U. S. NUCLEAR REGULATORY COMMISSION

REGION 111

Reports No. 50-315/92011(DRSS); 50-316/92011(DRSS)

Docket Nos. 50-315; 50-316

Licenses No. DPR-58; DPR-74

Licensee: Indiana Michigan Power Company

1 Riversile Plaza Columbus, OH 43216

Facility Name: Donald C. Cook Nuclear Power Station, Units 1 and 2

Inspection At: Donald C. Cook Plant Site, Bridgman, Michigan

Inspection Conducted: May 18 - 22, 1992

Inspector:

James R. Kniceley

Physical Security Inspector

6(2)92 Date

Approved By: James R. Creed, Chief for Safeguards Section

6/2/92 Date

Inspection Summary

Inspection or May 18 - 22, 1992 (Reports No. 50-315/92011(DRSS);

No. 50-316/92011(DRSS))
Areas Inspected: Routine, unannounced physical security inspection Involving Management Support; Protected and Vital Area Barriers; Access Control-Personnel, Packages, and Vehicles; Alarm Stations and Communications; Power Supply; Testing, Maintenance and Compensatory Measures; Training and Qualification; and a review of previous inspection findings. Results: The licensee was found to be in compliance with NRC requirements within the areas examined. We have concluded that the security program is well implemented. Licensee management attention to and involvement in the security program are excellent. Licensee resources are adequate and reasonably allocated. The Training and Qualification program met regulatory requirements. Security personnel observed were knowledgeable of their duties and responsibilities. Tested security equipment performed as required. The inspector also reviewed security requirements associated with the new fire protection pumping station which is being built within the protected area and determined that they have been adequately addressed. The licensee continues to progress adequately in their preparation for their Operational Safeguards Response Evaluation (OSRE) which has not yet been scheduled.

DETAILS

Key Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other licensee employees and members of the security organization. The asterisk (*) denotes those present at the Exit Interview conducted on May 22, 1992.

*E. Fitzpatrick, Vice President - Nuclear Operations *A. Blind, Plant Manager

*L. Matthius. Administrative Superintendent

*J. Bradshaw, Administrative Compliance Coordinator

*M. Horvath, Site Q.A. Superintendent *L. Gibson, Assistant Plant Manager

*M. Kennedy, O.A. Auditor

*D. Passehl, Resident Inspector, NRC Region III J. Isom, Senior Resident Inspector, NRC Region III

2. Entrance and Exit Interviews

- At the beginning of the inspection, Mr. J. Bradshaw, Security Administrative Compliance Coordinator and others of your staff were informed of the purpose of this visit and the functional areas to be examined.
- The inspector met with the licensae representatives denoted in Section 1 at the conclusion of the inspection on May 22, 1992. A general description of the scope of the inspection was provided. Briefly listed below are the findings discussed during the exit interview.
 - (1) The licensee was informed of and acknowledged the inspector's comments that no violations, deviations or unresolved items were identified during this inspection.
 - The inspector commented that the licensee's self assessment program and the Quality Assurance department's security audits and surveillances are important factors in their overall good performance and are considered program strengths.
 - The inspector commented that the security program continues to be well implemented.
 - The inspector commented that the contract security force members who were questioned and observed during this inspection were knowledgeable and proficient in performing their assigned duties.
 - (5) The inspector commented that the use of a remote control test device for crawl testing of the perimeter intrusion detection system would be acceptable and does give a more consistent and reliable test of the system.

- (6) The inspector commented that the licensee is adequately preparing for the Operational Safeguards Response Evaluation (OSRE).
- (7) The inspector commented that the security concerns associated with the installation of the new fire protection pumping station, which will be located inside the protected area, have adequately been addressed.
- (8) The Vice President Nuclear Operations informed the inspector that as of June 1, 1992, all Nuclear Division and Quality Assurance Company personnel will be required to participate in the company's Fitness-For-Duty program.

3. Program Areas Inspected

Listed below are the core inspection areas which were examined by the inspector within the scope of these inspection activities in which no violations, deviations, unresolved or open items were identified. These areas were reviewed and evaluated as deemed necessary by the inspector to meet the specified "Inspection Requirements" (Section 02) of NRC Inspection Manual Inspection Procedure 81700 as applicable to the security plan. Sampling reviews included interviews, observations, testing of equipment, documentation review and, at times, drills or exercises that provided independent verification of meeting security commitments. The depth and scope of activities were conducted as deemed appropriate and necessary for the program area and operational status of the security system.

Number Program Area and Inspection Requirements Reviewed 81700 Physical Security Program for Power Reactors

- a. Management Support: (02.01a) Degree of Management Support; (02.01b) Change to Security Plans Properly Reported and Do Not Reduce Security Effectiveness; (02.01c) Program and Corrective Action System for Annual Audits; Qualifications and Independence of Auditors.
- b. Protected and Vital Area Barriers: (02.02a) PA and VA
 Barriers Meet Commitments and Provided Required
 Penetration Resistance; (02.02b) Isolation Zones
 Adequately Maintained; (02.02d) As essment Aids Functional
 and Effective and Meet Commitments.
- c. Access Control-Personnel, Packages, and Vehicles:
 (02.03a) Positive Access Control to include: Proper
 Identification; Adequate Search Upon Entering PA; Badges
 Displayed; Visitors Escorted; Emergency Access to Vital
 Equipment; VA Access is Duty Related; (02.03b) Packages
 Searched and Properly Authorized; Controls for Containment
 Access; (02.03c) Vehicles Properly Authorized, Searched,
 and Controlled; Access to Vehicle Gates Controlled.

- d. Alarm Stations and Communications: (02.04a) Alarm Stations
 Adequately Equipped with Alarm, Surveillance, and
 Communications; Continuously Manned and Independent Functioning
 Capability; (02.04b) No CAS Interfering Operational Activities;
 (02.04c) Alarm Stations Have Continuous Communication
 Capability with Guards and LLEA.
- e. Power Supply: (02.05a) Secondary Power Source for Alarm and Communication System; (02.05b) Emergency Ingress and Egress During Loss of Power.
- f. Testing, Maintenance and Compensatory Measures:
 (02.06a) Adequate Installation, Testing and Maintenance of
 Security Equipment; (02.06b) Compensatory Measures Implemented
 and Effective.
- g. Training and Qualification: (02.07a) Officers Trained, Equipped, and Qualified; (02.07b) Officers Possess Adequate Knowledge and Ability to Perform Duties; (02.07d) Required Armed Response and Supervisors Available.
- 4. Physical Security Program for Power Reactors (IP 81700):

Some observations regarding the licensee's security program were identified and are discussed below:

a. The inspector reviewed the licensee's plans to build a new fire protection pumping station inside the protected area. A one story building will be built in the southwest corner of the protected area, 31 feet from the cruth fence line and 25 feet from the west fence line. Security personnel have been involved in the planning process to ensure that security requirements are maintained during this construction process. The inspector reviewed the proposed compensatory measures to ensure that trench work, excavation under the fence, craft workers infringing isolation zone boundaries, lighting, and other unforeseen security concerns are adequately addressed.

This dedicated fire protection system will be in a closed loop configuration. The system will be able to be filled from the lake, however, normal operation will not be f om lake water due to the continuing problem with Zebra mussels. Two 685,000 tanks (located outside the protected area) will deliver water via three pumps. This project is scheduled for completion by December 1992.

b. The licensee conducts protected area intrusion detection testing using both personnel and a remote control test device. The inspector encouraged the use of the remote control test device because the device provides a consistent test, is geared down to the appropriate test speed, and the consistent size made each test more reliable. The use of individuals to crawl through detection zones is adequate but the adequacy of each test was dependent upon the size of the individual, the speed and technique used. The test device would perform consistently even during inclement weather.

The licensee agreed to evaluate the inspector's comments and stated that they still were not totally satisfied with the performance results of their test device and will continue to use both personnel and the test device until they have complete confidence in the test device.

c. The licensee is continuing to improve their contingency response capabilities in preparation for the NRC Operational Safeguards Response Evaluation (OSRE). The OSRE will focus on the interaction between operations and security in establishing priorities for protection of equipment and on defensive strategies used to respond to an external threat.

The inspector determined through interviews with the security training department personnel that the focus of the OSRE is understood and that good progress is being made in preparation for OSRE. The inspector suggested that, if possible, they observe an OSRE being conducted at other facilities.

d. The inspector determined through interviews and observations with security and plant personnel that there is a high level of awareness towards security. This is attributed to the involvement and support of site management. Self assessment programs and a strong Quality Assurance staff continue to be program strengths and have been instrumental in the success of the program.