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Region I
(REGION)

5-25-89
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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/89-08

Docket No. 50-244

License No. DPR-18

Licensee: Rochester Gas and Electric Corporation

Facility Name: R. E. Ginna Power Plant

Inspection At: Ontario, New York

Inspection Conducted: April 17-21, 1989

Type of Inspection: Routine, Unannounced Physical Security

Inspectors:

W. K. Lancaster
W. K. Lancaster, Physical Security Inspector

5-25-89
date

E. D. Sylvester
E. D. Sylvester, Senior Reactor Engineer,
Physical Security

5-25-89
date

Approved by:

R. R. Keimig
R. R. Keimig, Chief, Safeguards Section
Division of Radiation Safety and Safeguards

5-25-89
date

Inspection Summary: Routine, Unannounced Physical Security (Inspection Report No. 50-244/89-08)

Areas Inspected: Onsite Follow-up of Previously Identified Items; Management Support, Security Program Plans and Audits; Protected Area and Vital Area Physical Barriers, Detection and Assessment Aids; Protected and Vital Area Access Control of Personnel, Packages and Vehicles; Alarm Stations and Communications; Power Supply; Testing, Maintenance and Compensatory Measures; and Security Training and Qualifications.

Results: The licensee was found in noncompliance with the NRC-approved Physical Security Plan in the areas of Physical Barriers - Vital Areas, and Protected Area Assessment Aids.

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DETAILS

1. Key Personnel Contacted

Licensee and Contractor Personnel

- *R. Smith, Vice President - Engineering and Production
- *S. Spector, Plant Manager
- *T. Powell, Manager - Risk Management Department
- *R. Marchionda, Director of Outage Planning
- *W. Borland, Electrical Engineer
- *R. Wood, Supervisor - Nuclear Security
- *M. Fowler, Coordinator - Nuclear Security Training
- T. Porter, Acting Foreman - Instrumentation and Controls (I&C)
- R. Benne, Project Manager - Wackenhut

U.S. Nuclear Regulatory Commission (NRC)

- *N. Perry, Resident Inspector

*Indicates those present at the Exit Interview

2. Onsite Follow-up of Previously Identified Items

- a. (Closed) VIO 88-18-01. The licensee failed to provide test procedures for the protected area (PA) intrusion detection system (IDS). The licensee's response to the Notice of Violation, as documented in a letter to the NRC dated December 5, 1988, was verified and corrective actions were found to be satisfactory. The inspectors observed tests of the PA IDS during the period of April 17-21, 1989, and found no discrepancies.
- b. (Open) VIO 88-12-02. The licensee was found with inadequate barriers at a certain vital area. The licensee estimates that the barriers on this vital area would be upgraded by August 1, 1989. The inspectors verified that compensatory security measures for the degraded barriers were in place.

3. Management Support, Security Program Plans, and Audits

- a. Management Support - Management support for, and attention to, the physical security program appeared to have decreased in certain areas. This is based upon the inspectors' review of various aspects of the licensee's program, and the nature of the apparent violations and security concerns identified during the inspection.



The inspectors observed that the licensee's physical security program has some notable strengths; however, it also has some weaknesses that are in need of attention. The following are examples of program strengths:

- A very professional, performance oriented, and effective security force;
- A positive attitude toward security is displayed by all plant personnel;
- Enhanced barriers at key locations on the protected area (PA) perimeter to protect against penetration by unauthorized vehicles;
- Large clear isolation zones and a double PA fence barrier system to aid alarm station operators in detection and assessment;
- An excellent fixed security lighting system;
- Strategically located defensive positions for the response teams; and,
- Excellent armament (types, distribution and locations) for the response teams.

The following are examples of weaknesses observed:

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The inspectors expressed the concern that, while most aspects of the program appeared to be performance-oriented and received appropriate attention, some aspects, notably equipment and systems, have been neglected to the point that they are only marginally effective. The licensee indicated that a bid specification was being prepared for a consultant to evaluate the program and expected the evaluation to be conducted in the near future. The inspectors indicated interest in reviewing the evaluation results after the licensee's review and assessment.



- b. Security Program Plans - The inspectors reviewed the NRC-approved security plan (the Plan) and met with licensee representatives to discuss several inconsistencies in the Plan. The following are some representative examples:

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Subsequent to these discussions, which included a review of the above examples with the licensee, the inspectors stated that the Plan and implementing procedures need to be reviewed to identify and resolve any additional inconsistencies and to ensure that the implementing procedures reflect the commitments in the Plan.

The licensee committed to include a section on security plan and plan implementing procedures review in the consultant's evaluation of the licensee's program.

- c. Audits - The inspectors reviewed the report of the 1988 annual security program audit, conducted by Quality Assurance (QA), and verified that the audit had been conducted in accordance with the Plan. The inspectors noted that there were no adverse findings, concerns or recommendations made in the official transmittal of the audit report. Apparently, the QA auditors found all aspects of the security program to be satisfactory. Based on the inspectors' findings during this inspection and an interview of a QA auditor who participated in the 1988 audit, the inspectors questioned the depth of the audit and/or the security expertise of the auditors.

The licensee agreed to look into the inspectors' concern in this area. The licensee's audit program will be reviewed further during the next inspection.

4. Protected and Vital Area Physical Barriers, Detection and Assessment Aids

- a. Protected Area Barriers - The inspectors conducted a physical inspection of the PA barrier on April 17, 1989. The inspectors



determined, by observation, that the barriers were installed and maintained as described in the Plan.

- b. Protected Area Detection Aids - The inspectors tested the PA perimeter intrusion detection system (IDS) on April 18, 1989, and determined that it was installed, maintained and operated as committed to in the Plan.

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- c. Isolation Zones - The inspectors verified that isolation zones were very well maintained and free of obstructions. However, as discussed in paragraph 4.e., obstructions outside of the isolation zones obscured assessment capabilities in two areas.
- d. Protected Area and Isolation Zone Lighting - The inspectors conducted a lighting survey of the PA and isolation zones on April 17 and 19, 1989. The inspectors determined, by observation, that lighting in the isolation zones was adequate. However, elsewhere within the PA, the inspectors identified several isolated areas where lighting was marginal due to on-going outage activities. While these lighting deficiencies did not represent a violation of the Plan, the inspectors noted that their existence was not indicative of an aggressive security lighting program.

Security force post orders and the Plan implementing procedures were reviewed by the inspectors. They noted that these documents did not specifically require security force members to be alert for and identify potential lighting deficiencies. The inspectors also determined through interviews with security force members that the security shift supervisors do not have ready access to a light meter with which to quantitatively assess security force identified potential lighting deficiencies.

The licensee committed to revise post orders and procedures to specifically address the responsibilities of security force members to be alert for areas of marginal lighting. The licensee also stated that shift supervisors would be provided with a light meter. PA lighting will be reviewed during subsequent inspections.



- e. Assessment Aids - The inspectors observed the use of assessment aids, and other security equipment in operation at the Central Alarm Station (CAS) on April 18, 1989. The inspectors found that two portions of the PA barrier and associated isolation zones could not be adequately assessed.

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The inspectors interviewed security and I&C personnel about this matter and determined that the problem has existed for over two years. However, when the matter was discussed with licensee security management personnel, they disclaimed knowledge of the problem and could offer no explanation of how the problem could exist for that period of time without it coming to their attention. The inspectors expressed the following concerns to the licensee:

- 1) Why was there not a deficiency report written concerning the problem when it was first identified? (The inspectors could not find one nor was one offered by the licensee.)
- 2) If a deficiency report was written, why was the problem not corrected?
- 3) Why was security management not aware of an apparent system problem that existed for over two years when it was general knowledge among security and I&C personnel?
- 4) How could the problem exist for over two years without being corrected, especially since the NRC had given the licensee credit for the system during the security plan approval process?
- 5) Why were compensatory measures not implemented when the problem first occurred?



- 6) If a conscious decision was made by someone not to correct the problem, who made that decision and why was the NRC not notified and a security plan change submitted?

The inspectors reviewed the Plan and found the following requirements:

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The inspectors determined that the licensee's failure to comply with commitments in the Plan is an apparent violation of NRC requirements (50-244/89-08-01).

The inspectors also observed the use of assessment aids during the hours of darkness on April 17, 1989.

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The licensee implemented compensatory security measures for these potential weaknesses and committed to review the entire CCTV system in the near future. The licensee's actions to resolve these matters will be reviewed during the next inspection.

- f. Vital Area Barrier - The inspectors conducted a physical inspection of Vital Area (VA) barriers on April 18, 1989.

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The licensee agreed to correct these deficiencies by the end of the current outage. This will be reviewed during subsequent inspections.

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The inspectors reviewed the Plan and found the following requirements:

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The inspectors determined that the licensee's failure to comply with the above requirements in the Plan is an apparent violation of NRC requirements. (50-244/89-08-02).

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- g. Vital Area Detection Aids - The inspectors observed and witnessed testing of the VA intrusion detection aids and determined that they were installed, maintained and operated as committed to in the Plan.



5. Protected and Vital Area Access Control of Personnel,
Packages and Vehicles

a. Personnel Assess Control

The inspectors determined that the licensee was exercising positive control over personnel access to the PA and VAs. This determination was based on the following:

- 1) The inspectors verified, by observation, that personnel are properly identified and authorization is checked prior to issuance of badges and key-cards.
- 2) The inspectors verified that the licensee has a fitness for duty program in place. A drug testing program has been implemented and includes:

- All prospective licensee employees (who would be assigned to the plant) are tested prior to employment;
- All consultants and contractors must certify to the licensee that their employees have been drug tested; and,
- Testing for cause.

The inspectors noted that the testing program does not include annual testing of licensee, consultants or contractor employees who have access to the PA and VAs at the station.

- 3) The inspectors verified that the licensee has a search program, as committed to in the Plan, for firearms, explosives, incendiary devices and other unauthorized material. The inspectors observed plant personnel and visitor access processing several times during the inspection and interviewed members of the security force and the licensee's security staff regarding personnel access procedures.

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- 4) The inspectors determined, by observation, that individuals in the PA and VAs display their access badges as required.



- 5) The inspectors verified that the licensee has escort procedures for visitors to the PA and VAs.
 - 6) The inspectors verified, by a review of security procedures and records, that the licensee has a program to confirm the trustworthiness and reliability of employees. This program includes checks on employment history, criminal history, physical examination, and a psychological examination.
 - 7) The inspectors reviewed the procedures for the control of security locks and keys and determined that they were consistent with commitments in the Plan. The inspectors also reviewed the PA and VA key inventory logs, and discussed lock and key control procedures with members of the security force and the licensee's security staff. No deficiencies were identified.
 - 8) The inspectors verified that the licensee has provisions for expediting prompt access to vital equipment during emergencies, and that the provisions are adequate for that purpose.
 - 9) The inspectors verified that unescorted access to VAs is limited to authorized individuals. The VA access list is revalidated at least once every 31 days as committed to in the Plan.
- b. Package Access Control

The inspectors determined that the licensee was exercising positive control over hand-carried items that are brought into the PA via the main gatehouse. The inspectors reviewed the search procedures for the main gatehouse and found them consistent with commitments in the Plan.

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The licensee agreed to assess and re-evaluate this area of the Plan. The NRC considers the licensee's practices regarding searches of packages and materials entering the PA to be a Unresolved Item (50-244/89-08-01).

c. Vehicle Access Control

The inspectors determined that the licensee properly controls vehicle access to and within the PA. The inspectors verified that vehicles are properly processed prior to entering the PA. The process was consistent with commitments in the Plan. The inspectors also reviewed the vehicle search procedures and determined that they were consistent with commitments in the Plan. This determination was made by observing vehicle processing and search, inspection of vehicle logs, and by interviewing members of the security force and licensee's security staff about vehicle processing and search procedures.

6. Alarm Station and Communications

The inspectors observed the operations of the CAS and SAS and determined that they were maintained and operated as committed to in the Plan. CAS and SAS operators were interviewed by the inspectors and found to be knowledgeable of their duties and responsibilities. The inspectors verified that the CAS and SAS do not contain any operational activities that would interfere with the assessment and response functions.

The inspectors also observed tests of all communication capabilities in both the CAS and the SAS and reviewed the testing records for the communications channels. All were found to be as committed to in the Plan.

7. Emergency Power Supply

The inspectors verified that there are several systems (batteries, dedicated diesel generator within a VA, and plant on-site AC power) that provide backup power to the security systems. The inspectors reviewed the test and maintenance records and procedures for these systems and found that they were consistent with the Plan.

The inspectors also verified that the door access control system for VAs will permit emergency ingress and egress when the system's normal power is lost.

8. Testing, Maintenance and Compensatory Measures

The inspectors reviewed testing and maintenance records and confirmed that the records committed to in the Plan were on file and readily available for review. The station uses experienced instrumentation and controls.



(I&C) technicians to repair/replace and test any security equipment which requires preventive or corrective maintenance. A check of repair records indicated that repairs, replacements and testing is being accomplished in a timely manner. The review also included the 1988/1989 Quarterly Security Event Logs and the 1988/1989 Maintenance Work Request records.

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The licensee agreed to review the maintenance history for these components in an effort to determine the reliability of this equipment. This matter will be reviewed during subsequent inspections.

The inspectors also reviewed the licensee's use of compensatory security measures and determined that they were being implemented as committed to in the Plan.

9. Security Training and Qualification

Several Security Officers (SOs) were interviewed to determine if they possess the requisite knowledge and ability to carry out their assigned duties. The interview results indicated that they were very professional and knowledgeable of their job requirements.

The licensee's contract security force consists of forty-seven SOs and watchmen, ten supervisory personnel and one project manager. The inspectors verified that the armed response force meets the commitments in the Plan and that there is always one full-time member of the security organization on-site who has the authority to direct security activities.

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The licensee agreed to review this matter. This matter will be reviewed again during subsequent inspections.

On April 20, 1989, at 12:19 a.m., the security shift supervisor found a security force member asleep on-post at a VA access point. The licensee properly reported the incident to the NRC in accordance with 10 CFR 73.71. The inspectors, who were on site at the time, reviewed the incident and determined that the security force member could have been asleep for only approximately seven minutes. The licensee took immediate and appropriate compensatory security measures. The inspectors determined that all appropriate actions had been taken. The inspectors also found that the licensee has an effective program in place to guard against members of the security force being inattentive while on duty for a length of time that would degrade security.

1C. Exit Interview

The inspectors met with the licensee representatives indicated in paragraph 1 at the conclusion of the inspection on April 21, 1989. At the time, the purpose and scope of the inspection were reviewed and the findings were presented.

At no time during this inspection was written material provided to the licensee by the inspectors.

