

ATTACHMENT 1

PALISADES NUCLEAR PLANT
DOCKET 50-255
LICENSE DPR-20

SECURITY INVESTIGATION REPORT
May 23, 1995

9506210080 950614
PDR ADOCK 05000255
F PDR

INTRODUCTION

In a letter from the Nuclear Regulatory Commission (NRC) to Consumers Power Company (CPCO) dated April 18, 1995, the NRC notified CPCO that it had received information concerning activities at the Palisades Nuclear Power Station. The NRC requested that CPCO investigate and respond to concerns identified in an attachment to that letter. Based upon that request CPCO initiated an investigation conducted by two members of the Property Protection Department staff, GWBalcom and JJWarner.

Scope of the investigation included personal interviews with current members of the Palisades contract security organization and review of applicable personnel records, corrective action documents and incident reports.

As a result of the investigation, three concerns listed in the April 18, 1995 letter to CPCO were validated. Of those three concerns, two had been identified by the security organization previous to receipt of the NRC letter and actions taken. One of the validated concerns, listed as Concern 3 in the April 18 NRC letter, had not been previously reported to security management. Actions to address this concern have been taken and are described in this report. The other concerns in the letter were not validated or could not be validated or refuted.

CONCERN 1

This concern identified two occasions on which security staffing levels at the main vehicle gate were reportedly less than required by procedures when the gate was open.

Response

Our investigation verified that an incident concerning staffing levels at the main gate did occur on January 5, 1995. A member of the Property Protection Department evaluated the incident and determined that Security Plan requirements were met but Security Implementing Procedures were not properly executed. Consequently, a plant Condition Report (CR), C-PAL-95-0047, was initiated on January 6, 1995. The CR evaluation resulted in the following corrective actions being taken:

1. The evaluation and resulting conclusions were distributed to security shift supervisors on February 9, 1995.
2. Appropriate personnel were retrained and requalified under relevant crucial tasks.
3. Recurring training has been approved for security shift personnel during calendar year 1995.
4. Affected Security Implementing Procedures were revised to address issues identified in the Condition Report evaluation.

The investigation was not able to verify that a second incident concerning staffing levels at the main gate occurred between 1993 and 1995.

Conclusion

Concern 1 was partially validated. The January 5, 1995 incident did occur, was reported to and evaluated by management in a Condition Report.

We were not able to verify that a second incident occurred between 1993 and 1995 in our interviews or review of documents.

No violations of the Palisades Security Plan were identified in this concern.

Action

No action required.

CONCERN 2

This concern alleged that on February 17, 1995, a security badging verification procedure requirement was not properly implemented.

Response

The investigation verified that the described incident did occur on February 17, 1995, at which time a Security Incident Report was initiated. After review by the Property Protection Department (PPD) a plant Condition Report, C-PAL-95-0228, was initiated on February 24, 1995. The incident was evaluated by the PPD and the following corrective actions were implemented:

1. A meeting was held with involved personnel shortly after the incident occurred. The importance of effective communication was discussed in this meeting. Also discussed were possible contributing factors to the incident and ways to improve the process.
2. The Badge Verification process which was originally issued as a policy was added to the Identification Station Post Order to assure that it is periodically reviewed. The revised Post Order was issued effective May 4, 1995 after review by all shift supervisors.

The Badge Verification process was implemented to improve the plant badging process. It is not a Security Plan or Implementing Procedure requirement.

Conclusion

This concern was validated. The February 17, 1995 incident did occur. It was reported to management and appropriate evaluation completed and corrective actions taken. No violations of the Palisades Security Plan were identified in this concern.

Action

No action required.

CONCERN 3

This concern identified an incident in which security supervisors allegedly allowed several plant personnel on multiple occasions to enter and leave a vital area door without logging in and out.

Response

The investigation validated this concern. On March 19, 1994, certain plant personnel were allowed to either enter or exit a vital area portal without the required use of card reader or logging of entry or exit.

This situation occurred in a location where there are two doors immediately adjacent to one another, the vital area (VA) door controlled by card reader and a second watertight door secured by four dogs. To enter the area, one must open the VA door and hold it open while opening the second watertight door. In this case personnel were reportedly allowed to initially log in to the VA via cardreader and make two or three trips through the VA doors to transfer material/ equipment (without logging in for each entry/exit) under the observation of security personnel. In each case, personnel were authorized for unescorted access to that VA.

Neither the Palisades Security Plan or Security Implementing Procedures (SIP) allow for this to occur. Rather it appears to have evolved as a method of dealing with the difficulties of moving material through an area which contained both a VA door and a watertight door.

The following actions were taken as a result of these findings:

1. A memo was issued to all security force members on May 11, 1995 which clarifies that any and all Vital Area entries and exits require logging in and out of the area.
2. A plant Condition Report, C-PAL-95-0436, was initiated on May 15, 1995. As part of the CR process, further evaluation of the incident will be conducted to determine if additional corrective actions are required.
3. The incident was logged in the Quarterly Reportability Log required by 10CFR73.71(c)(1) on May 15, 1995.

Conclusion

This concern was validated. Under specific circumstances personnel (authorized for unescorted access) were allowed to enter and exit a specific VA without meeting appropriate logging requirements.

This incident constitutes a violation of the Palisades Security Plan.

Action

Plant Condition Report C-PAL-95-0436 was initiated on May 15, 1995. As part of this Condition Report, further evaluation of the incident will be conducted by a member of the Consumers Power Company's security organization to determine if additional corrective actions are required. Per procedural requirements, this evaluation will be reviewed by the Administrative Department Manager. Due date for completion of this evaluation is July 16, 1995. Records from the evaluation and additional corrective actions, if any, will be available on site for NRC review.

CONCERN 4

This concern alleges that contract security management took no action after being told by several officers that a named security officer was not properly performing certain procedural requirements and that this same officer had violated a security procedure.

Response

The investigation indicated that security management was aware of a general concern about the performance of the named security officer but found no evidence to indicate that the officer did not meet qualification requirements of the Palisades Suitability, Training and Qualification Plan.

We were unable to verify that this same security officer violated security procedure by allowing an individual to exit the Protected Area (PA) through the main vehicle gate or by improperly monitoring metal detector search activities.

The named security officer's qualification and proficiency were also examined during a previous investigation which was performed at the request of the Nuclear Regulatory Commission, the results of which were submitted to the NRC in a letter dated April 3, 1995. The previous investigation also found no information which validated the incidents described in the above concern.

Conclusion

This concern was not validated.

No violations of the Palisades Security Plan were identified in this concern.

Action

No action required.

CONCERN 5

This concern alleges that named security supervisors did not report or document an unauthorized attempt to enter a vital area door.

Response

The investigation verified that on March 3, 1994 a plant worker attempted to enter a Vital Area door that her key card had not been programmed for but the attempt was properly documented in the Central and Secondary Alarm Station Alarm Logs and appropriate response was made by security personnel.

On March 3, 1994, an employee with unescorted access attempted to enter a Vital Area (VA) door for which her key card was not programmed. Security responded per procedural requirement. It was determined that the individual's key card did not have a label identifying an access status. This label, which is required by procedure, identifies the individual's access status and allows the individual to determine if they are authorized and programmed for access to specific VA or Protected Area (PA) doors.

The responding officer verified that the individual's access status did not allow her access to the VA and determined that the entry attempt was not of malevolent intent. The individual was told to report to the security office and have an access status label put on her key card. During the process of getting a status label for the key card it was determined that the individual did have a work related need to enter the VA. Her access status was changed and the appropriate label affixed to her key card.

At the time of the incident the on duty Security Shift Leader did not feel that a written report was necessary since it was considered a routine administrative matter and there had been no unauthorized access to a VA. A Second Lieutenant reported the incident to the Administrative Lieutenant (AL) by telephone on March 3, 1994, the day the incident occurred. On March 4, 1994 the AL wrote an incident report. The report was reviewed by a Property Protection Department Supervisor on March 7, 1994 who requested that the security contractor take additional actions. The Security Shift Leader was asked to write a report on the incident and did so on March 16, 1994. The incident was also reviewed by the Post Commander and a report written.

The alarm and response were documented in the Central and Secondary Alarm Station Alarm Logs. There is no procedural requirement directing supervisors to initiate additional documentation in cases like this. This was considered an administrative matter which was corrected.

Conclusion

This concern was not validated. The Central Alarm Station and Secondary Alarm Station supervisors properly documented the alarm in their station alarm logs. Appropriate response was made and followup actions were taken to deal with the incident. There was no requirement for the Shift Leader to write an additional report about the incident. No violations of the Palisades Security Plan were identified in this concern.

Action

No action required.

CONCERN 6

This concern alleges that a security employee did not follow badging procedures on five occasions between April and December 1994.

Response

The first part of this concern alleges that the badge verification process was not followed on three specific dates. We were not able to validate the concern for the specific dates named. The required Programmed Badge Lists had been completed for each of the dates in question.

We did verify that on February 17, 1995, the badge verification process was not followed properly and a Condition Report (CR) was initiated. This CR evaluated the process and recommended corrective actions (Reference discussion in Concern 2 above.)

The badge verification process is not a Security Plan or Security Implementing Procedure requirement. It was implemented to enhance the badging process.

Conclusion

This concern could not be validated.

No violations of the Palisades Security Plan were identified.

Action

No additional action.

The second part of this concern alleges that a security employee did not correct the security status level for plant employee until receiving approval from the individual's supervisor.

Investigation verified that the incident occurred and verified that the security employee acted appropriately in not granting an access status change until receiving appropriate authorization.

Changes to access status must be requested/approved by the affected individual's supervisor. In this case the affected employee had changed departments. The standard access status for his new department required access to more Vital Areas (VA) than his previous department. The affected employee's supervisor did not notify the Badging Supervisor that the employee had changed departments. Another security officer became aware of the employee's department change and reported it to the Badging Supervisor. The Badging Supervisor asked the security officer to explain to the affected employee that his supervisor needed to request a status change.

Eventually after the Badging Supervisor contacted Human Resources and the affected employee's department, appropriate approval to change the employee's status was received. The Badging Supervisor could not recall specifically how long this process took.

Conclusion

This concern was not validated. The Badging Supervisor correctly followed badging procedures by not changing an employee's access status until approved by the appropriate supervisor.

No violations of the Palisades Security Plan were identified.

Action

No action required.

The third part of this concern alleges that a security employee did not correct a name error on a photo badge for two weeks. In this case the error was a misspelling in which one letter of the individual's name was incorrect. Investigation revealed that a security officer did notify the Badging Supervisor that the plant employee's name was misspelled on the employee's badge. The Badging Supervisor contacted the individual and requested that he report to the badging area for a new badge. The individual's office was located in the Outage Building, approximately a half mile from the location of the badging office and he did not enter the plant on a frequent basis so he did not immediately report to Security to receive a new badge. The Badging Supervisor contacted the individual again and he eventually reported to Security and had the error corrected.

The Badging Supervisor could not verify how long this process took but indicated it may have been two weeks.

Conclusion

The concern was not validated. The Badging Supervisor did take action to get the error corrected when notified of the error.

No violations of the Palisades Security Plan were identified.

Action

No action required.