1) If yes, were approvals:

         (a) Written, and/or _____

         (b) Verbal? _____

3. [50.54(p)] For changes in the licensee's PSP which decreased its effectiveness, did the licensee submit an application to amend his license or to change the Technical Specifications incorporated in his license pursuant to §50.90? DNA

4. [50.54(p)] Were any changes made to the PSP which did not decrease its effectiveness? No

   If yes, list changes.

   A. _____

   B. _____

   C. _____

   D. _____

5. [50.54(p)] Did the licensee make changes in the PSP which did not decrease its effectiveness without proper notifications? DNA

III. FACILITY LICENSE CONDITIONS AND EXCEPTIONS

Attach current copy of specific license conditions applicable to the facility and comment on each condition as to compliance or noncompliance.

None imposed or granted.

IV. SECURITY ORGANIZATION

1. Are the following employees used to protect the facility against acts of industrial sabotage (NR)?

   A. Guards — Yes

   B. Watchmen — DNA

   C. Other individuals — Yes

2. Are the following contracted individuals employed to protect the facility against acts of industrial sabotage (NR)?

   A. Guards — No

   B. Watchmen — No

   C. Other individuals — No

3. [(RG-1.17)(C)(1)(a)] [RG-5.20], [(N)(4.5)] Are the facility security forces:

   A. Located onsite, — Yes

   B. Uniformed, and — Yes

   C. Armed: — Yes

   (1) Describe weapons: .38 caliber Smith and Wesson Specials, 12 gauge shotgun.

4. [(N)(4.5)] How are security forces deployed? One stationed in Security Control Point (Guard Office) One roving and conducting foot and vehicular patrols.

5. [RG-1.17)(C)(1)(a)] Is the primary duty of the security force to protect the facility from acts that could endanger the health and safety of the public? yes

6. [(N)(3.3.3)] Does the security force patrol the physical barriers of the PA at random intervals? Yes

7. [(N)(3.3.3)] Are random patrols of the PA physical barrier performed to sufficient depth to permit:

   A. Verification of the integrity of all barriers, and Yes

   B. Detection of violations of all barriers? Yes

8. [(N)(3.3.3)]. Is the frequency of random patrols of the PA physical barriers based upon the nature and extent of other surveillance and intrusion detection protection of the PA physical barrier? Yes

   A. If yes, is frequency of random patrol made at least once per day? Yes

   B. If no, is the frequency of random patrols made at least twice per eight (8) hour shift? DNA

9. Does the licensee maintain records which reflect the results of each security patrol conducted? Yes

10. [(N)(4.0)] Are sufficient number of individuals employed in the security force to adequately respond to various types of security threats without affecting safe operation of the plant? Yes

11. [(N)(4.4.1)] Are all individuals of the security force, including LEA and/or contracted service,:

    A. Specifically identified, and Yes

    B. Duties defined in writing? Yes

12. [(N)(4.4.1)] Is each member of the security force thoroughly familiar with that portion of the plant security program that he is expected to implement? Yes

13. [(N)(4.4.1)] Is each member of the security force thoroughly familiar with the hazards he may be expected to encounter in carrying out his duties? Yes

14. [(N)(4.4.2)] Is each member of the security force functioning under the jurisdiction of the licensee, trained and periodically retrained in subjects, skills, and procedures appropriate for effecting the discharging of his duties? Yes

A. Does the licensee use RG-5.20, or similar outline, as a guide for training and periodic retraining of the security force? Yes

B. Does this training and retraining include the following items?

(1) Purposes and principles of security at the site Yes

(2) Operation and testing of security systems and devices used at the nuclear power plant Yes

(3) Individual authority and responsibility as a member of the security force Yes

(4) Basic self-defense techniques Yes

(5) Weapons Qualifications Yes

(6) Bombs and bomb threats Yes

(7) Criminal law for security forces Yes

(8) Actions for responding to civil disturbance Yes

(9) Traffic control Yes

(10) Methods of search and seizure Yes

(11) Report writing Yes

(12) Company rules, procedures, and policies Yes

(13) First aid Yes

(14) Basic radiological protection orientation Yes

(15) Detail study of facility security program — Yes

(16) Facility emergency plans — Yes

(17) Access controls — Yes

(18) Standing orders and security procedures — Yes

(19) Communications — Yes

(20) Fire fighting and prevention — Yes

C. Does the licensee maintain records which indicate individual participants and details of training received? — Yes

15. [(RG-5.20)] Has each individual used for security purposes been tested and requalified according to the following schedule: Current guard force commenced assignement on 2/11/74. Provisions made for requalifications.

A. Annually - General duties and responsibilities — Yes

B. Semi-annually - Specific duties and responsibilities — Yes

C. Semi-annually - Communications equipment — Yes

D. Semi-annually - All other security equipment — Yes

E. Semi-annually - Firearms qualification (Guards only) — Yes

F. Annually - Medical examinations — Yes

16. [(N)(4.5.1.1)] Did all security force personnel receive a physical examination prior to employment or assignment of security duties? — Yes

A. What is the frequency of periodic physical reexamination? — Annual

B. Did each member of the security force, at the time of his last physical reexamination, pass company accepted standards for:

(1) Eyesight — Yes

(2) Hearing — Yes

17. [(N)(4.4.5)] Do all members of the security force receive an evaluation of performance:

A. Periodically, or Yes

B. At least annually Yes

18. [(N)(4.4.5)(4.5.1.1)] Has the licensee assured himself that during the past 12 months all members of the onsite security force have:

A. Demonstrated their ability to understand the facility's security procedures? How? Yes. Through training and written examinations.

B. Demonstrated their ability to execute all required physical and mental duties? How? On the job performance. Continuing supervision by corporate security training officer.

C. Requalified in all areas of security? Yes

19. [(N)(4.4.3)(4.5)] What equipment is used by the following individuals to protect the facility:

A. Guards .38 caliber Smith & Wesson revolvers, 12 gauge shotgun, handcuffs, flashlight, electronic searching wands, search light on patrol vehicle, two way radios.

B. Watchmen DNA

C. Other security force individuals DNA

20. [(N)(4.4.3), (4.5)] Is the equipment provided by the licensee adequate to aid in protecting the facility by:

A. Guards — Yes

B. Watchmen — DNA

C. Others — DNA

21. [(N)(4.5)] If the equipment provided by the licensee is considered inadequate, what equipment is needed? DNA

22. Does the licensee periodically inspect all security equipment utilized in the protection of his reactor facility (NR)? Yes

23. List security equipment inspected including frequency of inspections.

Equipment	Inspection Date
Revolvers	Weekly
Radio Equipment	Beginning of each shift
Shotgun	Weekly
Flashlight	Each use
Searching Wands	Each use

24. Document results of inspections (NR). Yes

25. [(N)(4.4.7)] What is the response time and manpower available to the facility from the following offsite LEA organizations?

LEA	Manpower Allocated	Response Time	Date of Agreement
County LEA	Linn County Sheriff Benton County Sheriff	15 minutes as needed	July, 1974
State LEA	State Highway Patrol	10-15 minutes	July, 1974
Other LEA			

26. [(N)(4.4.7), (4.5)] Does the licensee assure himself that offsite LEA response will be made by trained and qualified persons? Yes

27. [(N)(4.4.7] Is the senior operating persons on duty responsible for providing technical advice to any member of the LEA responding to a security threat at the facility? Yes

28. [(N)(4.4.7)] Does the licensee have established procedures to keep offsite security forces informed of any threat to plant security that might affect their responsibility for law enforcement in the community? Yes

V. PHYSICAL BARRIERS

1. [(N)(3.2)] Is the perimeter of the OCA marked with signs or other means which would provide reasonable assurance that persons entering are aware they are on private property? Yes

   A. Describe signs or other means (NR). "No Trespassing" signs posted throughout owner controlled area.

2. [(N)(3.3)] Is the PA enclosed by a physical barrier? Yes

3. [(N)(1)] Does the licensee use temporary physical barriers to prevent compromise of the security program during construction of adjacent units or facilities? Yes

4. [(N)(1)] Does the Protected Area (PA) of operating units and their associated operating facilities use temporary physical barriers to effectively isolate VA's from construction areas? Yes

5. [(N)(3.3)] Are physical barriers of the PA constructed so that its integrity is not compromised by:

   A. Natural bodies, See attached sheet

   B. Structures, or See attached sheet

   C. Access points? See attached sheet

6. [(N)(3.3) Except for building walls, is a clear area maintained on both sides of the physical barriers of the PA? Yes

   A. Do all clear areas provide for unobstructed view of adjacent areas? See attached sheet

Basis for Violation - Section V, Items 5 and 6

Except for a small section of the west fence perimeter, which was being worked on at the time of this inspection, the fence surrounding the protected area was complete. It was noted that the locking channel of the electric-motor driven vehicular gate was defective in that the gate when returned to its locked position was not fully engaged thereby providing a means of entry. Previously existing construction trailers, noted during prior inspections had been removed from within the clear area of the isolation zone. However, at the northwest corner of the protected area fence there were mounds of earth and weeds which are within the isolation zone and which could conceal an intruder. Also, along the south perimeter of the main protected area fence and on the south section of the fence surrounding the Intake Structure there was wooden poles immediately adjacent to the fences which could conceal an intruder or afford a means to climb over the fences. Failure to provide a fully effective protected area fence and to keep the isolation zones free of objects which could conceal an intruder constitutes noncompliance with commitments made in the Security Plan at Section 2.1.1.2. (See Violation No. 1 - Summary of Findings).

7. Describe PA physical barriers (NR). Seven foot high steel wire mesh fence topped with three strands of barbed wire mounted on outriggers overall height of fence 8 feet.

8. [(N)(3.4)] Do physical barriers to the ~~PA~~ VA provide:

A. The capability of deterring entry by unauthorized individuals? No
See attached page

B. Reasonable penetration resistance from outside the PA, such as:

(1) Small arms fire,

(2) Liquids, and

(3) Abrasives.

9. List all VA's at the site.

Control Room	Intake Structure
Cable Spread Room	Off-Gas Recombiner Building
Essential Switchgear	Off-Gas Retention Building
Reactor Building	Off-Gas Stack
Diesel Generator Rooms	
Chlorine Storage Room	

10. [(N)(3.4)] Describe the physical barriers of each VA? Metal doors or security fencing at portals, key locks or padlocks.

Basis for Violation - Section V, Item 8

DAEC has identified the vital areas at this reactor site and inspection of each revealed some deficiencies. The main access doors of the Essential Switchgear Room and Off-Gas Recombiner Building, while lockable, were not locked as required; the exterior door hinge pins of the Pump House and Intake Structure are accessible and susceptible to removal; and while the gate portal of the Off-Gas Stack was locked and alarmed, it was noted that there are three square holes within ground level that could provide a means of personnel entry or the introduction of industrial sabotage devices. Therefore, DAEC is in noncompliance with Sections 3.3.1.2, 1.0 and 2.1.3 of the Security Plan . (See Violation No. 2 - Summary of Findings)

11. [(N)(5.3)] Describe openings into buildings protecting VA's. Hollow core metal doors with no window surfaces or roll up corrugated metal doors mounted on rails and operable only from inside the plant.

12. [(N)(5.3)] Describe openings to VA's. Key locked or padlocked portals with limited key issuance.

13. [(N)(5.3)] Are openings to VA's minimized consistent with operational and emergency needs? Yes

14. [(N)(5.3)] Are openings to VA's having configurations amendable to personnel entry and are accessible from the ground protected against intrusion? Yes

15. [(N)(5.3)] Describe physical barriers used to protect water intake facilities. 22 foot high trash rake fronts the structure. A security fence surrounds the intake structure. Entry doors are locked and protected by intrusion alarm.

16. [(N)(3.1)] Does the facility physical barriers for the OCA, PA and VA provide an increasing degree of protection as one approaches the VE and other facilities of the plant? Yes

17. Does the licensee's records of physical barriers reflect the results of all:

A. Inspections, Yes

B. Tests, and Yes

C. Maintenance Yes

VI. ACCESS CONTROLS

1. [(N)(3.2.1)] Is access to the OCA determined by policy of the owner organization? Yes

2. [(N)(3.2.1)] Do access controls of the OCA consider compatable factors of:

   A. The emergency plan, Yes

   B. The evluation of a security threat, and Yes

   C. Natural and seasonal hazards Yes

3. [(N)(3.2.2)] Do provisions for controls of the OCA provide capability for:

   A. Removing persons from the area, and Yes

   B. Deterrent from further access? Yes

4. [(N)(3.2.4)] Do enforcement provisions of access controls to the OCA, PA and VA's provide corrective measures for abuse of access privileges? Yes

   A. If yes, explain. Removal of unauthorized persons from the site or buildings.

5. [(N)(3.3.1)] Is access to the PA limited to:

   A. Authorized persons, and Yes

   B. Essential vehicles? Yes

6. [(N)(3.3.2)] Is control of access to the PA controlled by:

A. Security personnel, Yes

B. Designated operating personnel, or Yes

C. Devices? Yes

(1) If devices are used, are they capable of:

(a) Admitting authorized persons, and Yes

(b) Excluding:

i. Unauthorized personnel, Yes

ii. Unauthorized material, and Yes

iii. Unauthorized objects? Yes

7. [(N)(3.3.2)] Is access to remote PA's and VA's, such as intake structures, controlled by a lock and key control system? Yes - but see attached sheet

A. If not, how? _____

8. [(N)(3.3.3.1)] Before access authorizations are granted to individuals who require escorting within the PA, does the licensee:

A. Establish a valid identity of the individual, Yes

B. Determine the validity of their need for access, and Yes

C. Require sign-in registration of the following information:

(1) Name, Yes

(2) Date, Yes

(3) Time, Yes

Basis for Program Weakness - Section VI, 7

The lock and key system initially instituted at DAEC was still in existence at the time of this inspection. RO:III Inspections conducted on August 7-9, 1974 and January 28-30, 1974 (prior to issuance of the Operating License) developed agreements to effect a change of key cores, particularly for vital areas. At the time of the current inspection, the key cores had not yet been changed. It was determined, however, that DAEC re-evaluated its lock and key system and decided to procure new locks which met more fully the standards of Regulatory Guide 5.12. The new locks were not ordered until October 6, 1974 with a promised delivery date of November 22, 1974. Because the matter of locks and keys for vital areas had been identified as problem area during previous RO:III inspections and since DAEC had not changed the locks as previously agreed, it is RO:III position that this item is a program weakness and that priority should be assigned to correct this matter as soon as possible. (See Summary of Findings - Program Weakness)

(4) Purpose of visit, Yes

(5) Employment affiliation, Yes

(6) Citizenship, and Yes

(7) Name of the individual to be visited, Yes

D. Require the individual to sign out Yes

9. Does the licensee maintain records of all site admissions? Yes

10. [(N)(3.3.3)] What precautions are taken when authorizing access to individuals who must be escorted while in the PA?

Badge issued requires escort. The visitee or designate provides escort while within the protected area.

11. [(N)(3.3.2.3)] Are persons, packages, and vehicles searched prior to entry or exit from PA? Yes

12. Are records maintained of all searches performed? Yes

13. [(N)(3.3.1)] Are parking facilities for all personnel and nonessential vehicles located outside the PA? Yes

14. [(N)(3.4.1)] Is access to VA's limited to AI's having a need to enter such areas? Yes

15. [(N)(3.4.2) Do access controls to VA's include one or more of the following:

A. Security force personnel, or No

(1) Designated operating personnel Yes

B. Lock and key system Yes

C. Electromechanical, or No

(1) Electronic devices No

16. [(N)(3.3.3.1)] Explain how personnel access authorizations to the facility are granted.

Access lists of personnel authorized access to the site and particular facilities are based upon operational necessity. Only those having a legimate need are included on the list.

17. [(N)(3.4)] Are vital areas (VA) isolated from non-vital equipment and facilities? Yes

18. [(N)(3.4)] Does the licensee maintain an up-to-date listing of all VA's? Yes

VII. SURVEILLANCE

1. [(N)(3.2.3)] Is surveillance of the OCA performed by:

   A. The security force — Yes

   B. Employees — Yes

   C. Contracted Individuals — No

   D. Combinations of the above —

   (1) If yes, explain. _____

2. [(N)(3.2.3)] Is surveillance of the OCA sufficient to determine compliance with existing company policy access limitations? — Yes

3. [(N)(5.2.1)] Are the necessary roads provided to facilitate surveillance of and response to security violations within the:

   A. Owner Controlled Area, and — Yes

   B. Protected Areas — Yes

4. [(N)(5.2.1)] Does grading, ground cover, and landscaping protect the surveillance by security patrols of the PA? — Essentially Yes But see Section V,5.

5. [(N)(5.2.1)] Are all weather roads and pathways provided for patrols? — Yes

   A. Within the PA, and — Yes

   B. To all remote PA's — Yes

6. [(N)(3.3.3)] Is surveillance of the PA tailored to the uniqueness of the facility? Yes

7. [(N)(3.3.3)] Is surveillance of the PA performed by:

   A. Plant security forces, or Yes

   B. Operating personnel? Yes

8. [(N)(3.3.3)] Is surveillance of the PA supplemented by:

   A. Visual surveillance, or Yes

      (1) Electronic surveillance, or No

   B. A sufficient number of adequately trained guards or patrol dogs which provide equivalent coverage to that provided by human observation? No

9. [(N)(5.2.1)] Is lighting of the PA sufficient to facilitate surveillance and patrol of the perimeter barriers? Yes

10. [(N)(3.3.3)] Is lighting of the PA sufficient to permit:

    A. Effective visual inspection of the area, Yes

    B. The operation of any intrusion detection device requiring illumination, such as CCTV, and DNA

    C. Maintenance of 0.2 ft. candle illumination at all times? Yes

11. [(N)(3.3.4)] Is response to the detection of intrusion into the PA made by:

    A. The security force, Yes

    B. Watchmen, No

    C. Operating personnel, or No

    D. Other invidivuals? No

12. [(N)(3.3.4)] Is the time for responding to a suspected or discovered intrusion into the PA within a 5-minute maximum? Yes

A. Is or can the response be made:

(1) With sufficient force or action to neutralize the suspected threat, and Yes

(2) In sufficient time to provide reasonable assurance that penetration to the vital area (VA) can be prevented? Yes

13. [(N)(3.4.3)] As part of their primary duties, are operating personnel assigned responsibilities for:

A. Primary surveillance and patrols of VA's, and Yes

B. Monitoring the status of vital equipment (VE)? Yes

14. [(N)(3.4.3)] Is surveillance of VA's by operating personnel supplemented by electronic monitoring devices such as intrusion alarms at:

A. Access points into each unoccupied VA, and Yes

B. Emergency exits to each VA? Yes

15. [(N)(3.4.3)] Is supplementary surveillance of VA's VE, and facilities therein, not normally accessible during operation, provided by remote monitoring devices, such as CCTV? No

16. [(N)(3.4.4)] Does the licensee's procedures require an immediate response to a discovered intrusion of a VA? Yes

A. If yes, is the response made:

(1) With sufficient force or action to neutralize the suspected threat, and Yes

(2) In sufficient time to provide reasonable assurance that the function of systems requiring the operation of VE or facilities will not be impaired? Yes

17. [(N)(4.6)] When unexpected variations in the status of VE are disclosed:

    A. Does the licensee regard this as a potential security threat, and — Yes

    B. Respond promptly by operating personnel? — Yes

18. [(N)(4.6)] In the event that response by operating personnel to VA's detects evidence of a sabotage threat is a response by security force requested? — Yes

19. [(N)(4.4.6)] Does the licensee maintain records of all tests, audits, drills and responses to threats to plant security? — Yes

VIII. BADGING AND IDENTIFICATION

1. [(N)(3.3.3.1)] As a condition for admission to the PA and VA's, is identification of individuals authorized access without escort accomplished by:

   A. Personnel recognition by:

      (1) Security force personnel, or — Yes

      (2) Designated operations personnel, or — Yes

      (3) Both (1) and (2) above, or —

   B. Comparison of the individual with a company - provided tamper-resistant photo-identification card or badge by:

      (1) Security force personnel, or — Yes

      (2) Designated operating personnel — Yes

      (3) Both A. and B. above, or —

   C. A device that:

      (1) Reads fingerprints, — No

      (2) Reads handprints, or — No

      (3) Other unique physical feature? — No

2. [(N)(3.3.2.2)] Does the licensee provide persons authorized access without escort, a tamper-resistant photo-identification:

   A. Card, or — No

   B. Badge? — Yes

3.	[(N)(3.3.2.2)] Except in areas where prohibited, does each non-escorted person display a company provided tamper-resistant photo-identification card or badge while withing the PA?	Yes
4.	[(N)(3.3.2.2)] In areas where tamper-resistant photo-identification badges are prohibited, are non-escorted persons issued a temporary non-photo badge?	DNA
5.	Does the licensee maintain records of badges issued?	Yes

IX. DETECTION AIDS

1. What areas of the facility are protected by intrusion alarms (NR)?

   A. Intake structure - Pump House

   B. Window surfaces of Administration Building

   C. External building doors

   D. _____

   E. _____

   F. _____

2. [(RG-1.17)(C)(1)(b)] Do all alarms annunciate in a continuously manned central alarm (primary) station? Yes

   A. That is located onsite (primary), and Yes

   B. At least one (1) other continuously manned station not necessarily onsite? Yes

3. [(RG-1.17)(C)(1)(b)] Are all alarms:

   A. Self-checking Yes

   B. Tamper indicating Yes

4. [(RG-1.17)(C)(1)(b)] Does the annunciation of an alarm in the onsite central alarm (primary) station indicate:

   A. The type of alarm (intrusion, emergency exit, etc.) Yes

   B. Location of the alarm? Yes

5. [(RG-1.17)(C)(1)(b)] Does the annunciation of an alarm in the second alarm station provide indications that an intrusion or illegal entry has occurred? Yes

6. [(RG-1.17)(C)(1)(b)] Does each alarm annunciator possess reset capability? Yes

7. [(RG-1.17(C)(1)(b)] Is each alarm annunciation reset only after satisfactory communications have taken place between alarm stations? Yes

8. [(RG-1.17)(C)(2)(a)] Are all security related equipment, including alarms and alarm systems, functionally tested for operability:

   A. At the commencement and completion of each interval for which it is used for security, but Yes

   B. Not less frequently than once each seven (7) days? Yes

9. [(RG-1.17)(C)(1)(b)] Do the following alarm systems meet the performance and reliability levels specified by GAS Interim Federal Specification W-A/0050B (GSA-FSS):

   A. Intrusion alarms Yes

   B. Emergency exit alarms Yes

   C. Line supervisory systems Yes

10. [(RG-1.17)(C)(3)] What devices are used by the facility to protect against undetected intentional acts that could impair equipment performance, such as automatic indicators of inoperability.

    A. Alarm annunciations on Control Room Panel

    B. _____

C. _____

D. _____

E. _____

F. _____

G. _____

H. _____

I. _____

J. _____

11. [(N)(4.4.6)] Does the licensee's intrusion alarm records document the results of:

A. Inspections, Yes

B. Tests, and Yes

C. Maintenance? Yes

12. [(N)(4.4.6)] Do records of alarm system activities include:

A. Each onsite alarm annunciation, Yes

B. Location of each alarm, false alarm and alarm checks, and Yes

C. Tamper indication alarms? Yes

13. [(N)(4.4.6)] Do records indicate the following data on each alarm annunciated:

A. Type of alarm, Yes

B. Location of each alarm, Yes

C. Alarm circuit, Yes

D. Date of alarm, and Yes

E. Time of alarm? Yes

X. COMMUNICATIONS

1. [(N)(4.4.4)] Are communications systems among the organizational units comprising the security force provided by the following means of redundancy:

   A. Two or more telephones, that — Yes

      (1) Are separate and independent in their route of departure from the site, or

   B. One telephone and one radio transceiver, or — DNA

   C. Two or more independently powered radio transceivers: — Yes

      (1) Which operate on separate frequencies (NR)? — Yes

2. Are radio communications capability provided for the following individuals on duty (NR):

   A. Guards, — Yes

   B. Watchmen, and — DNA

   C. Other security force individuals — Yes

   D. Central Control Room — Yes

3. Is a central communications station capable of calling for assistance from (NR):

   A. Each guard on duty, — Yes

   B. Each security force member on duty, and — Yes

   C. LLEA's — Yes

4.	Does each two-way radio voice communication system that is used for physical protection purposed terminate within the continuously manned central (primary) station that is located within a PA (NR)?	Yes
5.	Does each communications and system have the capability of remaining in an operable effective condition after the loss of the primary power source (NR)?	Yes
6.	[(RG-1.17)(C)(2)(b)] Is all communications equipment tested for operability and performance not less frequently than once at the beginning of each security personnel work shift?	Yes
7.	Are all security related devices maintained in an operable condition (NR)?	Yes
8.	Is the facility communication equipment functioning in an acceptable manner (NR)?	Yes
9.	[(N)(4.4.4)] Is communications equipment capable of providing reasonable assurance that appropriate response groups will be notified for:	
	A. Security threats, and	Yes
	B. Discovered intrusions into the PA and/or VA?	Yes
10.	[(N)(4.8)] Does the licensee verify communications with offsite support groups during periodic drills and tests of security measures?	Yes
11.	[(N)(5.3)] Is wiring associated with the following devices protected by metal conduit or equivalent protection:	
	A. Protective devices,	Yes
	B. Security communications systems, and	Yes
	C. Door lock activators	DNA

12. [(N)(5.3)] Are service panels for security systems of a VA lockable when located outside the VA? Yes

13. Does the licensee maintain records of communications equipment which reflect the results of all:

A. Inspections, Yes

B. Tests, and Yes

C. Maintenance? Yes

XI. SECURITY EDUCATION

1. Does each member of the security force have a clear understanding of physical protection practices employed by the licensee (NR)? Yes

2. [(N)(4.7)] Does the licensee routinely indoctrinate new employees on physical protection practices employed at the facility prior to being permitted access to VE and VA's? Yes

3. [(N)(4.7)] Is there a continuing security education program in effect at the facility to assure that each employee is receiving appropriate security orientation and training on matters which he has responsibility? Yes

   A. Are records of participants and details of training maintained? Yes

4. Are termination security interviews conducted (NR)? No

5. What actions are taken for security violations by employees (NR)? Disciplinary

6. Does the licensee have an outline of all security indoctrinations used at the facility (NR)? Yes

7. [(N)(4.8)] Does the licensee periodically conduct drills and tests for all employees and security force personnel to: Not to date (See attached sheet)

   A. Provide reasonable assurance of the effectiveness of security measures,

   B. Assess the adequacy of performance of individuals, and

   C. Demonstrate operability of equipment? Yes

8. [(N)(4.3), (4.5.1)] Does the licensee have procedures for making a determination of:

   A. The acceptability of candidates for nuclear plant employment, including contract guards Yes

   B. Continuing acceptability of employees with regard to trustworthiness? Yes

Comment on Section XI, Item 7

Section 3.4 of the Duane Arnold Industrial Security Plan states, "The Assistant Chief Engineer, or his designee, shall conduct security drills and training courses to develop, evaluate and maintain security control and preparedness." While station employees, including guards, have received indoctrination regarding security responsibilities, no security drills, per se, have been conducted. It is noted that the security plan is silent on retraining of employees and/or conducting security drills to test proficiency and makes no reference to the frequency of training sessions or drills. This matter will be referred through RO/HQ for discussion with Licensing.

9. [(N)(4.3), (4.5.1)] Does the licensee have procedures for screening candidates for employment which include as a minimum, the following provisions:

A. A background investigation,	Yes
(1) Prior to employment,	Yes
(2) Prior to work assignment without escort,	Yes
B. Medical Examination,	Yes
C. Continued observation of all employees, with	Yes
(1) Appropriate corrective measures for aberrant behavior.	Yes
D. Certification by Guard Contractor of character, physical fitness and stability of guards to be assigned.	DNA Guards are company employed

XII. PROCEDURES

1. [(50.34(b)(6)(v)] Does the licensee maintain procedures for coping with emergencies as shown in 10 CFR 50, Appendix E? Yes

2. [(N)(4.2)] Has the licensee prepared procedures which describe security requirements of the plant including the following topics as a minimum?

   (A) Bomb or other overt threats Yes

   (B) Civil disturbances Yes

   (C) Security communications Yes

   (D) Employee security training Yes

   (E) Security force duties and responsibilities Yes

   (F) Incoming package and material control Yes

   (G) Intrusion alarm response Yes

   (H) Lock and key procedures Yes

   (I) Patrol procedures Yes

   (J) Personnel identification Yes

   (K) Access control (i.e., security searches and monitoring) Yes

   (L) Special procedures or instruction for LLEA Yes

   (M) Vehicle traffic and parking control Yes

   (N) Surveillance requirements and procedures Yes

   (O) Testing and maintenance of security systems Yes

   (P) Reporting requirements Yes

   (Q) Audit procedures Yes

   (R) Security during operational emergencies Yes

   (S) Support from offsite security forces Yes

3. [(N)(4.2)] Are written security procedures:

   A. Part of facility administrative procedures manual, or — No

   B. A separate procedure manual? — Yes

4. [(N)(4.2.3)], [(N)(4.2.5)] Prior to being placed into effect, was each security procedure:

   A. Reviewed for content, completeness, and clarity, and — Yes

   B. Approved by appropriate plant supervision? — Yes

5. [(N)(4.2.3)] Do administrative procedures contain the delineation of individuals or groups responsible for the preparation, review, and approval of security procedures? — Yes

6. [(N)(4.2.4)] Are copies of security procedures placed at specific locations for use by employees and security forces? — Yes

7. [(N)(4.2.4)] Is each copy of the security procedures reviewed periodically at its designated location for completeness? — Yes

8. [(N)(4.2.4)] Is the dissemination of security procedures limited to those having a need to know? — Yes

9. [(N)(4.2.5)] Except for legal or historical purposes, are obsolete security revisions destroyed? — Yes

10. [(N)(4.2.6)] Are temporary security procedures prepared at the direction of the Plant Manager? — Yes

11. Does the licensee have written Administrative Control procedures which:

   A. [(N)(3.4.4)] Contain provisions for enforcement of access controls and surveillance of VA's? — Yes

   B. [(N)(4.0)] Outline specific duties of individuals responsible for the security program? — Yes

   C. Delineates day-to-day operations? — Yes

D. Require periodic review of all phases of the security program? Yes

E. Spell out techniques required to make changes in the PSP? Yes

F. Specifies what training, equipping and qualifying of security personnel will be performed? Yes

G. Outline access controls to the OCA, PA and VA's? Yes

H. Indicates detection aids to be used to supplement security protection of the facility? Yes

I. Stipulate records and reports to be maintained? Yes

J. Spells out responsibilities for changing physical protection procedures? Yes

12. [(N)(4.9)] Does the licensee maintain written records and reports as necessary to:

A. Ensure compliance with security provisions, and Yes

B. Facilitate audits performed of all phases of the security program? Yes