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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

October 13, 1978

Docket Nos. 50-317
50-318

Baltimore Gas and Electric Company
ATTN: Mr. A. E. Lundvall, Jr.
Vice President, Supply
P. O. Box 1475
Baltimore, Maryland 21203

Gentlemen:

The enclosed IE Circular No. 78-17 is forwarded to you for information. Should you have any questions related to your understanding of this matter, please contact this office.

Sincerely,

Robert T. Carlson
Boyce H. Grier
Director

Enclosures:

- 1. IE Circular No. 78-17
- 2. List of IE Circulars
Issued in 1978

cc w/encls:

- R. W. Davies, Manager, Quality Assurance
- R. M. Douglass, Chief Engineer
- W. Gibson, Supervisor Operational QA

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D. C. 20555

IE Circular No. 78-17
Date: October 13, 1978
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INADEQUATE GUARD TRAINING/QUALIFICATION AND FALSIFIED TRAINING RECORDS

Description of Circumstances:

Recent physical protection inspections and investigations of allegations pertaining to guard training have disclosed evidence of improper guard training practices and possible falsification of training records.* These items were disclosed through: (1) a review of existing guard training records; (2) interviews with guards and guard force supervisors which were conducted to determine the accuracy of specific information contained on records; and, (3) unannounced observation of training activities. In a number of situations, combinations of the above listed efforts were required to thoroughly identify the magnitude of the problems. The circumstances described below illustrate that individuals, who are performing duties as guards/watchmen, may not be adequately trained under existing requirements and/or that documentation may not give a true description of actual guard training nor individuals' abilities to perform job-related duties.

Examples of Qualification Records Falsification:

At one facility, a "record of certification" indicated that a guard had achieved a specific, passing score on a written test. An examination of the actual test showed that: (1) the test had never been fully completed by the individual, and (2) those portions of the test which had been completed were not corrected nor graded.

Interviews with guards were conducted, at one location, to determine if they had, in fact, received required training, even though records of that training were not immediately available. The guards initially indicated that they had received the training. Later, however, they confirmed that their supervisors had instructed them to verbally verify the training regardless of actual training received.

*The regulatory bases for providing adequate training to guards/watchmen and for adequately documenting that training are included in Title 10, Code of Federal Regulations, Part 73 (10 CFR 73.55(b)(4)).

Examples of Weapons Qualifications Improprieties:

In another instance, "certification" of firearms qualification was provided in the form of targets containing holes which were purported to have been made by guards during range firing. It was later determined that the holes had been made with a pencil. In another case, a number of notarized firearms qualification forms were later discovered to contain information which did not accurately reflect facts.

At other locations, records provided as evidence of training appeared adequate. They contained information which indicated that individuals had qualified in the use of firearms with specific range scores. Further investigation showed that the scores had been achieved by someone other than the individual who was certified. In fact, other guards and guard supervisors or range instructors had fired the qualifying scores, but certified that the person, whose name appeared on the record, had qualified. When discovered, these individuals were required to return to the range in order to adequately qualify. The results of this second qualification attempt showed that some individuals could not qualify, even after extensive range practice and training. They were subsequently not allowed to perform duties as guards.

In another instance, persons who were not able to achieve a qualifying score from a required distance were allowed to reduce that distance and then fire for qualification. Minimum qualifying scores were required to be obtained from a distance of 25 yards, however, they were actually obtained from less than 10 yards.

Also, an unannounced visit to a range by a management representative revealed that individuals were being allowed to use "bench rests" and supports when they could not qualify without them. This practice was not included in the qualification procedure and is not an acceptable method for establishing firearms qualification.

Discussion:

Guards and watchmen, who are responsible for the protection of nuclear power plants must successfully complete a program of training and qualification prior to assignment of security duties. Each guard or watchman, whether licensee employees or provided by contract must be tested and later requalified to ensure that they are capable of meeting and maintaining minimum levels of performance. (10 CFR 73.55 and effective October 23, 1978 Appendix B to 10 CFR Part 73)

Accurate records of training and qualification scores are necessary in order to provide management a means for determining whether or not an individual is able to initially meet and thereafter maintain performance levels.*

The previously listed examples demonstrated that the potential for a significant reduction in the effectiveness of the security organization may exist and, further, that responsible management personnel may not be aware of this reduction. This lack of awareness could compound the severity and duration of the vulnerability.

Management audits of guard training have been found, in some cases, to be either non-existent or severely deficient. In some cases audits of the actual quality of training programs and practices have never been conducted. In other cases the audits consisted of a spot review of lesson plans and individual guard's training records with no attempt being made to verify the accuracy of those records. Subsequently, in the cases cited, records were verified as false and confirmation was obtained that training had not been given or was improperly administered. Licensee management should monitor this training program so that inconsistencies in the record that suggest either a lack of, or inadequate training can be detected, irrespective of whether these inconsistencies are inadvertent or deliberate.

It should be noted that, in limited instances where a licensee conducted a comprehensive audit of records and actual training, management did identify significant problems and examples of apparent falsification. In those cases, the disclosures enabled management to take adequate, decisive action to correct the identified problems.

Recommended Action:

The purpose of this Circular is to inform all licensees: (1) of situations that have been found; (2) that their program to preclude similar situations will be evaluated by NRR during licensing review of their Guard Qualification and Training Plan submitted in accordance with Appendix B to Part 73; and, (3) to alert them that I&E inspectors will be assessing their situation. Therefore all licensees who are required to provide physical protection for nuclear power plants in accordance with the provisions of the Code of Federal Regulations, Title 10, Part 73.55, should verify that guards, watchmen or armed response individuals (as applicable) have been properly trained and qualified and have adequately demonstrated capability to perform assigned duties. Among the courses of action that the licensee could take are:

*See American National Standards Institute ANSI N18.17-1973, "Industrial Security for Nuclear Power Plants," Section 4.9, "Audits and Reports."

- A. Review training records, certifications and supporting documentation to verify that the records are accurate and complete and that they adequately reflect the demonstrated abilities of individuals currently performing duties as guards, watchmen or armed response personnel.
- B. Interview or test guards, watchmen and response individuals in order to confirm that the specific information contained in records is accurate.
- C. Observe pertinent aspects of the training program to verify that the actual training being given is adequate. This should include, but not be limited to: classroom presentations, administration of tests, range training and qualification. This direct observation should include both initial training/qualification and retraining/requalification activities.

No written response to this Circular is required. If you desire additional information regarding this matter, contact the Director of the appropriate NRC Regional Office.