

J.N. Joyce

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SGS-RI

8/2/87

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U.S. NUCLEAR REGULATORY COMMISSION
REGION 1

Report Nos. 50-220/86-23
50-410/86-59

Docket Nos. 50-220
50-410

License Nos. DPR-63
CPPR-112

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: October 27-31, 1986

Date of Last Physical Security Inspection: Unit 1 June 17-20, 1986; Unit 2
July 28-August 1, 1986

Type of Inspection: Special Physical Security

Inspectors: *W. G. Martin* 8/12/87
W. G. Martin, Physical Security Inspector date

J. A. Prell 7/12/87
J. A. Prell, Reactor Engineer date

Approved by: *R. Keimig* 7-17-87
R. Keimig, Chief, Safeguards Section date
Division of Radiation Safety and Safeguards

Inspection Summary: Areas reviewed: Contingency Plan events and guidance for operational interfaces.

Results: Guidance concerning operational interfaces for Contingency Plan events was found to be minimal.

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7 Pages

DETAILS

1. Key Persons Contacted

- A. Anderson, Senior Shift Supervisor
- *M. Ferris, Captain, Nuclear Security
- *R. Gayne, Assistant Superintendent, Operations
- G. Gilmer, Supervisor, Technical Services
- D. MacVittie, Nuclear Security Specialist
- *R. Miller, Captain, Nuclear Security
- B. Murtha, Senior Shift Supervisor
- T. Verno, Lieutenant, Nuclear Security
- D. Wilson, Assistant Senior Shift Supervisor

*Present at the exit meeting.

2.0 Operations-Security Interface

The purpose of this inspection was to review the interface between the operations organization and the security organization relative to threats of sabotage, suspected sabotage, actual sabotage, and external threats or attacks.

2.a References

The following documents were reviewed in preparation for the inspection:

- Nine Mile Point Security Plan
- IE Information Notice 83-27, Operational Response to Events Concerning Deliberate Acts Directed Against Plant Equipment
- IE Information Notice 83-36, Impact of Security Practices on Safe Operations

2.b Program Review

A review of the administrative procedures, emergency plan implementing procedures, operating procedures, emergency operating procedures, security plan, security procedures, and security contingency plan implementing procedures was made to determine whether:

- (1) the licensee has a program for responding to threats of sabotage, suspected sabotage, actual sabotage, and external threats or attacks;
- (2) procedures for both security personnel and operations personnel clearly identify responsibilities and actions in dealing with these events;

- (3) adequate manpower requirements have been established to respond to these events;
- (4) appropriate means have been established to assure that local law enforcement agencies would be notified.

The following procedures were identified as being germane to the area under review by the inspectors:

- Nine Mile Point Nuclear Site Emergency Plan, Rev. 15, Sections 4, 5, and 6
- EPP - 13, Rev. 14, Emergency Facilities Operations
- EPP - 14, Rev. 6, Emergency Access Plan
- EPP - 20, Rev. 7, Emergency Notifications
- EPP - 22, Rev. 4, Damage Control
- S - SEC - 4.3, Rev. 0, CAS/SAS Operations
- S - SEC - 8.5, Rev. 0, Response to Vital Area Intrusion Alarm Annunciation
- S - SEC - 8.6, Rev. 0, Response to Perimeter Intrusion Detection Alarm Annunciation
- S - SEC - 8.7, Rev. 0, Response to Obvious Attempt to Commit Sabotage or Confirmed Vital Area Intrusion
- S - SEC - 8.8, Rev. 0, Response to Bomb Threats
- S - SEC - 8.9, Rev. 0, Response to Attacks Threats
- N2 - EOP - RL, Rev. 1, RPV Water Level Control
- N2 - EOP - RP, Rev. 1, RPV Pressure Control
- N2 - EOP - RQ, Rev. 1, RPV Reactivity Control
- N2 - EOP - C1, Rev. 1, Level Restoration
- N2 - EOP - C2, Rev. 1, Emergency RPV Depressurization
- N2 - EOP - C6, Rev. 1, RPV Flooding
- N1 - EOP - 1, Rev. 0, Cautions and General Instructions

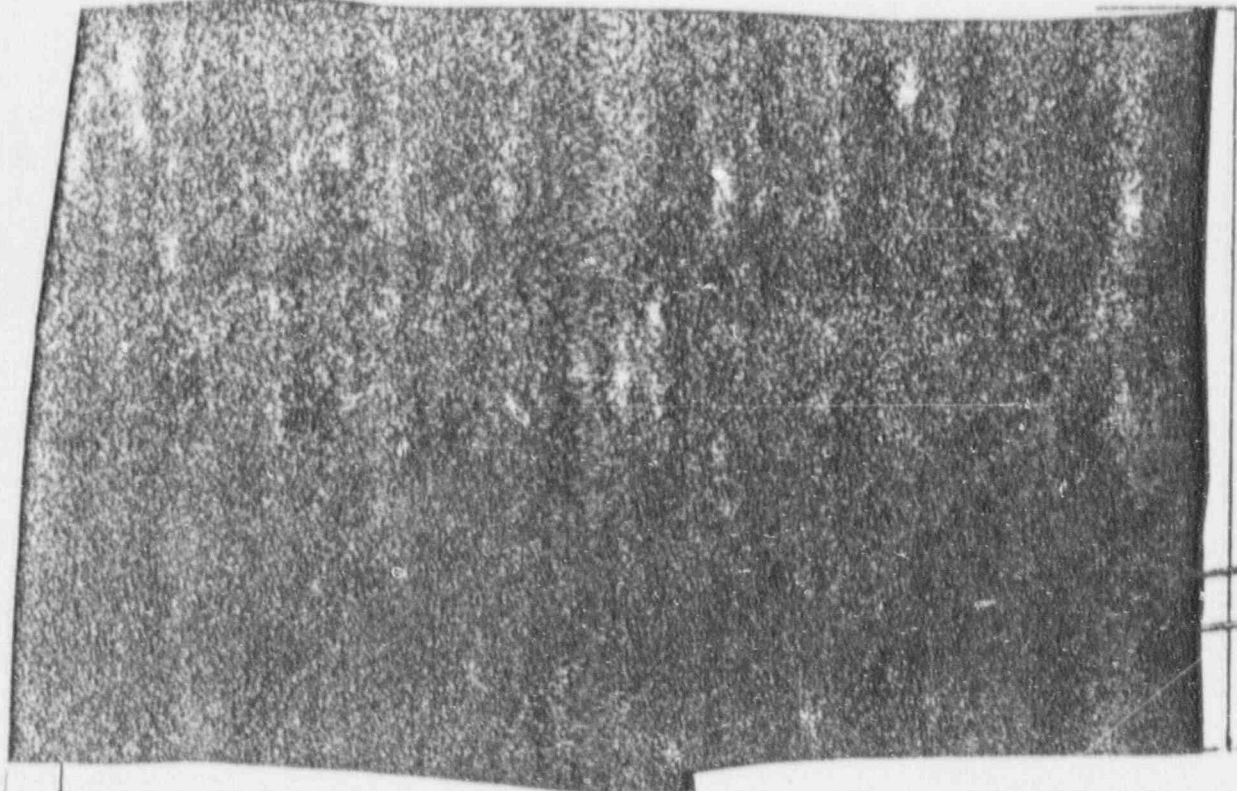
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- N1 - EOP - 2, Rev. 0, RPY Control
 - N1 - EOP -3, Rev. 0, Failure to Scram

In addition, interviews were conducted with security, operations, and training personnel. The purpose of these interviews was to determine whether;

- (1) personnel understand and were sensitive to their responsibilities in these areas;
- (2) operators were trained to consider the potential nuclear safety consequences of such events;
- (3) interface responsibilities between the operations and security organizations were clearly understood; and
- (4) operator responses were consistent and appropriate.

2.c Findings

Based upon the reviews and interviews by the inspectors, it was determined that the licensee does not completely address the operations-security interface responsibilities for nuclear plant safety when threats of sabotage, suspected sabotage, actual sabotage, and external threats or attacks occur. The following weaknesses were identified:





Based on the above findings this is an unresolved item. (50-220/86-23-01 and 50-410/86-39-01). An unresolved item is one where more information is necessary to determine whether or not a violation of NRC requirements exists.

The inspectors determined that the licensee has adequately addressed the following:

- (1) security manpower requirements for responding to threats and the conduct of security contingency drills to exercise the response plans;
- (2) local law enforcement notification and response capabilities;
- (3) and security notification and communications with operations on a priority basis.

3.0 Exit Interview

The inspectors met with the licensee representatives listed in paragraph 1 at the conclusion of the inspection on October 29, 1986. At that time, the purpose and scope of the inspection were reviewed and the findings presented.

The licensee representatives, without exception, expressed the opinion that guidance and training were needed in dealing with security related events that affect reactor operations. However, they indicated that they would not establish any formal procedures as a result of the inspection findings, but would await guidance and/or recommended action from the NRC.

At no time during the inspection was any written material provided to the licensee.

ENCLOSURE 2

OPERATIONS/SECURITY INTERFACE DURING
CERTAIN SECURITY EVENTS

In May 1983, the NRC informed reactor licensees and permittees in Information Notice No. 83-27 ("Operational Response to Events Concerning Deliberate Acts Directed Against Plant Equipment") of two incidents in which deliberate acts had been taken against plant equipment. The Notice also pointed out the lack of station procedures concerning response to such incidents by operating personnel. Information Notice No. 83-27 noted that licensees may not be prepared to assess such situations and take necessary steps to assure operability of systems important to safety or to make decisions concerning continued operation. Accordingly, it was suggested that guidelines or procedures outlining a process for followup of both deliberate and inadvertent acts with respect to plant operation be prepared and available. As a minimum, it was suggested that the guidelines and procedures include:

- verification of the affected system(s) alignment, the system(s) control logic, and the availability of the system(s) main power supply.
- inspection of interrelated systems, including, as necessary, inspection of selected safety-related electrical panels and cabinets, both in the plant and in the control room.

It was further suggested that the licensee should be prepared to make a decision on whether or not continued operation is justified and whether or not systems necessary for safe shutdown were operable, if additional tampering is detected. It was concluded that the potential impact of any deliberate act directed against plant equipment must be evaluated, and actions taken to mitigate the anticipated safety consequences.

Following dissemination of Information Notice No. 83-27, the NRC expected recipients of the Notice to review their procedures, determine if they were adequate to deal with acts of sabotage, tampering, etc., and, if not, to develop and adopt appropriate station procedures and policies. It was anticipated that plant operations personnel and supervisors would be trained to recognize that: (1) sabotage or tampering threats are primarily directed against them and the equipment they operate; (2) the security staff can delay and even possibly prevent an effect on nuclear safety, but only the operations staff is trained to recognize the safety priority of equipment and to know the appropriate techniques to cope with its loss; and (3) the operations staff must take the lead in developing the strategy of responses and providing direction to the integrated plant staff (including security, maintenance and operations) in dealing with security threats. Further, it was expected that station procedures, not just security procedures, would be developed that firmly establish the policy that (1) the operations staff is responsible for directing security threat response activities; (2) the Technical Support

Center would be activated to enhance response capability and provide response direction; (3) teams composed of operations, maintenance and security personnel would be used to search for sabotage devices or disabled equipment; (4) search strategies would be established to confirm equipment operability in descending order of safety importance, given existing plant conditions; (5) equipment cleared should be left guarded, expanding the envelope of operable equipment; (6) the security force would provide area access control, protect searchers and operators, defend cleared equipment and detain subjects; and (7) all potentially involved staff would be trained, periodically retrained, and drilled in implementing these procedures.

However, during recent inspections at four selected nuclear power plants in Region I to determine the extent of licensees' responses to Information Notice No. 83-27 and to confirm our assumptions, it was determined that the licensees were, at best, only marginally prepared to deal with such events. Some examples of the basis for this conclusion are as follows:

- Two of the four licensees did not have station policies or procedures that addressed the subject.
- The operations staff at one plant, where some procedures had been developed to deal with the subject, were not aware of their existence or the responsibilities assigned to them in those procedures.
- The operations staff at another plant where some procedures were provided did not demonstrate a consistent understanding of the procedures.
- Only one licensee provided formal training to its operators on the subject and that training was minimal.
- At none of the four plants were interface responsibilities adequately delineated or understood.
- The majority of the operations personnel interviewed indicated a need and desire to have established policies/procedures.

These inspection results also indicated that, at all four plants, the licensees' security contingency plans and procedures address, with varying degrees of specificity, responsibilities and actions to be taken by the security organization and the operations organization. Unfortunately, there is not integration with operations plans and procedures. In addition, the results of routine inspections of contingency plan exercises indicate that frequently the plant operations organization declines to participate in the exercise or only simulates its role.