

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Nos. 50-277/84-19
50-278/84-10

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Facility Name: Peach Bottom Atomic Power Station, Units 2 and 3

Inspection At: Delta, Pennsylvania

Inspection Conducted: June 25-29 and July 11, 1984

Date of Last Physical Security Inspection: March 5 - 9, 1984

Type of Inspection: Unannounced Physical Security Inspection

Inspectors: Roland Bailey
R. J. Bailey, Physical Security Inspector

7-25-84
date

for Roland Bailey
G. C. Smith, Physical Security Inspector

7-25-84
date

J. M. Dunlap
J. M. Dunlap, Physical Security Inspector

7-25-84
date

Approved by: R. R. Keimig
for R. R. Keimig, Chief, Safeguards Section

7-25-84
date

Inspection Summary:

Unannounced Physical Security Inspection on June 25 - 29 and July 11, 1984
(Combined Report Nos. 50-277/84-19 and 50-278/84-10)

Areas Inspected: Security Plan and Implementing Procedures; Management Effectiveness; Security Organization; Records and Reports; Physical Barriers - Protected Area; Physical Barriers - Vital Areas; Security System Power Supply; Assessment Aids; Access Control - Personnel; Access Control - Packages; Access Control - Vehicles; Detection Aids - Protected Area; Detection Aids - Vital Areas; Alarm Stations; Communications; Personnel Training and Qualification - General Requirements and follow-up on licensee action on previous inspection findings. The inspection was begun during regular hours and involved 76 inspector-hours onsite by three NRC region-based inspectors.

Results: The licensee was found to be in compliance with NRC requirements in 8 of the 16 areas examined during the inspection. The following apparent violations were identified:

Security Plan and Inspection Procedures

- (1) Failure to have a watchman controlling access and failure to communicate at specified intervals.

Security Organization

- (2) Failure to Notify the Commission of a change to the Security Program.

Records and Reports

- (3) Failure to record information in the security computer file on alarm annunciations.

Physical Barriers (PA)

- (4) Failure to maintain isolation zone.
- (5) Failure to provide adequate compensating security measures for the protected area perimeter.

Physical Barriers (VA)

- (6) Failure to maintain a locked door to a vital area.

Security System Power Supply

- (7) Failure to maintain a static uninterruptible AC power system.

Alarm Stations

- (8) Failure to detect alarms.
- (9) Failure to respond to VA alarms.

Communications

- (10) Failure to provide two-way radios to all posted guards and to maintain spare radios.
- (11) Failure to maintain dedicated communication link with LLEA.

Report Details

1. Key Persons Contacted

D. C. Smith, Acting Station Superintendent
R. A. Brower, Technical Engineer
K. P. Voight, Technical Engineer
J. E. Winzenried, Technical Engineer
S. Q. Tharpe, Security Supervisor
J. A. Williams, NRC Resident Inspector

All of the above were present at the exit meeting on June 29, 1984.
Messrs. Smith and Tharpe were present at the exit meeting on July 11, 1984.

The inspectors also interviewed other licensee personnel and members of the Burns contract guard force.

2. Licensee Action on Previous Inspection Findings

(Closed) Inspector Follow-up Item (81-09-02). In response to a review of security practices which could impact on safety and plant emergencies, the licensee eliminated the use of a four digit cypher code previously used in conjunction with a key card to enter vital areas. Elimination of the code will expedite emergency access to vital areas. Metal keys are also available for issuance by the control room in the event of card reader failure.

(Closed) Inspector Follow-up Item (82-16-05).

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(Open) Inspector Follow-up Item (84-06-01). Submit 10 CFR 50.90 change to Training and Qualification (T&Q) Plan to clarify requalification testing requirements. Review guard certification sheets and write a training program procedure. The licensee had not taken action on this issue at the time of this inspection.

(Open) Inspector Follow-up Item (84-06-02).

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3. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspection on June 29, 1984 and July 11, 1984. The purpose and scope of the inspection were reviewed and the findings presented. The licensee was advised that a management meeting would be held to further review the inspection findings. At no time during this inspection was written material provided to the licensee by the inspectors.

4. Independent Inspection Effort

On June 25, 1984, a plant employee advised the inspectors that he did not believe that he and other workers were afforded an adequate opportunity to "frisk" themselves after leaving the drywell containment personnel hatch located in the reactor building. Preliminary inquiry disclosed that workers were massing at a frisking station just outside the containment personnel hatch and when the line to use the two friskers available was too long, the workers, in frustration, would obtain their security badges and card-out into an adjacent hallway and use a frisker located there. Another option used was to proceed around the reactor building frisking station and through the ground level of the reactor building to the change trailer located on the west side of the auxiliary building, where several friskers were available. The inspectors requested smears be taken of badges at the containment personnel hatch health physics (HP) point and of badges in the main guard house to check for surface contamination. No surface contamination was detected on badges at either location. The Sergeant of the Guard issued instructions to the guard at the containment personnel hatch entrance to not return badges to workers until after they had used the frisker located at that point. Follow-up inspection on June 26 and 27 revealed that the licensee had positioned three additional friskers by the personnel containment hatch and employees were no longer allowed to leave the immediate area through the card reader controlled door until after they had cleared an authorized frisking station.

Health physics personnel located at Region I were briefed on the circumstances surrounding the inquiry and they advised that a closer examination of the health physics control points at Peach Bottom would be conducted during a scheduled inspection on July 2-6, 1984.

5. MC 81018 - Security Plan and Implementing Procedures

One apparent violation was identified.

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Failure to have a watchman controlling refueling floor access and failure to communicate at specified intervals is an apparent violation. (50-277/84-19-01 and 50-278/84-10-01)

6. MC 81020 - Management Effectiveness - Security Program

On June 25 and 26, 1984, the inspectors observed a Lieutenant from the contract security force serving in the capacity as the licensee Plant Security Supervisor, who was absent from the site. The Lieutenant was also responsible for managing the badge issue and access control programs. In discussions with the lieutenant, he stated that he was not engaged in reviewing the daily records produced by the security force nor was he authorized to alter any procedures, two activities normally performed by the Plant Security Supervisor.

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The Plant Security Supervisor also stated that the Captain had not advised him of the problem with the computer. The Plant Security Supervisor further stated that he was very busy with other duties and that he had been unable to review the records produced by the guard force for at least the three weeks prior to this inspection. The Assistant Plant Superintendent stated that company personnel actions had not been finalized to assign a full

time assistant to the Plant Security Supervisor. Inspector Follow-up Item 50-277/84-19-02, 50-278/84-10-02.

7. MC 81022 - Security Organization

One apparent violation was identified.

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Failure to notify the Commission of a change to the security program within the required two months is an apparent violation. 50-277/84-19-03 and 50-278/84-10-03.

8. MC 81038 - Records and Reports

One apparent violation was identified.

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Failure to record information in the security computer file or any other record or log is an apparent violation. 50-277/84-19-04 and 50-278/84-10-04. (Also see Paragraph 18 for discussion of the licensee's apparent failure to respond to alarms.)

9. MC 81052 - Physical Barriers - (Protected Area)

Two apparent violations were identified.

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Failure to maintain the isolation zone 20 feet from the protected area barrier is an apparent violation. 50-277/84-19-05 and 50-278/84-10-05.

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Failure to provide adequate compensatory security measures for the protected area perimeter is an apparent violation. 50-277/84-19-12, 50-278/84-10-12.

10. MC 81054 - Physical Barriers - Vital Areas

One apparent violation was identified.

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Failure to maintain a locked door to a vital area is an apparent violation.
50-277/84-19-06 and 50-278/84-10-06.

11. MC 81058 - Security System Power Supply

One apparent violation was identified.

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Failure to provide the required static uninterruptible AC power system is an apparent violation. 50-277/84-19-07, and 50-278/84-10-07.

12. MC 81066 - Assessment Aids

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13. MC 81070 - Access Control-Personnel

The licensee controlled access to the protected area in accordance with security plan requirements. Problems concerning access control to vital areas are identified in Paragraph 18 of this report. Search equipment was adequate and appropriate for the detection of firearms, explosives, and incendiary devices during searches of personnel entering the protected area.

14. MC 81072 - Access Control-Packages

The licensee controlled the entry of packages and material to the protected area in conformance with the physical security plan. The search equipment used was adequate and appropriate for the intended function.

15. MC 81074 - Access Control-Vehicles

The licensee controlled access of vehicles to the protected and vital areas in conformance with the security plan and regulatory requirements.

16. MC 81078 - Detection Aids-Protected Area

The perimeter intrusion alarm system detected penetration tests of the protected area as required by the security plan, except as identified in Paragraph 18 of this report.

17. MC 81080 - Detection Aids-Vital Areas

The intrusion detection alarm system detected penetration tests of vital areas as required by the security plan, except as identified in Paragraph 18 of this report.

18. MC 81084 - Alarm Stations

Two apparent violations were identified.

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Failure to respond to vital area alarms is an apparent violation.
50-277/84-19-09 and 50-278/84-10-09.

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19. MC 81088 - Communications

Two apparent violations were identified.

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Failure to maintain continuous communications between security personnel, the CAS, SAS and auxiliary SAS, and failure of the licensee to maintain spare radios is an apparent violation. 50-277/84-19-10 and 50-278/84-10-10.

A follow-up inspection was conducted July 11, 1984 to review the circumstances surrounding the evacuation of the central alarm station (CAS) at 5:45 a.m. on July 1, 1984. The inspector made the following additional observations:

a.

b.

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Failure to maintain a dedicated communication line with law enforcement authorities or to keep a communications link available until normal means of communication was restored is an apparent violation.
50-277/84-19-11 and 50-278/84-10-11.

ATTACHMENT 1
PARAGRAPH 81084
ALARM STATIONS

| LOCATION | TIME OF ALARM | ACKNOWLEDGE- MENT OF ALARM | TIME ALARM CLEARED | DETAILS | REMARK |
|----------|---------------|-------------------------------|-----------------------|---------|--------|
|----------|---------------|-------------------------------|-----------------------|---------|--------|

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ATTACHMENT 1
PARAGRAPH 8108h
ALARM STATIONS

Secondary Alarm Station Alarm History
Record for June 26, 1984 for Vital Area

| LOCATION | TIME OF ALARM | ACKNOWLEDGE- MENT OF ALARM | TIME ALARM CLEARED | DETAILS | REMARK |
|----------|---------------|-------------------------------|-----------------------|---------|--------|
|----------|---------------|-------------------------------|-----------------------|---------|--------|

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ATTACHMENT 2
 PARA N-8105B
 Security System Power Supply

200-T-A
 200-T-A

PARCEL NO 20123
 SECURITY SYSTEM POWER SUPPLY

- REMARKS: THE FOLLOWING
- A. SET TO LOAD CIRCUIT
 - B. OTHER BOND SYSTEM
 - C. OTHER BOND SYSTEM
 - D. DISTRIBUTED SYSTEM

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MRS - MANUAL BYPASS SWITCH

| FUNCTION | POSITION | STATUS | DATE | TIME | INITIALS |
|---------------|----------|--------|------|------|----------|
| MANUAL BYPASS | ON | | | | |
| MANUAL BYPASS | OFF | | | | |
| MANUAL BYPASS | ON | | | | |
| MANUAL BYPASS | OFF | | | | |

| FUNCTION | POSITION | STATUS | DATE | TIME | INITIALS |
|---------------|----------|--------|------|------|----------|
| MANUAL BYPASS | ON | | | | |
| MANUAL BYPASS | OFF | | | | |
| MANUAL BYPASS | ON | | | | |
| MANUAL BYPASS | OFF | | | | |

- 1) Switch is to be used only when necessary and is to be operated only when authorized personnel are present.
- 2) Switch is to be operated only when authorized personnel are present.
- 3) Switch is to be operated only when authorized personnel are present.

PARCEL NO 20150
 SECURITY SYSTEM POWER SUPPLY

- 4) Each bypass contact contains electrically to prevent any contact from being made at any time.

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ATTACHMENT 3

PARA - 9 - MC 810520

PHYSICIAN OPERIES

PROTECTED AREA

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⚠ - ROVING PATROL

⊕ - COMPENSATORY SECURITY POST

NOTE: POSTING PROCEDURE REQUIRES A GUARD
TO BE POSTED ON TOP OF C.W. PUMP
STRUCTURE FOR BETTER COVERAGE