

SUMMARY OF THE TESTIMONY OF

JEROME L. ROULO

Mr. Roulo is an employee of Commonwealth Edison Company whose present job title is Deputy Nuclear Security Administrator. As such his duties include administering the security screening program for employees of both Commonwealth Edison Company and its contractors at nuclear power plants. Mr. Roulo's testimony comprises that portion of Contention 42 dealing with the increased risk of sabotage as the result of using transient workers. The testimony describes the circumstances under which persons are allowed to work at the Byron Station without escort and describes the elaborate contractor employee screening procedure which must be followed for that purpose. Both the Nuclear Security Administrator and Quality Assurance check on the effectiveness of these screening procedures. Mr. Roulo's testimony concludes that there is no increased risk of sabotage at Byron Station as the result of using contractor employees, including transient workers.

TESTIMONY OF
JEROME L. ROULO
ON CONTENTION 42

Q.1. Please state your name.

A.1. Jerome L. Roulo

Q.2. By whom are you employed?

A.2. Commonwealth Edison Company

Q.3. How long have you been employed by Commonwealth
Edison Company?

A.3. For 31 years.

Q.4. What is your present job title?

A.4. Deputy Nuclear Security Administrator.

Q.5. For how long have you held that position?

A.5. For five years.

Q.6. What are your duties as deputy Nuclear Security
Administrator?

A.6. I administer the employee security screening programs
for Commonwealth Edison Company and contractor employees.

Q.7. Please describe the scope of your testimony.

A.7. My testimony addresses that portion of League

Contention 42 which asserts that "obtaining the temporary services of transient workman ... results in ... increasing the risk of sabotage...."

Q.8. Are contractor employees allowed to work at Byron Station, after the reactor has loaded fuel, unescorted?

A.8. No, except under the circumstances described below: Commonwealth Edison Company mandates that all personnel, who require unescorted access to Byron Station, will undergo pre-employment screening. The screening requirement begins 90 days prior to fuel load. Individuals are accepted or rejected for unescorted access based on the results of the pre-employment screening.

Q.9. What are the requirements of the Byron Station contractor screening procedure?

A.9. Contractors working at Byron Station are required to submit a screening procedure to the CECO Nuclear Security Administrator for approval. The procedure must, as a minimum, contain provisions to:

1. Establish a method for evaluating employees who have maintained a trustworthy work record for three continuous years.
2. Conduct a background check on all employees who have been employed with the contractor for less than three years which includes:
 - a. Contacting prior employers.
 - b. Contacting personal references.

- c. Examination by a licensed psychiatrist or physician or other persons professionally trained to identify aberrant behavior, for purpose of observing and disqualifying persons displaying indications of emotional instability such that there is reasonable doubt the person could discharge his duties in a competent manner.
 3. Establish a continued observation program for all employees, so that supervisors may identify and take appropriate corrective measures when personnel display aberrant behavior.
 4. Provide for immediate notification, of the termination, of all personnel for whom unescorted access has been requested. Also, to cancel the unescorted access privilege for any individual whose trustworthy status has changed.
 5. Commit to maintaining proper screening documentation and to making all documentation available to Commonwealth Edison Company and the Nuclear Regulatory Commission for audit. The documentation would include, as a minimum:
 - a. Current approved copy of the procedure.
 - b. Current letter of approval from CECO.
 - c. Current letter of authorized signatory officials.
 - d. Screening file for each concerned individual.
 - e. All current copies of requests for unescorted access.
 - f. All copies of cancellations of unescorted access.
 - g. Annual certificates of continuous observation.
- Q.10. Does Commonwealth Edison Company check on the effectiveness of contractor screening programs?
- A.10. Yes. Commonwealth Edison must assure that personnel, who have been granted unescorted access to Byron Station, have been screened properly. To this end, the Nuclear Security Administrator has a full time staff member, whose only assignment is to conduct periodic audits of all

contractors who require unescorted access to our nuclear plants. This individual can be supplemented with additional staff assistance if required.

Q.11. Are there any further checks of this contractor screening procedure?

A.11. Yes. Commonwealth Edison's quality assurance department personnel conduct periodic audits of contractor screening procedures and practices.

Q.12. Are there written guidelines for these screening requirements?

A.12. Yes. The attached screening requirements (Roulo Ex. 1) are furnished to all contractors who will require unescorted access to Byron Station. These requirements outline, in detail, the various rules by which we expect the contractors to satisfy the Commonwealth Edison personnel screening program.

Q.13. Have these procedures been reviewed by the NRC?

A.13. Yes. The Byron Station physical security plan has been evaluated by the Nuclear Regulatory Commission and has been accepted by them.

Q.14. Do you believe that there is increased likelihood of industrial sabotage at the Byron Station as a result of the employment of transient workers by contractors performing maintenance tasks at the Station?

A.14. No. I believe that the contractor screening procedure described above provides assurance that there is no increased risk due to the employment of transient workers. Only the employees meeting the stringent screening requirements set forth in Roulo Exhibit 1 can work unescorted at the Byron Station.

Roulo

Exhibit 1

Subject: Personnel Security Clearance - Screening Requirements for Access to Nuclear Power Plants

Contractors who have personnel needing unescorted access to Commonwealth Edison Company (CECo) Station Nuclear Power Plants are required to establish a personnel screening program. Appendix A quotes various regulatory requirements and CECo policies which are the basis for this requirement. Attachment 1 sets forth the requirements which the screening program must meet. Attachment 2 is a model procedure which may be used as a guide for establishing a contractor program.

Assistance in establishing a screening program can be obtained from Jerome L. Roulo, (312) 294-8554, and any questions should be directed to him.

Sincerely,

Winston L. Duke
Nuclear Security Administrator

WLD:JLR:jtf

Enclosure

APPENDIX A

BASIS FOR PERSONNEL SCREENING PROGRAMS

Unescorted access into an operating nuclear plant is authorized by the United States Nuclear Regulatory Commission Rules and Regulations, Part 73.55, Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Industrial Sabotage.

Following are excerpts from the various documents to be used in preparing the personnel security screening plan:

- a. ANSI N18.17-1973, "Industrial Security for Nuclear Power Plants", Paragraph 4.3 "Employee Screening." Procedures shall be employed for making a determination of the acceptability of candidates for nuclear plant employment and the continuing acceptability of employees with regard to their trustworthiness. These procedures shall include, as a minimum, the following provisions:
 - (1) an investigation, either prior to employment or prior to assignment to a position allowing access without escort, to disclose adverse character traits that might bear on his abilities or motivation to discharge his duties in a responsible manner.
 - (2) examination by a licensed psychiatrist or physician or other person professionally trained to identify aberrant behavior, either prior to employment or prior to assignment to a position allowing access without escort, for the purpose of observing and disqualifying persons displaying indications of emotional instability such that there is reasonable doubt that the person could discharge his duties in a competent manner.
 - (3) continued observation of all employees and appropriate corrective measures by responsible supervisors for indication of aberrant behavior of personnel in the course of performance of their duties.
- b. 10 CFR 73.55, Paragraph (a): The licensee shall establish and maintain an on-site physical protection system and security organization which will provide protection with high assurance against successful industrial sabotage by . . . the following:

Paragraph (a)(2): An internal threat of an insider, including an employee (in any position).

Paragraph (d): Access Requirements - (5) "A numbered picture badge identification system shall be used for all individuals who have authorized access to protected areas without escort. An individual not employed by the licensee but who requires frequent and extended access to protected and vital areas may have authorized access to such areas without escort provided that he receives a picture badge upon entrance into the protected area, which must be returned upon exit from the protected area, and which indicates: (i) non-employee - no escort required; (ii) areas to which access is authorized; and (iii) the period for which access has been authorized. Badges shall be displayed by all individuals while inside the protected area."

c. NRC MEMORANDUM FOR: Reactor Safeguards Licensing
Branch Members Division of
Operating Reactors

FROM: Robert A. Clark, Chief
Reactor Safeguards Licensing
Branch

SUBJECT: SCREENING OF INDIVIDUALS
GRANTED UNESCORTED ACCESS TO
THE PROTECTED AREA. Review
Guidelines #1

DATE: November 26, 1977

. . . unescorted access to the protected area may be granted to employees of a licensee and its contractors based on the reliability established by three (3) continuous years of trustworthy employment. This method of establishing reliability is considered to be equivalent to the pre-employment screening of ANSI N18.17-1973, Sections 4.1 and 4.2. A licensee's program for granting unescorted access to the protected area based on trustworthy employment is acceptable if (a) at least three continuous years of employment of the individual with the licensee or his contractor is documented, and (b) the trustworthiness of the individual as determined by a review of the individual's employment record.

ATTACHMENT 1

REQUIREMENTS FOR CONTRACTOR PERSONNEL SCREENING PROGRAMS
OPERATING NUCLEAR STATIONS

COMMONWEALTH EDISON COMPANY

I. OVERVIEW

All contractors with personnel performing work at Operating Nuclear Stations of the Commonwealth Edison Company (CECo.) must establish a personnel screening program. The following general steps are essential:

- . Establish a personnel screening procedure (Section II)
- . Obtain approval of the procedure from the CECo. Nuclear Security Administrator (NSA) (Section III A)
- . Implement the approved procedure: screen all personnel requiring unescorted access (Section III B)
- . Submit name(s) of official(s) authorized to approve requests for unescorted access to station (Section III C)
- . Submit Request for Unescorted Access to station (Section IV)
- . Maintain all documentation required by the approved procedure; this documentation must be available for audit by CECo. and the Nuclear Regulatory Commission (NRC) (Section V)
- . Submit changes in authorized access list to station as appropriate (Section VI A)
- . Submit revisions to the screening procedure for approval to the CECo. NSA (Section VI B)

II. SCREENING PROCEDURE

A. Introduction

1. The contractor shall submit a procedure detailing his personnel security screening program which meets the requirements of ANSI N18.17- 1973, "Industrial Security for Nuclear Power Plants," Paragraph 4.3 "Employee Screening."
2. The screening program consists of four elements used in several combinations depending upon the type of employee being screened:
 - a) Certification by Contractor/Union
 - b) Background Check
 - c) Behavioral Evaluation
 - d) Program for Continued Observation

Each element is described in detail in later sections and all are summarized in Section II G.

3. The procedure must address the screening of all types of personnel who may require unescorted access. In establishing his program, the Contractor must bear in mind that the purpose of his screening program is to determine and assure the continued acceptability of employees with regard to their trustworthiness

B. Certification by Contractor/Union

Employees or union members who have greater than three years of service may have all of their screening accomplished by supervisor certification. For contractor employees, the certification is made by a responsible contractor supervisor who can attest to the individual's trustworthiness. For union members, the same affirmation of trustworthiness shall come from the business agent or responsible officer of the member's local union. For people with three or more years of continuous employment or union membership, the certification is all the screening required.

There are cases where an employee has recently transferred from one nuclear station contractor to another. If such an individual has had continuous work experience in an operating nuclear station with satisfactory certification from previous employers, then he may be screened as if his employment had been

continuous with the current contractor. Thus, for example, if John Doe had worked for the XYZ company at Zion Station for the past three years and left XYZ to work for the ABC company at Zion Station, then ABC company may obtain a certification from XYZ company to include in John Doe's screening file. John would require no further screening.

C. Background Check

For employees and union members with less than three years of service, a background check is required as part of their screening. The background check shall, as a minimum, include the following:

- 1.) contact one (1) employment reference and contact two (2) other character references, or,
- 2.) contact two (2) employment references and contact one (1) other character reference.

The background check should address reliability and trustworthiness. The reference checks should not include relatives.

D. Behavioral Evaluation

Employees and union members with less than three years of service are required to undergo a Behavioral Evaluation similar to "Thurstone Temperament Schedule" by Dr. L. L. Thurstone, Science Research Associates, Inc., 259 East Erie Street, Chicago, Illinois, 60611; or 16 P. F. Test Form A, Institute of Personality and Ability Testing, 1602-04 Coronado Drive, Champaign, Illinois.

This evaluation is for the purpose of observing and disqualifying persons displaying indications of emotional instability such that there is reasonable doubt that the person could discharge his duties in a competent manner.

E. Continued Observation Program

The contractor shall include in his procedure provision for continued observation of all persons granted unescorted access to detect any signs of aberrant behavior or other indication of decreased trustworthiness. The contractor shall commit to notifying CECO. immediately of such signs and cancel the individual's unescorted access authorization.

F. Screening Requirements

The manner used to accomplish and document the screening of an employee will depend upon the length of time the individual has been associated with the contractor or union. There are two possible options listed below. The forms required for documentation of each option are attached as exhibits and referenced in the description. The contractor shall include the applicable option(s) with the associated forms as part of his screening procedure.

In order for an employee to gain unescorted access to a nuclear station for work purposes, individual contractors must certify each employee in accordance with one of the following options:

OPTION 1:

Observation by contractor supervision for three years or more while working for the contractor at any location (CECo. or non-CECo.) who will certify to the employee's reliability, (See Exhibit I), or;

Three years or more as a union member in good standing with certification by the business agent or responsible officer of the local union, (See Exhibit II), or;

Three years or more of continuous work experience in an operating nuclear station with satisfactory recommendations from all contractors with whom the person was employed during the three-year period.

OPTION 3:

A background check (See Paragraph II C).

A behavioral evaluation (See Paragraph II D).

G. Screening Requirements Summary

	<u>Requirements Summary</u>	
	<u>Less than three years (Option 3)</u>	<u>Three years or more (Option 1)</u>
Certification by Contractor	X	X
Program for Continued Observation	X	X
Background Check	X	
Behavioral Evaluation	X	

H. Subcontractor Screening

The principal Contractor is responsible for the screening of all Subcontractor personnel. The screening will be completed utilizing the approved screening procedure submitted by the Principal Contractor.

III. PROCEDURE APPROVAL AND IMPLEMENTATION

A. Approval

The contractor shall submit his screening procedure to CECO. for approval. The procedure must be dated and signed by the responsible company official. The procedure should be submitted to:

Nuclear Security Administrator
Commonwealth Edison Company
P. O. Box 767 - Room 1248 E.
Chicago, Illinois 60690

The procedure will be reviewed promptly. If it is found to be acceptable, an approval letter will be sent to the contractor. This should be maintained as part of the screening program documentation.

B. Implementation

Prior to requesting unescorted access for any individual, the contractor must have all of his necessary screening accomplished and the documentation assembled. The contractor shall determine which of the three options is appropriate for each of the personnel needing access and make his own arrangements, such as for psychological evaluation services. In establishing the program it would be appropriate to advise each individual that his screening records will be available for audit by CECO. and NRC personnel upon request. Incomplete or inadequate screening will result in denying the concerned individual access to the site.

Personnel screening is a requirement establishing compliance with performance objectives in Federal Regulations for nuclear station security and provides for assurance that the public health and safety are protected. Therefore, failure to adhere to procedures for personnel screening prior to requesting unescorted access can be a violation of Federal Regulations.

C. Authorized Signatures

Before the station can grant unescorted access it must have on file a letter or form containing the name(s), title(s), and specimen signature(s) of the contractor official(s) who are authorized to sign the request for unescorted access. Requests bearing signatures not on the authorized list will not be processed.

IV. REQUESTING UNESCORTED ACCESS

Contractors shall request unescorted access on the form shown as Exhibit V. A request shall be valid for a period of one year, at which time it must be renewed.

Each nuclear station has its own process for granting unescorted access. The screening procedure is only a part of this process. The contractor should take steps to understand the process and allow sufficient time to complete all steps. This will prevent delays in obtaining unescorted access badges once contractor employees reach the station.

V. DOCUMENTATION

A. General

The contractor's screening program must provide for complete, accurate documentation of all its parts. Federal Regulation provides for periodic audit of screening programs by the Nuclear Regulatory Commission and by the Commonwealth Edison Company Quality Assurance Department. Incomplete records are always interpreted to indicate inadequate screening and will lead to loss of unescorted access for the contractor personnel involved. Audits occur without warning and may be done on a basis of random selection.

B. Records

The contractor's screening documentation shall include, but not be limited to, the following:

- 1) Approved Screening Procedure
- 2) Procedure Approval letter
- 3) Authorized Signature letter
- 4) Individual Screening files (content depending upon which option is applicable)
 - a) Contractor Certificate
 - b) Union Certificate
 - c) Background check references (three)
 - d) Behavioral Evaluation record
- 5) All effective requests for authorized access
- 6) Authorized Access cancellations
- 7) Documentation of Continued Observation Program

C. Audits and Records Checks

- 1) Records checks will be made, usually for personnel newly added to the access list. These checks are to detect any difficulties encountered in the screening process and assist the contractor to maintain an effective program. Such checks will be made as deemed necessary by either nuclear station staff or corporate nuclear security personnel. Improperly screened individuals will not be granted access to the site.
- 2) Commonwealth Edison Quality Assurance audits will be made annually. The audits usually cover a random selection of contractors and contractor files for each station and are unannounced. Though it may happen that a particular contractor's records will not be scrutinized, all should be prepared to successfully pass such audits. Inadequacies will result in contractor personnel being barred from the site until records are put in proper order.
- 3) The Nuclear Regulatory Commission holds unannounced inspections of the nuclear stations. During such inspections, contractor screening records are subject to audit at the inspector's discretion. Such inspections occur as often as twice a year. Deficiencies can result in denial of access for some or all of a contractor's people, citations against the station and, if serious enough, fines.

VI. CHANGES AND REVISIONS

A. Access List Changes

We require that all contractors notify CECO immediately of the termination or change of the reliability status of any personnel for whom unescorted access has been requested. This notification will be by telephone or a personal visit followed by a written notification (See Exhibit VI).

Additions to existing access lists shall be made using Exhibit V. It is not necessary to resubmit the entire access list each time a change occurs. However, the contractor may be required, from time to time, to consolidate individual requests on a single current list.

Changes and cancellations must be signed by an official whose authorized signature is on file with CECO.

B. Procedural Changes

Revisions to an approved screening procedure must be submitted for review and approval. The letter of approval for such revisions must be in the contractor's possession before the revision may be implemented. As with the original procedure, revisions shall be submitted to the CECo. Nuclear Security Administrator.

ATTACHMENT 2

XYZ Company

Security Screening Procedure

1. This procedure will be followed for each employee of XYZ Company and each union member on the XYZ Company payroll who require unescorted access to a Commonwealth Edison Company (CECo.) Nuclear Generating Station. XYZ Company will require this procedure to be followed for any subcontractors to XYZ Company and will be responsible for ensuring that proper screening and documentation exists prior to requesting unescorted access for subcontractor personnel.

2. Option 1

For employees with three or more years of continuous employment with XYZ Company; or for union members with three or more years of continuous union membership; or for personnel with three or more years of continuous work experience in an operating nuclear station.

 - a.) XYZ management will certify three years of reliable and trustworthy employment based on observation and a check of the employee's work record using Exhibit I; or a union officer, or business agent, will certify three years of reliable and trustworthy union membership in good standing based upon observation and a check of work records using Exhibit II; or XYZ management will obtain satisfactory recommendation of three or more years of continuous work experience in an operating nuclear station from all employers involved using Exhibit I modified to show each employer and each period of employment.

3. Option 3

For employees with less than three years of continuous employment with XYZ Company; or for union members with less than three years of continuous union membership:

- a.) Examination and evaluation by a psychiatrist or physician, or testing evaluation similar to "Thurstone Temperament Schedule" for the purpose of observing and disqualifying persons displaying indications of emotional instability such that there is reasonable doubt the person could discharge his duties in a trustworthy and reliable manner. Such evaluation shall be documented.
 - b.) A background investigation to disclose adverse character traits that might affect a person's ability or motivation to discharge his duties in a reliable and trustworthy manner will be completed by contacting and documenting three references as follows:
 - 1) One (1) employment reference and two (2) personal character references (not relatives);
 - 2) Two (2) employment references and one (1) personal character reference (not relatives);
 - 3) If no previous employment exists, three (3) personal character references (not relatives).
4. XYZ Company will submit to the proper CECo. nuclear station, with a copy to the CECo. Nuclear Security Administrator, a letter containing name(s), title(s), and sample signature(s) of the company official(s) authorized to sign requests for unescorted access and cancellations of unescorted access.
 5. Upon completion of 2, or 3 above, XYZ management will submit a request for unescorted access using Exhibit V signed by an official designated as in 4 above.

6. XYZ Company will provide for continued observation of all personnel for whom XYZ Company has requested unescorted access to detect any signs of aberrant behavior or other indication of decreased trustworthiness. Should such behavior be detected, XYZ Company will immediately notify the CECO. Station Security Administrator by telephone or in person. Supervisory personnel performing such observation will submit every twelve months a letter certifying that he has performed the observation, listing each individual so observed and verifying that no aberrant behavior has been detected. XYZ Company will obtain the assistance of a competent psychiatrist or physician to establish a program to train supervisors in the detection of those types of aberrant behavior for which they must be alert.
7. XYZ Company will immediately notify CECO. of any termination from XYZ Company or change in reliable, trustworthy status of any person for whom unescorted access has been requested. Such notification will be by telephone or in person to the CECO. Station Security Administrator and followed by written notification using Exhibit VI.
8. XYZ Company will maintain documentation generated by this procedure as follows:
 - a.) Current approved copy of this procedure
 - b.) Current letter of approval from CECO.
 - c.) Current letter of authorized signatory officials
 - d.) Screening file for each concerned individual containing (as required):
 1. Copy of Exhibits I or II
 2. Three (3) background check references
 3. Certificate of Behavioral Evaluation
 - e.) All current copies of requests for unescorted access
 - f.) All copies of cancellations of unescorted access
 - g.) Annual certificates of continuous observation

All documentation will be available to CECO. and the Nuclear Regulatory Commission upon request. It will be maintained at the XYZ Company general office.

Company Officer

Title

Date

EXHIBIT I

Certification of Reliable and Trustworthy Employment

XYZ Company

The employee listed below has completed three or more years of continuous employment with XYZ Company in positions which have afforded close observation of the employee.

A review of the employee's employment record for the past three years has been completed. Based on this information, I consider the employee reliable and trustworthy. I recommend clearance for unescorted access to Commonwealth Edison Company Nuclear Generating Stations.

Name _____
(Last, First & Middle Initial)

Social Security Number _____

Date of Employment _____

Manager

Date

EXHIBIT II

Union Certification of Reliable and Trustworthy Employment

Name of Union Member _____
(Last, First & Middle Initial)

Complete Address _____

Social Security Number _____

Date of Membership _____

The person listed above has completed three or more years as a member of this union. A review of the member's work record for the past three years has been completed. Based on this information, I consider this person reliable and trustworthy. I recommend clearance for unescorted access to Commonwealth Edison Co. Nuclear Generating Stations.

Name of Union _____

Address _____

Union Officer/Business Agent

Date

EXHIBIT V

Request for Unescorted Access
Nuclear Power Station

Date _____

Commonwealth Edison Company
c/o Nuclear Security Administrator
72 West Adams Street, Room 1248 E.
P. O. Box 767
Chicago, IL 60690

Reference: Approved Procedure No. _____, dated _____

The attached list of personnel, employees of

_____, _____
(Name of Company) Address

have undergone the screening process established by the referenced procedure and have met the acceptability requirements. The records and reports of the screening process for the above-named are available for inspection upon request by the Commonwealth Edison Company and/or the Nuclear Regulatory Commission.

Unescorted access is requested for _____
Nuclear Power Station.

By virtue of my authority as an authorized representative of the aforesaid company or corporation, I herewith make this application.

By: _____

Name: _____
(Print or Type)

Title: _____

cc: Commonwealth Edison Company
Nuclear Security Administrator at
_____ Nuclear Power
Station(s)

EXHIBIT VI

Cancellation of Unescorted Access

Date: _____

Station Security Administrator
Commonwealth Edison Company

Dresden Station
R. R. #1
Morris, IL 60450

Quad Cities Station
P. O. Box 216
Cordova, IL 61242

Zion Station
101 Sniloh Blvd.
Zion, IL 60099

LaSalle County Station
R.R. No. 1 - Box 240
Marsielles, IL 61341

(Name of Company)

(Address)

Unescorted access is hereby cancelled for the personnel listed below:

<u>Name</u> (Last, First & Middle Initial)	<u>Social Security Number</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

By: _____

Name: _____
(Print or Type)

Title: _____

cc: Nuclear Security Administrator
72 West Adams Street, Room 1248 E.
P. O. Box 767
Chicago, IL 60690