



Northern States Power Company

414 Nicollet Mall  
Minneapolis, Minnesota 55401-1927  
Telephone (612) 330-5500

November 20, 1990

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
DOCKET NOS. 50-282      LICENSE NOS. DPR-42  
                  50-306                              DPR-60

Additional Information Regarding Access  
Authorization Loggable Event on October 24, 1990

Northern States Power Company (NSP) is taking this opportunity to communicate the facts regarding a loggable event involving an American Protective Services (APS) employee on October 24, 1990, and the corrective action we have taken to prevent a recurrence. In addition, this letter describes the outcome of our inquiries regarding the Investigation Corporation of America (ICA) report suspected of irregularities, and also explains why the problems in the ICA report were not noted during our audit of APS.

To recap the situation, the following is the sequence of events which explain how an APS employee was prematurely badged:

- 05-15-90                      APS received employment application for the employee.
- 06-11-90                      Employee takes written psychological test and completes security questionnaire indicating past alcohol problems, treatment, and a General Discharge from military service. APS recollection is that employee's short DD214 form was received on this day and that the long form was requested. (Short DD214 forms have no discharge data.)
- 06-12-90                      ICA received employee's security questionnaire, and "short" DD214 form.
- 06-15-90                      Psychological evaluation report sent to APS/Prairie Island.

9011290024 901120  
PDR ADCK 05000282  
FDC

*Handwritten:* Add: NRE/PRIS/RSCB  
1/0

06-18-90 Employee started training at Prairie Island.

06-25-90 ICA report on employee received by APS which stated no derogatory information was found, and that he was discharged under honorable conditions.

06-25-90 Access authorization information on employee reviewed, and deemed complete and satisfactory by APS.

06-27-90 Request for Unescorted Access Authorization completed by APS for employee, and sent to NSP Corporate Screening Services.

06-27-90 The "hiring packet", including the background investigation report, and documentation required by the NSP contract with APS were sent to NSP Corporate Security.

06-27-90 A letter from this date was found by APS in their Prairie Island records on November 9, 1990. This letter was addressed to NSP Corporate Security, and informed us of the military discharge, and former problems with alcohol. The letter implies that these problems were resolved. NSP has no record of this letter being received prior to November 9, 1990. APS, Brooklyn Center, who has the central filing responsibility for APS' access authorization program, has no copy of this letter. It is NSP's position that the issue was not properly resolved, regardless of what is stated in the letter.

06-28-90 Request for Unescorted Access Authorization approved by NSP.

07-23-90 ICA received employee's military records in microfiche form.

07-24-90 ICA submitted microfiche of employee's military records, and supplemental report to APS. Supplemental report indicates no problems were revealed in the military records. This is a significant problem, and has precipitated further investigation into this area.

- 10-24-90                   The employee's file was brought to the attention of NSP Corporate Screening during an annual APS contract compliance audit.
- 10-24-90                   Employee's access to Prairie Island was suspended. APS' approved screening program was suspended.
- 10-30-90                   NSP Corporate Security began audit of APS. Findings are explained in the audit report.

Pursuant to the audit, and interviews of pertinent APS, and NSP personnel, NSP has determined the root cause of the incident to be APS' failure to follow their procedure regarding access authorization. APS should have, upon receipt of the security questionnaire, alerted NSP's Fitness for Duty Coordinator. This is part of the APS access authorization procedure. Several instances were discovered during the audit, and in interviews, in which APS miscommunicated between themselves, or with NSP on issues regarding access authorization. It should be noted, however, that no other loggable events were noted during the audit.

Corrective actions have been identified for both NSP and APS. Those addressed to APS are as follows:

1. Immediately complete or correct individual access authorization files listed in the audit report. Appropriate evaluation of each file shall be done to determine whether the APS employee does in fact meet NSP criteria. In any case where a denial is warranted, NSP, Corporate Screening Services shall be immediately notified. NSP has directed APS to have this item completed by December 15, 1990.
2. Develop and implement measures to ensure that APS receives and reviews fitness for duty history self-disclosure information as required by 10 CFR Part 26.27 and NSP requirements. A form has been developed by APS and submitted to NSP for approval. NSP review of the form shows that it exceeds the requirements of NSP's contractor access authorization program. The form will, as part of complying with this action, be integrated into APS' access authorization program.
3. Require NSP's Form 3019, Contractor Access Authorization Procedure, current revision, to be made an addendum to APS' procedure NCR-PRO 8924-A.
4. Ensure that APS procedures on access authorization are fully implemented. This applies to the areas of "Temporary" access authorization and retention of copies of authorization for

November 20, 1990

Page 4

release of military personnel records. Documentation of how APS ensures this will be submitted to NSP.

5. Conduct follow-up investigations as appropriate to resolve discrepancies or derogatory information. All follow-up activities shall be fully documented.

6. Institute a redundant review procedure, so that any access authorization file is reviewed by two qualified APS personnel prior to access authorization being requested.

7. Institute use of a stamp which will be used on all access authorization documents to indicate when they were received by APS.

Corrective action to be taken by NSP are as follows:

1. Revise the Request for Access Authorization, Form 3019-1, so that:

- o a completion date is required for each element listed on page two of the form;

- o a separate line is added to indicate completion of suitable inquiry under Temporary, Full, or Transferable access authorizations.

Revision of this form has been initiated. NSP is awaiting Quality Assurance review and printing of the form.

2. Provide training to APS personnel who will be administering any portion of the APS access authorization program. Training will be provided by NSP Corporate Screening Services staff. Arrangements have been made to conduct the training prior to APS' next scheduled hiring in February, 1991.

3. Change access authorization status of all APS employees audited to "Temporary" until documentation is received by NSP from APS that they have been properly evaluated according to criteria for a full access authorization. The access authorization status of the APS employee in question has been made "Incomplete" until suitable inquiry has been completed. This status prevents him from having an active badge.

Along with revising the Request for Access Authorization, NSP will explicitly define our expectations of all contractors with respect to suitable inquiries, military records, and notification to NSP when derogatory information arises.

November 20, 1990

Page 5

Following Mr. Madeda's inspection on November 8, 1990, NSP Corporate Security has diligently pursued suspected irregularities by ICA. The results of our investigation are:

- o NSP received copies of all ICA source documentation regarding the APS employee in question on November 9, 1990.

- o Information in the report regarding the employee's military service history is false in that it claims that his discharge was under honorable conditions. ICA claims that their initial source of data for the military service information was the short form DD214.

- o A supplemental report provided on July 24, 1990 indicates the data source was the military history records received from the National Personnel Records Center. The supplemental ICA report is also false in that it claims no derogatory information was found in the military history records.

- o There was no documentation that indicates that "suitable inquiry" questions were explicitly asked of employers. The report makes a blanket statement that all employers responded in a positive manner to these questions. ICA admits that there is no documentation that these questions were asked, but indicates their practice is to ask these questions. A new form has been implemented by ICA following this event for their investigators to use which will ensure that all suitable inquiry questions are being asked of all employers.

- o The body of the ICA report states that the military service history of the employee in question contains no negative data and that he was discharged under honorable conditions. This is a problem from two aspects:

- (1) If ICA had the short form DD214, they gave incorrect information regarding the discharge because the short form contains no discharge information.

- (2) If ICA had the long form DD214, or the entire military record, they gave incorrect information regarding the discharge because these records clearly show the general discharge and alcohol problems.

November 20, 1990

Page 6

Based on the irregularities found, NSP has directed that the 12 background investigations performed by ICA be fully re-investigated. NSP will use the services of its two approved security investigative firms (Equifax, and Information Reporting Systems Incorporated (IRSI)) to perform the investigations. The results will be compared with ICA's and checked for discrepancies.

Our conclusion is that there are irregularities on the part of ICA regarding military and suitable inquiry information. Based on interviews with ICA management, it is inconclusive as to the source of these irregularities.

NSP requires investigative agencies under contract with us or our contractors to employ sound investigative practices. This includes documenting each piece of information which is reported to the client. Documentation NSP requires includes: name of the investigator, name of the source, date/time of contact, and substance of the interview. ICA did not embrace these practices.

Another area of concern identified by Mr. Madeda was that the potential falsification was not identified during the audit of the APS employee's case. NSP was aware of the file discrepancies during the audit, but because of the following key points, they were not pursued.

- o The employee's file was inspected to determine solely whether all access authorization elements were properly completed and evaluated.

- o A discrepancy was noted during review of the employee's file. The information given by the Military source was disregarded because the DD214 and records from the NPRC were in the file. These were the essential elements for access authorization not the erroneous interview information in the file.

In summary, NSP considers appropriate corrective action has been taken, and that this action was taken in an expedient manner to prevent reoccurrence of this situation. Information received to date from APS and ICA has not been found to contain events which require further logging or reporting to the Commission.

If you have questions regarding our course of action, please contact Mr George T Miserendino, Manager Corporate Security, at

November 20, 1990

Page 7

612-330-5630. We will inform you immediately if further problems are identified or if additional information is developed.



Leon R. Eliason

Vice President Nuclear Generation

c: T J Madeda, Region III, NRC  
Document Control Desk, NRC  
Senior Resident Inspector, NRC  
NRR Project Manager, NRC  
G. Charnoff