

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-002/94001(DRSS)

Docket No. 50-002 License No. R-28 Safeguards Group No. V

Licensee: The University of Michigan  
Phoenix Memorial Laboratory  
Ann Arbor, MI

Facility Name: Ford Nuclear Reactor

Inspection At: Ford Nuclear Reactor Site

Inspection Conducted: April 12-13, 1994

Type of Inspection: Routine, Announced Physical Security Inspection

Inspector: J. L. Belanger  
J. L. Belanger  
Senior Physical Security Inspector

4/22/94  
Date

Approved By: J. R. Creed  
J. R. Creed, Chief  
Safeguards and IR Section

4/22/94  
Date

Inspection Summary

Inspection on April 12-13, 1994 (Report No. 50-002/94001(DRSS))

Areas Inspected: Included a review of Plans, Procedures and Revisions, Reports of Safeguards Events; and Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance.

Results: The licensee was found to be in compliance with NRC requirements in the areas inspected. The licensee's physical protection system adequately implemented the applicable provisions of 10 CFR Part 73. Staff security awareness was good. Attention to detail regarding security plan implementation by management was also good. The physical structures, equipment and procedures were adequate to allow the licensee to control access to the designated security area and Controlled Access Area. The security program minimized the potential for unauthorized removal of special nuclear material and facilitated the location and recovery of missing material. The tests required by the security plan were adequately performed. Detection aids, communications, physical barriers, locks, and access control systems performed as designed. Campus public safety officers provided excellent response support. A weakness pertaining to the physical protection of extra badge inserts was noted. Additionally, it was noted that the Communications Center did not have the most recent revision to the reactor's emergency response procedures. Both of these issues were adequately addressed by the licensee prior to the conclusion of the inspection.

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## DETAILS

### 1. Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other employees and members of the security organization. The asterisk (\*) denotes those present at the onsite Exit Interview conducted on April 13, 1994.

- \*R. Fleming, Director, Michigan Memorial-Phoenix Project
- \*R. Burn, Manager, Nuclear Reactor Laboratory
- \*B. Ducamp, Assistant Reactor Manager-Operations
- \*P. Simpson, Assistant Reactor Manager-Research Support
- R. Patrick, Assistant Director of the Department of Public Safety and Security, University of Michigan

### 2. Entrance and Exit Interviews

a. At the beginning of the inspection, Mr. B. Ducamp, was 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, at the conclusion of onsite 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 details of each finding listed below are referenced, as noted in the report.

- (1) The licensee acknowledged the inspector's comments that no violations, deviations, or unresolved items were identified.
- (2) The licensee acknowledged the inspector's observation that campus security's communication center did not have the most recent revision of the licensee's emergency response procedures.

The licensee responded that they have provided the revised page change to the Communications Center and are reviewing the distribution question. The licensee believed that the current revision was provided to the Communications Center. (Report Details, Section 4.a)

- (3) The inspector stated that a weakness was noted relative to the protection afforded the inserts for the licensee's photo identification badge system. Specifically, the inserts were not stored in a locked container to preclude unauthorized badge fabrication.

The licensee acknowledged the weakness and committed to storing the inserts in a locked area. (Report Details, Section 4.b)

3. Followup on Previous Inspection Findings (IP 92701, 92702, 92703):

- a. (Closed) Violation, SLIV (Report No. 50-002/91001-01): This violation was described in Section 5.a of that report.

Inspection had shown that not all of the access alarms to the security area were routinely tested in accordance with the frequency specified in the security plan. Only one of the operable circuits was being tested. The Reactor Manager committed to assuring that tests of all of the alarms to the security area would be conducted in accordance with the frequency established in the approved security plan.

Inspection showed that the appropriate testing procedure was revised, at the time this issue was identified, to require testing of all alarmed points to the security area. Discussions with reactor operations personnel, a review of the testing procedure, and a review of test documentation, showed that all alarmed access doors are being tested. This violation is closed.

- b. (Closed) Violation, SLIV (Report No. 50-002/91001-02): This violation was described in Section 5.b of that report.

Routine security surveillance of the restricted and security areas during non-normal working hours were not routinely conducted at the plan specified frequency. Prior to the conclusion of that inspection, the surveillance of these areas were being completed in accordance with plan commitments, as of March 28, 1991.

Inspection showed that a security plan revision (Revision 1) submitted by letter dated May 17, 1991 changed surveillance requirements during non-working hours. By letter dated June 25, 1992, the NRC issued Amendment No. 37 to the Facility Operating License No. R-28. This Amendment implemented Revision 1.

Discussions with a representative University's Department of Public Safety and Security confirmed that after hour surveillance of the reactor facility was being performed in accordance with current security plan commitments. This violation is closed.

4. Clear Functional/Program Areas Inspected (MC 0610)

Listed below are the areas which were examined by the inspector within the scope of these inspection activities in which no violations, deviations, unresolved or open items were identified. These areas were reviewed and evaluated as deemed necessary by the inspector to meet the specified "Inspection Requirements" (Section 02) of the applicable NRC Inspection Procedure (IP) as applicable to the security plan. Sampling

reviews included interviews, observations, testing of equipment and documentation review that provided verification of the licensee's ability to meet security commitments. The depth and scope of activities were conducted as deemed appropriate and necessary for the Program Area and operational status of the security system.

<u>Number</u>	<u>Program Area and Inspection Requirements Reviewed</u>
81401	<u>Plans, Procedures and Reviews:</u> (01) Plan Revisions, (02) Unapproved Revisions; (03) Records of Revisions; (04) Procedures; (05) Security Program Review.
81402	<u>Reports of Safeguards Events:</u> (01) Trace Investigation; (02) Incidents; (03) Events
81431	<u>Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance:</u> (01) Use and storage; (02) Detection and Surveillance; (03) Access Control; (04) Response, (05) Testing and Maintenance.

5. Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance

An observation pertaining to the emergency response procedures maintained by the campus security communications's center was noted. Additionally, a weakness was noted regarding the protection afforded blank photo badge inserts. Both issues were appropriately addressed by licensee management prior to the conclusion of the inspection.

- a. The Communications Center operated by the University Department of Public Safety and Security maintains a copy of the reactor Emergency Plan. Specific responses to unauthorized intrusions, fire, bomb threat, etc., are provided in this plan. Response procedures describe the type of response to be accomplished for each event identified and the duties and responsibilities of the security organization and management involved in the response.

The inspector noted the Communications Center had a copy of the reactor's Emergency Plan, Revision 10 dated November 1993; however, the current available at the reactor is Revision 11. Revision 11 addressed a minor one page change involving a response by watchmen personnel to a non-security related alarm. This change was faxed to the Communications Center prior to the conclusion of the inspection.

Reactor management believed that Revision 11 was sent to the Communications Center; however, they indicated that a review would be conducted of the distribution process to assure that the Communications Center has a copy of the current plan.

- b. The licensee maintained a photo identification program which requires that authorized facility users wear photo identification

badges while in the facility. The inspector noted that unused inserts were stored in an unlocked desk drawer within the reception area of the Phoenix Laboratory. To preclude unauthorized badge fabrication, the inspector recommended that the inserts be stored within a locked cabinet or drawer. The licensee agreed to store the inserts under lock and key protection.