U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 70-371/89-05

Docket No. 70-371

License No. SNM-368

Licensee: UNC, Incorporated

UNC Nava' Products

67 Sandy Desert Road Uncasville, Connecticut 06382

Facility Name: UNC Naval Products

Inspection At: Uncasville, Connecticut

Inspection Conducted: Scatember 11-15, 1989

Type of Inspection: Routine Physical Security

Safeguards Specialist

Safeguards Auditor

Approved by:

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

Inspection Summary: Unannounced Physical Security Inspection on September 11-15, 1989 (Report No. 70-371/89-05)

Areas Inspected: Plan and Implementing Procedures; Management Effectiveness; Organization; Program Audit; Records and Reports; Testing and Maintenance; Locks, Keys and Combinations; Physical Darriers - Protected Areas; Physical Barriers - Material Access Areas; Security System Power Supply; Lighting; Compensatory Measures; Assessment Aids; Access Control (Personnel, Packages

and Vehicles); Detection Aids (Protected and Material Access Areas); Alarm Stations; Communications: Personnel Training and Qualifications; Authorization for Access to National Security Information (NSI) and Restricted Data (RD); and Physical Protection and Safeguarding of NSI and RD.

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

DETAILS

1. Key Persons Contacted

R. Gregg, Director, Technical Services

*T. Collopy. Nuclear Material Control Manager (Acting Director, Technical Services)

*R. Gigliotti, Director of Security

R. Ormeno, Security Operations Supervisor

R. Jason, Security Training Officer

J. Brady, Plant Services Manager

N. Kornacki, Security Administrator

K. Nurmi, Security Shift Supervisor

B. Gibson, Security Shift Supervisor

E. Ezzel, Security Shift Supervisor

C. Bowler, Security Shift Supervisor

B. Taft, Security Shift Supervisor

J. Watson, Security Shift Supervisor

The inspectors also interviewed employees of the licensee's contract security organization.

*present at the exit interview

2. Security Plan and Implementing Procedures

The inspectors reviewed the licensee's NRC-approved security plan (the Plan) and implementing procedures and confirmed that the procedures were consistent with the Plan commitments and were adequate to meet applicable regulatory requirement.

3. Management Effectiveness

The inspectors found that licensee management is involved in the security program and continues to be supportive of program requirements. This involvement and support was evident from the progress being made on security program hardware upgraces and the continuing efforts to increase the number of contract security force members through an aggressive recruiting program.

4. Security Organization

The inspectors reviewed the area of security force manning and determined that progress is being made in resolving previous shortages as a result of the licensee's and contractor's aggressive recruitment program for security personnel. The inspectors noted that the amount of overtime being worked by security force members has been reduced as a result of that progress. A significant factor in the shortage is the length of time necessary to obtain U.S. Department of Energy (DCE) clearances for new

members of the force. The inspectors noted that there has been a slight, but steady, decline in the clearance turn-around time. The licensee currently has submitted applications, and is awaiting clearances, for approximately 30 individuals. The inspectors determined that the performance of the security force has not been adversely affected by the shortages.

5. Program Audits

The inspectors reviewed the security program audit that was in progress during the inspection. The inspectors determined that the scope of the audit was more comprehensive and better documented than it had been in the past. The inspectors also determined that personnel who were conducting the audit possessed security expertise, which was not always the case in the past. However, the audit was being conducted by management personnel employed by the security force contractor and the inspectors questioned the independence of these auditors. The licensee stated that an independent consultant was scheduled to do this audit (and future audits). but he did not receive his clearance in time to meet the audit frequency requirement. Since the security force contractor's management personne? were already cleared and possessed the requisite security expertise, they were being used to conduct the audit. The inspectors' review disclosed that the persons conducting the audit had no day-to-day responsibilities for security force operations and that the draft audit findings did not indicate any lack of objectivity as a result of the auditors' affiliation with the contractor. The final audit report, and disposition of its findings and recommendations, will be reviewed in a subsequent inspection.

6. Recurds and Report

The inspectors reviewed the following records and reports generated since the last inspection: protected area visitor access control register; duty logs; security incident reports; testing and maintenance records; and records of lock, key and combination changes. All records were found to be well-maintained and were completed in accordance with the Plan commitments and implementing procedures.

Testing and Maintenance

The inspectors reviewed the testing and maintenance records and procedures for the intrusion detection system, metal detectors, explosives detectors, and assessment aids. No discrepancies were identified.

8. Locks, Keys, and Combinations

The inspectors reviewed the installation, storage, rotation, and associated records generated since the last inspection for all locks, keys and combinations. No deficiencies were identified.

9. Physical Barriers - Protected Areas

The inspectors observed all physical barriers that form the protected area perimeter and found that the barriers were installed and maintained in accordance with the Plan and license conditions.

16. Physical Barriers - Material Access Areas

The inspectors observed the interior and exterior barrier features of the Material Access Areas and found that they were installed and maintained in accordance with the Plan and license conditions.

11. Security System Power Supply

The inspectors reviewed the uninterruptable power supply system and determined that the _______ functioned and was maintained as committed to in the Plan. The inspectors found that the system was tested under no-load conditions weekly. The inspectors also reviewed the documentation for the annual full-load test that was conducted on July 29, 1989. The documentation discrossed that the system's equipment performed as required and all security systems operated properly. The equipment is located in controlled access areas within a material access area.

12. Lighting

The inspectors observed the lighting within the protected area and isolation zones from 7:00 to 8:30 p.m. on September 13, 1989. All areas were determined to be illuminated in excess of 0.2 foot candles, measured horizontally at ground level in accordance with the Plan and NRC regulatory requirements. The determination was made through general observations and measurements made with the licensee's calibrated light meter.

Compensatory Measures

The inspectors observed the implementation of compensatory measures being utilized in conjunction with an on-going major construction project inside the protected area. The compensatory measures were being implemented in conformance with Plan commitments and implementing procedures.

14. Assessment Aids

The inspectors observed the various methods of alarm assessment used by the licensee and confirmed that they were in conformance with the Plan commitments and implementing procedures.

15. Access Control - Personnel and Packages

The inspectors reviewed the personnel and package access control procedures and determined them to be as committed to in the Plan. The inspectors noted minimum delays while observing personnel access processing during the peak traffic periods at shift changes. The inspectors noted that, in accordance with the Plan and regulatory requirements, 100% of all personnel and packages entering the protected area were searched prior to entry.

16. Access Control - Vehicles

The inspectors reviewed the vehicle access control procedures and determined that they were as committed to in the Plan. This determination was made by observing vehicles being processed through the main and contractor access control points.

17. Detection Aids - Protected Area

The inspectors observed operability tests of 100% of the perimeter intrusion detection system and performance tests of selected zones on September 12 and 13, 1989. The test results confirmed that the system performed in accordance with regulatory requirements and applicable license conditions.

18. Detection Aids - Materia? Access Areas

The inspectors observed the licensee conduct tests of selected Material Access Area alarmed portals on September 12-13, 1989. The alarms functioned properly and were in conformance with the Plan commitments and implementing procedures.

19. Alarm Stations

The inspectors confirmed that the Central Alarm Station (CAS) and Secondary Alarm Station (SAS) operators were performing their duties in conformance with commitments in the Plan and implementing procedures.

20. Communications

The inspectors monitored radio voice transmissions between the CAS and SAS operators, and other members of the security organization and observed tests of offsite communications equipment. The inspectors confirmed that equipment a dalarm station operators' performance were in accordance with the Plan commitments and implementing procedures.

21. Personnel Training and Qualification

The inspectors reviewed the licensee's Training and Qualification Plan (T&QP) and its implementation. The inspectors identified the following:

 There were several discrepancies in the documentation of training relative to the date that the training was received and, in several cases, the instructor who conducted the training did not sign the documentation to indicate that the training had been received.

The inspectors interviewed a majority of the involved trainees and the instructor and determined that the documentation discrepancies were administrative in nature. The licensee committed to strengthen the administrative controls to preclude this type of discrepancy from recurring. (In 89-05-01)

 The lesson plans being used were not standardized and lacked sufficient details to assure that all aspects of the subjects identified in the T&QP were being completely and consistently covered by all instructors.

The lack of formal lesson plans was discussed by the inspectors with licensee management. The licensee stated formal lesson plans would be developed for the subjects identified in the T&QP. The formal lesson plans, when developed, will be reviewed by the inspectors. (IFI 89-05-02)

22. Authorization for Access to National Security Information (NSI) and Restricted Data (RD)

The inspectors examined the licensee's program for granting access to NSI and RD. The program was determined to be in compliance with the requirements of 10 CFP 25. All access records were properly completed and terminations were handled as specified by the regulation.

23. Physical Protection Facility Approval and Safeguarding of National Security information (NSI) and Restricted Data (RD)

The inspectors reviewed the licensee's facility approval and determined that it was documented in a letter from the NRC and was implemented by an NRC-approved facility security plan. The inspectors determined that classified materials were being safeguarded as required by 10 CFR 95. No discrepancies were noted.

24. Exit Interview

The inspectors met with licensee representatives indicated in paragraph 1 at the conclusion of the inspection on September 15, 1989, and summarized the scope and findings of the inspection. The inspectors also confirmed the commitments made by the licensee during the inspection, as occumented in this report.

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