U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-255/90004(DRSS)

License No. DPR-20

Docket No. 50-255

Licensee: Consumers Power Company

212 West Michigan Avenue

Jackson, MI 49201

Facility Name: Palisades Nuclear Plant

Inspection At: Palisades Site, Covert, Michigan

Inspection Conducted: January 22-26, 1990

Inspector:

A. R. Kniceley
Physical Security Inspector

2/7/90

Approved By:

James R. Creed, Chief Safeguards Section 2/7/90

Inspection Summary

Inspection on January 22-26, 1990 (Report No. 50-255/90004(DRSS))

Areas Inspected: Routine unannounced physical security inspection involving:
Vital Area Barriers; Access Control - Personnel, Packages, and Vehicles;
Alarm Stations and Communications; Power Supply; Testing, Maintenance and
Compensatory Measures; Training and Qualifications; TI 2515/102 (SIMS No. MPA L9-07) "Land Vehicle Bomb Contingency Procedure Verification"
and review of licensee actions on previous inspection findings.

Results: The licensee was found to be in compliance with NRC requirements
within the areas examined. Temporary Instruction 2515/102 was reviewed and
closed. Licensee management attention to and involvement in security activities
is excellent.

DETAILS

1. Key Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other licensee employees and members of the security organization. The asterisk (*) denotes those present at the Exit Interview conducted on January 26, 1990.

- *T. Palmisano, Administration and Planning Manager, Consumers Power Company (CPCo)
- *D. VandeWelle, Technical Director, CPCo
- *C. Kozup, Technical Engineer, CPCo *R. Beeker, Audit Supervisor, CPCo

*S. Cote, Property Protection Superintendent, CPCo

J. Warner, Senior Property Protection Operations Supervisor, CPCo

*G. Balcom, Property Protection Operations Supervisor, CPCo

*K. Wallace, Nuclear Security Coordinator, CPCo

S. Palmucci, Supervisor, Instrument and Controls, CPCo

*R. Rank, Site Manager, Burns International Security Services, Inc. (BISSI)

*C. Mitchell, Administration Assistant, BISSI
*M. O'Brien, Training Instructor, BISSI

- D. Zastrow, District Manager, BISSI
- *E. Swanson, Senior Resident Inspector, NRC

2. Followup on A Generic Letter (IP 92703)

(Closed) Land Vehicle Bomb Contingency Procedure Verification (Temporary Instruction 2515/102))

Generic Letter 89-07 dated April 28, 1989, and its enclosure, provided guidance for licensee's to consider in planning for a land vehicle bomb potential threat. Generic Letter 89-07 also required the licensee to confirm in writing, within 180 days from the date of receipt of the generic letter, that they have included in their safeguards contingency planning those short term actions that could be taken to cope with the land vehicle bomb threat.

The licensee provided the written confirmation by letter dated October 31, 1989, stating that their safeguards contingency procedures had been revised to include short-term measures that could be taken to protect against attempted radiological sabotage involving a land vehicle bomb.

The inspector verified by interviews and a review of records that the safeguard contingency procedure (Revision 5, dated December 1, 1989) was revised to include planning to counter the land vehicle bomb threats. Also, the inspector verified that the procedure addressed the possibility of receiving a warning from the NRC about the threat and that resources needed to implement short-range contingency measures are available. This item is closed.

3. Entrance and Exit Interviews (IF 30703)

- a. At the beginning of the inspection, Mr. S. Cote, Property Protection Superintendent was informed of the purpose of this visit and the functional areas to be examined.
- b. The inspector met with the licensee representatives denoted in Section 1 at the conclusion of the inspection on January 26, 1990. A general description of the scope of the inspection was provided. Briefly listed below are the findings discussed during the exit interview. Included below is a statement provided by or describing licensee management's response to each finding.
 - (1) The licensee was informed of and acknowledged the inspector's comment that no violations or open items were identified during this inspection.
 - (2) The inspectors noted that licensee's Land Vehicle Bomb Contingency Procedure required by NRC Generic Letter 89-07 was reviewed and is considered closed. (Refer to Section 2)

4. Program Areas Inspected

Listed below are the core inspection areas which were examined by the inspector within the scope of these inspection activities in which no violations, deviations, unresolved or open items were identified. These areas were reviewed and evaluated as deemed necessary by the inspector to meet the specified "Inspection Requirements" (Section 02) of NRC Inspection Manual Inspection Procedure 81700 as applicable to the security plan. Sampling reviews included interviews, observations, testing of equipment, documentation review and, at times, drills or exercises that provide independent verification to meet security commitments. The depth and scope of activities were conducted as deemed appropriate and necessary for the program area and operational status of the security system.

Number

Progam Area and Inspection Requirements Reviewed

81700

Physical Security Program for Power Reactors

- a. Management Support: (02.01a) Degree of Management Support; (02.01b) Change to Security Plans Properly Reported and do not Reduce Security Effectiveness.
- b. Protected and Vital Area Barriers: (02.02a) PA and VA Barriers Meet Commitments and Provide Required Penetration Resistance; (02.02b) Isolation Zones Adequately Maintained; (02.02c) Detection Aids Functionally Effective, Meet Commitments, and no Vulnerabilities to Avoid Detection; (02.02d) Assessment Aids Functional and Effective and meet Commitments.

- c. Access Control Personnel, Packages, and Vehicles:
 (02.03a) Positive Access Control to include:
 Proper Identification; Required Personnel Screening
 Completed; Immediate Measures to Prevent Access
 when Person is Terminated or Transferred for Cause;
 Adequate Search Upon Entering PA; Badges Displayed;
 Visitors Escorted; Emergency Access to Vital Equipment;
 VA Access is Duty Related; (02.03b) Packages Searched
 and Properly Authorized; (02.03c) Vehicles Properly
 Authorized, Searched, and Controlled; Access to
 Vehicle Gates Controlled.
- d. Alarm Stations and Communications: (02.04a) Alarm Stations Adequately Equipped with Alarm, Surveillance, and Communications; Continuously Manned and Independent Functioning Capability; (02.04b) No CAS Interfering Operational Activities; (02.04c) Alarm Stations Have Continuous Communication Capability with Guards and LLEA.
- e. Power Supply: (02.05a) Secondary Power Source for alarm and Communication Systems.
- f. Testing, Maintenance and Compensatory Measures:
 (02.06a) Adequate Installation, Testing and
 Maintenance of Security Equipment;
 (02.06b) Compensatory Measures Implemented and
 Effective.
- Training and Qualification: (02.07a) Officers
 Trained, Equipped, and Qualified; (02.07b) Officers
 Possess Adequate Knowledge and Ability to Perform
 Duties; (02.07c) Responses are Consistent with Plans
 and Procedure Requirements; Safeguards Capabilities
 in SCP are Available, Effective, and Functional;
 (02.07d) Required Armed Response and Supervisor(s)
 Available.