

September 16, 1987

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Murley:

In accordance with 10CFR73.71(c), enclosed for your information is a copy of a Report of Physical Security Event, reported to the NRC Region I Office by telephone on September 10, 1987.

This information concerns subject matter which is exempt from disclosure under 2.790(d) of the NRC's Rules of Practice, Part 2, Title 10, Code of Federal Regulations. Accordingly, we request that the attachment not be placed in the Public Document Room, and that they be disclosed only in accordance with the provisions of 10CFR9.12.

Very truly yours,

Joseph P. Beratta

Joseph P. Beratta
Manager, Nuclear Security

/jmw
Enclosures

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REPORT OF PHYSICAL SECURITY EVENT

Region 1, USNRC, Office of Inspection and Enforcement
631 Park Avenue, King of Prussia, PA 19406
Phone (215) 337-5000

Date Of Occurrence: 09/09/87
Time Of Occurrence: 2208 hours
Facility and Location: Nine Mile Point Nuclear Station
Unit #1 and Unit #2, Lycoming, NY 13093
Docket Nos.: 50-220/50-410
License No.: DPR-63/NPF-54
Licensee's Occurrence Report No.: 87-04
Brief Title (Subject): Perimeter Intrusion Detection System
Failure (Not Properly Compensated For).

DESCRIPTION OF EVENT: On Wednesday, September 9, 1987, at approximately 2208 hours members of the Safety Review and Audit Board "SRAB" attempted to verify reliability of the perimeter intrusion detection system via functionally testing several perimeter zones. Accordingly, the results did not fall within the Site Security Plan and Procedures. Upon identifying this deficiency, the subject members and their armed escort proceeded to other perimeter zones with the intent of performing a duplicate test.

Consequently, the armed guard failed to properly compensate for the degradation identified in the previous zone tested. This practice was exercised at several perimeter zones.

RESPONSE BY LICENSEE: Upon being notified by "SRAB" members at approximately 2235 hours the site security supervisor "Lieutenant" immediately responded to the effected zones commencing functional test generating results as prescribed in the NRC approved Security Plan.

CONSEQUENCES AT FACILITY: Minimal; Due to the fact that watchtours are performed in addition to the entire perimeter at both sites.

Licensee Employee Reporting: Daniel D. O'Hara, Asst. Nuclear Security Specialist (315) 349-1319

NRC Staff Employee Receiving Phone Call: Mr. John Mackinon, H.O.O.

Date Of Phone Call: September 10, 1987

Time of Phone Call: 2150 hours.

NOV 18 1988

Docket No. 50-220
50-410

License Nos. DPR-63
NPF-69

Niagara Mohawk Power Corporation
ATTN: Mr. C. V. Mangan
Senior Vice President
301 Plainfield Road
Syracuse, New York 13212

Gentlemen:

Subject: Combined Inspection No. 50-220/88-30 and 50-410/88-29

This refers to the routine physical security inspection conducted by Mr. W. J. Tobin of the NRC's Region II office on September 26-30, 1988, at Scriba, New York, of activities authorized by NRC License Nos. DPR-63 and NPF-69 and to the discussions of our findings held by Mr. Tobin with Mr. B. Bandia, yourself and others at the conclusion of the inspection.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations were observed.

Sections of the enclosed inspection report contain details of your security program that have been determined to be exempt from public disclosure in accordance with 10 CFR 73.21 (Safeguards Information). Therefore, the sections so identified will not be placed in the NRC Public Document Room and will receive limited distribution. This letter and the remainder of the inspection report will be placed in the Public Document Room, in accordance with 10 CFR 2.790(a).

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Ronald R. Bellar

Stewart D. Ebner, Director
Division of Radiation Safety
and Safeguards

H/8

Enclosure: Combined Inspection Nos. 50-220/88-30 and 50-410/88-29 (Contains Safeguards Information (SGI) in Paragraphs 7, 8, 9, 10, 11, 12 and 13)

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cc w/encl (w/o SGI):

J. P. Beratta, Supervisor, Nuclear Security
 T. Perkins, Vice President, Nuclear Generation
 J. Willis, General Station Superintendent
 W. Hansen, Manager, Corporate Quality Assurance
 K. Dahlberg, Unit 1 Station Superintendent
 R. Randall, Unit 1 Supervisor, Operations
 R. B. Abbott, Unit 2 Station Superintendent
 C. Beckham, Manager, Nuclear Quality Assurance Operations
 W. Drews, Technical Superintendent
 J. A. Perry, Vice President, Quality Assurance
 J. F. Warden, New York Consumer Protection Branch
 Troy B. Conner, Jr., Esquire
 John W. Keib, Esquire
 Connor & Wetterhahn
 Director, Power Division
 Department of Public Service, State of New York
 Licensing Project Manager, NRR
 State of New York, Department of Law
 Public Document Room (PDR)
 Local Public Document Room (LPDR)
 Nuclear Safety Information Center (NSIC)
 NRC Resident Inspector (w/SGI)
 State of New York

bcc w/encl (w/o SGI):

Region I Docket Room (with concurrences)
 NRC Project Inspector
 Management Assistant, DRMA (w/o encl)
 Section Chief, DRP
 Region I SLO
 PAO (All Inspection Reports)
 Robert J. Bores, DRSS
 W. J. Tobin, Region II (w/SGI)
 B. Clayton, EDO

RI:DRSS
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 Keinig

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 Bellamy

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NRC: REGION I 11-18-88

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-220/88-30
50-410/88-29

Docket No. 50-220
50-410

License No. DPR-63
NPF-69

Licensee: Niagara Mohawk Power Corporation
300 Erie Boulevard, West
Syracuse, New York 13202

Facility Name: Nine Mile Point, Units 1 and 2

Inspection At: Scriba, New York

Inspection Conducted: September 26-30, 1988

Inspectors: *[Signature]* 11-16-88
W. J. Tobin, Physical Security Inspector date

[Signature] 11-16-88
D. F. Cameron, Resident Engineer, Physical Security date

Approved by: *[Signature]* 11-16-88
Richard R. Keating, Chief, Safeguards Section, DRSS date

Inspection Summary: Routine, Unannounced Physical Security Inspection on
September 26-30, 1988 Report Nos. 50-220/88-30 and 50-410/88-29)

Areas Inspected: Security plan and procedures; management organization;
audits; records and reports; testing and maintenance; barriers (protected and
vital areas); security power supply; assessment aids; detection aids
(Protected Area); access controls; alarm stations; and Licensee's actions in
response to NRC Information Notices and Generic Letters.

Results: The licensee was in compliance with NRC requirements in the areas
examined

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50-220-88-41
1 of 4 copies
6 pages

DETAILS

1. Persons Contacted

Licensee

- *J. Beratta, Manager, Nuclear Security
- *N. Rademacher, Director, Nuclear Compliance
- *B. Bandia, Superintendent, Operations (Unit 1)
- *D. Macvittie, Manager, Security Projects
- *D. Ohara, Director, Security Compliance
- *G. Gilmer, Supervisor, Security Technical Services
- R. Holliday, Security Technician
- R. Commins, Security Assistant
- S. Demingo, Reactor Operator

U.S. NRC

W. Schmidt, Resident Inspector

2. NRC Notices and Generic Letters

IE Information Notice 88-26 (Closed) - The licensee reviewed this Notice with its staff responsible for nuclear security clearances. Additionally, the Notice was forwarded by the licensee to the contractor who performs clearances and background investigations for the licensee and, to the various contractors who furnish the licensee with employee clearances, e.g., General Electric, Combustion Engineering, etc. The licensee's actions were considered appropriate by the inspectors.

IE Information Notice 88-41 (Closed) - The licensee attended an NRC Regulatory Effectiveness Review (PER) at another Region I facility and currently is gathering information from other utilities who have had an RER. The licensee is forming a team of security/maintenance/operations personnel to conduct a comprehensive review of the security program in anticipation of an RER in the future.

IE Information Notice 88-49 (Closed) - The licensee reviewed this Notice with all security personnel and has incorporated its content into the security training and General Employee Training programs. The Notice was also forwarded by the licensee to various vendors and contractors who deal with safeguards information and an article on the subject was included in the utility's news letter. The licensee also conducts random audits on the program for handling safeguards information.

Generic Letter 88-10 (Closed) - The licensee had reviewed the Letter and stated that it has not experienced a problem in purchasing approved safes and file cabinets.

3. Security Plan/Procedures (MC 81018)

The inspectors reviewed the licensee's Physical Security Plan (PSP) and randomly reviewed the various security procedures which implement the PSP. Several of these security procedures are discussed elsewhere in this Report under the applicable inspection module paragraph.

The inspectors determined that the licensee is meeting the criteria of 10 CFR 50.54(p) and 50.90 with respect to PSP revisions.

The inspectors noted a minor inaccuracy with Figure #10 in the PSP. Figure #10 is the wiring diagram for the uninterruptable power supply for the security system. During the Exit Meeting, the licensee agreed that a more accurate diagram was appropriate and would be submitted with the next PSP revision.

4. Management Organization (MC81020/81022)

The licensee utilizes a proprietary security organization of approximately 250 individuals, of whom about 155 are armed guards. The organization includes support services from a Compliance Section, an Administration Section (clearances and investigations), a Services Section (training, maintenance and technical support) and an Operations Section which provides the day-to-day implementation of the security program. The Manager of Nuclear Security is one of five Managers reporting to the Senior Vice President who is located onsite. The inspectors found that the organization was as depicted in the PSP.

5. Program Audit (MC81034)

The inspectors verified that the 1987 annual security audit was performed on September 8-16, 1987, and, that the 1988 audit was conducted on September 15-23, 1988. The audit is the responsibility of the licensee's Safety Review and Audit Board, an independent organization that reports to the Manager of Quality Assurance (Corporate) in Syracuse, New York. The 1987 audit report was furnished to the Senior Vice President (Finance), the Plant General Superintendent, and to the Manager of Nuclear Security (onsite). The audit included the licensee's PSP, Contingency Plan, Training and Qualifications Plan, security procedures, and NRC inspection findings. Although the 1988 audit had been completed, the report had not yet been issued. The inspectors noted in their review of the draft report that open items from the 1987 audit had been reviewed and were resolved. The inspectors also noted that while there were no adverse findings in 1988, several minor findings were noted on the auditors checklists, e.g., key control, access lists, and control of safeguards information at the licensee's corporate headquarters. The 1988 security program audit report and its disposition will be reviewed during a subsequent inspection.

6. Records/Reports (MC81083)

Throughout this inspection, various documents were randomly audited. They included alarm printouts, daily logs, event reports, shift assignment rosters, maintenance requests, and patrol records.

The inspectors reviewed the Quarterly Log of Safeguard Events for April 1 - June 30, 1988, submitted to the NRC via licensee letter dated July 25, 1988. The Log indicated a total of 70 events; 26 attributable to human error and 44 due to equipment failures. With one exception, all events were recorded within 24 hours of discovery. The exception was drug related and was not logged for seven days due to complications with confirmation of drug screening tests which were beyond the licensee's control. However, the inspectors reviewed Security Administrative Procedure #14, "Reporting of Safeguards Events" Revision 2, dated February 17, 1988, and noted that the procedure does not define "discovery" for the purpose of establishing the start of the 24 hour period within which loggable event must be recorded. The Security Compliance Director stated his interpretation that the 24 hour period started whenever he or another security manager became aware of an event. The Compliance Director was advised that this interpretation was inconsistent with the NRC's regulation, 10 CFR 73.71, and that the regulation should be reviewed and the reporting procedure should be modified accordingly in order to avoid problems in the future. He was also of the opinion that in lieu of "red phoning" an event to NRC Headquarters, the Resident Inspector could be notified. He was also advised that this practice would not comply with 10 CFR 73.71 and that a modification to the reporting procedures was in order to correct this misunderstanding.

This matter will be reviewed during a subsequent inspection.

7. Testing/Maintenance (MC81042)

The inspectors randomly selected 5 Hardware Problem Reports (HPRs) from entries in the Daily Security Event Logs for the purpose of reviewing the licensee's handling of maintenance and repair of security equipment. The HPRs selected were as follows:

- HPR#4931-An assessment aid was taken out of service on May 2nd, and was repaired and returned to service the next day.
- HPR#5690-A vital area door was found to have a faulty locking mechanism on May 11, and was fixed and returned to service by May 13.
- HPR#4884-A card reader concentrator was taken out of service on April 8 due to constant alarms, and was repaired by April 13.

- HPR#5306-An intrusion detection zone was found faulty and was repaired within the same day, June 22.
- HPR#6317-A metal detector was found faulty and was repaired within the same day, April 4.

The inspectors determined from their review of the HPRs that the licensee is conscientious in repairing and promptly returning security equipment to use thereby minimizing the use of compensatory measures and corresponding security force overtime.

(SGI) The inspectors also reviewed the licensee's Security Surveillance Procedure, [REDACTED] for weekly testing of the [REDACTED] intrusion detection system. The inspectors noted that the procedure only requires each zone to be tested [REDACTED]

[REDACTED] The inspectors noted that this is not consistent with NRC Regulatory Guide (RG) 5.44 but also noted that the licensee had not committed to the testing requirements established in the RG. The licensee was advised that the effectiveness of the system could be enhanced by testing as outlined in the RG. (SGI)

8. Physical Barriers (Protected Area) (MC81052)

During a tour of the protected area, the inspectors noted several potential security system weaknesses that could decrease the effectiveness of the security program. The potential weaknesses were discussed with the licensee who took immediate corrective action as follows:

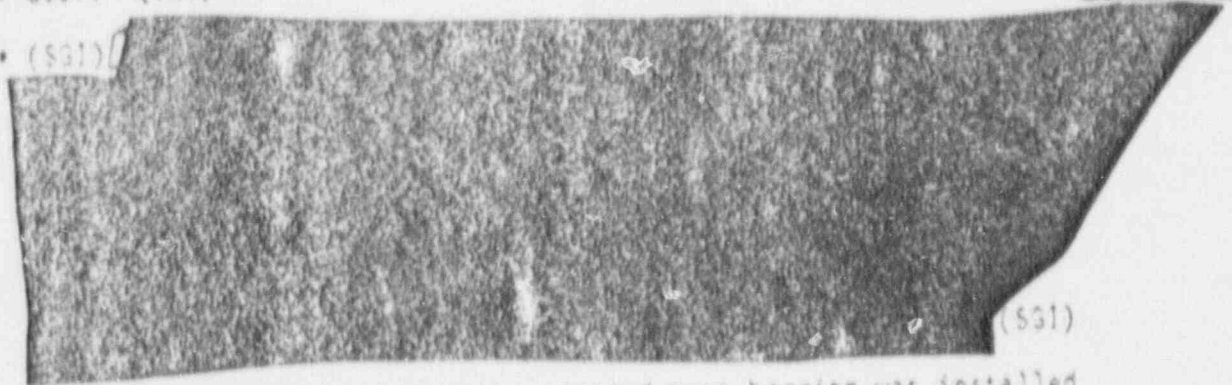
- (SGI) Unit 1 Vehicle Gate - The bottom of the gate was in excess of 6 inches from the pavement level (the inspectors measured 7 inches). It should be noted that from [REDACTED] this gate is attended by a guard who processes vehicles. Additionally, the gate is protected with a [REDACTED] system (which the inspectors did not crawl test), and [REDACTED] and is located directly in front of the Unit 1 Security Building. As a corrective action, the licensee raised the pavement under the gate. (SGI)
- (SGI) PA Fence Zone 28 - This zone is located in the extreme Northeast corner of the facility. The inspectors noted that there were several poles located outside the fence but close enough to the fence barrier to be used as a climbing aid. The inspectors pointed out that the poles could be used to jump over the [REDACTED] fence, leaving only the [REDACTED] to warn of an intruder. As a corrective action, the licensee had these poles removed. (SGI)
- (SGI) Zone 13 - This zone comprises the interface of Unit 1 and Unit 2. Loosely piled crushed rock was found under the interior fence that could be easily pushed aside to create an opening in excess of 96 square inches (man-size). The licensee promptly corrected this problem by [REDACTED]

[REDACTED] The inspectors did not consider this weakness to be easily exploitable since there was a [REDACTED]

(SGI)

- (SGI) Unit 1 Access Control Booth - The inspectors pointed out that a 3/4 inch gap existed under the [REDACTED] door leading into the Access Control Booth. The door is located near the badge issuance window, but to get to this door, an individual must first process through the various special purpose detectors. As a precautionary measure, the licensee had a steel bar welded to the bottom of the door. (SGI)

• (SGI)



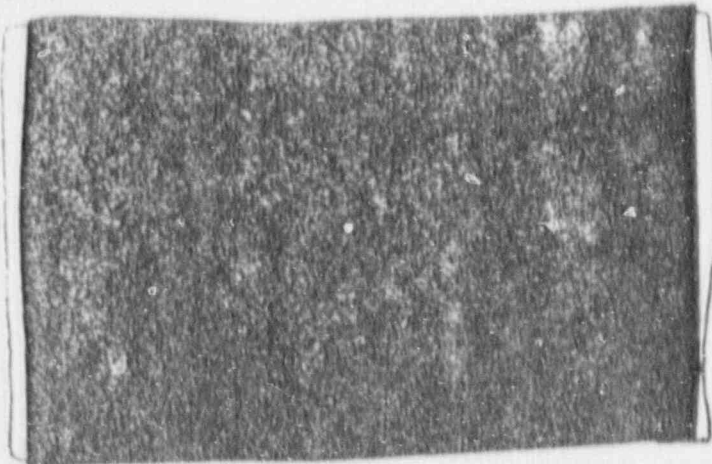
(SGI)

The inspectors found that the protected area barrier was installed and maintained in conformance with commitments in the PSP.

9. Physical Barriers (Vital Areas) (MCB1054)

The inspectors randomly selected the following vital areas to evaluate the effectiveness of the barriers and doors:

(SGI)



- (SGI) The inspectors, with the concurrence of and in the presence of the licensee, attempted to manipulate several of the locking devices associated with vital area doors but were unsuccessful in unlocking the barriers. However, the inspectors determined that [REDACTED]

should be installed on doors [redacted] as an additional protective measure. The licensee agreed to install the [redacted] as necessary. (SGI)

• (SGI) There is no intrusion barrier installed [redacted] where they penetrate vital area barriers. The licensee pointed out that [redacted] are used. The licensee advised the inspectors that it is evaluating this matter as part of a security upgrade effort. The inspectors determined that the [redacted] they encountered were not easily exploitable but considered that the licensee's evaluation was an appropriate course of action. The evaluation will be reviewed during a subsequent inspection. (SGI)

• (SGI) The inspectors questioned the resistance of ventilation grills in the [redacted] doors. The licensee advised the inspectors that this was also included in the security upgrade effort. (SGI)

• (SGI) [redacted]

(SGI)

The inspectors stated that these vital area barrier weaknesses appear to conflict with Paragraph 2.2.1 of the PSP which commits to vital area barriers of "...sufficient strength to meet the performance requirements of 10 CFR Part 73.55(a)...". This is considered an Unresolved Item (88-30-01 and 88-29-01) pending completion of the licensee's ongoing evaluation.

10. Security Power Supply (MCB1058)

The inspectors requested that the licensee test the uninterruptable power supply for the security system to determine its operability as committed to in the PSP.

(SGI) On the evening of September 29, the licensee removed normal AC power to exercise the backup [REDACTED] sources for the security system. During the transient, the licensee selectively tested [REDACTED]

[REDACTED] All were shown to be operable. [REDACTED] monitors, printers and computers all remained operable without interruption. However, there was no annunciation at either the CAS or SAS to indicate the system was being powered by the backup power supply, as stated in the PSP. The inspectors reviewed records of a test performed on September 26, 1988. The test record indicated that the required annunciation "TROUBLE UP 105 COM UPS COMMON ALARM" had been received. The licensee could not explain why the security computer failed to printout the alarm annunciation during the NRC requested test. (SGI)

This is considered an Unresolved Item (89-30-02 and 88-29-02) pending a review by the licensee into why the alarm failed to annunciate.

11. Assessment Aids (MCB1066)

The inspectors reviewed the operability and quality of assessment aids from the CAS and SAS.

(SGI) The inspectors noted that minor degradations exist in the licensee's capability to assess protected area intrusion alarms due to the [REDACTED]

[REDACTED] When this potential weakness was discussed with the licensee's technical support staff they indicated that corrective measures would be taken. The inspectors did not consider the weakness to be significant since [REDACTED] however, corrective measures are appropriate to enhance the assessment system. (SGI)

There were no violations identified in this area.

12. Access Controls (Packages/Vehicles) (MCB1077/MCB1074)

Throughout this inspection, the inspectors observed numerous packages and vehicles being processed into the protected area. On September 29, at about 5:45 p.m. a personnel injury occurred inside the protected area that resulted in the need for an ambulance.

(SGI) The inspectors observed that the security force expeditiously facilitated the entry of the ambulance into the protected area and escorted it to the Administration Building. [REDACTED]

[REDACTED] After the injured person was placed in the ambulance, the vehicle was properly escorted out of the protected area. Upon

termination of the emergency, the security force was observed documenting the event, which was considered as an exception to the normal access control procedure. The inspectors reviewed the licensee's procedure and the actions of the security force and found them to be consistent. No discrepancies were identified. Additionally, during this inspection, the inspectors observed various vehicles inside the protected area and found them to be [REDACTED] in accordance with the requirements of the PSP. On several occasions, however, the adequacy of vehicle searches at the Unit 2 entry point was questioned by the inspectors because they were rapid, nonsystematic and mirrors were not always used for undercarriage searches. (SGI)

(SGI) The inspectors also questioned the adequacy of vehicle gate control. The inspectors observed a truck entering the Unit 1 vehicle gate during the afternoon of September 28. [REDACTED]

[REDACTED] The inspectors brought these two observations to the licensee's attention. The licensee stated that the matters would be reviewed and appropriate action would be taken. (SGI)

(SGI) With respect to package searches, the inspectors found the licensee to be implementing the requirements of its PSP. The licensee uses two source weapons in testing its X-ray package search equipment: [REDACTED]

[REDACTED] (SGI)

No violations were identified in this area.

13. Detection Aids (Protected and Vital Areas) (MCB1078/MCB1060)

The inspectors reviewed the licensee's use of detection aids through observation of protected and vital area systems and equipment.

(SGI) The inspectors observed one potential weakness in protected area detection zone #13, where the Unit 1 detection system interfaces with the Unit 2 system. [REDACTED]

[REDACTED] The licensee, in the PSP, commits to "...the perimeter intrusion system is designed to meet NRC RG 5.44 (Revision 2)..." The RG calls for installation of [REDACTED]

[REDACTED]

The inspectors did not consider this weakness to be readily exploitable since the [REDACTED] (SGI)

(SGI)

[REDACTED]

(SGI)

14. Alarm Station (MC81084)

The inspectors toured the Central and Secondary Alarm (CAS and SAS) Stations during this inspection, on various shifts and noted that there are four operators on duty at all times; one operator is dedicated to Unit 1 and another to Unit 2, in both the CAS and SAS. The operators appeared to be knowledgeable of their duties and responsibilities and familiar with the alarm station controls except that one operator was hesitant and appeared unsure when asked by the inspectors to perform a specific task. Upon being reassured by a the second operator, the first operator performed the task without difficulty.

There were no violations identified in this area.

15. Exit Interview

An exit interview was held on September 30, 1988, with those persons indicated in Paragraph 1. The inspectors described the areas inspected and discussed the inspection results in detail.

No written material was provided to the licensee by the inspectors during this inspection.