

R. R. Keimig
Signature-Title-Office-Date
SAFEGUARDS 4-10-92

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/92-04

Docket No. 50-244

License No. DPR-18

Licensee: Rochester Gas and Electric Corporation
89 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Inspection At: Ontario, New York

Inspection Conducted: March 16 - 20, 1992

Inspector: *R. Della Ratta* 4-10-92
A. Della Ratta, Physical Security Inspector date

Approved by: *R. R. Keimig* 4-10-92
R. R. Keimig, Chief, Safeguards Section date
Division of Radiation Safety and Safeguards

Areas Inspected: Onsite Followup of Previously Identified Fitness-for-Duty (FFD) Items; Management Support and Security Program Plans; Protected Area Physical Barriers, Detection and Assessment Aids; Protected and Vital Area Access Control of Personnel, Packages and Vehicles; Alarm Stations and Communications; and Testing, Maintenance and Compensatory Measures.

Results: The physical security program was found to be effective and directed toward assuring public health and safety. Management support was evident through continuing program reviews and upgrades. The licensee was found to be in compliance with NRC requirements in the areas inspected. One unresolved FFD issue, one FFD violation and six open FFD items were closed.

DETAILS

1.0 Key Personnel Contacted

1.1 Licensee and Contractor Personnel

- J. Widay, Plant Manager - Ginna
- * R. Marchionda, Superintendent Support Service
- * T. Powell, Department Manager - Risk Management
- * W. Dillon, Director, Corporate Security
- * R. Wood, Supervisor, Nuclear Security
- * M. Fowler, Security Operations Coordinator
- * R. Teed, Security Training Coordinator
- * T. Porter, Security Systems Specialist
- * S. Eckert, Access Authorization Administration
- * S. Johnson, Security Instrument and Controls (I&C) Technician
- * K. Laubacher, Lead Engineer
- * M. Lilley, Manager, Nuclear Assurance
- * E. Palmer, Training Supervisor - Wackenhut Corporation
- * R. Benne, Site Security Supervisor - Wackenhut Corporation

1.2 U. S. Nuclear Regulatory Commission (NRC)

- * T. Moslak, Senior Resident Inspector

* indicates those present at the exit interview

The inspector also interviewed other licensee personnel and members of the contract security force during this inspection.

2.0 Followup of Previously Identified Fitness-for-Duty Items

2.1 (Closed) UNR 50-244/91-04-01

During the initial Fitness-for-Duty (FFD) inspection, 50-244/91-04, the inspector determined, through a review of the licensee's Selection and Notification for Testing procedures, that the licensee did not have a policy to deal with personnel with infrequent access to the station. The licensee agreed to develop such a policy and implementing procedures. During this inspection, the inspector determined through discussions with the FFD manager and a review of the Rochester Gas & Electric (RG&E) Infrequent Unescorted Site Access Policy, FFD-20, dated March 18, 1992, that the licensee had developed a policy and implementing procedures that dealt with personnel with infrequent access to the station. The inspector found this action to be adequate to resolve this matter. This item is closed.

2.2 (Closed) VIO 50-244/91-04-02

During the initial FFD inspection, 50-244/91-04, the inspector determined, through a review of the licensee's "Permanent Record Book" (PRB), that the PRB was not being maintained in accordance with the requirements of the NRC rule. During this inspection, the inspector determined, through discussions with the FFD manager and a review of the PRB, that all of the required data is now being entered into the PRB. The inspector found the action to be adequate to resolve this matter. This item is closed.

2.3 Open Items

The inspector reviewed the licensee's actions on open items noted during the initial FFD inspection, as documented in report No. 50-244/91-04. The inspector determined through discussions with the FFD manager, observations, and a review of documents that the licensee had:

- revised Page 2, item number 3.2.3 of the Collection Process and Chain of Custody procedure, FFD-9, to read "If the employee refuses to cooperate with the collection process or fails to appear for a scheduled test after one hour following notification of designated contact person, supervisor or individual, the Site Collection Officer shall document this action in the permanent record book. The Site Collection Officer shall immediately contact the RG&E department head, supervisor or contractor's site manager. If the RG&E supervisor cannot provide a logical answer, the Site Collection Officer must contact the Director of Employment or his alternate." The collection site staff are now aware of this requirement;
- developed and implemented a policy and procedure delineating the responsibilities of the Medical Review Officer (MRO) that are addressed in its Medical Review Officer Guidelines for Notification, FFD-16, dated March 1, 1991;
- revised Page 3, item number V of the Drug and Alcohol Abuse Policy, Revision 1, dated March 1, 1991 to include that employees must report to the RG&E Medical Office any over-the-counter medication they are using that would adversely affect his or her performance as determined by the prescribing physician. The revised section is now consistent with the NRC rule;
- revised Page 9, item G of the Drug and Alcohol Abuse Policy, Revision 1, dated March 1, 1991, to read "An employee may appeal a confirmed positive drug or alcohol test by making a written request for a

re-analysis of the original urine or blood sample within 60 days of receipt of the final test results from the MRO. The employee may specify re-analysis by the original laboratory or by another certified laboratory." The revised section is now consistent with the NRC rule;

- revised Page 10, item number 6 of the Drug and Alcohol Abuse Policy, Revision 1, dated March 1, 1991, to read "After successful completion of EAP (Employee Assistance Program) recommended actions, the employee will be subject to an unannounced testing program. In addition, all employees with an active Ginna Station badge will be reinstated to the random testing pool." The revised section is now consistent with the NRC rule; and
- revised its Collection Process and Chain of Custody procedure, FFD-9, Revision 1, dated June 1, 1991, to provide the Site Collection Officers with step-by-step instructions for carrying out the collection process to eliminate the potential for Site Collection Officers to deviate from acceptable practices.

The inspector's review of the licensee's corrective actions on these items during this inspection found the actions to be adequate. No deficiencies were noted.

3.0 Management Support and Security Program Plans

3.1 Management Support

Management support for the licensee's physical security program was determined to be aggressive by the inspector. The inspector noted the active involvement of corporate management in observations and reviews of the continuing progress being made on program upgrades and enhancements.

Since the last routine physical inspection, which was documented in NRC Inspection Report No. 50-244/91-22, the licensee continued to upgrade the security program as described below:

- purchased seven new weapons;
- purchased three new training systems that will provide the security officers (SO's) with realistic weapons training;
- purchased fourteen new portable radios;
- participation in a five day instructor development seminar by security training personnel;

- participation in a training seminar by the security I&C technician on the new intrusion detection system (IDS) that will be used in the security upgrade; and
- initiation of a Security Officer of the Month and a Security Supervisor of the Quarter awards programs, effective January 1992.

Based upon the inspector's review of the security program and the efforts being made to upgrade and enhance it, the inspector determined that management attention and support is strong.

3.2 Security Program Plans

The inspector verified that changes to the licensee's security program and plans, as implemented, did not decrease the effectiveness of the respective plans, and had been submitted in accordance with NRC requirements. No discrepancies were noted.

3.3 Audits

The inspector reviewed the licensee's annual QA Audit Report No. 91-29, dated October 29, 1991, and verified that the audit had been planned and carried out in accordance with the NRC-approved security plan (the Plan). The audit was very comprehensive in scope, and the results were reported to the appropriate level of management. No deficiencies were noted.

The licensee continued to supplement the NRC-required annual program audit by performing assessments of security activities. The inspector reviewed the assessments and determined that they were very thorough and objective. Appropriate corrective actions were noted to have been recommended and initiated, where applicable.

4.0 Protected Area Physical Barriers, Detection and Assessment Aids

4.1 Protected Area Barriers

The inspector conducted a physical inspection of the protected area (PA) barrier on March 18, 1992, and determined by observation that the barrier was installed and maintained as described in the Plan. No deficiencies were noted.

4.2 Protected Area Detection Aids

The inspector requested that the licensee conduct tests of the PA perimeter IDS on March 18, 1992. Numerous tests were conducted around the entire perimeter and the inspector determined that the detection system was installed, maintained and operated as committed to in the Plan. However, the inspector identified five areas that did not alarm as required during the inspector-requested testing.

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4.3 Isolation Zones

The inspector verified that the isolation zones were adequately maintained to permit observation of activities on both sides of the PA barrier. No deficiencies were noted.

4.4 Assessment Aids

Potential problems with assessment aids identified during inspections 90-21 and 91-06 were noted by the inspector to have been included in the assessment system upgrade. Based on the inspector's observations and discussions with licensee management, the assessment system upgrades are expected to be complete by October 1992. The work completed to date has been very effective in correcting prior weaknesses identified by the NRC. This matter will continue to be reviewed during subsequent inspections.

4.5 Protected Area and Isolation Zone Lighting

The inspector conducted a PA and isolation zone lighting survey on March 18, 1992, accompanied by the Security Operations Coordinator. The

5.0 Protected and Vital Area Access Control of Personnel, Packages and Vehicles

5.1 Personnel Access Control

The inspector determined that the licensee was exercising positive control over personnel access to the PA and vital areas (VAs). This determination was based on the following:

- 5.1.1 The inspector verified by observation that personnel were properly identified, and authorization was checked, prior to issuance of badges and key cards. No deficiencies were noted.
- 5.1.2 The inspector verified that the licensee took precautions to ensure that an unauthorized name could not be added to the access list by having a member of management review the list every 31 days. No deficiencies were noted.
- 5.1.3 The inspector verified that the licensee had a search program, as committed to in the Plan, for firearms, explosives, incendiary devices and other unauthorized materials. The inspector observed plant personnel and visitor access processing several times during the inspection and interviewed SO's and the licensee's security staff regarding personnel access procedures. No deficiencies were noted.
- 5.1.4 The inspector determined, by observation, that individuals in the PA displayed their access badges as required. No deficiencies were noted.
- 5.1.5 The inspector verified that the licensee had escort procedures for visitors to the PA and VA's. No deficiencies were noted.
- 5.1.6 The inspector verified that the licensee had a mechanism for expediting access to vital equipment during emergencies and that the mechanism was adequate for its purpose. No deficiencies were noted.

5.2 Package and Material Access Control

The inspector determined that the licensee was exercising positive control over packages and materials that are brought into the PA at the main access control portal. The inspector reviewed the package and material control procedures and found that they were consistent with commitments in the Plan. The inspector also observed package and material processing and interviewed SO's and the licensee's

security staff about package and material control procedures. No deficiencies were noted.

5.3 Vehicle Access Control

The inspector determined that the licensee properly controls access to and within the PA. The inspector verified that vehicles were properly processed prior to entering the PA. The process was consistent with commitments in the Plan. The inspector also reviewed the vehicle search procedures and determined they were consistent with commitments in the Plan. This determination was made by observing vehicle processing and search, inspection of vehicle logs, and by interviewing SO's and licensee's security staff about vehicle processing and search procedures. No deficiencies were noted.

6.0 Alarm Stations and Communications

The inspector observed the operations of the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS) and determined that they were maintained and operated as committed to in the Plan. CAS and SAS operators were interviewed by the inspector and found to be knowledgeable of their duties and responsibilities. The inspector verified that the CAS and SAS did not contain any operational activities that would interfere with assessment and response functions. No deficiencies were noted.

The inspector also verified that the CAS and SAS operators maintain continuous communication with on-duty security officers and were capable of requesting assistance from law enforcement agencies. No deficiencies were noted.

7.0 Testing, Maintenance and Compensatory Measures

The inspector reviewed testing and maintenance records and confirmed that the records committed to in the Plan were on file and readily available for licensee and NRC review. The station provides I&C technicians to repair/replace and test any security equipment that requires corrective maintenance. The inspector determined, through a review of work request records, that repairs were being completed in a timely manner and that security is receiving appropriate prioritization of work requests. No deficiencies were noted.

The inspector reviewed the licensee's use of compensatory measures and determined them to be as committed to in the plan. No deficiencies were noted.

8.0 Exit Interview

The inspector met with the licensee representatives indicated in Paragraph 1 at the conclusion of the inspection on March 20, 1992. At that time, the purpose and scope of the inspection were reviewed and the findings were presented.