

REVIEWED BY:

R. R. Keimig

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NRC: REGION I

(ORGANIZATION)

10-26-89

(DATE)

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-219/89-22

Docket No. 50-219

License No. DPR-16

Licensee: GPU Nuclear
100 Interpace Parkway
Parsippany, New Jersey 07054

Facility Name: Oyster Creek Nuclear Generating Station

Inspection At: Forked River, New Jersey

Inspection Conducted: September 11-15, 1989

Inspectors:

Thomas W. Dexter
T. W. Dexter, Physical Security Inspector

10/23/89
date

William T. Olsen
W. T. Olsen, Reactor Engineer-Physical Security

10-23-89
date

Approved by:

R. R. Keimig
R. R. Keimig, Chief, Safeguards Section,
Facilities Radiological Safety and
Safeguards Branch

10-24-89
date

Inspection Summary: Routine, Unannounced Physical Security Inspection on September 11-15, 1989 (Report No. 50-219/89-22)

Areas Inspected: Management Support, Security Program Plans, and Audits; Protected 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 Training and Qualification Program.

Results: The licensee was found to be in compliance with NRC requirements in the areas inspected.

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DETAILS

1. Key Personnel Contacted

- *E. Fitzpatrick, Vice President and Director, Oyster Creek
- *J. Knubel, Nuclear Security Director
- *R. Stintzum, Security Manager
- *G. Busch, Licensing Manager
- *G. Narayan, Plant Engineer
- *M. Heller, Licensing Engineer
- *C. Comerford, Security Staff
- R. Pazzella, Security Sergeant
- *M. Douches, QA Monitor
- R. Ewart, Security Lieutenant
- J. Venet, Manager of Occupational Medicine

U. S. Nuclear Regulatory Commission (NRC)

- E. Collins, Senior Resident Inspector
- *D. Lew, Resident Inspector

*present at Exit Meeting

2. Follow-up on Previously Identified Items

Closed (VIO 50-219/88-32-01): Failure to submit a change to the site security plan in accordance with 10 CFR 50.54(p). The security licensing engineer has been retrained in the requirements of 10 CFR 50.54(p), and subsequent security plan changes have been submitted to the NRC as required.

Closed (VIO 50-219/88-38-01): Unauthorized entry into a vital area. The licensee took corrective actions to prevent similar events from recurring. This included adding another security officer (SO) at the VA entry point during periods of heavy traffic to ensure that no one could by-pass the entry point. This requirement is documented in a revision to Security Directive No. 30.

Closed (VIO 50-219/88-33-01): A vital area barrier was found degraded due to maintenance activities. The licensee has revised the work control program to ensure that security requirements are reviewed prior to issuance of work orders. In addition, security force supervisory personnel are now directly involved in daily work planning activities.

Closed (UNR 50-219/87-25-01): The tamper indicating circuit for an intrusion detection device on a certain vital area door was found inoperable and a routine surveillance testing program for those circuits was not in effect. The inspector verified that the previously inoperable circuit was functioning, requested functional tests on several other

devices and reviewed the licensee's surveillance testing program. No deficiencies were identified.

3. Management Support, Security Program Plans, and Audits

- a. Management Support - Management support for the licensee's Physical Security Program was determined to be adequate by the inspectors. This determination was based upon the inspectors' review of various aspects of the licensee's program during this inspection as documented in this report.
- b. Security Program Plans - The inspectors verified that changes to the licensee's Security, Contingency, and Security Officer Training and Qualification Plans, as implemented, did not decrease the effectiveness of the respective plans, and had been submitted in accordance with NRC requirements.

However, the inspectors noted that Revision No. 26 to the physical security plan (the Plan), which had been submitted to the NRC under the provisions of 10 CFR 50.54(p) and had been implemented by the licensee, contained changes that were sufficiently vague to preclude a consistent interpretation. The licensee was advised to discuss the revision with the NRC Region I reviewer and then to clarify the intent of the changes.

- c. Audits - The inspectors reviewed the 1987 and 1988 annual security program audit reports and verified that the audits had been conducted in accordance with the NRC-approved Physical Security Plan (the Plan). The audits were comprehensive in scope with the results reported to the appropriate levels of management. The inspectors' review included the responses from the security organization to the audit findings. The documented corrective actions appeared appropriate for the findings.

4.0 Protected and Vital Area Physical Barriers, Detection and Assessment Aids

- a. Protected Area Barriers - The inspectors conducted a physical inspection of the protected area (PA) barrier on September 11 and 12, 1989. The inspectors determined by observation that the barriers were installed and maintained as described in the Plan. No deficiencies were noted.
- b. Protected Area Detection Aids - The inspectors observed the PA perimeter detection aids on September 12 and 13, 1989, and determined that they were installed, maintained and operated as committed to in the Plan. No deficiencies were noted.

- c. Isolation Zones - The inspectors verified that isolation zones were adequately maintained to permit observation of activities on both sides of the PA barrier. No deficiencies were noted.
- d. Protected Area and Isolation Zones Lighting - The inspectors conducted a lighting survey of the PA and isolation zones on September 12, 1989, from approximately 8:30 p.m. to 11:30 p.m., accompanied by a representative of the licensee's security organization. The inspectors determined, by observation, that lighting in the PA and isolation zones was adequate. No deficiencies were noted.
- e. Assessment Aids - The inspectors observed the PA perimeter assessment aids and determined they were generally installed, maintained, and operated as committed to in the Plan.

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The inspectors identified these potential weaknesses to the licensee and the licensee immediately enhanced existing compensatory measures for these weaknesses. The licensee also committed to review the assessment systems in an effort to correct the weaknesses. This will be reviewed during subsequent inspections. (IFI 50-219/89-22-01)

- f. Vital Area Barriers - The inspectors conducted a physical inspection of VA barriers on September 14, 1989. The inspectors determined, by observation, that the barriers were generally installed and maintained as described in the Plan.

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The licensee stated that, because of seismic considerations, these barriers could not be strengthened or reenforced. However, the licensee did not have the seismic analysis available for review by the inspectors. The licensee committed to obtain and reevaluate the analysis in an effort to resolve this matter. This item will be reviewed during the next inspection. (IFI 50-219/89-22-02)

- g. Vital Area Detection Aids - The inspectors observed the VA detection aids and determined that they were installed, maintained and operated as committed to in the Plan. No deficiencies were identified.

5.0 Protected and Vital Area Access Control of Personnel, Packages and Vehicles

- a. Personnel Access 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 that personnel are properly identified and authorization is checked prior to issuance of badges and key-cards. No deficiencies were noted.
 - (2) The inspectors verified that the licensee has a program to confirm the trustworthiness and reliability of employees and contractor personnel. This program includes checks on employment, credit and criminal history, and a psychological examination. No deficiencies were noted.
 - (3) The licensee is in the process of conforming its fitness-for-duty program to the recently published NRC requirements (10 CFR 26).
 - (4) The inspectors reviewed the security lock and key procedures 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 procedures with

members of the security force and the licensee's security staff. No deficiencies were noted.

- (5) The inspectors verified that the licensee takes precautions to ensure that an unauthorized name cannot be added to the access list by having only one member of security management authorized to make changes to that list. No deficiencies were noted.
- (6) The inspectors verified that the licensee has a search program, as committed to in the Plan, for firearms, explosives, incendiary devices and other unauthorized materials. The inspectors observed personnel access processing during shift changes, visitor access processing, and interviewed members of the security force and licensee's security staff about personnel access procedures. A potential weakness was identified by the inspectors.

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This item will be reviewed during subsequent inspections
(IFI 50-219/89-22-03)

- (7) The inspectors determined, by observation, that individuals in the PA and VA display their access badges as required. No deficiencies were noted.
- (8) The inspectors verified that the licensee has escort procedures for visitors to the PA and VAs. No deficiencies were noted.

- (9) The inspectors verified that the licensee has a mechanism for expediting access to vital equipment during emergencies and that the mechanism is adequate for its purpose. No deficiencies were noted.
- (10) The inspectors verified that unescorted access to VAs is limited to authorized individuals. The access list is revalidated at least once every 31 days as committed to in the Plan. No deficiencies were noted.
- b. Package and Material Access Control - The inspectors determined that the licensee was exercising positive control over packages and material that are brought into the PA via the MAF. The inspectors reviewed the package and material control procedures and found that they were consistent with commitments in the Plan. The inspectors also observed package and material processing and interviewed members of the security force and the licensee's security staff about package and material control procedures. No deficiencies were noted.
- c. Vehicle Access Control - The inspectors determined that the licensee properly controls vehicle access to and within the protected area. The inspectors verified that vehicles are properly authorized prior to being allowed to enter the PA. Identification is verified by the SO at the vehicle access portal. This procedure is consistent with the commitments in the Plan. The inspectors also reviewed the vehicle search procedures and determined that they were consistent with commitments in the Plan. The inspector determined that at least two SOs control vehicle access at the main vehicle access point. No deficiencies were identified.
6. Alarm Stations and Communications
- a. Alarm Stations
- The inspectors confirmed through direct observation that the central alarm station (CAS) and the secondary alarm station (SAS) were manned and operating in compliance with the Plan. Both the CAS and SAS operator demonstrated adequate skill and knowledge in the performance of their duties.
- b. Communications
- The inspectors requested and observed testing of the communications capabilities between the CAS and required on- and off-site locations. They were found to be in compliance with the Plan.

7. Power Supply

The inspectors reviewed the uninterruptible power supply for security equipment and determined that the system was installed, functioning and tested in accordance with commitments in the Plan. The power supply is located in a VA.

8. Testing, Maintenance and Compensatory Measures

a. Testing and Maintenance

The inspectors determined that the licensee was conducting tests and maintenance of security systems as committed to in the Plan. The inspectors made this determination based upon the following: review of test records for security equipment located in the access control facilities; observations of functional testing of security equipment located in the access control facilities; review of procedures for the functional testing of security equipment; review of maintenance requests for security-related equipment; interviews of personnel in the Instrument and Control (I&C) groups responsible for the maintenance of security-related equipment; and by reviews of records kept by the I&C groups on security-related equipment. No deficiencies were noted.

b. Compensatory Measures

The inspectors observed the implementation of compensatory measures utilized in conjunction with the current outage work. The compensatory measures were being implemented in conformance with Plan commitments and the implementing procedures.

9. Security Training and Qualification Program

The inspectors reviewed selected training records and procedures and found them to be in accordance with the NRC-approved Training and Qualification Plan. The inspectors also interviewed members of the security organization and found them to possess adequate knowledge to perform their assigned duties and responsibilities.

10. Exit Interview

The inspectors met with the licensee representatives identified in paragraph 1 at the conclusion of the inspection on September 15, 1989. At that time, the purpose and scope of the inspection were reviewed, the findings were presented and commitments made by licensee representatives during the inspection were confirmed.

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