U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 50-352/84-38

Docket No. 50-352

License No. CPPR-106

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pennsylvania 19101

Facility Name: Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: July 23-24 and 26-27, 1984

Date of Last Physical Security Inspection: March 19-23, 1984

Type of Inspection: Preoperational Security Program Review

Inspector:

Roland J. Bailey, Physical Security

Approved by:

Richard R. Keimig, hief Bafeguards Section

Inspection Summary: Preoperational Security Program Review on July 23-24 and 26-27, 1984 (Report No. 50-352/84-38)

Areas Reviewed: Preoperational review of progress for implementing the security program: Security Plan and Implementing Procedures; Security Organization; Records and Reports; Physical Barriers (Protected Area); and Personnel Training and Qualification Plan. The security program review involved 32 inspector hours onsite by one NRC region-based inspector.

Results: Implementation of the licensee's security program is progressing as scheduled.

1. Persons Contacted

- C. R. Endriss, Regulatory Engineer
- J. A. Basilio, Administrative Engineer
- P. Supplee, Administrative Assistant
- J. Wiggins, NRC Senior Resident Inspector

All were present at the exit interview.

The inspector also interviewed other licensee personnel and members of the Yoh Construction and Site Security Guard Force.

2. 30703 - Exit Interview

The inspector met with the licensee representatives (listed in paragraph 1) at the conclusion of the review on July 27, 1984. At that time, the purpose, scope and the progress of construction on security related equipment was discussed. At no time during this inspection was written material provided to the licensee by the inspector.

3. 81018 - Security Plan and Implementing Procedures

The inspector conducted a random review of the proposed written security procedures. The licensee was advised to ensure that all tasks outlined in the Security Plan and all other existing plans are reflected in the procedures with special emphasis on security computer failure.

4. 81022 - Security Organization

The current security organization is organized as follows:

THIS PATAGRAPH CONTAINS SAFEGUARDS INFORMATION CHO IS NOT FOR PUBLIC DISCLOSURE, IT IS INTENTIONALLY LEFT BLANK.

The licensee advises that all personnel have been trained and qualified in accordance with the Training and Qualification Plan. See paragraph 7 for additional details. Inspector Follow-up 84-13-04 remains open.

5. 81038 - Records and Reports

The licensee stated that they will ensure that a separate log is maintained to record security events that are reported to NRC in accordance with 10 CFR 73.21. Inspector Follow-up 84-38-01.

6. 81052 - Physical Barriers (Protected Area)

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7. 81501 - Personnel Training and Qualification

The inspector conducted a random review of the training and qualification records and the following observations were made:

- a. The Site Security Supervisor needs to document his review of each individuals training file. A review of the file is required by paragraph 4.1 of the Training and Qualification Plan.
- b. The Certifying Official needs access to or written verification that an individual has completed all phases of the qualification process before attesting that a security officer is qualified to perform duties onsite.
- c. Weapons requalification requires a written examination as well as demonstration of proficiency on the firing range.

d. A written procedure should be developed to incorporate the steps required for certification, test standards, appointment of authenticating officials, types of documentation needed for a complete file, etc. Inspector Follow-up 84-38-03.