

**U. S. NUCLEAR REGULATORY COMMISSION
REGION I
SECURITY INSPECTION REPORT**

License/Docket/Report Nos.: DPR-53/50-317/94-14; DPR-69/50-318/94-14

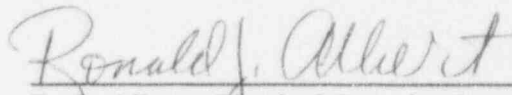
Licensee: **Baltimore Gas and Electric Company**

Facility: **Calvert Cliffs Nuclear Power Plant, Units 1 and 2**

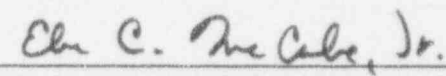
Inspection At: **Lusby, Maryland**

Inspection Dates: **April 4-7, 1994, April 14, 1994**

Inspectors:


R. J. Albert, Physical Security Inspector
G. C. Smith, Senior Physical Security Inspector

Approved by:


E. C. McCabe, Chief, Safeguards Section

SCOPE. Announced physical security inspection of: Previously Identified Unresolved Item; Audits; Protected Area Physical Barriers, Detection and Assessment Aids; Vital Area Physical Barriers; Protected and Vital Area Access Control of Personnel and Vehicles; Power Supply; Alarm Stations and Communications; and Testing, Maintenance and Compensatory Measures.

RESULTS. Inspected aspects of the licensee's physical security program were generally determined to be appropriately directed toward assuring public health and safety. However, an apparent violation was identified for the failure of annual audits of plant physical security activities to evaluate the potential impact of security and contingency plans and procedures on plant and personnel safety.

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DETAILS

1.0 Key Persons Contacted

1.1 Licensee

J. Alvey, Assistant General Supervisor
A. Anuje, Supervisor, Quality Audits Unit
J. Ents, Security Shift Supervisor
J. Frost, Security Shift Supervisor
L. Gibbs, Director - Nuclear Security
R. Hall, Quality Assurance Auditor
J. Holleman, Fitness for Duty Administrator
J. Kennedy, Supervisor, Security Training and Support
H. Long, Security Shift Supervisor
M. Milbradt, Compliance Engineer
M. Neyman, Security Program Specialist
C. Schertle, Security System Analyst

1.2 Contractor

A. Salvas, Burns International Security Services

1.3 U. S. Nuclear Regulatory Commission

H. Lathrop, Resident Inspector
C. Lyon, Acting Senior Resident Inspector

The inspectors also contacted other licensee and contractor personnel.

2.0 Previously Identified Unresolved Item

(Closed) Unresolved Item (URI) 50-317/93-29-01 and 50-318/93-29-01: During the inspection ending on October 1, 1993, the NRC noted that the licensee had exempted all on-duty armed security force members (SFMs) from further search after alarming a portal metal detector upon entry into the Protected Area (PA). In accordance with the NRC-approved Physical Security Plan (the Plan), such an exemption was limited to armed SFMs whose duties outside the PA were within the security processing building or who were performing search functions related to access processing. The security processing building was a one-story, relatively small facility which allowed SFMs, regardless of their specific functions within the building, to be observed by each other.

On August 17, 1993, access control functions were moved to the nuclear security facility (NSF), a two-story building. The inspector noted that the search exemption was being applied in that building for all SFMs, including those returning from areas outside the

PA such as second-floor NSF offices and the top of the NSF. In addition, armed SFMs returning from owner-controlled area patrols appeared to be included in the exemption.

At the time, the NRC was (and still is) reviewing a proposal to relax the search requirements for on-duty armed security personnel, i.e., to have them only process through explosives detectors and not have to undergo further search after alarming metal detectors upon entry into the PA. On October 13, 1993, the licensee was informed that no such proposal had yet been approved by the NRC and that corrective actions were needed to comply with existing regulatory requirements. The implementation and effectiveness of those actions were classed as unresolved, pending further NRC review.

During this inspection, the inspectors observed that armed SFMs, upon alarming a portal metal detector, underwent a pat-down search or a search with a hand-held metal detector, or removed their equipment belt for search by a personnel search officer. The corrective actions were found effective.

On April 19, 1994, the NRC conducted an Enforcement Conference with the licensee on a related issue. At that conference, the licensee stated that, after identification of the above search discrepancy, the search exemption had been stopped and not reinstated. Based on that statement and inspector confirmation of proper searches of armed SFMs during the current inspection, URI 50-317/93-29-01 and 50-318/93-29-01 was closed.

3.0 Audits

The inspectors reviewed the licensee's Fitness-for-Duty (FFD) Program Audit Report No. 93-19, conducted on August 30 - October 21, 1993. The FFD audit was found comprehensive in scope and did not identify any adverse findings. Its results were reported to the appropriate level of management.

The November 3 - December 13, 1993 Licensee Security and Safeguards Audit (Report No. 93-17) was also inspected. This audit developed four findings, which were reported to an appropriate level of management and satisfactorily resolved. However, the audit did not appear to cover all security program aspects specified in the Plan. In addition, the documented scope of the audit indicated that safeguards information was to be covered, but there was no mention of safeguards information in the report. The licensee stated that the full audit scope had not been documented in the report and, on April 14, 1994, provided the NRC with additional information. As further discussed by telephone on April 14, 1994, the inspectors still could not determine that the audit covered the required evaluation of potential impact of the security program on plant and personnel safety. In addition, a review of the previous licensee annual audit report (No. 92-23) disclosed that the 1992 audit also did not address the safety impact of security. The failure to audit the potential impact of the security program on plant and personnel was an apparent violation of the Security Plan (VIO 50-317/94-14-01 and 50-318/94-14-01).

From the additional information that the licensee provided, the inspectors determined that licensee audit No. 93-17 was more in-depth than first evaluated. The licensee stated that, even though certain aspects of the audit were not documented, the auditors made a conscious evaluation. The licensee further stated that, as part of its new, performance-base auditing program, areas without known problems were not audited in depth, and that the audit reports consisted of documentation of exceptions to requirements and did not include all areas evaluated during the audits. Subsequent NRC review of this input noted that the failure to incorporate the full audit scope and findings in the audit report left both licensee and NRC reviewers with no confirmation that the audit had covered all required areas or that sufficient attention had been paid to areas not fully audited. Further, the lack of a comprehensive audit report appeared to necessitate that the licensee maintain additional records to show that audit coverage was sufficient.

4.0 PA Physical Barriers, Detection and Assessment Aids

4.1 PA Barrier

Physical inspection of the PA barrier on April 4, 1994 identified two deficiencies. These were in recently established, temporary barrier sections (for the diesel-generator project). One of the deficiencies was a section of fencing that was not of prescribed height. The other was a building that became part of the PA barrier, with windows that did not provide the prescribed barrier. These deficiencies were promptly corrected by the licensee. Further NRC review concluded that the fence height discrepancy was minor because it was very small. The building discrepancy was found to be a significant degradation involving a potential for a barrier breach. However, because the previous PA barrier was still intact and outside the present barrier, this represented another minor barrier breach. It was concluded that, in accordance with the NRC Enforcement Policy, no violation citation would be issued for these matters. The inspectors had no further questions on the PA barrier.

4.2 PA Detection Aids

The inspectors observed operability testing of the PA perimeter intrusion detection system (IDS) on April 4, 1994. The entire perimeter was tested, and the inspectors determined that the IDS was installed, maintained and operated as committed to in the Plan.

4.3 Isolation Zones

The inspectors verified that the isolation zones were adequately maintained to permit observation of activities on both sides of the PA barrier.

4.4 Assessment Aids

The inspectors observed the PA perimeter assessment aids and determined that they were installed and operated as committed to in the Plan.

5.0 Vital Area (VA) Physical Barriers

The inspectors physically inspected selected VA barriers on April 5, 1994, and observed that the barriers were installed and maintained as described in the Plan.

6.0 PA and VA Access Control of Personnel and Vehicles

6.1 Personnel Access Control

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

- The licensee properly identified personnel and checked authorization prior to issuance of badges and key cards.
- The licensee was implementing a search program for firearms, explosives, incendiary devices and other unauthorized materials as committed to in the Plan.
- Individuals in the PA and VAs displayed their access badges as required.
- The licensee had a mechanism for expediting access to vital equipment during emergencies and that the mechanism was adequate for its purpose.

6.2 Vehicle Access Control

The inspectors determined that the licensee properly controlled access to and within the PA. Vehicles were properly processed prior to entering the PA; that process was consistent with commitments in the Plan. The inspectors also reviewed the vehicle search procedures and practices, and determined that they were consistent with the commitments in the Plan. This determination was made by observing vehicle processing and search, by inspection of vehicle logs, and by interviewing SFMs and the licensee's security staff about vehicle processing and search procedures.

7.0 Power Supply

The inspectors verified that several systems (batteries, and a dedicated security diesel-generator) provided backup power to security systems. However, the inspectors determined that the licensee did not designate the security diesel-generator a vital area

even though its construction and controls met VA criteria. Also, the licensee protected the security diesel as a VA. The licensee committed to designate the area around the security diesel-generator as a VA and to reflect the designation in the next revision of the Plan. This is an inspector follow-up item (IFI 50-317/94-14-02 and 50-318/94-14-02).

8.0 Alarm Stations and Communications

The inspectors observed the operations of the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS). Since the last program inspection, the CAS had been completely renovated. Both the CAS and SAS were maintained and operated as committed to in the Plan. Both stations had exceptional closed-circuit television (CCTV) picture quality, supported by excellent camera alignments.

Station operators were interviewed by the inspectors and found to be knowledgeable of their duties and responsibilities. The inspectors verified that neither station was involved in operational activities that would interfere with the execution of assessment and response functions. Each station maintained internal-licensee communications and communications with the security force. The inspectors also verified that each station maintained communications with local law enforcement authorities.

9.0 Testing, Maintenance and Compensatory Measures

9.1 Testing and Maintenance

The inspectors reviewed testing and maintenance records and confirmed that the records committed to in the Plan were on file and readily available for NRC and licensee review. To conduct preventive and corrective maintenance, the licensee had provided designated instrumentation and controls technicians. A check of repair records indicated that timely maintenance and testing were being accomplished.

9.2 Compensatory Measures

The inspectors reviewed the licensee's use of compensatory measures and determined them to be as committed to in the Plan. Because of excellent turnaround time in equipment repairs, compensatory measures for failed equipment were exceptionally low.

10.0 Exit Interview

The inspectors met with the licensee representatives identified in Section 1.0 at the conclusion of the inspection on April 7, 1994. At that time, the purpose and scope of the inspection were reviewed and preliminary NRC findings were presented. The licensee's commitment to designate as vital the area surrounding the security-diesel generator was reviewed and confirmed with the licensee. Licensee representatives acknowledged the inspection findings.