

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/94007(DRSS)

License No. NPF-62

Docket No. 50-461

Licensee: Illinois Power Company  
500 South 27th Street  
Decatur, IL 62525

Facility Name: Clinton Power Station

Inspection At: Clinton Site, Clinton, Illinois

Inspection Dates: April 19-20, 1994

Type of Inspection: Announced Reactive Physical Security

Date of Previous Security Inspection: January 31-February 4, 1994

Inspector: T. J. Madeda  
T. J. Madeda  
Physical Security Inspector

5/5/94  
Date

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

5/5/94  
Date

Inspection Summary

Inspection on April 19-20, 1994 (Report No. 50-461/94007(DRSS))

Areas Inspected: Reactive, announced physical security inspection relating to the implementation of personnel metal detection search activities.

Results: No violations were identified. Licensee physical personnel search practices reviewed were determined to be acceptable and met security plan requirements. Some licensee and contractor security managers were less than effective in identifying, following up and resolving discrepancies between actual search practices and written procedures in a timely manner. These discrepancies were corrected when the problem occurred a second time.

## 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 at the Exit interview conducted on April 20, 1994.

\*R. Morgenstern, Plant Manager  
\*W. Bousquet, Director, Plant Support  
\*D. Smith, Security Supervisor  
\*J. Sipek, Supervisor, Regional Regulatory Interface  
\*M. Reandeau, Licensing Specialist  
\*G. Birk, Operations Coordinator, Burns International Security Services, Inc.

\*P. Brochman, Senior Resident Inspector, USNRC  
F. Brush, Resident Inspector, USNRC

### 2. Entrance and Exit Interviews

- a. At the beginning of the inspection, Mr. D. Smith, Security Supervisor, and other members of the licensee's staff were informed of the purpose of this visit and the areas to be examined.
- b. The inspector met with the licensee representatives denoted in Section 1 at the conclusion of the inspection on April 20, 1994. A general description of the scope of the inspection was provided. Briefly listed below are the findings discussed during the exit interview. Licensee representatives were invited to provide comments on each item discussed.
  - (1) No violations were identified. Review of two security concerns were completed and were considered closed.
  - (2) We identified weak action by senior licensee and contractor security personnel in identifying and resolving in a timely manner deficient security implementing procedures. The licensee has corrected the procedures and action is being taken to improve security staff performance in the area of procedure review. Senior plant management staffers agreed with the inspector's findings and conclusions.

### 3. Access Control - Personnel (IP 81070)

- a. Concern: On February 23 and March 15, 1994, an improperly searched individual gained access to the protected area, because security force personnel failed to adequately implement a metal detection search procedure.

NRC Review: Inspector review of records and interviews with security force members directly involved in the search activities referenced above, showed that on February 23, 1994, at about 6:00 a.m., a badged, plant employee attempting to enter the protected area twice generated an alarm while processing through a walk-through metal detector. The individual was then frisked by a security officer with a hand-held metal detector, which alarmed on the individual's shoes. The officer requested the individual remove the shoes for further search. The individual refused.

Access was denied and the officer contacted the shift captain who responded and also frisked the individual with a hand-held metal detector, the same results were achieved. The captain requested and the individual refused to remove the shoes. The captain conducted a further hands-on pat down search of the shoes. When no unauthorized material was found the captain allowed the individual access to the protected area. The alarm appeared to be caused by a metal shank inside the sole of each shoe.

Subsequent to the search, the officer and captain discussed and agreed that the actual search conducted was different than the search procedures. The procedures did not address conducting a hands-on search. Both agreed that the procedures should be modified to include the hands-on search. The captain immediately notified his supervisor of this fact. On March 15, 1994, a similar event occurred with the same plant employee. In this case a security officer, under the observation of a security supervisor, conducted the same type of search noted above, including a hands-on search of each shoe. As in the previous case the alarm appeared to be caused by a metal shank inside each shoe. The individual was then allowed access.

The licensee's security plan requires a metal detector search of all individuals seeking access to the protected area and a followup physical "hands-on" search if equipment is not fully effective in identifying unauthorized material. Licensee procedures (PSO-025 and CPS 1032.02) required that any item located with a hand-held metal detector, must be removed for inspection before access can be granted and to contact a security supervisor if access is not granted. The procedures did not address the followup hands-on search or what action is to be taken after security supervisor involvement.

Interviews with the licensee's site Security Supervisor and two security training instructors confirmed that it was an accepted practice to conduct a followup hands-on search of shoes if they caused metal detector alarms. It was also a search practice, but less frequently used, to have shoes removed and x-rayed if they caused a metal detection alarm. The first approach was the licensee's preferred method. The inspector agreed that this was a reasonable approach. These two measures, hands-on or x-ray search, were not included in the licensee's procedures referenced above.

Inspector review showed that the licensee's actual search practices met NRC regulations and licensee security plan requirements.

Inspector interviews determined that the day after the February 23, 1994, event the licensee's site Security Supervisor (SS) was notified by the security contractor Operations Supervisor that written search procedures, as they apply to shoes, were not clear. The SS agreed that a difference existed between the written procedures and actual practice but believed the procedures did not require change because actual search practices were adequate. The issue was not pursued again by the Operations Supervisor, even though he still disagreed. A similar event occurred on March 15, 1994. Subsequent to the second event, the SS made procedural changes so they agreed with actual search practices. The changes became effective on April 18, 1994, almost two months after initial SS involvement.

The SS's action was less than effective in recognizing a potential problem and contact security management did not aggressively pursue the procedure issue even though they concluded the procedures to be inadequate.

Conclusion: This concern was partially substantiated. The failure to implement an adequate search of an individual on the two dates referenced in the concern was not substantiated. It was substantiated that the procedures were not followed, but the actual search practice was acceptable. Procedures were modified to address actual search practices. No regulatory or safety related issues were identified.

- b. Concern: A licensee "Condition Report" was not written following notification to licensee security management personnel of an inadequate security search procedure.

NRC Review: Review of Clinton Power Station Procedure No. 1016.01, Titled "CPS Condition Reports" identified seven circumstances when a "Condition Report" should be initiated. They included equipment failure related issues and implementing deficient procedures that result in a plant safety or regulatory violation. The purpose of this procedure was to provide management a means to track, document and resolve potential adverse safety conditions.

Our review showed that the site Security Supervisor (SS) was aware of potential deficient procedures on February 24, 1994, but he did not document this on a "Comment Control Form" because the actual search practice was adequate and it was his opinion that it was not necessary to change the procedures. Subsequent to a second event, which occurred on March 15, 1994, the SS modified the procedures to address actual search practices. An interview with the Director, Plant Support, who has supervisory overview for the

plant security program and the group that implements the Condition Report and Comment Control program, stated that a procedure change request should have been made on a Comment Control Form and it should have been done by the SS after the February 24, 1994 event. The SS has been consulted on the use of the plant procedure change program by the Director, Plant Services. In addition, security officers will be advised on their responsibilities on how to report potential deficient procedures.

Inspector analysis determined that the security search procedure issue did not relate to the failure of security equipment or to a plant safety or regulatory violation. Therefore, the Condition Report did not appear to be the proper mechanism to use. However, our review did identify a licensee procedure, "Comment Control Form" No. 1005.01 which has the purpose to provide plant personnel a means to report potential deficient procedures and provide plant management a means to track and resolve these issues. The Comment Control Form appears to be the correct mechanism to use to identify and correct a potentially deficient procedure that has no safety or regulatory concern.

Conclusion: This concern was not substantiated. A Condition Report was not required to be written. However, licensee security management should have taken action in another format, Comment Control form, to resolve the inadequate procedures. Corrective action has been taken. No safety or regulatory issue was identified.