

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-282/94006(DRSS); 50-306/94006(DRSS)

Docket Nos. 50-282; 50-306

Licenses No. NPF-42; NPF-60

Licensee: Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401

Facility Name: Prairie Island Generating Plant, Units 1 and 2

Inspection Dates: April 26 to May 6, 1994 onsite
May 12, 1994 in NRC Region III Office

Type of Inspection: Announced Physical Security Inspection

Date of Previous Physical Security Inspection: July 19-27, 1993

Inspector: Gary L. Pirtle
Gary L. Pirtle
Physical Security Inspector

5/24/94
Date

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

5/26/94
Date

Inspection Summary

Inspection Between April 26 and May 12, 1994 (Reports No. 50-282/94006(DRSS);
No. 50-306/94006(DRSS))

Areas Inspected: Routine, announced physical security inspection involving Management Support; Protected and Vital Area Barriers; Access Control-Personnel, Packages, and Vehicles; Alarm Stations and Communications; Security Organization; Security Management Effectiveness; and Followup on Previous Inspection Findings.

Results: A licensee identified noncited violation was noted in reference to a tailgating incident involving a member of the security organization. An unresolved item was noted pertaining to the visitor to escort ratio used during tours of the plant facilities. An inspection followup item was identified in reference to the need to revise several procedures and other documents. Two of three previously identified inspection items were reviewed and closed. The observed performance of the security force was considered to be a program strength.

Management support for the security program continued to be good. Equipment observed functioned as designed. Housekeeping standards within the security facilities were good except for the badge issue area. The material condition of the security computer consoles and associated equipment was excellent.

REPORT DETAILS

1. Key Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other employees, contractor personnel, and members of the security organization. The asterisk (*) denotes those present at the onsite Exit Interview conducted on May 6, 1994.

- *K. Albrecht, General Superintendent, Engineering, Northern States Power Company (NSP)
- *G. Miserendino, Manager, Corporate Security Services, NSP
- *F. Evitch, Prairie Island Superintendent, Security, NSP
- *B. Anderson, Monticello, Superintendent, Security, NSP
- *D. Hutchison, Nuclear Security Specialist, NSP
- *D. Matz, Nuclear Security Specialist, NSP
- *D. Blakesley, Nuclear Security Program Coordinator, NSP
- R. Cleveland, Supervisor, Personnel Security, NSP
- *D. Scnlintz, Nuclear Quality Assurance Department, NSP
- B. Kappes, Nuclear Quality Assurance Department, NSP
- *S. Gunterson, Site Manager, Burns International Security Services, Inc. (BISSI)
- *M. Samuel, 2nd lieutenant, BISSI
- *V. Majeski, 1st Lieutenant, BISSI

- *R. Bywater, Resident Inspector, NRC Region III

2. Followup on Previous Inspection Findings

- a. (Closed) Inspection Followup Item (Reports 50-282/93013-02; 50-306/93013-02)): This item was addressed in Section 5.b of the above report and pertained to supervisors not being thoroughly familiar with the location of contingency equipment. The serviceability and condition of some contingency equipment was a concern and some security force members were not adequately trained on a special piece of contingency equipment. Inspection results consisted of record reviews, inventory of contingency equipment, and demonstration of assembly and disassembly of the night vision aid by selected security force members. The contingency equipment was well maintained and serviceable, supervisors were aware of the equipment location, and security force personnel have been trained on the night vision aid. This item is closed.

- b. (Closed) Inspection Followup Item (Reports 50-282/93013-03(DRSS); 50-306/93013-03(DRSS))): This item was addressed in Section 5.c of the above report and pertained to the excessive alarm rate for the protected area alarm system for the period between May and June of 1993. The inspection report noted that during June 1993, approximately 600 environmental caused alarms for the perimeter alarm system were recorded, which was close to all environmental caused

alarms during the first quarter of 1993. Analysis of the alarm rate by the security staff concluded that the severe weather extremes (electrical storms and heavy rainfall) was the primary factor for the high alarm rate.

Review of this issue during this inspection disclosed that the environmental caused alarms for the entire first quarter of 1994 was 119 alarms, or approximately 20% of the alarm rate noted in June 1993. This item is considered closed.

- c. (Open) Violation (Reports No. 50-282/93022-01(DRSS); 50-306/93022-01(DRSS)): This item was addressed in Section 6 of the above report and pertained a violation being cited for a safeguards information document being left unsecured in a building outside of the protected area for a short period of time. This violation was considered a repeat violation. The licensee provided a written response to the violation dated March 14, 1994, and identified several corrective actions that had been implemented to prevent recurrence of the violation.

All of the corrective actions identified in the licensee's March 14, 1994 letter were reviewed by either interviews, record reviews or observation. The inspector concluded that all of the corrective actions, except one had been implemented. The licensee's March 14, 1994 letter stated that a designated area used for storage of safeguards information was protected by an intrusion alarm system. The intrusion alarm system was not operational when checked during the inspection. It should be noted however that the storage area is checked at regular and frequent intervals by security personnel assigned to the location.

This issue will remain open pending completion of the installation of the alarm system described in the licensee's March 14, 1994 letter. This issue also demonstrated a need for the Manager, Security Services to be more adequately briefed by his staff on the accurate status of completion of projects identified to the NRC to resolve violations.

3. Exit Meeting

- a. At the beginning of the inspection, Mr. M. Wadley 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, 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 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) Personnel present were advised that two of three previous inspection findings would be closed (Refer to Section 2 for further information)
- (2) A licensee identified violation was noted pertaining to a deliberate act of tailgating by a member of the security organization (Refer to Section 5.a for further information).
- (3) An unresolved item was noted pertaining to the visitor to escort ratio used during tours of the plant facilities (Refer to Section 5.b for further information).
- (4) An inspection followup item was identified in reference to the need to revise several procedures and other documents. The Superintendent, Security stated that the necessary revisions could be completed within 30 days after receipt of the inspection report (Refer to Section 5.c for further information).
- (5) A program strength was noted in reference to the observed performance of the security force (Refer to Section 5.d for further information).
- (6) Housekeeping standards were generally good, except for the badge issue area. Material condition of the security computer and associated equipment was excellent (Refer to Section 5.e for further information).

4. Program Areas Inspected

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

The below listed clear 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). Sampling reviews included interviews, observations, and document reviews that provided independent verification of compliance with requirements. Gathered data was also used to evaluate the adequacy of the reviewed program and practices to adequately protect the facility and 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 security systems 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) Audits Program Corrective Action, Auditor Qualification.
 02. Protected and Vital Area Physical Barriers, Detection and Assessment Aids: (a) PA and VA Barrier Resistance; (b) Isolation Zones Maintained; (c) VA Detection Functional and Effective; (d) Assessment Aids Functional and Effective.
 03. Protected and Vital Area Access Control of Personnel, Packages and Vehicles:
 - (a) Personnel Access: (1) Identification and Authorization Checked Before Access; (2) Changes Made for Terminations; (3) Personnel Are Searched; (4) Badges Are Displayed; (5) Visitors Are Escorted.
 - (b) Package Control: (1) Packages Authorization Checked; (2) Handcarried Packages Searched at PA.
 - (c) Vehicle Control: (1) Vehicles Are Searched; (2) Authorization Verified Prior to Entry.
 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.
5. Physical Security Inspection Program for Power Reactors-ip 81700

One licensee identified violation, one unresolved item, one inspection followup item, a program strength, and a observation pertaining to housekeeping standards were identified and are addressed below.

- a. 10 CFR 73.70(d) requires entry and exit into normally unoccupied vital areas to be recorded. 10 CFR 50.9 requires information required by the Commission's regulations to be complete and accurate in all material respects. Section 8.3.4.2 of Revision 29A of the licensee's security plan states that access to vital areas is controlled by badges and card readers.... Logs are maintained of entries and exits from the affected vital areas.

In December 1993, the licensee concluded as a result of an investigation that a security force member deliberately tailgated at a security door leading to a vital area on at least one occasion in September 1993. The investigation report defined intentional tailgating as occurring when a person attempts to intentionally deceive the computer, i.e. the computer records show (1) that a person was in a room or building when they weren't or

(2) that a person was not in a room or building when they were. This is normally done by following someone through a security door without using an access card to record the entry or exit. Tailgating results in the log of entry and exit required by Section 8.3.4.2 of the licensee's security plan and 10 CFR 73.70(d) to be inaccurate and are not complete and accurate in all material respects as required by 10 CFR 50.9. Therefore, the incident constitutes a violation of the licensee's security plan and 10 CFR 50.9. It should be noted that the security officer was authorized into all of the appropriate vital areas of the plant so the tailgating did not constitute an unauthorized entry into the areas.

The licensee terminated the unescorted access authorization for the security officer and the contract security firm terminated the individual's employment as a result of the incident.

Although the incident constitutes a violation of 10 CFR 50.9 and the security plan, the violation described above meets the criteria of a licensee identified violation as addressed in 10 CFR Part 2, Appendix C, Section VII.B.(2). Therefore, a Notice of Violation will not be issued and we have no further questions pertaining to this issue.

- b. An unresolved item was noted pertaining to the visitor to escort ratio used during several tours of the plant facilities. Section 8.3.3 of revision 29A of the licensee's security plan states that the ratio of visitors to escort may be up to 5 to 1 in vital areas. This section of the plan also states that under "unique conditions" (emphasis added) larger ratios may be authorized by the General Manager Prairie Island/designee and documented by written correspondence. Inspection activities disclosed that between February 1 and April 28, 1994, there have been 41 occasions whereby the exemption to the 5 visitors to 1 escort within a vital area was granted. The variances in visitor to escort ratio ranged from 6 to 1 to 10 to 1 (three occasions of a 6 to 1 ratio; 10 occasions of a 7 to 1 ratio; 19 occasions of a 8 to 1 ratio; six occasions of 9 to 1 ratio; and three occasions of a 10 to 1 ratio). The frequency of the exemption to the visitor to escort ratio for plant tours indicated that the tours were not "unique conditions". It should be noted that all licensee personnel who have a security badge at the plant have been trained and are qualified to perform escort duties.

The Superintendent, Security noted that the tour program itself constituted the "unique condition" which warranted the visitor to escort exemption authorizations. The Superintendent, Security also noted that the site had realized a dramatic increase in tours requests due to the dry cask storage concern of the populace, and that such exemptions were not planned to be a continual mode of operation in the future.

The resolution of this issue will be addressed by separate correspondence after coordination with NRC Headquarters (282/94006-01; 306/94006-01).

- c. The security staff needs to be more responsive and proactive in revising security related procedures when organizational and other changes made information in existing procedures incorrect. Examples noted during the inspection included:

- (1) Procedure NIACD 8.6 assigns the Nuclear Training Department as responsible for training security force personnel in security related functions. This training responsibility was removed from the Nuclear Training Department over eight months ago but the procedure has not been changed.
- (2) Procedure 5ACD 5.1 describes the security supervisor positions that were deleted from the security organization in September 1993.
- (3) The Corporate security procedure pertaining to the protection of Safeguards Information was not revised until May 2, 1994. The significant changes addressed in the procedure were implemented in approximately December 1993.
- (4) The job description for the position of Corporate Nuclear Security Coordinator incorrectly states that the position is responsible for the development and implementation of the security programs at the nuclear sites. Other responsibilities in the job description were not considered as applicable by the person assuming the position. A job description for the position of Nuclear Security Specialist (NSS) for Prairie Island had been prepared. The job description of the Monticello NSS positions were used for both positions. The job description was inaccurate in some respects.
- (5) The security plan depicts the access control coordinator as reporting to the security superintendent. The access control coordinator position was deleted from the security organization in November 1993, as a result of a reorganization.

Although the above noted deficiencies when considered as single isolated issues may not be significant, collectively, they indicate a need for the security staff to be much more sensitive to the need to revise applicable plans and procedures when changes cause such plans and procedures to be inaccurate and do not describe current practices and responsibilities (282/94006-02; 306-94006-02).

- d. The observed performance of the security force was considered to be a program strength. The security force members observed and

interviewed were very knowledgeable of their responsibilities and compliance with procedures was evident for the tasks observed. The shift supervisors appeared well informed and were aware of the security activities requiring compensatory measures. Several routine functions performed by the security force were observed on several occasions and no performance related deficiencies were noted during the periods of observation. The security force appeared to be well supervised and the personnel observed seemed very confident in fulfilling their responsibilities. Interviews disclosed that the security force has completed more than 100 days without causing a personnel error loggable security event.

- e. The material condition of the security computer and related equipment was excellent. Additionally, housekeeping standards within the security facilities were generally very good, with one obvious exception. The badge issue area (to include the PRC area) was well below the housekeeping standard observed in other security facilities and detracted from the professional image earned by the security force's performance. A chair in the badge issue area had the upholstery torn and stuffing was extended through the fabric. Parts of the walls were scuffed and marked, and some areas of painted piping had been worn beyond the paint and primer and bare pipe was visible.