

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-454/94005(DRSS); 50-455/94005(DRSS)

Dockets No. 50-454; 50-455

Licenses No. NPF37; NPF-66

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Facility Name: Byron Nuclear Power Station, Units 1 and 2

Inspection Dates: February 16 - March 2, 1994

Type of Inspection: Routine, Announced Physical Security Inspection

Date of Previous Physical Security Inspection: June 28 - July 7, 1993

Inspector: James L. Pirtle 3/30/94
Date
Physical Security Inspector

Approved By: James R. Creed 3/30/94
Date
James R. Creed, Chief
Safeguards and IR Section

Inspection Summary

Inspection Between February 16 - March 2, 1994 (Reports No. 50-454/94005 (DRSS); No. 50-455/94005(DRSS))

Areas Inspected: Routine, announced physical security inspection involving: Management Support; Security Plans and Audits; Protected Area Physical Barriers; Isolation Zones; Protected Area Detection System; Assessment Aids; Protected Area Access Control of Personnel and Packages; Alarm Stations; Security Training and Qualification; and Followup on Previous Inspection Items.

Results: The licensee was found to be in compliance with NRC requirements within the areas examined. The self-assessment efforts since the previous inspection was considered a program strength. An Inspection Followup Item pertaining to the need to provide written guidance and training for implementation of the backup security computer console and alarm systems was identified. A slight trend in increased security plan deviations was noted. Observed weapons qualification was conducted in a safe and professional manner. A previous inspection item pertaining to a required area not being audited during the annual audit of the security program was closed. A previous inspection item pertaining to a required revision to the Security Force Training and Qualification Plan was reviewed but could not be closed

because the necessary revision had not been submitted to the NRC for review. Maintenance support for the security system continues to be good and equipment functioned as designed. Timely security event trending and analysis was performed by security management personnel.

Management support for the security program was adequate and personnel were knowledgeable of their duties and responsibilities. The security force continues to be well managed.

DETAILS

1. Key Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other licensee employees and members of the security organization. The asterisk (*) denotes those present during the telephone exit meeting conducted on March 2, 1994.

Commonwealth Edison Company

- *E. Campbell, Director, Support Services
- *M. Snow, Work Control Superintendent
- *W. Grundman, Superintendent, Site Quality Verification
- *E. Zittle, Station Security Administrator
- *S. Nosko, Assistant Security Administrator
- *D. Brinden, Regulatory Assurance Supervisor
- *P. Enge, NRC Coordinator
- R. Bastyr, Site Quality Verification

Burns International Security Services, Inc.

- M. Mareth, Site Manager
- M. Cavanaugh, Training Coordinator
- D. Minor, Operations Coordinator
- S. Meyer, Maintenance Administrator

- *H. Peterson, Senior Resident Inspector, NRC Region III

2. Followup on Previous Inspection Findings

- a. (Closed) Violation (Report No. 50-454/93011-01; No. 50-455/93011-01): This item was addressed in Section 4.a of the above report and pertained to a failure to audit an area required to be evaluated during the annual security program audit. The potential impact that security measures may have on plant and personnel safety was not evaluated. A joint surveillance by the Off-Site Quality Verification Department and the Corporate Security Department was completed and their audit results were documented by letter dated August 3, 1993. The surveillance report concluded that the security measures would not adversely impact on plant and personnel safety. This item is considered closed.

- b. (Open) Inspection Finding (Report No. 50-454/93011-02; No. 50-455/93011-02): This item was addressed in Section 4.c of the above report and pertained to the need to revise the Security Force Training and Qualification (SFT&Q) Plan. Several administrative errors or deficiencies were noted during the review of the SFT&Q Plan. The errors or deficiencies were of an administrative nature and did not impact on the quality or quantity of training received by the security force. The licensee

had completed the initial review process but had not sent the revisions to the SFT&Q Plan to the NRC for formal review action. Since the SFGT&Q Plans for the other licensee sites had similar deficiencies, the licensee chose to address the issue on a generic basis rather than a site specific basis. The Station Security Administrator was advised that we were disappointed in the time taken to address the errors noted in the SFT&Q Plan since it was identified as a site specific issue. Additionally, we were not advised that a significant delay may be necessary to address the issues as a generic problem. The Station Security Administrator stated that the SFT&Q Plan revision would be submitted within 30 days after receipt of this inspection report. This issue will be reviewed during the next security inspection.

3. Entrance and Exit Interviews

- a. At the beginning of the inspection, Mr. E. Campbell and other members of the licensee's staff were informed of the purpose of this inspection, its scope and the topical areas to be examined.
- b. The inspector met with the licensee representatives denoted in Section 1 above at the conclusion of the inspection activities. A general description of the scope and conduct of the inspection was provided. Briefly listed below are the findings discussed during the exit interview. The licensee representatives were invited to provide comments on each item discussed. The details of each finding listed below are referenced, as noted, in the report.
 - (1) The personnel present were advised that no violations, deviations or unresolved items were noted.
 - (2) One followup inspection item pertaining to an audit deficiency was closed. One followup inspection item pertaining to errors in the Security Force Training and Qualification Plan remains open (See Section 2 for details).
 - (3) An effective self assessment effort was noted since the previous inspection and contributed to the good performance by the security force observed during this inspection (See Section 5.b for details).
 - (4) The need for training and procedural guidance for use of the alternate computer console and perimeter alarm system was noted (See Section 5.a for details).
 - (5) A slight upward trend in security plan deviations was noted and may warrant followup actions by the security section (Refer to Section 5.c for details).

4. Program Areas Inspected

Listed below are the areas examined by the inspector in which no findings (strengths, deviations, unresolved items, or inspection followup items) were identified. Only findings are described in subsequent Report Details sections.

The below listed areas were reviewed and evaluated as deemed necessary by the inspector to meet specified "Inspection Requirements" (Section 02) of the applicable NRC Inspection Procedure. Sampling reviews included interviews, observations, and document reviews that provided independent verification of compliance with security plan commitments. Gathered data was also used to evaluate the adequacy of the reviewed program and practices to adequately protect the health and safety of the public. The depth and scope of inspection activities were conducted as deemed appropriate and necessary for the program area and operational status of the security system. Additional testing of the security system was not requested by the inspector.

IP 81700 - Physical Security Inspection Program for Power Reactors:

01. Management, Plans, Audit: (a) Degree of Management Support for Program; (b) Security program Plans Changes; (c) Audit Program Corrective Action; (d) Auditor Qualification.
02. Protected Area Physical Barriers, Detection and Assessment Aids: (a) PA Barrier Resistance; (b) Isolation Zones Maintained; (c) PA Detection Functional and Effective; (d) Assessment Aids Functional and Effective.
03. Protected Area Access Control of Personnel and Packages:
 - (a) Personnel Access: (1) Identification and Authorization Checked Before Access; (2) Personnel Are Searched; (3) Badges Are Displayed; (4) Visitors Are Escorted.
 - (b) Package Control: (1) Packages Authorization Checked; (2) Handcarried Packages Searched at PA.
04. Alarm Stations and Communication: (a) CAS and SAS Are Manned, Equipped, Independent and Diverse and Can Call For Assistance; (b) No Interference of CAS activities; (c) CAS and SAS Have Continuous Communications With Each Onsite Security Officer and Can Call Offsite.
05. Testing and Maintenance: (a) Licensee Implements Programs To Verify Installation, Testing, Maintenance and Correction; (b) Compensatory Measures Implemented That Do Not Decrease Effectiveness.
06. Security Training and Qualification: (a) Each Individual Is Trained, Qualified and Equipped For Each Task Prior To Assignment;

(b) Security Personnel Have Knowledge and Ability To Perform Duties; (c) Response Capabilities Are Adequate and Effective To Meet Plans and Protect Against Design Basis Threat; (d) Size and Leadership of Response Adequate.

5. IP 81700 - Physical Security Inspection Program for Power Reactors

One inspection followup item was identified pertaining to the need to provide training and procedural guidance to the security force. Two program strengths were also identified and are described below.

- a. The licensee has an alternate security computer console capability (referred to as RACS) and an alternate perimeter alarm monitoring system (referred to as APARS). The specific capabilities of both redundant systems is considered Safeguards Information and exempt from public disclosure in accordance with 10 CFR 73.21.

During interviews with alarm station operators, it was noted that the operators had limited knowledge pertaining to system capabilities, activation and deactivation procedures, and actions required to be completed when they returned to the primary security computer console and primary alarm monitoring system. The information known about the alternate systems was primarily self-taught and passed on by word of mouth. No training or procedural guidance had been developed for the alternate systems. This represents an operational weakness since actions taken while in the RACS mode have to be reentered in the primary computer system when it is returned online; a requirement not known by some of the alarm station operators when questioned about the systems capabilities. The Station Security Administrator agreed to address this issue (454/94005-01; 455/94005-01).

- b. The Security Section had an aggressive and effective self assessment program since the previous inspection. Two program audits had been conducted since the previous inspection. One of the audits was completed by the Quality Verification Department (Report 06-93-08, dated December 21, 1993) which was a performance based audit and identified two findings. The other audit was performed by the Corporate Security Department between September 27th and October 1, 1993 (Report dated December 17, 1993). This audit was more administrative in nature and identified three strengths, 27 suggestions, and six observations. The Security Section had been responsive to the audit findings and an action plan to address the audit findings had been developed. Audit items were being closed in a timely manner. Additionally, the contract security firm, Burns International Security Services, Inc. (BISSI), had completed about 15 surveillances of security related activities during 1993 and developed about 69 items requiring attention. The surveillance items were being addressed in a timely manner. Thirteen such surveillances were also scheduled for 1994. During January 1994, over 100 security drills or exercises (introduction of contraband into the Protected area

and other issues) had been performed. The Security Section also routinely monitored eight categories of security performance on a monthly basis and provided their trend and analysis data to appropriate management personnel and NRC Region III. The self assessment effort was considered a program strength.

- c. During review of the Monthly Security Trending Report a slight upward trend in the area of Security Plan Deviations was noted which warrants close monitoring by the Security Section supervisors. Between September and December 1993 (four month period) five security plan deviations were recorded. During January and February 1994, (two month period) four security plan deviations had been noted. Although the trend is of short duration, the data warrants close monitoring by security supervisors to identify an adverse trend as early as practical and to implement corrective actions in a timely manner. This category of trend analysis will be evaluated during the next scheduled inspection (454/94005-02; 455/94005-02).
- d. The inspector observed weapon qualification at an indoor firing range during this inspection. The weapon qualification was conducted in a safe and professional manner. Personnel qualifying with the weapons were familiar with the safe operation of the weapons and were familiar with the course of fire. All of the personnel qualified with the firearms (pistol and shotgun) during the first qualification attempt.
- e. Maintenance support for security equipment continued to be adequate. Equipment failure requiring compensatory measures was routinely repaired within two or three days after compensatory measures were implemented. Compensatory measures for equipment failures for January 1994 totaled only 163 hours. Most categories of security equipment achieved 99% in service time for the last quarter of 1993 and the first month of 1994. Equipment performance was considered a program strength.