

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

REGION III

IE Investigation Report No. 50-10/78-13
IE Investigation Report No. 50-237/78-11
IE Investigation Report No. 50-249/78-13

Subject: Commonwealth Edison Company
Dresden Units 1, 2, and 3
Docket Nos. 50-10, 50-237, 50-249
License Nos. DPR-2, DPR-19, DPR-25

Irregularities in guard weapons qualifications and falsification of records reported by the licensee were confirmed.

Period of Investigation: April 24 - May 23, 1978

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REASON FOR INVESTIGATION

By telephone on April 17, 1978, and through further discussions on April 19, 1978, the licensee reported that some firearms qualifications records and some guard door check patrol records had apparently been falsified. Region III initiated an investigation to obtain information regarding these matters.

SCOPE OF INVESTIGATION

This investigation was conducted to obtain information regarding reported irregularities in guard weapons qualification and the falsification of related records as well as the falsification of vital area door check records. The investigation consisted of an examination of pertinent records and procedures, and interviews of personnel.

SUMMARY OF FACTS

By telephone on April 17, 1978 and in a meeting on April 19, 1978, licensee security personnel informed Region III that information had been developed which indicated contractor guard personnel employed at the Dresden station had falsified patrol records and that records of some guards' firearms qualifications were falsified in that irregularities had occurred while they were firing the qualification course.

During this investigation 17 individuals were interviewed, some more than once. Included in this group were licensee personnel, guard contractor personnel, and former employees of the guard contractor. Through these interviews 13 cases of irregularities were identified and of these 7 were confirmed by the guards themselves. This investigation did not attempt to identify each instance wherein an irregularity occurred, but did establish that these irregularities were not confined to one or two isolated occurrences.

The kinds of irregularities that occurred were as follows:

1. A supervisor or instructor firing into a guard's targets to obtain a qualifying score for them.
2. Permitting the use of bench rests to aid the guard's accuracy.
3. Combining targets used in two qualifying courses and combining the practice targets with the qualification course targets.

4. Firing into targets at close range.
5. Allowing a guard to fire under slow fire conditions at targets requiring timed firing.

Through interviews it was also determined that a guard supervisor on several occasions had instructed guards to complete a door check patrol record to show the patrol had been performed when in fact it had not been conducted. This falsification occurred during busy periods when available guard manpower was insufficient to accomplish all required tasks.

During the investigation information was received to the effect that the Dresden Security Administrator had issued an oral instruction on or about April 3, 1978, that a vital area door, identified as Door No. 9, should be recorded as locked on the door patrol checksheet whether it was found opened or locked. It was determined that the Security Administrator had informed Burns personnel that if Door No. 9 was found open but attended by a station employee or a contractor employee who did not require an escort, this condition met security requirements. Instructions given regarding the entry to be made on the checksheet in such instances were not clear.

While failure to check vital area doors and failure to conduct proper guard firearms qualifications are matters not in compliance with requirements, the licensee is not being cited for them since they were identified by the licensee, reported to the NRC and corrective action was initiated.

DETAILS

1. Introduction

On April 17, 1978, the Commonwealth Edison Nuclear Security Administrator and the Dresden Station Security Administrator advised Region III by telephone that an audit of guard contractor records indicated that some firearms qualification records may have been falsified. Arrangements were made for a meeting in the Region III offices to discuss the matter further.

On April 19, 1978, the above-mentioned licensee personnel visited Region III and provided the following information. The Dresden Security Administrator advised that in reviewing a guard's file containing required training and qualification data, he noted two firearms qualification records, one handwritten and one typed, each bearing identical subscores and total scores but different dates. Since this appeared questionable he discussed the matter with the Burns Account Supervisor. As a result of this discussion, he decided to pursue the matter by interviewing a sampling of guard personnel. Information obtained through these interviews indicated irregularities had occurred in several instances when guards fired the NRA Short Course for weapons qualification.

Region III was further advised that a guard sergeant had on occasion instructed some guards to complete a record indicating a vital area door check patrol had been made when in fact the patrol had not been performed.

The Commonwealth Edison representatives indicated that these matters had been discussed with Burns management who said they would conduct an investigation and provide a report to Commonwealth Edison. The Commonwealth Edison representatives were advised that Region III would initiate an investigation of these matters.

2. Background Information

As part of the security program for the protection of the Dresden Station, Commonwealth Edison has utilized the services of a contractor guard force. Effective December 17, 1977, Burns International Security Services, Inc. (Burns) replaced Pinkerton's, Inc. as the guard service contractor for Dresden as well as the Quad Cities and Zion Stations. In preparation for this changeover, it was necessary for Burns to train and qualify a number of personnel to man the station. Several new guards were trained and weapons

qualified by Burns prior to the changeover. Others underwent training and qualification after the changeover took place. In addition, it was necessary for Burns to requalify those Pinkerton guard personnel who stayed on at the Dresden Station as Burns employees. This requalification took place in February 1978.

One provision of the contract, consistent with Commonwealth Edison's commitment to the NRC, is that guards will demonstrate their qualification with firearms by successfully firing the NRA Short Course set forth in Regulatory Guide 5.20, Training, Equipping, and Qualifying of Guards and Watchmen. The Short Course consists of the following:

SHORT COURSE

Range	Type Fire	Time	No. Shots	No. Strings	Target	Maximum Points
25 yd	Slow	5 min	5	2	25 yd (SF)	100
25 yd	Timed	20 sec	5	2	25 yd (TF)	100
25 yd	Rapid	10 sec	5	2	Silhouette	100

Target Specifications:*

25 yd (SF)-21 in. x 24 in. with No. 7, 8, 9, and 10 rings black and black area 5.50 in. diameter (B-16).

25 yd (TF)-21 in. x 24 in. with No. 9 and 10 rings black and black area 5.54 in. diameter (B-8).

Silhouette - B-27

Guards must achieve a minimum point total of 175.

* As set forth by the National Rifle Association in its Official Rules and Regulations.

As evidence of a guard's qualification, Burns supplied a certification to Commonwealth Edison stating:

"On the above indicated date, _____ fired a score _____ out of 300. The course of fire was the NRA Short Course (as outlined in NRC Regulatory Guide 5.20, Appendix C). The scoring sequence was as follows:

Slow fire _____ out of 100 points.

Timed fire _____ out of 100 points.

Rapid fire _____ out of 100 points."

Although Commonwealth Edison has committed in their security plan to performing fewer vital area door check patrols, guards perform these patrols every hour. The results of these patrols are recorded on a form identified as an Exterior Door Check Sheet. The guard performing the door check enters the time and his initials. An entry, usually a checkmark or an "X", is entered opposite each door number in the appropriate "Yes" or "No" column to indicate whether the door was found locked. These records are maintained on file for review by NRC inspectors during routine security inspections at that facility. A copy of the Exterior Door Check Sheet is attached to this report as Exhibit A.

3. Interview with the Dresden Security Administrator on April 24, 1978

During an interview with the Dresden Station Security Administrator on April 24, 1978, the following information was obtained. He stated that on April 13 he reviewed the file on a guard because of an incident which occurred on April 5. During the review he had noted that it contained two firearms qualification records. On one the date, name and qualification scores were typewritten and bore the date of February 24, 1978. The other was completed in handwriting and bore the date of February 27-28, 1978. The subscores and the total score on both certifications were identical. Since there would be no need for a guard to fire for qualification scores on two separate occasions within a few days if he qualified the first time and since identical scores would be unlikely on two separate occasions, he considered the records to be suspect. He discussed the records with the Burns Account Supervisor who agreed that the records were questionable. The Account Supervisor also suggested that he might talk to other guards concerning their experience when firing for weapons qualification.

The Security Administrator then interviewed the guard in question concerning the records and the guard indicated that he had fired on one occasion and had been told that he had fired from the wrong

distance and so he was required to fire again a day or two later. The guard had no other explanation concerning the contents of the two records. The Security Administrator then interviewed two other Burns personnel, both of whom admitted that there had been irregularities during their qualification firing. Through interviews with additional guard personnel, the Security Administrator found additional indications of firearms qualification irregularities and was also informed that on occasion they had been instructed by a sergeant to prepare a record of a vital area door check patrol even though they had not performed the patrol.

Upon becoming aware of the above matters, the Dresden Security Administrator telephonically contacted the Commonwealth Edison Nuclear Security Administrator to inform him. The Nuclear Security Administrator informed him to contact the Burns management to set up a meeting to discuss the matter. The Dresden Security Administrator also briefed the Station Superintendent on the information he had obtained.

On April 17, 1978, the Dresden Security Administrator and the Nuclear Security Administrator met with Burns management personnel to inform them of the information that they had obtained and obtained a commitment from Burns that an investigation would be conducted into the matter.

The Dresden Security Administrator stated that as far as he had been able to ascertain through interviews with guard personnel, the falsification of vital area door check sheets had been limited to patrols conducted under the supervision of one guard sergeant. He went on to say that the guard sergeant had resigned from his employment with Burns on April 17, 1978.

During this discussion the Security Administrator provided copies of Security Incident Reports prepared by himself, the Account Supervisor, and a supervisor of the Burns guards. Copies of these Security Incident Reports are attached to this report as Exhibits B, C and D, respectively.

4. Interviews with Burns Guard Personnel on April 24-25, 1978

On April 24 and 25, 1978, ten guard personnel were interviewed. Regarding the subject of firearms qualification the following information was obtained. Three individuals stated that there had been no irregularities involved when they fired the qualification course. They also stated that they had no first hand knowledge concerning any irregularities relating to the qualification firing of other personnel.

One individual stated that in early December, 1977, a group of guards fired the qualification course using a bench rest. This was observed by the Dresden Security Administrator who discussed the matter with the Burns representative, Individual A, who was supervising the firearms training and qualification. It was concluded that the use of bench rests was not permitted and the guards were required to fire the qualification course again a day or two later. The individual stated that the second time the qualification course was fired, she was permitted by the Burns representative in charge to use a bench rest. The targets used on this occasion were used for her qualification score. The certification signed by Individual A, which was furnished by Burns to the licensee, indicates this individual scored 207 on December 9, 1977. (During a subsequent interview on May 8, 1978, the Dresden Security Administrator stated that the discussion concerning the use of bench rests took place on December 6, or 7, 1977. He said he was able to determine it was one of those two days because the discussion took place a day or two before he attended a meeting in Aurora, Illinois on December 8, 1977. The date of the meeting was confirmed through a telephone contact with the Nuclear Security Administrator who also attended the meeting. The Dresden Security Administrator stated he had discussed the use of bench rests with Individual A and Individual B, and they had agreed that all of those guards who had fired with the aid of a bench rest would have to requalify.)

A copy of the certification for Individual C is attached to this report as Exhibit E. Individual C signed a statement concerning the above, a typed transcript of which is attached to this report as Exhibit F.

Individual D stated that in early December, 1977, she fired the NRA Short Course for qualification three or four times. One target from an earlier firing was substituted for one of those used the last time she fired the course in order to obtain a total qualifying score. She indicated that Individuals A and B were supervising the course firing. The certification furnished to the licensee signed by Individual B showing that Individual D had fired a qualifying score, was obtained and is attached to this report as Exhibit G.

Individual D also stated that she saw either Individual A or Individual B fire into one of the targets of Individual E so that she could get a qualifying score. It was her recollection, however, that Individual E did not subsequently work at Dresden as a guard.

A signed statement regarding the above was obtained from Individual D, a typed transcript of which is attached to this report as Exhibit H.

Individual F stated that when he initially fired the NRA Short Course for requalification in February 1978, he had difficulty in obtaining a qualifying score. He fired the course again after the table from which he fired was moved about 6 feet closer to the targets. He indicated that Individual A and someone else, whom he could not recall, were supervising the firing. After completing the course he was informed he had achieved a qualifying score. That evening, however, he received a telephone call at home from Individual G advising him he had not qualified and that he would have to fire the course again the next day.

He fired the course again the next day and, upon completing it, he was informed he needed a higher score on the small bull's-eye target. He was instructed to fire at another small bull's-eye target. Since he achieved a better score on the second target, it was substituted for the first one to obtain a total qualifying score.

Individual F had no explanation for two certifications of his firearms qualifications being furnished to the licensee. Copies of the two certifications, one typed and the other handwritten, are attached to this report at Exhibits I and J, respectively.

Regarding the combining of targets, a signed statement was obtained from Individual F, a typed transcript of which is attached to this report as Exhibit K.

Individual H stated that in February 1978 he fired 5 practice shots at a small bull's-eye target before he fired the qualification course. He was instructed to fire 5 more shots at the practice target as part of the qualification course firing. Since his first 5 shots practice were well placed, they were used in determining his score on that target. He also stated that he was allowed to fire at the other targets comprising the course without any time restrictions. He stated that Individual A was in charge of the range on that occasion. He was assisted by Individual G and a third individual whom he could not identify. He also said that Individual I and Individual J fired on the same occasion. He said they appeared to be having more difficulty and were still firing when he departed from the range. A copy of the certification furnished to the licensee concerning the firearms qualification of Individual H is attached to this report as Exhibit L. A signed statement was obtained from Individual H, a typed transcript of which is attached to this report as Exhibit M.

Individual K stated that it was her recollection that she fired the qualification course twice on the same day in late November or early December, 1977. Individual A and Individual B were in charge of the range on that occasion. She stated that either Individual A or Individual B fired into one of her targets for her so that she could obtain a qualifying score. She indicated that she did not recall which one fired into her target since both of them were close to the targets, about half the distance from the firing table, and both of them fired into the targets of the other two guards present as well as hers. She advised that Individual L and Individual M were firing for qualification at the same time she did. She indicated the targets fired into by Individual A and Individual B were used as the basis for the qualifying scores for both her and the other two guards. Individual K declined to sign a statement regarding the above events. Copies of the certifications furnished to the licensee for Individuals, K, L, and M are attached to this report as Exhibits N, O, and P, respectively.

Individual J stated that she fired the NRA Short Course to requalify in February 1978 at the same time Individual H and Individual I fired. Individual J said that after she fired 10 shots at the first target and failed to hit it, Individual A, who was in charge of the range, fired into her target at close range. Individual A also fired 10 shots in the same manner into her other bull's-eye target. She indicated that she was allowed to fire from close range into the silhouette target. These targets were used as the basis for the certification of her weapons re-qualification furnished to the licensee. Individual J also stated that she observed Individual G fire into the targets of Individual I.

Individual J said that Individual A told her that if word about what he had done ever got out, he would deny it. She told him not to worry because she would be ashamed to tell anyone. A copy of the certification furnished to the licensee regarding the firearms qualification of Individual J is attached to this report as Exhibit Q. A signed statement was obtained from Individual J, a typed transcript of which is attached to this report as Exhibit R.

Individual I stated that she fired for requalification in February 1978 along with Individual H and Individual J. Individual I said that she fired at the first target in the course and her score was not good so that target was thrown away. Individual G, who was assisting Individual A in conducting the firing, then fired into both bull's-eye targets for her from about half the prescribed distance. She fired into the silhouette target herself

but not under any time restriction. The two targets fired into by Individual G were combined with the silhouette target as the basis for her qualifying score. A copy of the certification furnished to the licensee regarding the arms qualification of Individual I is attached to this report as Exhibit S. A signed statement regarding the above was obtained from Individual I, a typed transcript of which is attached to this report as Exhibit T.

Individual N stated that there had been no irregularities in his qualification firing. He stated that on that occasion he observed Individual O firing at targets from close range, about half the prescribed distance, but could not state whether those targets were used for her qualification score. A copy of the certification furnished to the licensee regarding the weapons qualification of Individual O is attached to this report as Exhibit U.

Regarding the falsification of vital area door check patrol records, 4 guards interviewed stated that they had been instructed on one or more occasions to fill out the door check record without performing the patrol. In all cases, it was indicated that during busy periods on the day shift the guard force was frequently short-handed and it was on those occasions that the patrols were omitted and the record falsified to indicate they had been made. Other guard personnel said that they had not been instructed personally to fill in the patrol sheet without performing the patrol, but most were aware or had heard rumors that this had been done. One guard stated that he was aware of one or two instances wherein a guard was dispatched to make a door check patrol but did not perform it. With this exception, no information was obtained to indicate that door check patrol records were falsified except at the instruction of Individual P on several occasions during the period November 1977 - April 1978. None of the personnel interviewed were able to identify specific times or dates when patrols were not performed. None of the individuals interviewed indicated that they had any knowledge that other Burns supervisory personnel or licensee personnel were aware that door check patrols were not being made and the records were being falsified.

5. Interview with the Burns Account Supervisor on April 25, 1978

On April 25, 1978, the Burns Account Supervisor at Dresden furnished the following information during an interview.

The Account Supervisor stated that the first indication she had of any irregularities occurred when Individual G had informed her that Individual F needed some help to requalify on the firing range. She instructed Individual G to have Individual F go back to the range the next day to fire the qualification course again. She stated that she considered this an isolated occurrence and since corrective action was taken, she thought no more about it.

After that date, however, her difficulties with the Burns branch office increased. In addition, Individual J occasionally made references to phoney door checks. She assumed Individual J was referring to things which had occurred before Burns had taken over the guard service contract and did not pursue the matter. After Individual J had made these remarks on several occasions, she asked Individual J for more specific information. Individual J stated that Individual C told her that she had been instructed by Individual P on several occasions to fill out the vital area door check record even though the check had not been made. Individual J also informed her that she had witnessed Individual P give this instruction to Individual C on one occasion.

The Account Supervisor stated that when this problem came to her attention, she recalled the arms requalification incident that had occurred and began to wonder whether there were other such occurrences. The Account Supervisor said she then asked Individual I and Individual J if they had legitimately requalified on the firing range and they informed her that they had not. (During interviews with Individual I and Individual J they provided corroborating information concerning the above.) The Account Supervisor stated that she spoke with Individual P about the falsifying of door check records and he denied it. Later in the conversation, he said he could not remember but that it was possible that door checks were not made when he was short of guards. She stated that after thinking these matters over for a few days, she informed the Dresden Security Administrator about them.

6. Interview with Individual P on April 27 and May 8, 1978

On April 27, 1978 Individual P was interviewed. He stated that he had been promoted from a guard to a sergeant when Burns took over the Dresden guard operation from Pinkerton in December 1977. He stated that he worked the day shift, and because of the heavy traffic coming into and leaving the site in addition to other duties required of guards, he was frequently short of guards to accomplish all of the work assigned. He said that under those circumstances he had on about 10 occasions instructed a guard to

complete the door check patrol record even though the patrol had not been performed. He stated that in early April 1978 he received an instruction that if a door check patrol could not be made because of a manpower shortage, he should make an entry in the record "No Guards Available." He said that he did not realize that you could do this before he received this instruction.

He stated that he was of the opinion that Individual G and other Burns supervisory personnel were aware that guards under his supervision were recording door check patrols that were not made. He also stated that it was his opinion that the same thing was done on other shifts but he had no specific knowledge that these things had occurred.

Individual P also stated that during the last several weeks of his employment at Dresden, which terminated about April 18, door No. 9 was frequently found unlocked. He had estimated that it was being found open by the guards on about 75% of their door check patrols. He indicated this door was located on the roof of the Turbine Building and it was necessary for contractor personnel to go in and out the door frequently during a recent outage. Individual P stated that he was instructed by the Dresden Security Administrator to instruct the guards to record the door as being locked on the door check patrol sheet whether it was found open or locked during their patrols.

During a subsequent interview with Individual P on May 8, 1978, he modified the above statement by saying this instruction had been received from the Burns Account Supervisor who said it had originated with the Dresden Security Administrator. On that occasion he also stated that he had made an entry in the shift sergeant's log book regarding this instruction. Individual P declined to sign a statement in this regard.

7. Telephone Conversation with the Burns Operations Manager-Midwest Group on April 27, 1978

On April 27, 1978 a telephone conversation was held with the Burns Operations Manager-Midwest Group regarding arrangements to interview Individual A and Individual B. During that conversation he advised that he had learned through interviews conducted during Burns' investigation that Individual Q had assisted some guards in obtaining a qualifying score by firing into their targets for them. It was subsequently determined that Individual Q had been employed by Burns as a guard at Dresden and, because of his previous experience in the use of firearms, had assisted the range officer on a few occasions.

8. Interview with Individual G On April 29, 1978

On April 29, 1978 Individual G was interviewed. He advised that he left his employment with Burns as a member of the guard force at Dresden on about March 20, 1978. He said he had assisted Individual A in conducting the firearms qualification firing for guards on two occasions in about February 1978.

He confirmed the information previously obtained concerning the qualification firing of Individual F. He also confirmed that on the other occasion he and Individual A had fired into the targets of Individual I and Individual J as a means of producing targets which would show a qualifying score. A signed statement concerning the above was obtained from Individual G, a typed transcript of which is attached to this report as Exhibit V.

Individual G said he had no personnel knowledge concerning the matter of vital area door check patrol records being falsified.

Individual G also confirmed that Individual Q had been employed by Burns as a guard at the Dresden site for a short time during the first part of 1978. He indicated that Individual Q had on a few occasions assisted Burns supervisory personnel in the firearms training and qualification activity.

9. Telephone Conversation with the Dresden Security Administrator on May 1, 1978

During a telephone conversation with Region III personnel on May 1, 1978, the Dresden Security Administrator advised he had been informed that the ongoing investigation by Burns had revealed Individual Q had assisted Individual R and Individual S in obtaining a qualifying score by firing into their targets. Copies of the certifications for Individuals R and S furnished to the licensee were subsequently obtained and they are attached to this report as Exhibit W and X, respectively.

10. Interview with Individual A on May 2, 1978

On May 2, 1978 Individual A was interviewed. At Individual A's request, his supervisor, the Branch Manager of the Burns office located in Evergreen Park, Illinois, was present during this interview.

Individual A stated that the first group of guards to fire for qualification did so in early December 1977. At that time the firing was supervised by Individual B who acted as the range

officer and he had assisted him. Individual A stated that after some guards had fired with the aid of a bench rest, a question arose as to whether this was permissible. When it was decided that it was not, the guards fired the qualification course again, without using a bench rest. Individual A denied that any guard had been permitted to qualify using a bench rest.

Individual A stated that he and Individual B had fired one or two shots into one or two targets for two or three guards. He indicated that these guards were close to a qualifying score and they gave them only that amount of help. He indicated that it was a mutual decision between him and Individual B to fire a few shots for the guards.

Individual A said that a second group of guards fired the qualification course in January 1978, and that Individual B was again the range officer. He indicated that he may have assisted Individual B but was certain that he was not there all of the time because he was ill with the flu. He stated no assistance was afforded any of those guards to his knowledge.

Individual A said that another group of guards fired for qualification in February 1978. This group was a mixture of new personnel and guards, including supervisors, who were due for requalification. He said he was the range officer for this group and he was assisted by Individual Q.

Individual A said that the Burns Account Supervisor at Dresden had requested him to give the supervisors all the help they needed to qualify. Individual A stated that he interpreted this to mean that he should do whatever was necessary to qualify them, even firing into their targets for them.

Individual A said it was his recollection that Individual J and Individual P were on the range at the same time, and that Individual I was on the premises but did not fire at the same time they did. Individual A said that Individuals J and P "couldn't hit the broad side of a barn." They were allowed to fire approximately 17 yards from the targets and still did not score well enough to qualify. Because they were not able to qualify through their own efforts, he fired into their targets for them. Individual A said that although Individual G had helped on the range, he was not present while Individuals J and P were firing.

Individual A said that the first time Individual F fired, Individual G had helped him. When Individual F fired the course a few days later, he legitimately qualified.

Regarding the two certifications he had signed for Individual F, Individual A had no explanation for the existence of both the certifications. He said that the handwritten names, dates, and scores were not in his handwriting but that both signatures were his. He said that he has not signed any blank certification forms for later use and had always signed the certifications the same day, either at the firing range or immediately upon returning to his office.

Individual A denied any knowledge or participation in the following kinds of irregularities: allowing guards to qualify without timed firing; the use of bench rests; the combining of targets; and, with the exception of the above described instances, allowing guards to fire at a closer distance than prescribed.

Individual A said that Individual Q told him that he had fired into the targets of Individual S to aid her in achieving a qualifying score. He said he was not present when this occurred.

Individual A estimated that 80 or more personnel had fired for qualification during the period December 1977 through February 1978.

Individual A declined to provide a signed statement regarding the above information.

Individual A said that he had no knowledge concerning the falsification of vital area door check patrol records.

11. Interview with Individual B on May 2, 1978

On May 2, 1978 Individual B was interviewed. At his request, the Burns Operations Manager-Midwest Group, was present during the interview.

Individual B stated that he has occupied the position of Operations Manager in the Burns South Bend, Indiana, office for about the past 14 months. In December 1977 he was brought to the Chicago area to provide firearms training and instruction, and to conduct the qualification course firing for guards assigned to Dresden. During a two-day period in December 1977, about 50 personnel, all new employees, fired the qualification course. Of that group about 3 failed to qualify and were not retained. A few others came close to qualifying, and in his opinion, if given more time, could have qualified. Since they were close to obtaining the qualifying score, he and Individual A fired a few times, perhaps three or four, into their targets to raise their score to a qualifying total. He said he was sure that at least two individuals were helped in this manner.

Individual B stated that in January 1978, he was again involved in training and qualification of about 35 newly employed guards for Dresden. He was allocated 2 1/2 days in which to get them qualified. On this occasion, there were again a handful of people who needed a little help to qualify. The same kind of help was provided that they had given those people in December 1977. He said one individual was washed out because he was sure he would never qualify.

Individual B stated that he did not participate in the qualification firing that took place in February 1978.

Individual B indicated that there were only three positions on the firing range they used and it was difficult to push 30 to 50 people through a qualifying course in a matter of 2 or 3 days. Individual B stated that he considered NRA Short Course to be inappropriate for the firearms qualification of people who have not handled firearms in the past. He indicated he considered this course to be a difficult one. He said he did not understand the seriousness of the firearms qualification of guards as far as the NRC was concerned at the time the training and qualification sessions took place.

With respect to adhering to the prescribed short course timed firing sequences, Individual B stated that there was a slight deviation of perhaps a second or two, but that it was nothing significant. Regarding the selection of the best targets from several firing sequences in order to achieve the best possible score, Individual B stated that someone whom he could not identify indicated that this could not be allowed. He could not recall with certainty, but it was his recollection that there were some instances wherein people qualified by mixing targets. People who had qualified in this way, before he had been informed that this was not permitted, were not required to requalify.

Individual B stated that as far as he knew there were no other Burns personnel other than those who participated in the qualification firing who were aware of the irregularities. He had received no specific instructions from anyone to permit the irregularities.

Individual B declined to sign a statement concerning the information he had provided.

12. Discussion with the Burns Operations Manager-Midwest Group on May 2, 1978

Following the interview of Individuals A and B, discussions were held with the Burns Operations Manager-Midwest Group. He stated that he did not recall any indication being received from the branch office that they were having difficulties in the training and qualification of guards for Dresden. He indicated that it appeared that time pressures were felt by the people conducting the training, and that part of the pressure could have come inadvertently from him because of his frequent requests for information concerning the progress of the training program for the people to be assigned to the Dresden facility. He also stated that the availability of the firing range for use by the personnel conducting the training may have limited the time available for the guard personnel to fire.

13. Interviews with Dresden Security Administrator on May 8 and 23, 1978

On May 8 and on May 23, 1978, the Dresden Security Administrator was interviewed primarily concerning any instructions he was reported to have issued regarding entries to be made by guards on the vital area door check sheet relating to door No. 9. A representative of the licensee's law firm was present during the interview on May 8, 1978 at the request of the Security Administrator.

The Security Administrator confirmed that door No. 9 was identified as a vital area door and advised that it was located on the roof of the Turbine Building. This roof was observed to be at least 30 feet above ground level. The Security Administrator said that beginning sometime in March 1978, it became necessary for personnel of a contractor organization to go in and out of that door frequently since they were erecting a shed on the roof. On April 3, 1978, the Maintenance Department requested that a guard be posted at the door. The Security Administrator discussed this request with the station's Administrative Assistant and it was decided a guard would not be posted there for the following reasons:

- a. There is no normal access to that area of the roof.
- b. The contractor would be working in the immediate vicinity of the door.

- c. Access into the vital area through that door by an unauthorized individual was considered unlikely because of the difficulty in getting to its location.

During an interview on May 8, 1978, the Administrative Assistant confirmed that this matter was discussed with the Security Administrator and that it was a mutual decision between them that a guard would not be posted at door No. 9.

The Security Administrator stated that access through the door was controlled by contractor personnel who did not require an escort or by station personnel. He recalled that at about that time, the Burns Account Supervisor received a call from a guard or a guard sergeant inquiring about the status of the door. The question was relayed to him and he responded to the effect that as long as an authorized individual was controlling the door, it was not a problem. The Security Administrator said that he might have said, "Don't worry about it," but said he did not recall ever saying that it should be recorded as locked if it was open but attended.

He stated he had no recollection of ever issuing any specific instruction concerning the entry to be made on the door check sheet by guards if they found the door unsecured but attended. He indicated that he was under the impression the guards would record it as open but attended. He went on to say that this situation had not been covered in any written instructions to the guards in the past. In the absence of specific guidance, he indicated that it was possible that some guards would record the door as locked since its being controlled was equivalent to its being locked. Others might record it as open and might or might not add a word or two to indicate it was not a problem. He advised that a written security directive was currently being issued. It would state that for any future instances of this kind a door should be recorded on the check sheet as open with the word "attended" added.

A review of the door check sheets for the period March 1 through April 30, 1978, showed that door No. 9 had been recorded as open 42 times. In some instances, an entry, "working in area," had been made after the check mark. On April 16, 1978, the shift officer's daily log, the Security Incident Report file, and the Security Service Report file were reviewed for the months of March and April, 1978 and no entry was found as described by Individual P.

14. Interviews with Burns Guard Supervisory Personnel on May 16 and 23, 1978

On May 16, 1978, three guard supervisory personnel who had been regularly assigned to the day shift were interviewed. All three stated that they had not received any instructions, either orally or in writing, directly from the Security Administrator or indirectly from him through the Account Supervisor that guards should not record door No. 9 as locked if found unlocked. Through inquiry during these interviews, it was ascertained that there was not common agreement as to what should be recorded on the door check sheet by a guard when a door is found unlocked but attended.

On May 23, 1978, the Account Supervisor was interviewed primarily concerning the issuance of instructions regarding door No. 9. The Account Supervisor said it was her recollection that in March or early April 1978 she had received a call from a sergeant, probably Individual P, asking whether an unlocked door attended by an employee or a contractor employee was a problem. After checking with the Security Administrator, she advised the sergeant that such a condition was permissible. Although she did not recall precisely, it was her recollection she informed the sergeant that in such circumstances the door should be recorded on the door check sheet as open with the added notation "monitored". She stated no instruction had been issued regarding this matter and indicated that this may have resulted in some uncertainty and inconsistency among guard personnel regarding the entry to be made on the door check sheet. She stated that to her knowledge, no one had ever issued an instruction orally or in writing, that any door should be recorded as locked regardless of the condition in which it was found.

15. Management Meeting

On June 22, 1978 the investigation findings were discussed by Commonwealth Edison and Region III management. The meeting was also attended by representatives of Burns International Security Services, Inc. Also present as observers were representatives from the State of Illinois Attorney General's Office and the Citizens for a Better Environment.