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INDIANA & MICHIGAN ELECTRIC COMPANY

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April 21, 1986
AEP:NRC:0846R

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO INSPECTION REPORT NOS. 50-315 AND 316/86012 (DRSS)
D. C. COOK SECURITY PIP

Mr. James G. Keppler
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter responds to your March 12, 1986 letter transmitting Inspection Reports No. 50-315/86012 (DRSS) and 50-316/86012 (DRSS) and the Management Meeting (IP 30702) held in the Region III office on February 20, 1986. As a result of the Inspection Report and the February 20, 1986 meeting, we have developed and begun the implementation of a Security Performance Improvement Program (PIP), which addresses the problems identified in the SALP 5 Board Report and previous Security Inspection Reports.

The attached D. C. Cook Security PIP is submitted for your review. We believe it presents a finite, goal and results oriented program that identifies objectives, descriptions of actions, and quantifiable indication of success and scheduling data. In addition, as can be observed in reviewing the PIP, results of some short-term goals and specific actions are already demonstrated.

We believe the attached Security PIP fulfills our commitment to develop and implement a plan to resolve the problems identified by the NRC.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

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PDR ADOCK 05000315
Q PDR

Very truly yours,

M. P. Alexich
M. P. Alexich
Vice President
9/11
4/21/86

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MPA/rjn

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
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G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

APR 24 1986

D. C. COOK SECURITY PERFORMANCE IMPROVEMENT PROGRAM (PIP)

The following PIP has been established to address problems identified in Region III Inspection Reports No. 50-315/85018, 50-316/85019, 50-315 and 316/85023, 50-315 and 316/85038, 50-315 and 316/86003, 50-315 and 316/86010, 50-315 and 316/86012, and the attendant enforcement action, as well as the SALP 5 Board Report, dated January 13, 1986, and Licensee Audit Report NSDRC No. 117.

This program has been evaluated by senior plant and corporate management in addition to security management and brings to focus prioritized goals essential to establish strong management controls over the facility's physical security program and to ensure compliance with the approved Security Plan. All attempts have been made to ensure that the PIP is a finite, goal and results-oriented program that identifies objectives, descriptions of actions, quantifiable indicators of success and scheduling data if applicable.

Even though the PIP is a finite program, it is understood that to maintain results of established goals, continuous monitoring of the security program must be conducted. On-site security management will monitor the program through daily observation of security activities, plant tours, review of security logs and records, daily meetings during normal work days with security supervision and documented inspections and evaluations of security personnel and equipment on all shifts. In addition, random surveillances of selected security tasks shall be conducted by the on-site Quality Assurance Department. To ensure an unbiased evaluation of the security program an audit shall be conducted every 12 months by an offsite organization independent of the security organization. Plant procedures shall be reviewed in accordance with approved Plant Document Control Procedures and revised and updated as necessary.

Goals have been established to:

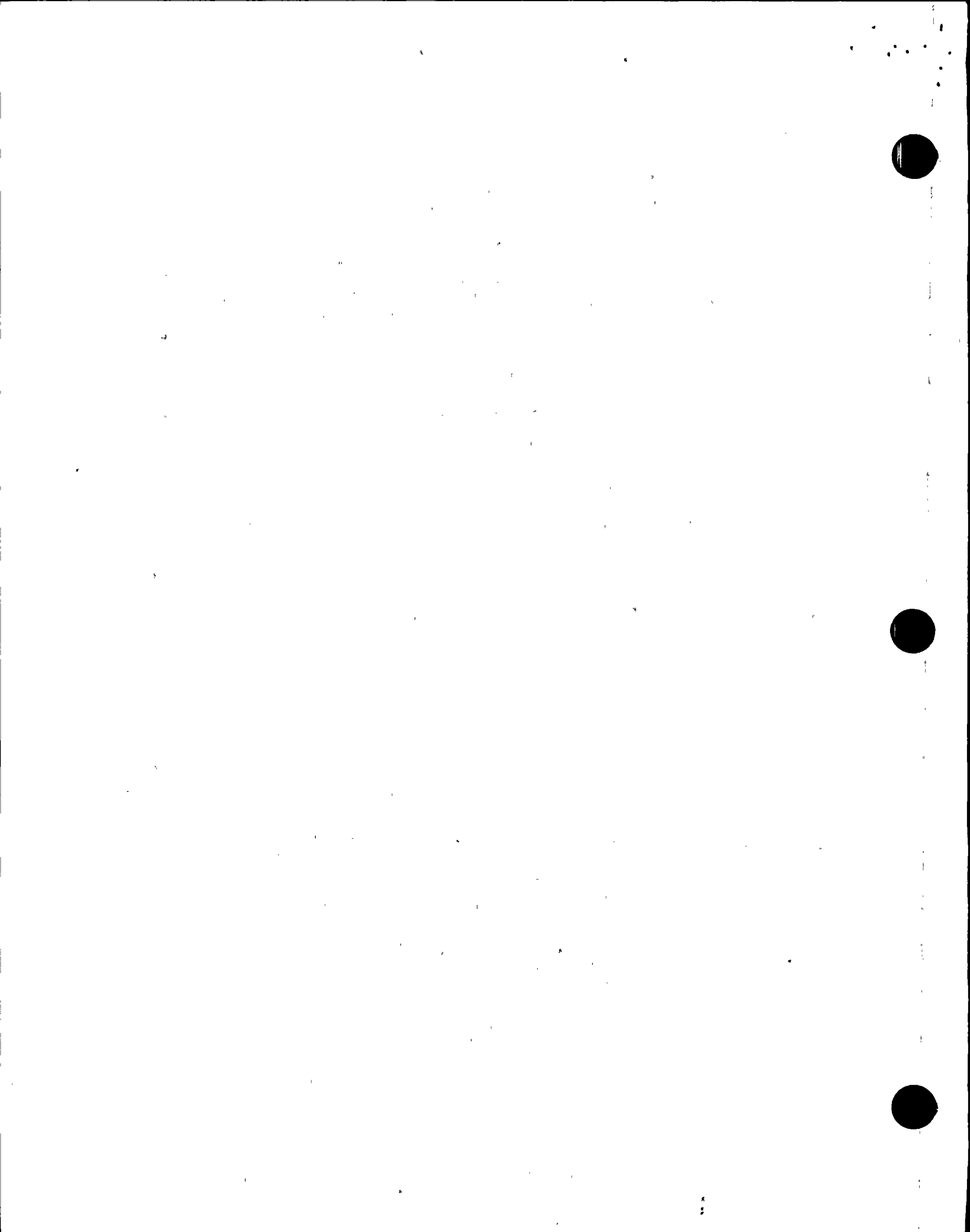
- I. Improve management and supervisory effectiveness in monitoring and directing security activities.

1. OBJECTIVE

Reduce the potential for degradation of a vital area barrier to go unrecognized and/or unreported by plant or security personnel.

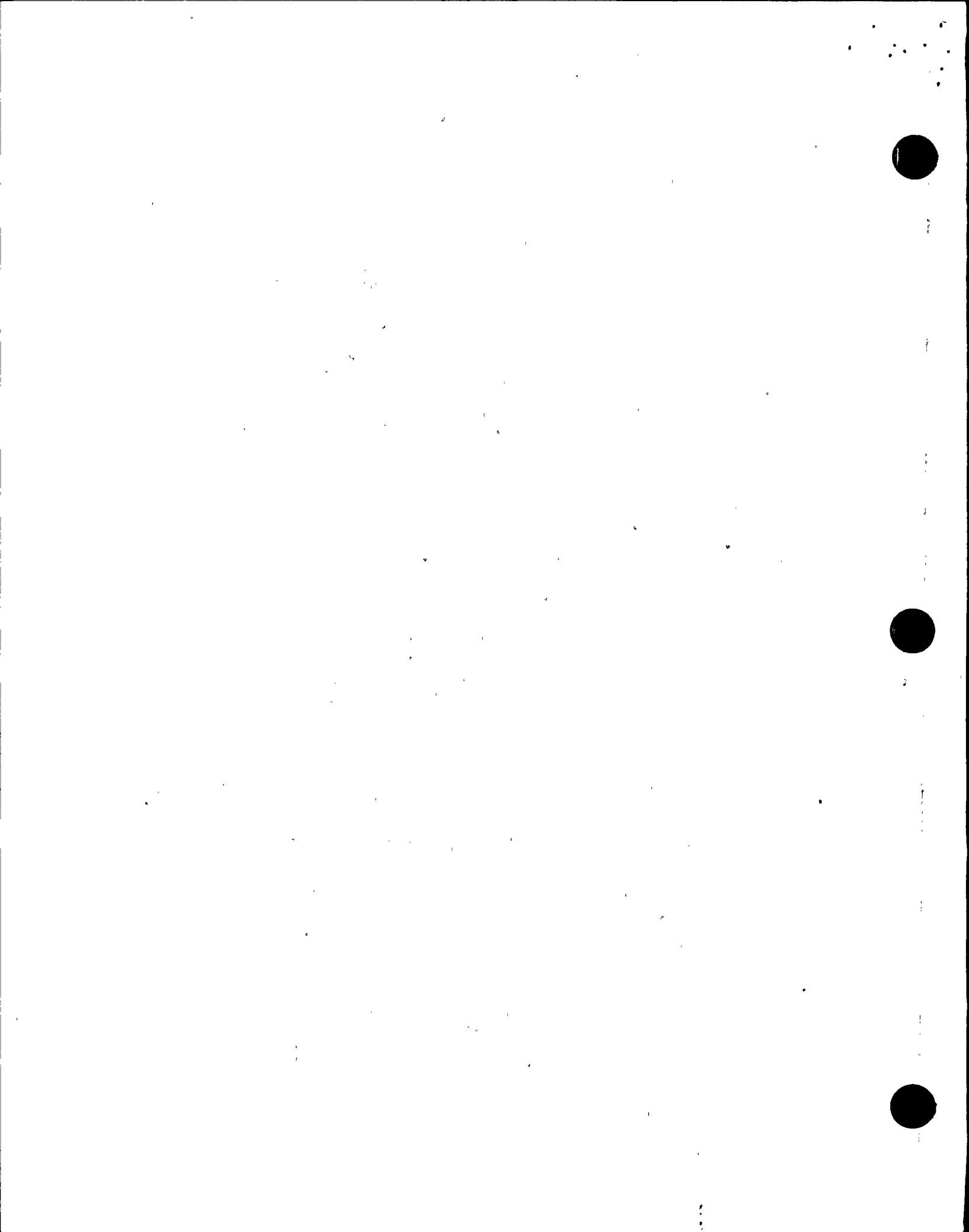
The following action items to accomplish this objective have been completed:

- A. A memo from the RRS, Inc. Security Contractor, dated May 17, 1985, required that contract security personnel be alert for breaches in vital areas.



- B. Signs were installed on vital area hatches and vents by June 19, 1985, directing personnel to notify Security before removing vent covers.
- C. From June 20, 1985, through June 25, 1985, vital area barriers were visually inspected for openings of 96 square inches or greater. Questionable areas were modified or welded shut to preclude unauthorized entry.
- D. Between May 17, 1985 and June 25, 1985, Design Changes (RFCs) in progress were reviewed to determine any interaction with plant security measures which would degrade security plan requirements.
- E. Plant Modifications (PMs) were reviewed between May 17, 1985 and June 18, 1985, to insure that the work done in the process of performing the PM would not result in any unidentified degradation of a vital area barrier.
- F. In addition, RFCs and PMs on which physical work had not been started were placed on hold on June 25, 1985, pending review for interaction with security system or vital area barriers. This is ongoing (see following paragraph K).
- G. To control the removal of hatches from the roof of the Essential Service Water (ESW) Pump Rooms, the east and west hatches for Units 1 and 2 were chained and locked together on October 23, 1985. In addition, the locks chaining the hatches together have been put under the control of the Security Department. Prior to this time, the key to operate the Screen House crane, which is used to lift the ESW pump room hatches, was controlled by one individual, the Maintenance Production Supervisor. In the future, the Maintenance Department office will control this key.
- H. On June 21, 1985, Operating Memo 85-93 (T) was issued. The memo was addressed to Shift Supervisors in reference to vital area barrier breaches for maintenance and operation activities. The memo briefly advises Shift Supervisors of the significance of maintaining vital area barriers and reminds them of their reporting responsibilities.
- I. Security Safeguards Procedure No. 12 AHP 2060 SEC. 032, "Vital Areas," was revised on July 5, 1985, to require the contract security force to be sensitive to any unguarded opening during the performance of their duties.
- J. Contract Security Post Orders for guard positions 6-A, 6-1, and 6-2 were revised by June 25, 1985. The revision provided guidance to guards while on routine patrols of vital areas, reminding them to check floors, ceilings and walls as well as normal entry portals for any openings. Any opening found, of 96 square inches or larger, is to be reported to the Shift Security Supervisor (SSS).

- K. Security system information was included in Plant Procedure PMI 5040, "Design Change Control Program," on June 27, 1985. Included was a requirement for pre-production walk-downs to "evaluate impact on plant security." In addition, a Security Supervisor sign-off was added to the Pre-Production Review Checklist.
- L. Training classes were completed by July 12, 1985, for contract security guards. This training included emphasis on identification of vital area barrier deficiencies and necessary compensatory actions. Subsequent to the training, special drills were conducted to assess security officers' performance in checking vital area boundaries during the course of their normal patrol duties. These drills were completed by September 9, 1985.
- M. Training classes were conducted during August 1985 for selected plant personnel, describing the security event, the corrective and preventive measures taken, and the necessity to be alert for degradation of security barriers of systems.
- N. The Employee Security Manual was revised on August 1, 1985, to discuss recent degradation of vital area barriers, an explanation of the 96 square inch opening criterion, a list of identified vital areas, and a statement that if an employee has any doubt about impacting a security barrier he should contact the Shift Security Supervisor.
- O. The Plant Manager instructed the Chief Security Supervisor and Administrative Superintendent on June 29, 1985, that Security Department personnel must take the lead in assessing required action as a result of adverse security events/conditions. Security must advise plant management on what appropriate compensatory measures and reporting requirements must be met, and reiterate plant policy of "If in doubt, report and retract after thorough assessment, if appropriate."
- P. Security Safeguards Procedure No. 12 AHP 2060 SEC. 048, "Reporting of Physical Security Events," was revised on July 5, 1985, to clarify the mechanics of reporting, and given wider distribution to plant personnel. Actual implementation of this procedure shall be monitored closely by security management.
- Q. Plant Procedure PMSO. 034, "Immediate Notification by the Shift Supervisor of Significant Events," has been incorporated into PMI 7030, "Condition Reports," effective 11-22-85, which includes appropriate warnings and guidance on MASP reportable events per 10 CFR 73.71(c).



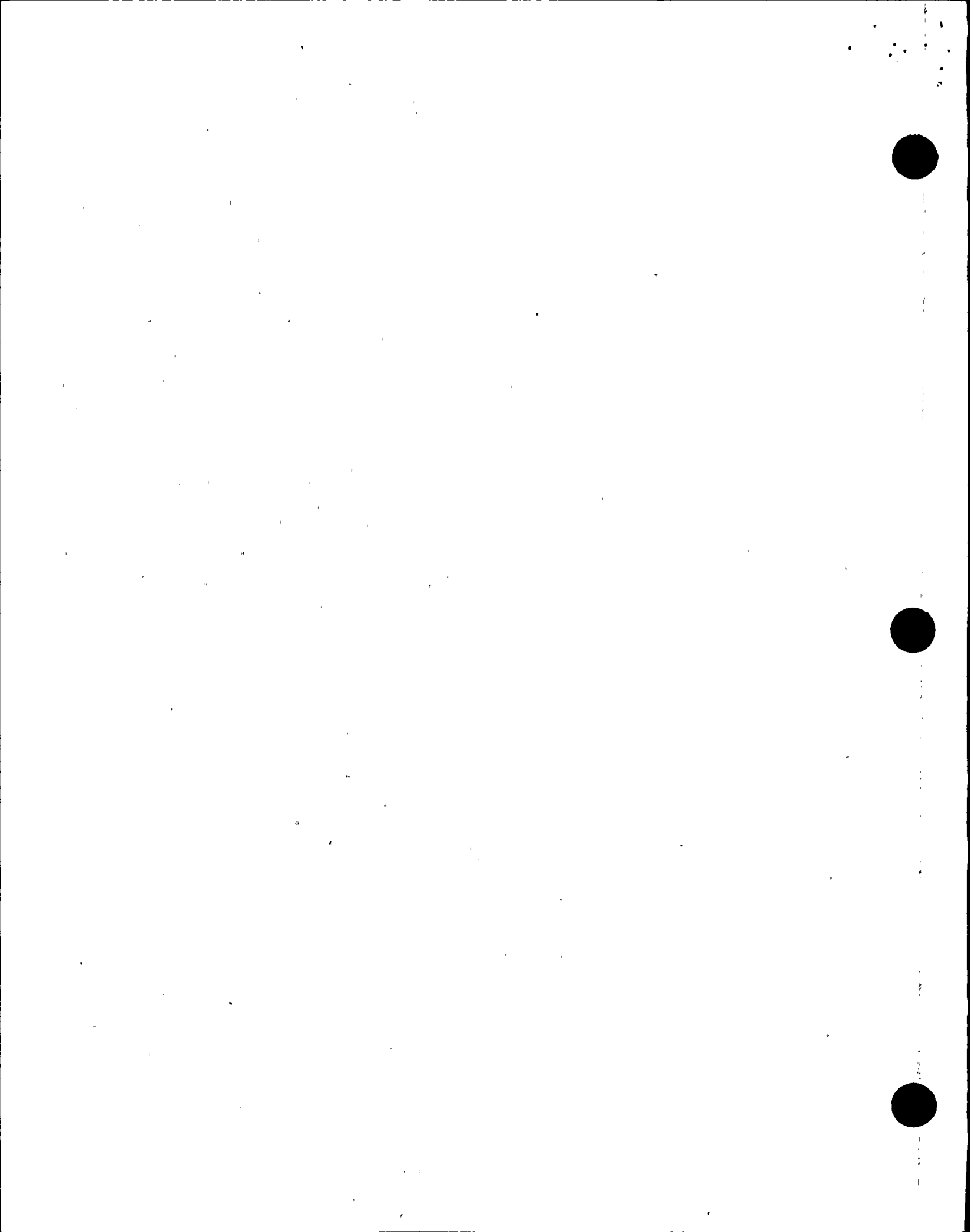
- R. Security Contingency Procedures Nos. 12 AHP 2060 SCP. 001 through 014 have been revised effective 1-22-86 to include a note directing those involved in the initial assessment of a security event to Plant Procedure 12 AHP 2060 SEC. 048, "Reporting of Physical Security Events."
- S. On October 31, 1985, tack welding and/or riveting vent hoods on roofs of 4KV Switchgear and Battery Rooms was completed.
- T. On July 20, 1985, the sky light opening above the spent fuel pit was chain-locked.
- U. Beginning on or about February 28, 1986, Condition Reports submitted by plant personnel have been and will continue to be reviewed each normal workday by security management personnel to determine the condition's effect on security systems.

The following action items to accomplish this objective are to be completed:

	ACTION ITEM	START	FINISH
A.	Plant Manager Instruction PMI 2140, "Temporary Modifications," is in the process of revision to include the Security Section in the review process and to require security logging of temporary modifications.	1-1-86	5-30-86
B.	Establish a Vital Area Surveillance Checklist for each vital area envelope to include a three-dimensional drawing which will identify location of openings such as doors, vents and similar items in walls, floors and ceilings. In addition, the checklist shall identify at a minimum how the various openings are secured and special considerations, if applicable. The completed checklist shall be reviewed by licensee security management.	4-1-86	7-30-86
C.	Establish a schedule to ensure that each vital area is checked by licensee management using the Vital Area Surveillance Checklist at least once each quarter.	7-30-86	Ongoing

2. OBJECTIVE

Ensure that the Security Officer training program is relevant to NRC-mandated training requirements and is consistently implemented and that each officer currently assigned has met established requirements.



	ACTION ITEM	START	FINISH
A.	Review and revise as necessary the Training and Qualification Plan (TQP) to ensure that appropriate job knowledge and skills are consistent with crucial tasks required to perform a job assignment.	1-1-86	4-30-86
B.	Develop a Training and Qualification Plan Implementing Procedure (TQPIP) to provide specific guidelines for security trainers and to ensure consistent evaluation of security personnel for qualification and requalification. The TQPIP shall include Individual Qualification Record (IQR) forms which outline all crucial tasks and evaluation standards. The procedure shall also include a requirement for licensee management review of all lesson plans prior to implementation.	2-28-86	4-30-86
C.	Conduct a complete review of all existing lesson plans to ensure that crucial tasks are being addressed.	4-15-86	6-30-86
D.	Revise existing lesson plans or write new plans to ensure consistency in format and to ensure that all crucial tasks are being addressed.	6-30-86	12-31-86
E.	Assign a Plant Security Management representative to monitor the Security Officer Training Program. This individual will be titled Security Training Administrator. He will be responsible to the Security Manager, and his primary responsibilities will be to oversee the construction and maintenance of the NRC-mandated T&Q Plan, implement procedures, qualification standards and lesson plans, recommend changes to the security section modules of the Plant General Employee Training (GET) and conduct audits of training to ensure compliance.	1-6-86	1-6-86
F.	Revise the lesson plan for pat-down search training and retrain 100% of the Security Officers in pat-down search procedures to ensure that pat-down searches are accomplished correctly and consistently.	1-15-86	2-7-86
G.	Develop contingency drill scenarios and establish a portfolio to ensure that all contingencies outlined in the Safeguards Contingency Procedure are addressed at least once each year.	3-15-86	Ongoing

	ACTION ITEM	START	FINISH
H.	Evaluate security trainers consistent with plant Training Department policy.	6-30-86	Ongoing

3. OBJECTIVE

Establish a management control system which provides for effective utilization of available manpower and specific guidelines for chain of command and supervisory responsibilities.

	ACTION ITEM	START	FINISH
A.	Hire a new Security Manager to examine the security program, with a view to challenging all existing security practices, and revise add or delete programs as necessary.	12-16-85	12-31-86
B.	Reorganize the contract security force shift schedule to reduce shifts from twelve to eight hours to reduce Security Officer fatigue and enhance their alertness.	12-16-85	1-20-86
C.	Train contract security agency lieutenants to assume the duties of Licensee Shift Security Supervisors in order to utilize licensee security personnel for other duties. Assign duties when training is completed.	1-20-86	2-12-86
D.	Develop the following position descriptions for licensee security personnel to bring ownership of specific responsibilities to individuals and to ensure that all tasks are accomplished. (1) Security Training Administrator (2) Administrative Compliance Coordinator (3) Access Control Supervisor (4) Access Control Specialist (5) Nuclear Security Investigator	1-1-86	3-30-86
E.	Revise the Security Section Organizational Chart to reflect reassignment of I&ME Shift Security Supervisors from shift duties to other security-related duties.	1-1-86	3-15-86
F.	Review and revise the Security Plan and Safeguards Contingency Plan to eliminate redundancy and reduce potential for misinterpretation.	1-1-86	7-30-86

	ACTION ITEM	START	FINISH
G.	Review and revise when necessary all existing security implementing procedures to eliminate redundancy, combine where appropriate, and expand for clarity.	3-30-86	12-31-86
H.	One licensee security management person shall be assigned at least once each week, time of resources permitting, to work at least one security shift during other than normal duty hours to evaluate security officer performance and equipment. The evaluation shall be documented on a security shift inspection form and retained for one year.	4-30-86	Ongoing

4. OBJECTIVE

Establish methods to achieve reasonable assurance that plant employees are aware of existing and new security requirements and how they and their respective departments interface with and affect security.

	ACTION ITEM	START	FINISH
A.	Establish a Security Awareness Newsletter to be published and made available to all site personnel on an as-needed basis. The letter shall be informative regarding security matters, and shall be written in a positive vein. Items such as vital area door concerns, search procedures and similar items shall be addressed when appropriate.	3-15-86	On an as-needed basis
B.	Utilize the plant newsletter (Moderator) as a medium to inform plant employees of security concerns or issues, as necessary.	1-31-86	On-going
C.	Ensure that existing security requirements and changes which may affect plant employees are introduced into the Security General Employee Training program. This shall be accomplished by the Security Training Administrator in writing as necessary.	1-31-86	12-31-86

5. OBJECTIVE

Establish tracking systems for security-related commitments such as Condition Reports, Internal Audit Responses, NRC Audit Responses, Security Equipment Test and Inspections and other items requiring tracking to ensure that commitments are met and that other items are completed on schedule.

	ACTION ITEM	START	FINISH
A.	Appoint an Administrative Compliance Coordinator whose responsibility it will be to ensure that the Security Section meets the administrative and regulatory requirements of the D. C. Cook Modified Amended Security Plan (MASP), associated plant procedures and the Security Section's administrative policies.	1-15-86	12-31-86
B.	Develop a tracking mechanism to ensure that responses to audits and Condition Reports are made in a timely manner and that adequate notice of required completion is passed on to the appropriate persons.	1-15-86	2-15-86
C.	Develop a tracking mechanism to ensure that all security equipment tests and inspections are accomplished in accordance with approved procedures.	2-15-86	5-30-86
D.	Develop a tracking system for Job Orders submitted for repair of security equipment to permit follow-up of Job Orders and allow for trending to determine inherent equipment problems or unsatisfactory equipment.	1-15-86	2-28-86
E.	Develop a mechanism to track personnel related security errors.	5-31-86	6-30-86
6.	<u>OBJECTIVE</u>		
	Establish a means of ensuring that security concerns such as thefts, vandalism, malicious mischief and law enforcement liaison are given individual attention.		

	ACTION ITEM	START	FINISH
A.	Establish the position of Nuclear Security Investigator, whose responsibility it will be to investigate incidents of accident, theft, vandalism, property loss, property damage, illegal drug activity and other incidents which may pose a threat to plant security, and to maintain an investigative file. He shall investigate deviations from approved security plans and procedures and in addition investigate Condition and Inspection Reports pertaining to security and perform other duties as requested by the Security Manager. He shall maintain close liaison with local law enforcement agencies to ensure necessary cooperation and assistance.	2-28-86	12-31-86



II. Improve the effectiveness of the plant protected and vital area physical and personnel access control programs.

1. Establish improvements to existing personnel access authorization programs which will enhance assurance that only persons with a legitimate need for access to plant protected and vital area(s) are admitted and then only after it has been determined that established screening and fitness for duty requirements have been met.

	ACTION ITEM	START	FINISH
A.	Develop and implement a company employee access authorization procedure to ensure that consistent guidelines are followed.	2-15-86	5-30-86
B.	Develop and implement a non-company employee access authorization procedure to ensure that consistent guidelines are followed.	2-15-86	5-30-86
C.	Develop and implement a contractor audit program to ensure that contractors are adhering to approved access authorization requirements.	4-15-86	10-31-86
D.	Develop a photo badging procedure to ensure that badging is accomplished in a more consistent manner.	3-15-86	5-15-86
E.	Develop improved methods to ensure that continued documentation and accountability are maintained for all magnetic key cards.	2-28-86	5-1-86
F.	Develop and implement an improved Lock, Key, and Magnetic Key Card Procedure for Vital Protected Areas.	3-5-86	5-15-86

2. OBJECTIVE

Improve reliability and credibility of the personnel and vehicle physical access control program for protected and vital areas.

	ACTION ITEM	START	FINISH
A.	Replace existing metal detectors with improved performance models to reduce the number of spurious alarms.	2-8-86	2-18-86

	ACTION ITEM	START	FINISH
B.	Replace the existing X-ray equipment with improved performance models to improve the ability to examine hand-carried items.	3-24-86	9-30-86
C.	Replace existing explosive detection equipment with improved performance models to reduce maintenance time.	3-30-86	12-31-86
D.	Assess the number and necessity of vehicles entering the plant protected area to reduce unnecessary traffic.	2-15-86	3-30-86
E.	Evaluate Security Officer consistency in implementing vehicle search procedures and use of available vehicle search equipment.	4-15-86	6-30-86
F.	Review Post Orders for all post assignments to ensure consistency with plant procedures.	4-15-86	6-30-86

3. OBJECTIVE

Reduce the spurious alarm rate from vital area door alarm systems from the alarm rate in 1985.

	ACTION ITEM	START	FINISH
A.	Evaluate the length of the inhibiting cycle of key card readers on vital area doors. Monitor the effect of the new inhibiting cycle if changed, and modify as necessary.	1-2-86	4-1-86
B.	Hire a plant locksmith dedicated primarily to the repair of door locks and door mechanisms to ensure rapid repair of door problems.	3-15-86	4-15-86

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