

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-346/80-18

Docket No. 50-346

License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Dates of Investigation: June 5 and 6, 1980

Investigation at: Davis-Besse Nuclear Power Station, Unit 1
Oak Harbor, OH

Investigator: *C. E. Norelius* 7/17/80
for C. H. Weil (Date)

Inspector: *T. J. Madeda* 7/11/80
T. J. Madeda (Date)

Reviewed by: *C. E. Norelius* 7/11/80
C. E. Norelius (Date)
Assistant to the Director

F. Donahue 7/11/80
F. Donahue (Date)
Chief, Security Section

Investigation Summary: Investigation on June 5-6, 1980 (Report No. 50-346/80-18)

Areas Investigated: Special, announced investigation concerning allegations that guards at the Davis-Besse Nuclear Power Station were not preparing Security Incident Reports, and were not receiving training as Central Alarm Station operators. This investigation involved 32 investigative hours, both on an off site, by two NRC representatives.

Results: The allegations pertaining to the guard force not receiving training as Central Station Alarm operators and not preparing Security Incident Reports were substantiated. However, both of these areas were identified by the licensee during April and May 1980, and the licensee had begun to correct the problems in these areas. Three items of non-compliance with NRC requirements were identified during the course of this investigation. These items were:

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Enclosure 2

1. Access Control (Identification, Authorization, and Badging) - The licensee failed to assess the adequacy of the search required for proper authorization in accordance with security plan commitments. (Infraction)
2. Access Control (Vital Areas) - Failure to adequately and effectively control access in accordance with a security plan requirement. (Infraction - Repeat Item)
3. Alarm Station - Failure to provide communication capabilities in accordance with a security plan commitment. (Infraction)

REASON FOR INVESTIGATION

On May 19, 1980, Individual A informed the Nuclear Regulatory Commission, Region III (RIII), of certain data pertaining to the nuclear security force at the Davis-Besse Nuclear Power Station. In a letter, Individual A stated the guards at the Davis-Besse Nuclear Power Station were not preparing Security Incident Reports on all occasions, and that the guards had not received training in the operation of the Central Alarm System.

SUMMARY OF FACTS

By copy of a letter dated May 19, 1980, addressed to Toledo Edison Company, Individual A advised NRC personnel of allegations pertaining to the security force at the Davis-Besse Nuclear Power Station. One allegation concerned the adequacy of training provided to guards operating the Central Alarm System. The second allegation pertained to the instructions by site security management to not prepare Security Incident Reports on fence alarms.

The investigation confirmed the two allegations made by Individual A. However, both areas had been previously identified by the supervision of the station's security force and that action had been initiated to correct the problems in these areas.

DETAILS

1. Personnel Contacted

Toledo Edison Company

*T. D. Murray, Station Superintendent
B. R. Beyer, Assistant Superintendent
*A. R. Schumaker, Quality Assurance Representative
*M. P. Polk, Corporate Industrial Security Director
*G. M. Grime, Nuclear Security Manager
*C. L. DeTray, Nuclear Guard Supervisor
W. A. Phillips, Nuclear Guard Supervisor
P. D. Thompson, Nuclear Guard Supervisor
W. Blackburn, Nuclear Security Officer
L. E. Danklefson, Nuclear Security Officer
D. A. Foos, Nuclear Security Officer
E. L. Irick, Nuclear Security Officer
T. L. Lenz, Nuclear Security Officer
P. J. Nerce, Former Nuclear Security Officer
W. D. O'Connor, Nuclear Security Officer

Individuals

Individual A

*Denotes those present for exit interview.

2. Receipt of Allegations

On May 19, 1980, Individual A furnished RIII with a copy of a letter addressed to the Toledo Edison Company. In this letter, Individual A stated that the Central Alarm Station (CAS) operators at the Davis-Besse Nuclear Power Station did not receive training in the operation of the CAS. Individual A also alleged the Nuclear Security Manager had directed that Security Incident Reports not be written on fence and perimeter alarms. The letter also contained information pertaining to the loss of a key ring by a guard shift supervisor. A copy of Individual A's letter, dated May 19, 1980 is attached (Exhibit I).

3. Interview of Individual A

On June 5, 1980, Individual A was interviewed and provided the following information:

Individual A had been employed as a Nuclear Security Officer at the Davis-Besse Nuclear Power Station from April 1977 through June 1980. According to Individual A, many of the problems involving the guard force stem from the twelve hour shifts required of the guards for the

past several months. Other problems involved having too few people to do a large amount of work, coupled with having too much responsibility being placed upon the individual guards. Other problems with the guard force are caused by the varying interpretations of policy and procedures by individual guard supervisors.

During a procedure requalification meeting held during the Fall, 1979, a question was raised pertaining to the preparation of Security Incident Reports. Individual A could not recall who raised the question, but recalled the question dealt with when, or when not, to prepare a report. The question was raised because of the increased number of Security Incident Reports being prepared resulting from the high number of alarms being generated by the new security system.

According to Individual A, the Davis-Besse Nuclear Security Manager, Gary Grime, was in attendance at the procedure requalification meeting when this question arose. Grime's response to the question was to not write Security Incident Reports on perimeter or fence alarms when the cause of the alarm could not be determined. In late March or early April 1980, Grime issued a memorandum directing the security guards to begin writing Security Incident Reports on all alarms, regardless of cause. Individual A stated that this reversal of policy pertaining to writing Security Incident Reports has caused confusion among the guard force, as to when, or when not, to write a Security Incident Report.

In January 1980, a new computer security system was installed in the Central Alarm Station, and is continuing to be modified. During January and February, 1980 approximately four or five guards were trained in operating the computer system by the contractor installing that system. Since that time, other guards have not been trained to operate the Central Alarm System except through on-the-job training. Individual A stated that neither Individual A nor the other guards responsible for operating the Central Alarm System felt qualified and trained to operate the system. Individual A advised the licensee's security department did not have a formal training program for central alarm operators, and Individual A did not believe one had been planned. Also, Individual A advised many of the problems in the Central Alarm System computer were caused by constantly changing the program and commands. Individual A recalled that upon returning from vacation, all of the commands for the computer system had been changed and it was necessary to relearn all of those commands. However, a program to advise the alarm system operators of the changes had not been instituted.

Individual A had made reference to the loss of a key ring by a security supervisor in the letter of May 19, 1980. Individual A advised a security supervisor had left a key ring in a public restroom. Individual A stated the key ring had contained master keys to the security trailer and other keys of importance to the security department. Individual A stated that in retrospect, this comment in the letter of May 19, 1980 had been vindictive and Individual A did not wish to see this particular incident pursued.

In addition to the information provided in the letter of May 19, 1980, Individual A was aware of at least one other problem involving the security function at the Davis-Besse Nuclear Power Station. This other problem involved security screening prior to access to the site. Detailed information concerning this allegation and the investigation findings regarding it have been determined to be 2.790(d) Information which is exempt from public disclosure. This information and other exempt information relating to items of non-compliance identified during the investigation are contained in a separate document.

4. Interview of Nuclear Security Manager

On June 5, 1980, Gary M. Grime, the Nuclear Security Manager at the Davis-Besse Nuclear Power Station, was interviewed and provided the following information:

He has been the Nuclear Security Manager at the Davis-Besse Nuclear Power Station since April 1976.

He recalled a safety meeting held during the early part of 1980, where a question was brought up about writing Security Incident Reports. A question was raised as to whether or not a Security Incident Report should be prepared on fence and perimeter alarms, when the cause of that alarm (i.e. weather-related) could not be readily determined. He advised the person, who posed the question that he did not have the answer readily available, but he would research the question and render an opinion at a later date. He could not recall how long it took to research the security plan, but felt it was several weeks. In conducting the research, he found that Security Incident Reports were not being prepared on occasions where a fence alarm had sounded and the cause of the alarm could not be discovered. In reviewing the Davis-Besse Security Plan he found that Security Incident Reports were necessary in all cases of alarm activation, including those on the fence where the cause of the alarm could not be determined. He then notified the guard force to immediately begin writing Security Incident Reports on all instances of alarm activation. He also noted during his research that although Security Incident Reports had not been written on all occasions, the activation of the alarms was noted in the daily Door and Fence Alarm Log. He could not recall preparing a memorandum instructing the guard force to begin preparing the Security Incident Reports, and thought that his instructions to the guard force was passed on orally through the guard supervisor.

During January 1980, the Signatron Corporation began installation of the Central Alarm System computer. During the installation process, Grime asked for volunteers from the guard force to begin training in the operation of the new system. Approximately five guards per shift volunteered for the training, and the Signatron Corporation presented approximately twenty hours of training in the operation of the new alarm system. Since that time, there has not been any formal training

provided to other guards in the operation of the Central Alarm System computer; however, many guards have received over-the-shoulder training from those previously trained by Signatron. Grime recognized the need for a formal training program in the operation of the Central Alarm System computer, and during the spring of 1980, he directed Wayne A. Phillips, a Nuclear Guard Supervisor, to design a formal training program in the operation of the alarm system. Phillips' training program is about ready to be presented, but still requires preparing written procedures.

A written report of the circumstances surrounding the loss of a Nuclear Guard Supervisor's key ring was never prepared, and Grime was only vaguely aware of the incident. To his knowledge, the key ring was dropped by a Nuclear Guard Supervisor in a washroom and the key ring was almost immediately recovered by one of the Nuclear Guards. The key ring contained a minimum amount of keys, the most important of which was the key to the security trailer located outside the protected area. The key ring also contained a key to a key cabinet located inside that trailer. This key cabinet contained keys dealing with the daily operation of the security department (i.e., vehicle keys). The key ring did not have any keys of vital significance to the overall security program.

5. Interview of Industrial Security Director

On June 5, 1980, Michael R. Polk, Director of Industrial Security, Toledo Edison Company, was interviewed and provided the following information:

He recalled a conversation with Gary Grime concerning the preparation of Security Incident Reports for the Davis-Besse Nuclear Power Station. He could not recall the exact content of the conversation, other than it dealt with interpretation of the Security Plan. As recalled, Grime had asked questions about the interpretation of the Security Plan. At the time of their conversation, the security force at the Davis-Besse Nuclear Power Station was not preparing Security Incident Reports on perimeter fence alarms when the cause of an alarm appeared to be weather-related (i.e., high winds, rains, snow). His instruction to Grime was to proceed in accordance with the Security Plan. He could not recall that any part of the conversation dealt with vital area door alarms.

He continued, a communications audit had been conducted at the Davis-Besse Nuclear Power Station during December 1979. This communications audit involved the interview of 279 people, including the majority of the Nuclear Guards at the station. The section of the audit dealing with the guard force revealed there were numerous personnel problems. These problems related to the interaction of the guards and supervision, as well as individual guards not understanding the various security requirements. The information gathered during the communications audit is still being evaluated and to date has not been acted upon.

6. Interview of Nuclear Guard Supervisor

On June 5, 1980, Wayne A. Phillips, Nuclear Guard Supervisor and Training Coordinator, was interviewed and provided the following information:

On January 27, 1980, a procedure requalification meeting was conducted for the guards at the Davis-Besse Nuclear Power Station. He was the instructor for that procedure requalification meeting and nine guards, plus Grime, were in attendance.

During that meeting, a question arose pertaining to the preparation of Security Incident Reports. The question centered on when, or when not, to prepare the Security Incident Reports. Phillips could not recall who posed the question, but felt the question was raised because of the increased incidence of alarms. In January 1980, the installation of the new Central Alarm System computer began and with the installation of the computer, the number of alarms increased. Phillips felt the question arose because the increased incidence of alarms caused by the new computer resulted in an increased work load being placed upon the guards. It was Phillips' understanding of the Security Plan that the Security Incident Reports were not required on perimeter fence alarms where the cause of the alarm could not be determined. Phillips stated the guards had not been required to prepare the Security Incident Reports where the specific cause of the alarm on perimeter fences could not be determined, and were suspected to have been caused by weather conditions (i.e. rain, wind). When the question arose, he advised the class to continue the above practice of not writing Incident Reports on the alarms where the cause of the alarm could not be determined. However, Grime told the class he was not sure of this point, and that he would research it and provide an answer. During February 1980, Grime instructed the guard force to begin writing Security Incident Reports on all alarms, regardless of whether the cause of the alarm could be determined. Additionally, Phillips stated that even though Security Incident Reports were not prepared where the source of the perimeter fence alarm could be determined, the activation of the alarm was recorded in the daily alarm log.

7. Review of Door and Fence Alarm Log

On June 6, 1980, a review of the Door and Fence Alarm Log for selected dates disclosed that door and fence alarms had been logged. Where door alarms had been logged, an entry was made referring to the appropriate Security Incident Report. On the fence alarms, where the cause could not be determined for the alarm, the log did not have a comment referring to a Security Incident Report. Inquiry of guards and supervisors disclosed the Door and Fence Alarm Log was discontinued in January 1980, with the installation of the Central Alarm System computer, as the computer had the capability of storing such alarm activations in the computer historical bank.

8. Interview of Nuclear Guards

On June 5 and 6, 1980, seven Nuclear Guards at the Davis-Besse Nuclear Power Station were interviewed. These seven individuals had attended the procedure requalification meeting on January 27, 1980. Of the seven guards interviewed, two were supervisors.

Six of those interviewed were able to recall the procedure requalification meeting on January 27, 1980, and were able to recall the question concerning preparation of the Security Incident Reports.

Prior to that meeting on January 27, 1980, none of the guards had been preparing Security Incident Reports on perimeter and fence alarm activation where the cause of the alarm activation could not be determined, and where the alarm activation was probably weather-related (high wind, hard rain, snow). The guards' understanding regarding preparation of Security Incident Reports was that reports were only to be prepared where the alarm activation could be attributed to a known cause. This understanding was in effect for over four years, until the recent change of instructions to prepare Security Incident Reports on all alarms, regardless of cause. Most were aware that all alarm activations had been recorded in a daily alarm log, even though a Security Incident Report had not been prepared.

None of those interviewed could recall who had raised the question about preparation of Security Incident Reports at the January meeting. All were aware that the question arose due to the increased number of alarm activations made following installation of the new Central Alarm System computer. They recalled they were instructed by Phillips to continue the practice of not preparing the Security Incident Reports on perimeter fence alarms where the source of the alarm activation could not be determined. Each was able to recall a discussion between Grime and Phillips at that January meeting, but none could recall the specific instructions resulting from that conversation. During February-March 1980, Grime instructed the guard force to begin writing Security Incident Reports on all alarm activations, regardless of whether the source of the alarm activation could be determined.

Each stated the question of when, or when not, to prepare the Security Incident Reports dealt only with the activation of perimeter fence alarms, and did not pertain to the activation of Vital Area alarms. Each understood the need to prepare Security Incident Reports on Vital Area alarm activation, and each had done so during the course of employment.

9. Exit Interview

The Region III representatives met with licensee representatives (denoted in Paragraph 1) at the conclusion of the investigation on June 6, 1980. During the meeting, the licensee was advised that the two allegations raised in Individual A's letter, pertaining to Central

Alarm Station training and the preparation of Security Incident Reports were substantiated. Both of these areas had been previously identified by the licensee and the licensee has begun or has planned corrective action in these areas. The licensee was further advised that during the investigation, three items of noncompliance relating to other security requirements had been identified. The licensee was informed that two items of noncompliance had been previously identified by licensee personnel, but action had not been taken to successfully correct the items.

Subsequent to the meeting, the licensee (Nuclear Security Manager) was telephonically advised on June 19, 1980, of the final determination for the items of noncompliance and their severity level. The items of noncompliance, the licensee's comments and commitments relative to these items are contained in a separate document, the content of which has been determined to be exempt from public disclosure under 10 CFR Part 2.790(d).

Exhibit: Exhibit 1, Transcribed
copy of Individual A's ltr
5/19/80

Dear Sirs:

You may consider this a two week notification of my intention to quit my position as Nuclear Security Officer on June 3, 1980.

It is with both deep regret and great relief that I write this letter.

To those of you who are wondering why you received a copy, I hope and feel it will be enlightening.

I have been a faithful and competent employee for three years. My husband, also stationed at Davis-Besse has been employed by Toledo Edison for ten years. We both had intended to remain with the company until retirement. He has turned down several job offers, from similar companies, to do so. But in light of the unfair and undue action against me April 26, 1980, and the inhumane treatment and conditions, we the guards, have had to work under the past few years, I am forced into taking this action, as regretful as it is to me and my husband.

It appears to me that I was used as an example, an omen, to the other guards, and punished in an effort to make it look as though Supervision was doing their job. Attached, you will find a copy of the disciplinary action and their reasoning for it. In their attempt to find a justifiable reason, I was misquoted and accused of lying. I do have witnesses for my behalf.

My record will show I have always been a conscientious and loyal employee.

I was one of the few Cas Operators (operators of the new Security Computer System) on my shift. A job for which I had received no training - other than through my own initiative to learn and advance.

I received nothing extra for my trouble and extra responsibility, monetarily nor in any other way. On my shift I was even hindered with the rotating system, of taking the Cas Operator and rotating them every two hours with the inside patrol position. A job which has grown to be more and more impossible for one person or even two to handle. The numerous door alarms and the added number of doors have made it impossible. It has been easy for Management to commit themselves to these responsibilities, but have they given any consideration to whether it is humanly possible for that one person to do? In my opinion, NO! and that is negligent and short-sighted on their part, but who pays for this mis-management? I did.

I personally requested additional help inside several times and once recorded it in the daily log. It was always denied, even when it was evident that Security requirements could not be met.

We as a group have advised Management of the impossible responsibility placed upon us. It went ignored. No action has been taken to rectify this situation. (To close one's eyes will not make it disappear.) Supervision had full knowledge that Security requirements could not be met, by the few of us, on which the responsibility solely rested. The computer system is still in the hands of Construction, incomplete and unreliable. It appears to me that in an effort to make it look like they were attending to governing this matter, I was signaled out and made an example to others. If there was any mistake on my part, it was of the Station's geography, nothing more.

My records at Cas for the past several months will show I have been doing my job as efficiently and conscientiously as was humanly possible. If this alleged mistake on my part was justifiably punishable by three day suspension, then who is to punish supervision for their much more serious mistakes of judgement? Such as (the Security Manager's) decision during a Procedure Requalification Meeting to not write Security Reports on alarms where the cause for the alarm was not found. A direct contradiction to procedure and the Security Plan. Had SIR's been written on these incidents, there would have been an unbelievable number. We also never wrote SIR's on fence and perimeter alarms. We were told we didn't have to by Supervision.

It was only after the nine indictments of the Security manager and Station Superintendent at another plant that a memo was issued ordering SIR's on all alarms. Although I believe the commitment to do so was there all along.

I do not know if this particular mistake in judgment was intentional or from lack of knowledge and understanding of Security Procedures, but I am quite sure it will be denied.

Also there was the time I found the LT's key ring, which contains the key to the Master key cabinet, keys to the Security trailer (which houses weapons and ammunition) and other keys vital to Security. It had been negligently left in the public restroom in the Gatehouse by (Name Omitted).

To go any further would make it appear as though all I wanted was revenge, (although it would be sweet) it is not my intention.

My intention is to clear my name, my record, regain three days pay, and quit this job so that I am no longer subjected to the harassment and disregard of what I consider is incompetent and inadequate Security Management.

Maybe by bringing all of this to your attention, it will save the Company fines and embarrassment at the hands of this muddled mis-managed department. It just seems a shame to me that the Company and myself have to endure the loss of my employment in order that it is exposed. But the damage done to my reputation and credibility leave me no other choice.

My only consolation is that the fellow employees and friends that I leave behind may benefit. Just maybe they will obtain a job where they know what is expected from one day to the next. A job in which everyone is treated equally (very much unlike the conditions that presently exist), and one in which they can have faith and consistency in the decisions of Supervision.

In closing, may I suggest that a closer look be given to the survey initiated by (Name Omitted). I am sure the feelings which were expressed at those meetings will only reiterate what I have said about the Management of this department.

Sincerely and regretfully,

/S/

Individual A

I also request that I be given my two weeks vacation starting today, 5/19/80. The serious connotation of this letter will make it impossible for me to be treated fairly these last two weeks.

Attachment

cc: G. Grime
T. Murray
M. Polk
L. Phillips
J. Williamson
T. Medina (Security Inspector US-NRC)
B. Green
L. Reyes (Station Resident NRC)