

Appendix A

NOTICE OF VIOLATION

Commonwealth Edison
Company

Docket No. 50-10
Docket No. 50-237
Docket No. 50-249

Based on the inspection conducted on October 10-13 and 16-19, 1978, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. Items 1 and 2 are infractions; items 3 through 7 are deficiencies. Since immediate corrective action was taken where appropriate, and commitments made to re-train guards in the applicable procedures, no response is required.

1. []

Contrary to the above, it was observed on October 10 and 13, 1978, that construction material, capable of providing concealment, was stored within [] on the inside of the protected area barrier.

2. 10 CFR 73.55(g)(1) requires that physical barriers be maintained in operable condition.

Contrary to the above, it was observed on October 13, 1978, that a section of the protected area barrier was not maintained in an operable condition in that, []

3. 10 CFR 73.55(g)(2) and [] requires that each intrusion alarm be tested at least once every seven days during periods of continuous use.

Contrary to the above, it was noted that on four occasions, between the period of May 6, 1978 and October 12, 1978, the interval between tests exceeded the seven day requirement.

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4.

10 CFR 73.55(b)(4) requires that a person be properly trained prior to acting as a guard.

Contrary to the above, it was noted that a guard had not received training in prior to assignment as an armed guard.

5.

Contrary to the above, such communication verifications were not performed for the period under review, namely, August 1977 to the present.

6. 10 CFR 73.55(d)(4) requires that all vehicles, except under emergency conditions be searched for items which could be used for industrial sabotage purposes prior to entry into the protected area. Areas to be searched include the cab, engine compartment, undercarriage, and cargo area.

Contrary to the above, it was observed that on six instances on October 13 and 18, 1978, the undercarriage of vehicles were not searched prior to entry into the protected area.

7. 10 CFR 73.55(f)(3) requires that the licensee control all points of personnel access into the protected area.

Contrary to the above, a review of the records disclosed that two visitors were granted admittance to the protected area between the period of May 1978 to the present.

This is a repeat item of noncompliance from the September/October physical protection inspection.

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Appendix B

SECURITY CONCERNS

During the period April 24 to May 23, 1978, an investigation was conducted concerning the falsification of patrol records and guard firearms qualification records by the guard service contractor at Dresden. The results of that investigation were discussed with Commonwealth Edison Management in a meeting held in the regional office on June 22, 1978. During this meeting, concerns disclosed as a result of the investigation, specifically relating to [] were discussed.

[As a result of the current inspection, our concerns have increased. A review of records and discussions with site security personnel disclosed that the [] is in excess of [] based on the number of guards required by the guard contract. The inspection also disclosed that morale continues to be low. Many of the items of noncompliance disclosed during the inspection can be attributed to the failure of security personnel to follow established security procedures. We feel that unless steps are taken to reduce [] the effectiveness of the security organization may be adversely affected.]

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

REGION III

Report No. 50-10/78-28; 50-237/78-24; 50-249/78-26

Docket No. 50-10; 50-237; 50-249

License No. DPR-2; DPR-19; DPR-25
Safeguards Group 11, IV

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

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

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: October 10-13 and 16-19, 1978

| | | |
|--------------|---|-----------------|
| Inspectors: | <i>J. L. Belanger</i> J. L. Belanger | <u>11-20-78</u> |
| | <i>L. C. Estell</i> L. C. Estell | <u>11-20-78</u> |
| | <i>C. A. Schwan</i> C. A. Schwan | <u>11/20/78</u> |
| Approved By: | <i>J. A. Hind</i> J. A. Hind, Chief Safeguards Branch | <u>11/21/78</u> |

Inspection Summary

Inspection on October 10-13 and 16-19, 1978 (Report No. 50-10/78-28;
50-237/78-24; 50-249/78-26)

Areas Inspected: Unannounced inspection regarding implementation of (a) approved security plan dated May 6, 1974 (revised); (b) applicable portions of 10 CFR 73.55 which became effective May 25, 1977; (c) 10 CFR 73.70 requirements. Specifically, the inspection covered areas relative to the security organization, physical barriers, access controls, detection aids, communication controls, testing and maintenance of security equipment, response controls and record requirements. The inspectors reviewed the licensee's corrective action relative to items of noncompliance identified during the physical protection inspections conducted September 26-30 and

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October 3, 1977; and March 27-28, 1978. Additionally, the inspectors reviewed the licensee's progress toward full 10 CFR 73.55 implementation. The inspection involved 165 hours onsite by two NRC inspectors and an inspection assistant.

Results: Of the areas inspected, seven items of noncompliance were identified relative to the security organization (Paragraph 4), access controls (Paragraph 7), physical barriers (Paragraph 5), testing and maintenance (Paragraph 6) and response capability (Paragraph 8). Two of the items are considered infractions; the remaining five are deficiencies. The items of noncompliance noted during the previous security inspections are closed. Two of the three unresolved items noted during the September/October 1977 inspection have been resolved by the Office of Nuclear Reactor Regulation; the third item regarding vital areas will remain open pending approval of the licensee's revised Modified Amended Security Plan.

(Details Part 2.790(d) Information)

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DETAILS

1. Persons Contacted

Commonwealth Edison Company

- E. B. Stephenson, Station Superintendent
 - Station Administrative Assistant
 - Station Security Administrator
 - Nuclear Security Administrator (Corporate)
 - QC Engineer
 - Station Office Supervisor
 - Station Technical Staff Supervisor
 - Dresden QA
 - Senior QA Inspector, Dresden

Security Services

- Group Nuclear Safeguards Manager
 - Security
 - Site Supervisor
 - Security
 - Security

NRC - Region III

- J. Barker, NRC Resident Inspector
- R. C. Knop, Operations Branch

All of the above individuals were present at the exit meeting.

The inspectors also conducted interviews with ten members of the contract security force.

2. Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (50-010/77-28; 50-237/77-25; 50-249/77-15) - Failure to conduct required searches of individuals who required escort in the protected area. Observation of access control activities disclosed that the licensee is complying with the Office of Nuclear Reactor Regulation (NRR) staff position with respect to "pat-down" searches.

(Closed) Noncompliance (50-010/77-28; 50-237/77-25; 50-249/77-25) - Failure to positively control licensee designated vehicles. Several tours of the protected area were conducted in which vehicles were inspected for keys left in the ignition. None were found. Guards are required to

(Closed) Noncompliance (50-010/78-11; 50-237/78-10; 50-249/78-10) - Lack of continuous communication by each guard, watchman, or response individual on duty with the continuously manned alarm station. Inspection disclosed that additional radios have been purchased to provide communication capability for each guard on duty. All radios inspected were found to be in operable condition.

(Closed) Unresolved Item (50-010/77-28; 50-237/77-25; 50-249/77-25) - Failure to number badges for persons who do not require frequent access. (10 CFR 73.55(d)(5) - Numbered Picture Badge Identification System). Inspection disclosed that the licensee has since numbered all badges in the system, thus they are in full compliance with the regulatory requirement.

(Open) Unresolved Item (50-010/77-28; 50-237/77-25; 50-249/77-25) - The Office of Nuclear Reactor Regulation has advised RIII that this issue should remain unresolved until the Modified Amended Security Plan is reviewed and approved.

(Closed) Unresolved Item (50-010/77-28; 50-237/77-25; 50-249/77-25) -

NER's position with respect to this requirement will be forwarded to the licensee for their action.

3. 10 CFR 73.55 Implementation

On September 5, 1978, several RIII security inspectors met with the CECo responsible project engineer and the nuclear security coordinator at corporate headquarters for the purpose of reviewing the implementation schedule for all of the operating Commonwealth Edison nuclear stations. With respect to Dresden station, the inspectors were advised that the licensee expects to meet the intent of the regulation by February 23, 1979 by equivalent measures. Final completion of new construction items is expected by July 20, 1979.

The inspectors observed that the new gatehouse facility [] is structurally complete. Use of the facility as the main access control point into the protected area is expected by February 23, 1979. The licensee intends to continue utilizing the present []

[] Posts for the additional protected area barrier have been installed. The licensee is awaiting delivery of the fence fabric. []

4. Security Organization

10 CFR 73.55(b)(4) states, in part: "The licensee shall not permit an individual to act as a guard, watchman, or armed response individual unless such individual has been properly trained and qualified....."

Contrary to the above, a guard had not received the [] The inspectors conducted a complete audit of guard training and qualification files. The audit disclosed a number of deficiencies, that if they are not corrected, will result in items of noncompliance after approval of the Modified Amended Security Plan. Most of the deficient documentation was also noted in an audit conducted by the licensee in August 1978. The above item of noncompliance resulted from commitments made in the existing approved security plan. The NRC audit also disclosed that at least five guards received approximately sixteen hours of their initial training eight months subsequent to site assignment. The latter had been identified by the licensee and corrected prior to the inspection.

With respect to the guard lacking the required training in [] the licensee initiated immediate corrective action by ordering the particular individual suspended until the training has been accomplished and documented. To preclude recurrence, the licensee has established the policy that no guard will be accepted for assignment unless that individual has completed all training and complete documentation of training and qualification is provided.

This finding represents apparent noncompliance (Deficiency) with the above stated requirements.

5. Physical Barriers

Contrary to the above, objects capable of concealing an individual were found within the isolation zone on two occasions. On October 10, 1978 at approximately 1900 hours, the NRC inspectors, accompanied by the Station Security Administrator, observed that a stack of lumber, approximately eight feet in length and five feet in width, was located

On the noted occasions, the objects were found on the east side of the protected area, an area of heavy construction activity.

Immediate corrective action was initiated by the removal of the material the day it was discovered. To preclude recurrence, the licensee made a commitment to re-construct guards regarding the isolation zone.

This finding represents apparent noncompliance (Infraction) with the above stated requirement.

6. Testing and Maintenance

- a. 10 CFR 73.55(g)(2) states: "Each intrusion alarm shall be tested for performance at the beginning and end of any period that it is used for security. If the period of continuous use is longer than seven days, the intrusion alarm shall also be tested at least once every seven (7) days."

Contrary to the above, intrusion alarm tests exceeded the seven day requirement on four occasions.

A review of the site "Security System Electronic Surveillance Test Checklists" for the period of May 6 - October 12, 1978 was conducted October 17, 1978. Intrusion alarm tests, exceeding the required time limits, were documented for the following dates:

| <u>Date of Tests</u> | <u>Days Between Tests</u> |
|-------------------------|---------------------------|
| 5/26-27/78 and 6/4-5/78 | 8 |
| 6/15/78 and 6/23/78 | 8 |
| 8/23/78 and 9/4/78 | 12 |
| 9/4/78 and 9/12/78 | 8 |

These findings represent apparent noncompliance (Deficiency) with the above stated requirements.

- b. 10 CFR 73.55(g)(1) states in part: "All alarms, communication equipment, physical barriers, and other security related devices or equipment shall be maintained in operable condition."

Contrary to the above, the physical barrier of the protected area was not maintained in an operable condition. On October 13, 1978, during a test of the

The demonstration was witnessed by the Station Security Administrator.

At the direction of the Station Security Officer, the area affected by

A commitment was made during the exit meeting to re-train guards in what to look for during barrier inspections.

The finding represents apparent noncompliance (Infraction) with the above stated requirement.

7. Access Controls

- a. 10 CFR 73.55(d)(4) states in part: "All vehicles, except under emergency conditions, shall be searched for items which could be used for sabotage purposes prior to entry into the protected area. Vehicle areas to be searched shall include the cab, engine compartment, undercarriage, and cargo area."

Contrary to the above, during the course of this inspection, vehicles entered the protected area without a complete search as required. The NRC inspectors conducted observations of protected area vehicle entry procedures during periods of 0700-0800 hours, October 13, 1978 and 1500-1600 hours, October 18, 1978. During each occasion, three vehicles were admitted to the protected area without a search of the vehicle undercarriage. Interviews with security personnel revealed this search requirement had been a subject of procedural training and was familiar to them.

This deficiency represents apparent noncompliance (Deficiency) with the above stated requirement.

- b. 10 CFR 73.55(d)(1) states, in part: "The licensee shall control all points of personnel....access into the protected area. Identification....of all individuals....and authorization shall be checked...."

Contrary to the above, a review of records and interviews with personnel showed that visitors were granted admittance to the protected area.

An examination of the "Records of Admittance" forms for the period May 1 through October 12, 1978 was conducted by the inspectors on October 16, 1978. The "Records of Admittance" form provides space for the name of the individual authorizing entry into the protected area. The guard records the name of the individual granting access to the protected area. The inspectors noted that on September 8 and 16, 1978,

It should be noted that the inspectors reviewed approximately five thousand entries of admittance.

On the above indicated dates, a total of two individuals were granted access by unauthorized individuals.

The above finding represents apparent noncompliance (Deficiency) with the above stated requirements.

8. Response Controls

Contrary to the above, on drills conducted for one calendar year prior to the date of the inspection,

inspection disclosed that at least

A commitment was made to perform such communication verifications on future security drills.

The finding represents noncompliance (Deficiency) with the above stated requirement.

9. Exit Meeting

At the conclusion of the inspection on October 19, 1978, a meeting was held with station management and others noted in Paragraph 1 to discuss the results of the inspection. The senior member of the NRC security inspection team reviewed each item of noncompliance. No substantive rebuttals were offered. The licensee was advised that immediate corrective action had been accomplished where appropriate, but that in several items, action to preclude recurrence was required. The licensee noted that the items of noncompliance were the result of human error, rather than a lack of adequate procedures. The commitment was made to retrain security force personnel in those areas of the security program where noncompliance was found during the current inspection. This commitment was acceptable to the NRC inspectors.

The inspectors expressed concern with the existing personnel turnover within the security guard force. It was noted that more than