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8-31-90
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U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-247/90-18

Docket No. 50-247

License No. DPR-26

Licensee: Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, New York 10003

Facility Name: Indian Point Nuclear Generating Station Unit 2

Inspection At: Buchanan, New York

Inspection Conducted: July 23 - 27, 1990

Type of Inspection: Routine, Unannounced Physical Security

Inspectors: Thomas W. Dexter 8/24/90
T. W. Dexter, Physical Security Inspector date

Edward B. King 8/24/90
E. B. King, Physical Security Inspector date

Approved by: Arthur Della Ratta for 8/24/90
R. R. Keimig, Chief, Safeguards Section date
Division of Radiation Safety and Safeguards

Inspection Summary: Routine, Unannounced Physical Security Inspection on
July 23 - 27, 1990 (Inspection Report No. 50-247/90-18)

Areas Inspected: Management Support, Security Program Plans, and Audits;
Protected and Vital Area Physical Barriers, Detection, and Assessment Aids;
Protected and Vital Area Access Control of Personnel, Packages, and Vehicles;
Alarm Stations and Communications; Power Supply; Testing, Maintenance and
Compensatory Measures; Security Training and Qualifications; and the Land
Vehicle Bomb Contingency Procedure.

Results: One non-cited violation was identified. In addition, one unresolved
item concerning vehicle searches and potential weaknesses in the areas of
assessment aids, vital area barriers, and alarms were identified.

DETAILS

1. Key Personnel Contacted

Licensee and Contractor Personnel

- *S. Bram, Vice President, Nuclear Power
- *M. Miele, General Manager, Technical Services
- *G. Cullen, Security Operations Supervisor
- *T. Elstroth, Security Administrative Supervisor
- *J. Bahr, Nuclear Safety and Licensing Engineer
- *J. Odendahl, General Supervisor, Instrument and Controls
- *J. Boylan, Security Shift Supervisor (CE)
- *J. Worrall, Project Manager, Wackenhut
- *T. Constantino, Wackenhut Training
- S. Quinn, General Manager, Nuclear Power Operations
- J. Drexel, Manager - Site Protection
- C. Jackson, Manager - Nuclear Safety and Licensing

U. S. Nuclear Regulatory Commission (NRC)

- *G. Hunegs, Senior Resident Inspector
- D. Lew, Resident Inspector

*Indicates those present at the exit interview.

In addition, other licensee and contractor personnel were interviewed.

2. Follow-up of Previously Identified Items

- a. (Closed) Inspector Follow-up Item (IFI) 89-22-01: During inspection 89-22, the inspectors noted that the licensee's surveillance testing procedure did not adequately challenge the perimeter intrusion detection system (IDS). The licensee committed to review and revise the procedure as necessary to ensure that the IDS is appropriately challenged. During this inspection a review of the procedure, and observations of testing conducted by a security officer, confirmed that the procedure has been revised, that the IDS is being appropriately challenged and that satisfactory results are being achieved.
- b. (Closed) Inspector Follow-up Item (IFI) 50-247/89-22-04: During inspection 89-22, the inspectors noted that the document provided to the security contractor by the licensee confirming the accomplishment of the annual physical was, in many instances, illegible and improperly completed. During this inspection, subsequent documentation was reviewed and found to be legible and properly completed. The inspectors also verified that the previously reviewed documentation had been validated and properly completed.

- c. (Open) Inspector Follow-up Item (IFI) 50-247/89-22-02: During inspection 89-22, the inspectors noted several areas in which assessment aids were marginal. During this inspection, it was noted that, although some corrective actions had been taken, the problem has not been fully resolved. Therefore, this item will remain open. (See also Paragraph 4.e.)
- d. (Open) Inspector Follow-up Item (IFI) 50-247/89-22-03: During inspection 89-22, the inspectors identified several vital area barriers that required upgrading. During this inspection, the inspectors reviewed documents that indicated the receipt of the necessary equipment to upgrade the barriers and noted that one barrier already had been corrected. This item will remain open pending completion of all work. (See also Paragraph 4.f.)

3. Management Support, Security Program Plans, and Audits

- a. Management Support - Management support for the licensee's physical security program was determined to be adequate by the inspectors. This determination was based upon the inspectors' review of various aspects of the licensee's program and the licensee's responsiveness to the NRC concerns identified during this inspection and documented in this report.
- b. Security Program Plans - The inspectors verified that changes to the NRC-approved Security, Contingency, and Guard Training and Qualification Plans, as implemented, did not decrease the effectiveness of the respective plans, and that the changes had been submitted in accordance with NRC requirements.

4. Protected and Vital Area Physical Barriers, Detection and Assessment Aids

- a. Protected Area Barriers The inspectors conducted a physical inspection of the Protected Area (PA) barriers on July 24, 1990. The inspectors determined, by observation, that the barriers were installed and generally maintained as described in the NRC-approved Physical Security Plan (the Plan). The inspectors also reviewed the licensee's plans for barrier upgrades in portions of the protected area perimeter. The progress on the barrier upgrades will be reviewed during subsequent inspections.
- b. Protected Area Detection Aids - The inspectors observed the perimeter detection aids on July 24, 1990 and determined that they were generally installed, maintained and operated as committed to in the Plan. The inspectors requested testing of the IDS at several locations in several zones; all but one location in one zone tested satisfactorily. The licensee immediately took compensatory action for the affected area. The system was adjusted and satisfactorily tested on July 25. The inspectors found the IDS to be acceptable.

The inspectors noted that the licensee has a perimeter IDS upgrade program in progress in conjunction with the barrier upgrades.

- c. Isolation Zones - The inspectors verified that the isolation zones were adequately maintained to permit observation of activities on both sides of the PA barrier. No deficiencies were noted.
- d. Protected Area and Isolation Zone Lighting - The inspectors conducted a lighting survey of the PA and isolation zones on July 24, 1990. The inspectors determined, by observation, that lighting in the PA and isolation zones was very effective. No deficiencies were noted.
- e. Assessment Aids - The inspectors observed the PA perimeter assessment aids and determined that they were generally installed, maintained and operated as committed to in the Plan.

However, the inspectors identified several areas where the assessment aids continue to be marginal effective. This was first identified in inspection 89-22. The licensee is using compensatory measures in these marginal areas. A phased improvement program is scheduled to be completed by 1991. Maintenance and Instrument and Controls (I&C) efforts have corrected some of the deficiencies. This will remain a follow-up item to be reviewed during subsequent inspections.

- f. Vital Area Barriers - The inspectors conducted a physical inspection of several vital area (VA) barriers on July 25 and 26, 1990. The barriers were found to be installed and maintained as committed to in the Plan.

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This item remains open and will be reviewed during a subsequent inspection.

5. Protected and Vital Area Access Control of Personnel, Packages, and Vehicles

The inspectors determined that the licensee was exercising positive control over personnel access to the PA and VAs. This determination was based on the following.

- a.) The inspectors verified that personnel are properly identified and authorization is checked prior to issuance of badges and key-cards. No deficiencies were noted.
- b.) The inspectors verified that the licensee has a program to confirm the trustworthiness and reliability of employees and contractor personnel. This program includes checks on employment history, criminal history, a physical examination, and a psychological examination. No deficiencies were noted.
- c.) The inspectors verified that the licensee has a search program, as committed to in the Plan, for firearms, explosives, incendiary devices and other unauthorized materials. The inspectors observed personnel access during various periods throughout the inspection and interviewed members of the security force about personnel access procedures. No deficiencies were noted.
- d.) The inspectors determined, by observation, that individuals in the PA and VAs display their access badges as required. No deficiencies were noted.
- e.) The inspectors verified that the licensee has escort procedures for visitors to the PA and VAs. No deficiencies were noted.
- f.) The inspectors verified that the licensee has provisions for expediting prompt access to vital equipment during emergencies and that the provisions are adequate for the purpose. No deficiencies were noted.
- g.) The inspectors verified that unescorted access to VAs is limited to authorized individuals. The access list is revalidated at least every 31 days as committed to in the Plan. No deficiencies were noted.
- h.) The inspectors verified that vehicle and package searches are conducted as committed to in the Plan.

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This is an unresolved item to be reviewed during subsequent inspections. (UNR 50-247/90-18-01)

6. Emergency Power Supply

The inspectors verified that there are several systems (batteries, dedicated diesel generator, and plant on-site AC power) that provide back-up power to the security systems and reviewed the accompanying test and maintenance procedures for these systems. The systems and procedures are consistent with the Plan. The batteries, battery chargers and the diesel generator are in VAs. A full load test of the diesel is conducted annually. No deficiencies were noted.

7. Alarm Station and Communications

The inspectors observed the operation of the Central Alarm Station (CAS) and Secondary Alarm Station (SAS) and determined that they were maintained and operated as committed to in the Plan. CAS and SAS operators were found to be knowledgeable of their duties and responsibilities. The inspectors verified that the CAS does not contain any operational activities that would interfere with the assessment and response functions. No deficiencies were noted.

8. Testing, Maintenance and Compensatory Measures

The inspectors reviewed testing and maintenance records and confirmed that the records committed to in the Plan were on file and readily available for review by the licensee and the NRC. The station provides three full-time I&C technicians and a supervisor to perform testing, maintenance and preventive maintenance on the security system. Results are well documented and indicate that repairs/replacement of security equipment is being conducted in a timely manner.

During a review of events (both quarterly and one hour reports) that must be reported to the NRC, the inspectors found that one event, 90-SO2, was not reported to the NRC until 1 hour and 50 minutes after the event was identified by the licensee. The licensee stated that the cause was a failure, on the part of a security supervisor, to follow-up on information provided to him. When the Security Operations Supervisor became aware of the information, he immediately recognized that the event should have been

reported within one hour and he made the report. The licensee promptly recognized the reporting deficiency and took corrective action. The on-duty security supervisor was disciplined and received additional training to ensure that he fully understood the event reporting criteria. This is a non-cited violation because the criteria specified in 10 CFR 2, Appendix C.V.A were met. This was a Severity Level IV Violation. The licensee took prompt corrective action and identified the cause and the violation was not willful. The inspectors also determined that the licensee has a good event reporting procedure in place and a review of their past reporting history indicates that this was an isolated incident involving an individual rather than a programmatic problem (NCV 50-247/90-18-02).

9. Security Training and Qualification

The inspectors randomly selected and reviewed training and qualification records for nine security officers. The physical qualification and firearms requalification records were inspected for armed guards, security monitors and security supervisors. The inspectors determined that the training had been conducted in accordance with the security program plans and that it was properly documented. No deficiencies were noted.

The inspectors verified that the licensee's contract security force is staffed to meet the armed response force commitments in the Plan and there is always one full-time member of the licensee security organization onsite who has the authority to direct security activities. No deficiencies were noted.

The inspectors determined that the turnover rate in the security force has decreased since the new contract, which provided better benefits, was implemented. Morale was generally good and personal errors did not appear to be a problem. No deficiencies were noted.

10. Land Vehicle Bomb Contingency Procedure

The inspectors conducted a review of the licensee's Land Vehicle Bomb Contingency Procedure. The licensee's procedure details short-term actions that could be taken to protect against attempted radiological sabotage involving a land vehicle bomb if such a threat were to materialize. The procedure appeared adequate for its intended purpose. No deficiencies were noted.

11. Exit Interview

The inspectors met with the licensee representatives indicated in paragraph 1 at the conclusion of the inspection on July 27, 1990. At that time, the purpose and scope of the inspection were reviewed and the findings were presented. The licensee's commitments, as documented in this report, were reviewed and confirmed with the licensee.