



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W., SUITE 2900
 ATLANTA, GEORGIA 30323-0199

Report Nos.: 50-259/95-58, 50-260/95-58, and 50-296/95-58

Licensee: Tennessee Valley Authority
 6N 38A Lookout Place
 1101 Market Street
 Chattanooga, TN 37402-2801

Docket Nos.: 50-259, 50-260
 and 50-296

License Nos.: DPR-33, DPR-52,
 and DPR-68

Facility Name: Browns Ferry Nuclear Power Station Units 1, 2, and 3

Inspection Conducted: October 3-5, 1995

Inspectors: Walter D. Standberry 10/24/95
 David H. Thompson, Safeguards Inspector Date Signed

Lori C. Stratton 10/24/95
 Lori C. Stratton, Safeguards Inspector Date Signed

Approved by: David M. Verrelli 10/24/95
 David M. Verrelli, Acting Chief Date Signed
 Special Inspections Branch
 Division of Reactor Safety

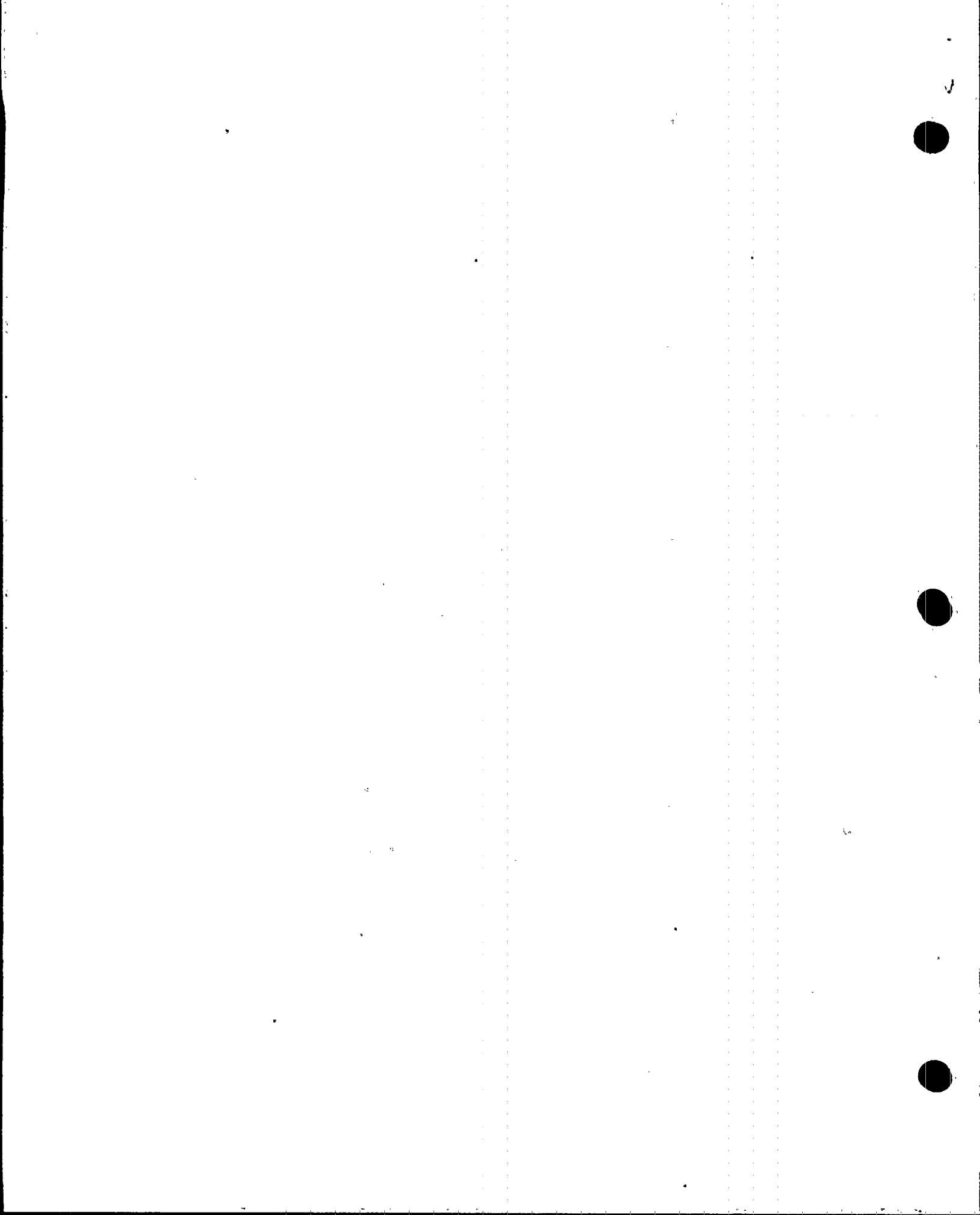
SUMMARY

Scope:

This announced inspection was conducted to review the licensee's Access Authorization Program, as required by 10 CFR 73.56. Specifically, psychological evaluations, and the training of personnel and supervisors were evaluated. The inspectors also reviewed the licensee's appeal process and the protection afforded personal information. Additionally, 10 CFR Part 26, Fitness For Duty concerning call-in procedures was reviewed.

Results:

In the areas inspected there were no violations identified. The licensee's Access Authorization Program, in the areas inspected, was found to be in accordance with the Site Plans and Procedures. Several of the personnel who were interviewed did not know the requirements for reporting arrests. However, the personnel being interviewed erred on the conservative side and stated that they would report any arrest. Within the area of Fitness for Duty, specifically the call-in procedure, requirements were found to be in compliance with the licensee's plans and procedures.



REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. Brazell, Site Security Manager, Browns Ferry Nuclear Plant, (BFNP), Tennessee Valley Authority (TVA)
- *S. Kenney, Security Shift Supervisor, BFNP, TVA
- *S. Moss, Site Human Resources Manager, BFNP, TVA
- *E. Preston, Plant Manager, BFNP, TVA
- *S. Rudge, Site Support Manager, BFNP, TVA
- *P. Salas, Licensing Manager, BFNP, TVA
- *R. Waldrep, Technical Training, BFNP, TVA
- *J. Wallace, Site Licensing Engineer, BFNP, TVA
- *J. White, Outage Manager, BFNP, TVA

NRC Residence Inspectors

- *L. Wert, Senior Resident Inspector

*Attended exit interview

The NRC inspectors also interviewed 18 randomly chosen licensee and contractor personnel, to include supervisors.

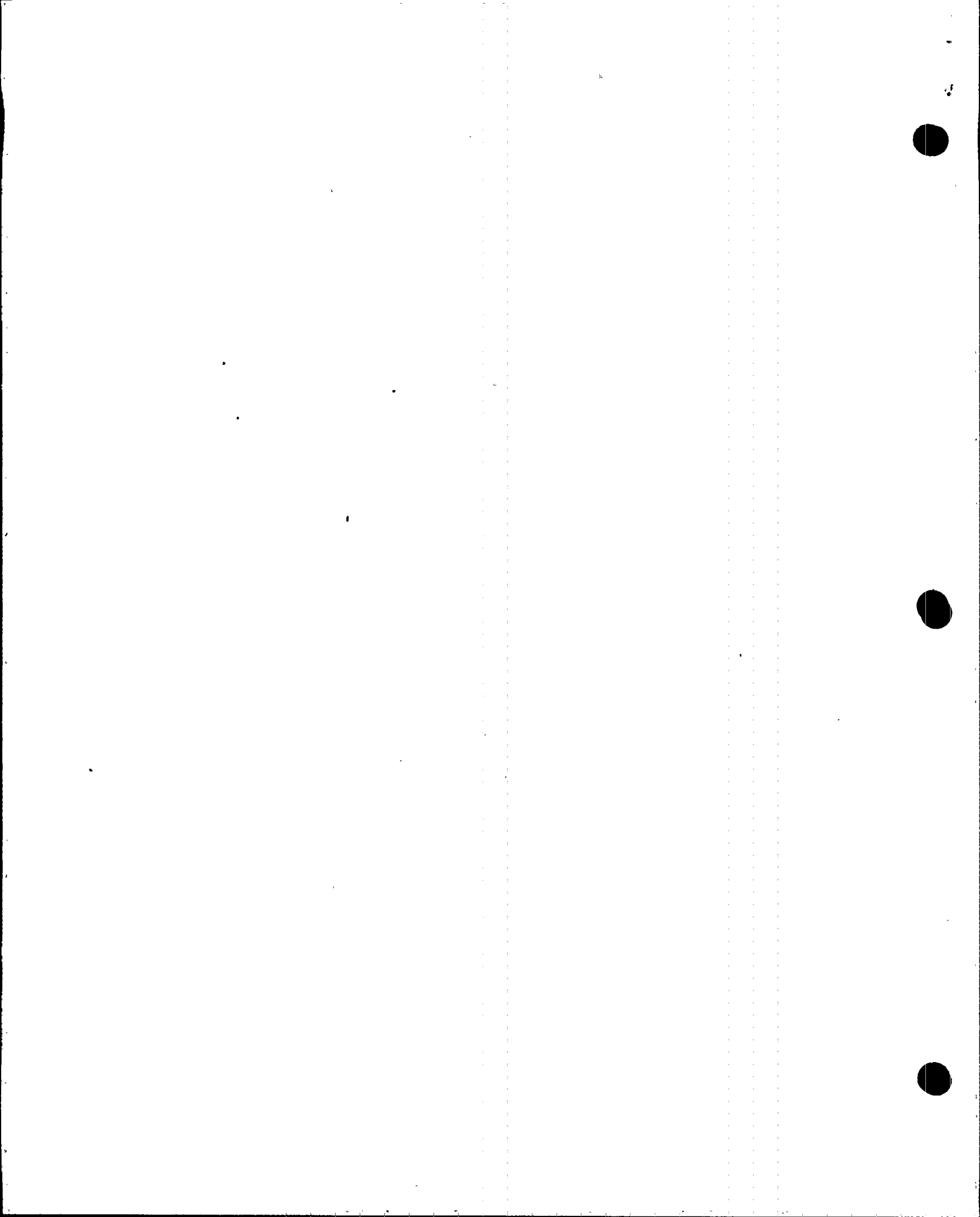
2. Access Authorization Program (Temporary Instruction 2515/127)

On April 25, 1991, the Commission published 10 CFR 73.56, Personnel Access Authorization Requirements for Nuclear Power Plants, which required licensees to fully implement their Access Authorization Program (AAP) by April 27, 1992. By letter dated September 12, 1995, the licensee submitted Revision 24 to the Browns Ferry Nuclear Plant, Physical Security Plan committing to the requirements of 10 CFR 73.56 and NRC Regulatory Guide 5.66, Access Authorization Program for Nuclear Power Plants.

a. AAP Administration

The licensee's AAP is solely managed and implemented at the Corporate level by the Manager, Nuclear Security Personnel Branch. All AAP functions, procedures and records are found at the Corporate Office, specifically at the office of the Manager, Nuclear Security Branch. There are no AA personnel, procedures nor records at the nuclear stations.

Based on the inspectors' review, the licensee's AAP administration appeared to be well managed and effective.



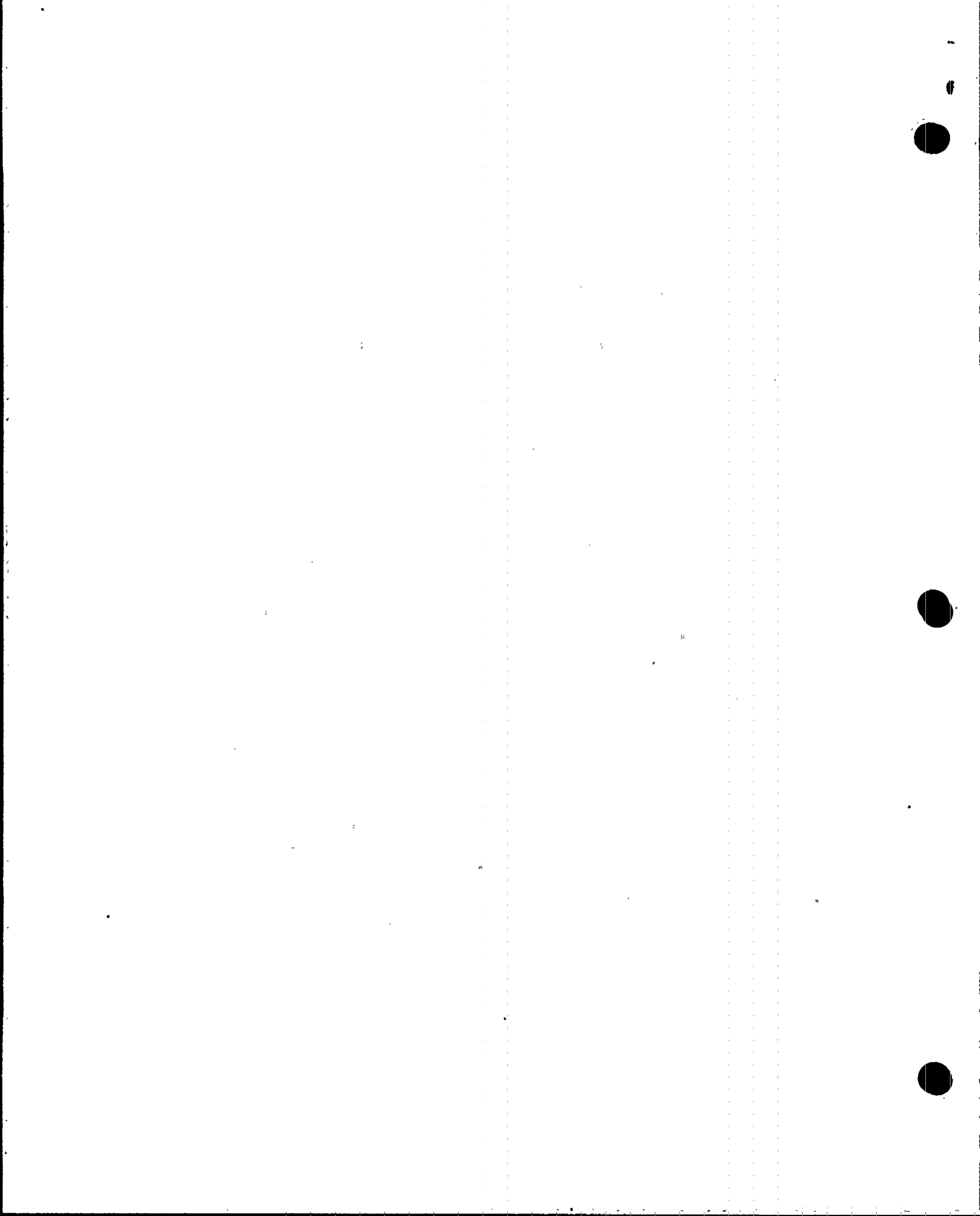
There were no violations of regulatory requirements identified in this area.

b. Behavioral Observation Program (BOP)

The Nuclear Management and Resources Council (NUMARC) has published the Industry Guidelines for Nuclear Power Plant Access Authorization Programs (No. 89-01) adopted by NRC's Regulatory Guide 5.66 titled, "Access Authorization Programs for Nuclear Power Plants." Paragraph 9.0 of NUMARC No. 89-01, Continual Behavior Observation Program, requires that supervisors be given training in the detection of aberrant behavior, to include signs of drug and alcohol abuse as well as observing personnel for changing behavioral traits and patterns indicative of an adverse trend of their trustworthiness and reliability. Additionally, Paragraph 9.0 also requires that individuals with unescorted access authorization must be notified of their responsibility to report any arrest that may impact upon their trustworthiness.

The inspectors reviewed the licensee's lesson plans for training supervisors in detecting aberrant behavior. The inspectors verified that aberrant behavior training is provided to all personnel who are granted unescorted access and annually during the site Nuclear Employee General training. It was noted during this review (and substantiated during interviews of seven supervisors, both licensees and contractors) that the training for detecting aberrant behavior is largely based upon detecting the signs of drug and alcohol abuse. There appeared to be little training relative to the behavioral changes indicative of a lack of trustworthiness and reliability of personnel; however, each supervisor during further discussion related the detection of aberrant behavior to access authorization. The licensee acknowledged the inspectors' observation and will evaluate their training.

Additionally, 18 individuals were interviewed as to their understanding of personnel reliability and their responsibility to report any arrest. The individuals appeared to have a good recall of this responsibility but were confused as to what arrest to report. The inspectors reviewed the Nuclear Employee Lesson Plan and found it states, "Report arrest and convictions to Plant Access section including traffic violations with fines of \$200 or more." Overall, the personnel interviewed recalled that their responsibility for reporting any arrest varied from any contact with law enforcement personnel to the need to report anything above a parking ticket. The licensee acknowledged the inspectors' observation; however, they consider the subject sufficiently covered in the training material.



The inspectors determined that an employee could be absent from a nuclear station or the Corporate Office, for greater than 30 days but less than 365 days for such reasons as military leave or pregnancy. It was noted that when an employee had not used a badge for access within 28 days their access was deleted from the system until they returned and contacted the Security Badging Department to account for their time during the absence. This information is documented on a licensee developed form.

There were no violations of regulatory requirements noted in this area.

c. Psychological Testing

The licensee and their contractors administer the Minnesota Multiphasic Personality Inventory (MMPI) 1 or 2, which if warranted, is followed by a clinical interview. The inspectors reviewed testing procedures and visited facilities at the site. All personnel responsible for testing required positive identification from the applicant. Facilities accommodated the proctoring of the tests, were appropriately secure, and test materials were secured when not in use.

Based on the inspectors review the licensee's practice of psychological testing appears to be adequate.

There were no violations of regulatory requirements noted in this area.

d. Revocations/Denials and Appeals

During discussion the inspectors noted that very few of the 18 individuals interviewed on a random basis knew of the appeal process; in fact, several believed that there was no appeal process for the access authorization program. Contractors universally believed they could only appeal through their "home offices." Union members would rely on the grievance procedure. The inspectors further determined that there is no mention of the appeal process during Nuclear Employee General Training. The licensee advised the inspectors (and it was verified in various documents) that at the time a person is informed of the denial or revocation of access the licensee provides in writing the right to appeal.

Based on the inspectors' review of this area the appeal process was considered adequate.

There were no violations of regulatory requirements noted in this area.



3. Fitness for Duty (81502)

In accordance with 10 CFR 26.10(a), the licensee must provide reasonable assurance that nuclear power plant personnel will perform their tasks in a reliable and trustworthy manner and are not under the influence of any substance, legal or illegal, or mentally or physically impaired from any cause, which in any way adversely affects their ability to safely and competently perform their duties.

In order to determine licensee compliance, the inspectors reviewed TVA Nuclear Standard 1.6, "Fitness for Duty Program Administration," Revision 5, dated April 24, 1995. Section 3.13, "Call-In for Unscheduled Work" specifies steps to be taken to ensure employees are fit for duty prior to reporting to work. The licensee utilizes a call-in form, which is Appendix B to TVA Nuclear Standard 1.6, to document the name of the individual called; the time the call was placed; the time the individual is needed to report to duty; whether the individual has consumed alcohol within the last five hours; and whether the individual is fit for duty. If the individual has consumed alcohol within the last five hours, the licensee documents the amount. Determination to report to duty falls upon the caller, and if alcohol was consumed, a breath test will be administered as soon as the person arrives onsite. If test results are 0.040 and above, the employee will not be permitted to work. Through discussion with the licensee, the inspector also learned that if an individual states he/she is not fit for duty, the caller terminates the request for reporting to duty. It is the employee's duty to inform the caller if he/she is not fit for duty.

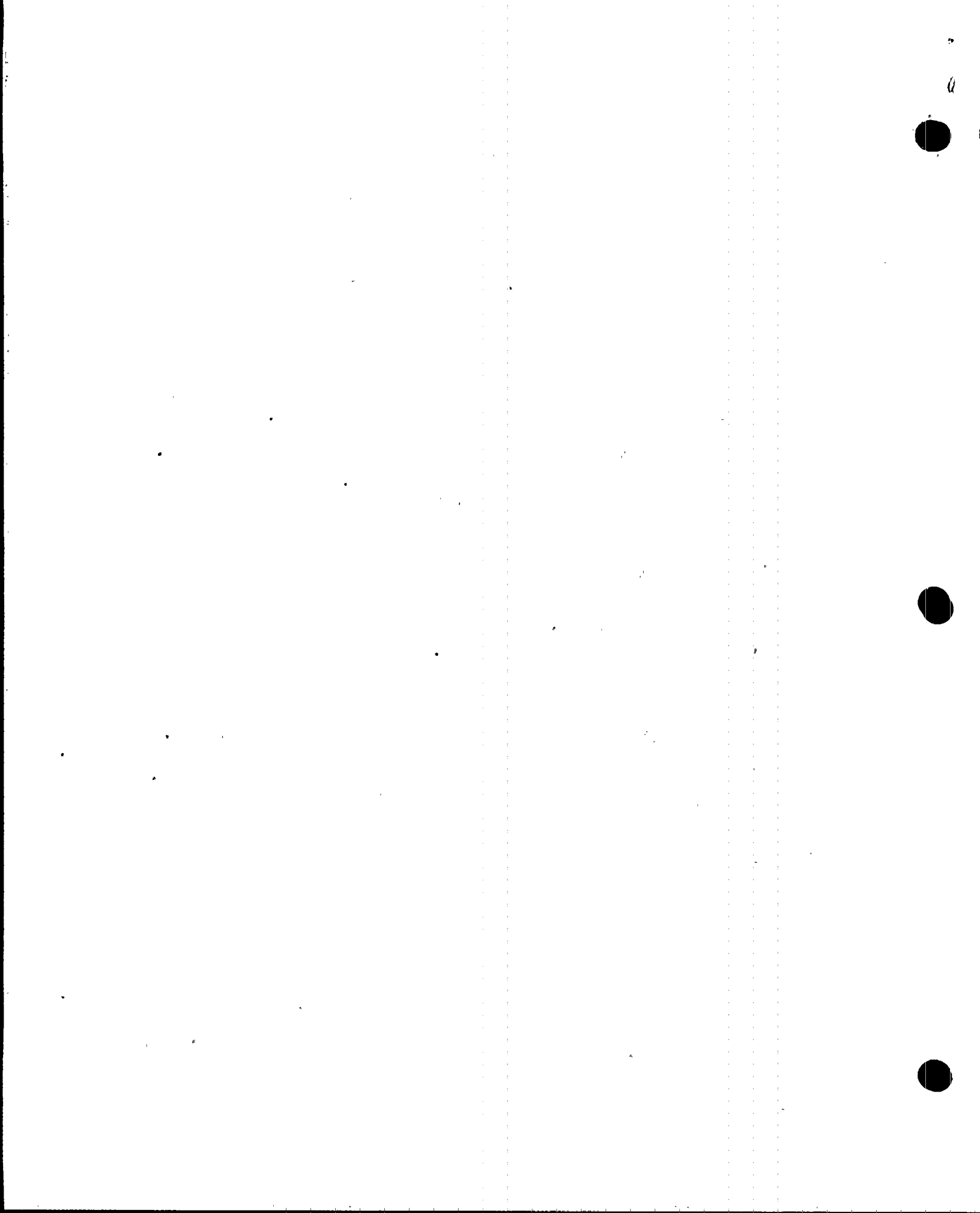
The inspectors reviewed call-in sheets for the period of August 1, 1995 to present, to determine if the licensee was following their procedure. All call-in sheets were documented properly and in accordance with the licensee's procedure.

Through procedure and related document review, discussion with the licensee, and interview of licensee employees, the inspector determined that the licensee has an effective call-in procedure, which meets the regulatory requirements of 10 CFR 26.

There were no violations of regulatory requirements noted in this area.

4. Exit Interview

The Exit Meeting was held on October 5, 1995, with those so noted in Paragraph 1 in attendance. The licensee was advised that the inspectors had found that the employees were aware of the access authorization program requirements and their responsibilities under the program except as noted in paragraphs 2.b and 2.d. It was noted that although the training clearly explained what type of arrest



needed to be reported there continued to be confusion among the employees as to what arrest needed to be reported. The Fitness for Duty portion of the program concerning call-in requirements was reviewed and found to be in compliance with regulatory requirements. Dissenting comments were not received from the licensee.

