

U. S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report Nos. 50-289/91-04  
50-320/91-03

Docket Nos. 50-289  
50-320

License No. DPR-50  
DPR-73

Licensee: GPU Nuclear  
100 Interpace Parkway  
Parsippany, New York 07054

Facility Name: Three Mile Island Units 1 and 2

Inspection At: Middletown, Pennsylvania

Inspection Conducted: February 25-28, 1991

Inspectors:

*G. C. Smith*

G. C. Smith, Senior Physical Security  
Specialist

3/11/91  
date

*Edward B. King*

E. B. King, Physical Security Inspector

3/11/91  
date

Approved by:

*R. R. Keimig*

R. R. Keimig, Chief, Safeguards Section,  
Facilities Radiological Safety and Safeguards  
Branch

3.11.91  
date

Inspection Summary: Routine Unannounced Physical Security Inspection on  
February 25-28, 1991 (Combined Inspection Nos. 50-289/91-04 and  
50-320/91-03)

Areas Inspected: Management Support and Audits; Protected Area Physical  
Barriers, Detection and Assessment Aids; Vital Area Access Control of  
Personnel, Alarm Stations; Testing, Maintenance and Compensatory Measures;  
and Security Training and Qualifications.

Results: No items of noncompliance were identified.

## DETAILS

### 1. Key Persons Contacted

#### Licensee

T. Broughton, Vice President and Director of TMI-1  
M. Pactor, Nuclear Security Director  
J. Stacey, Security Manager  
R. Goodrich, Senior Site Protection Supervisor  
S. Mervine, Lead Protection Training Instructor  
R. Wells, Licensing Engineer  
D. Burry, Plant Engineering  
M. Press, QA Auditor  
J. Schork, Manager, Licensing TMI-2

#### USNRC

D. Beaulieu, Resident Inspector

The inspectors also interviewed other licensee security and training personnel.

### 2. Management Support and Audits

- a. Management Support - Management support for the licensee's physical security program was determined to be adequate by the inspectors. This determination was based upon the inspectors' review of various aspects of the licensee's program during this inspection, as documented in this report.

The inspectors noted that security force members (SFMs) are very knowledgeable of their post duties, contents of procedures and their responsibilities, and exhibit a very professional demeanor. Onsite security managers and supervisors appear to be effectively implementing a quality program and corporate support is evident.

- b. Audits The inspectors reviewed Nuclear Quality Assurance (NQA) Audit S-TMI-90-22 that was conducted from September 27, 1990 through January 22, 1991. During the audit six minor findings were identified. The findings were not indicative of any programmatic problems and appropriate actions for resolution were taken.

The inspectors questioned whether the clock for the next annual audit would begin when this audit began or when it ended. Licensee management stated the next NQA audit of the security program was scheduled to begin before the end of September 1991 and the clock on the annual audits runs from the beginning of the audit to the beginning of the next audit.

### 3. Protected Area Physical Barriers, Detection and Assessment Aids

- a. Protected Area Barriers - The inspectors conducted a physical inspection of the protected area (PA) barrier on February 26, 1991. The inspectors determined that the barrier was installed and maintained as committed to in the Plan.
- b. Protected Area Detection Aids - The inspectors observed the PA perimeter detection aids on February 27, 1991. The inspectors determined that the detection aids were installed, maintained and operated as committed to in the Plan.

The inspectors requested the licensee to test the detection aids at several locations. All test results were acceptable. No discrepancies were noted.

- c. Isolation zones - The inspectors verified that the isolation zones were adequately maintained to permit observation of activities on both sides of the PA barrier. No discrepancies were noted.
- d. Assessment Aids - The inspectors observed the use of assessment aids and other security equipment in operation at the CAS, February 26 and 27, 1991. The inspectors determined, by observation, that the assessment aids were installed, maintained, and operated as committed to in the Plan.

The inspectors noted that in two areas around the perimeter, the effectiveness of the assessment aids was hampered due to the "wall effect" caused by the PA barrier. The impact of this potential weakness was mitigated by the licensee's implementation of backup assessment and detection measures. However, the licensee committed to install additional assessment aids as an enhancement to assure 100% effective assessment. This action will be reviewed during a subsequent inspection.

### 4. Vital Area Access Control of Personnel

The inspectors determined that the licensee was exercising positive access to the Vital Areas (VAs). This determination was based on the following:

- a. The inspectors verified that the VA access list was revalidated at least once every 31 days as committed to in the Plan and that access to VAs is limited to only those personnel with a valid need.

The inspectors noted the licensee's continued use of the new access control system to identify those persons that had VA access but did not use it for the previous 31 day period. Those persons were

identified to their supervisors who then had to provide additional justification for the individuals' continued access. The aggressive revalidation program has resulted in effectively limiting the number of individuals with VA access to those with a valid need.

- b. The inspectors determined, by observation, that individuals in VAs displayed their access badges as required. No discrepancies were noted.
- c. The inspectors reviewed the anti-pass back print out for several vital areas. This feature of the access control system identifies those persons that have not properly key carded out of a VA before key carding into the next VA. The system is not an access denial system but identifies those persons that are not using the access control system properly. Review of the anti-pass back print disclosed no anti-pass back problems.

#### 5. Alarm Station and Communications

The inspectors observed the operation of the Central Alarm Station (CAS) and Secondary Alarm Station (SAS) and determined they were operated as committed to in the Plan. CAS and SAS operators were interviewed by the inspectors and found to be knowledgeable of their duties and responsibilities. The inspectors verified that the CAS and SAS did not contain any operational activities that would interfere with the assessment and response functions. No deficiencies were noted.

#### 6. Testing, Maintenance and Compensatory Measures

The inspectors reviewed testing and maintenance records and confirmed that the records committed to in the plan were on file and readily available for licensee and NRC review. The Security Department had dedicated an instrumentation and controls (I&C) technician to conduct preventative and corrective maintenance on security equipment. A check of repair records indicated that repairs, replacements and testing were being accomplished in a timely manner. No discrepancies were noted.

The inspectors also reviewed the licensee's use of compensatory measures and determined them to be as committed to in the Plan. No discrepancies were noted.

#### 7. Security Training and Qualification

The inspectors randomly selected and reviewed training and qualification records for nine SFMs. The physical qualification and firearms requalification records were inspected for site protection officers and security supervisors. The inspectors determined that the training had been conducted in accordance with the security training and qualification (T&Q) plan and that it was properly documented with the following exception.

Prior to the installation of the current access control system there were some alarm station training tasks that only CAS operators required and some alarm station training tasks that only SAS operators required. After installation of the current access control system all alarm station training tasks were required for both CAS and SAS operators. The inspectors noted that while the CAS/SAS operators had received all required alarm station classroom training, a formally SAS-only required task had been inadvertently left off the T&Q certifications for two of the CAS/SAS operator training records reviewed. The licensee conducted a review of all CAS/SAS operator training records and found that this oversight existed on several other operator records. The licensee took prompt action to retrain and re-certify those operators whose training records reflected this oversight. Approximately 50% of the operators had been retrained and re-certified prior to the completion of the inspection and the remainder were scheduled to be completed when the operators that were off during the inspection returned to work. This action will be reviewed during a subsequent inspection.

8. Exit Interview

The inspectors met with the licensee representatives indicated in Paragraph 1 at the conclusion of the inspection on February 28, 1991. At that time, the purpose and scope of the inspection were reviewed, and the findings were presented. The licensee's commitments, as documented in this report, were reviewed and confirmed with the licensee.