

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 50-352/85-12

Docket No. 50-352

License No. NPF-27

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

Facility Name: Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: February 4-8, 1985

Date of Last Physical Security Inspection: November 19-26, 1984

Inspector: *R. R. Keimig for* 3-4-85  
Roland J. Bailey date  
Physical Security Inspector

Approved by: *R. R. Keimig* 3-4-85  
R. R. Keimig, Chief, Safeguards date  
Section, Division of Radiation  
Safety and Safeguards

Inspection Summary:

Routine, unannounced physical protection inspection on February 4-8 and 13, 1985  
(Report No. 50-352/85-12)

Areas Inspected: Security Plan and Implementing Procedures; Management Effectiveness; Security Program Audit; Locks, Keys, and Combinations; Records and Reports; Physical Barriers (Protected Area); Compensatory Measures; Access Control (Personnel, Packages, and Vehicles); Personnel Training and Qualification; Security Contingency Plan; follow-up on previously identified violations and the licensee's response to a Confirmatory Action Letter (CAL No. 84-24). The inspection involved 46 hours by one region-based inspector.

Results: Five apparent violations were identified in the following areas: Locks, Keys, and Combinations, Records and Reports, Compensatory Measures, and Personnel Training and Qualification.

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## DETAILS

### 1. Key Persons Contacted

**V. S. Boyer	Senior Vice President, Nuclear
**M. J. Cooney	Manager, Nuclear Production
***R. J. Deneen	Director of Security
***R. J. Weindorfer	Assistant Director of Security
*G. M. Leitch	Plant Superintendent
**J. Franz	Assistant Plant Superintendent
**J. A. Basilio	Administrative Engineer
*D. Clohecy	Quality Assurance Engineer
*C. R. Endriss	Regulatory Engineer
*B. J. Kirkpatrick	Quality Assurance Auditor
*N. R. Carter	Security Staff Member
**L. P. Arvin	President, Yoh Security, Inc.
**W. V. Allen	Vice-President, Yoh Security, Inc.
**P. E. Therriault	Program Manager, Yoh Security, Inc.
**T. T. Martin	Director, Division of Radiation Safety and Safeguards, NRC
**J. H. Joyner	Chief, Nuclear Materials Safety and Safeguards Branch, NRC
**R. R. Keimig	Chief, Safeguards Section, NRC
**R. M. Gallo	Chief, Project Section 2A, NRC
***J. T. Wiggins	Senior Resident Inspector, NRC

\* Individuals present at exit interview on February 8, 1985.

\*\* Individuals present at exit interview on February 13, 1985.

\*\*\* Individuals present at both exit interviews.

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

### 2. MC 30703 - Exit Interview

The inspector conducted a preliminary exit interview with licensee representatives at the conclusion of the inspection on February 8, 1985. Because of the number and nature of the inspection findings, a second exit interview was conducted at the Region I office, King of Prussia, PA which was attended by Philadelphia Electric Company (PECO), YOH Security, Inc., and NRC Region I supervisory and management personnel on February 13, 1985. On both occasions, the purpose, scope and findings of the inspection were discussed. At the February 13 meeting, licensee representatives commented on the results of their preliminary inquiries into the findings and their proposals for corrective actions.

3. MC 92701 - Follow-up on Inspector Identified Problems

(Closed) Inspector Follow-up (50-352/84-69-03): Licensee was required to disable an auxiliary gate control switch to the main vehicle gate that was not under the control of the Central Alarm Station. Licensee took immediate action to neutralize this auxiliary switch and surveyed other security related components and hardware which could allow uncontrolled access to protected and vital areas. The licensee representatives stated that no other control devices were found that would allow uncontrolled access to protected or vital areas.

(Closed) Inspector Follow-up (50-352/84-69-04): The design of the main guard house search area resulted in the potential for compromise of the search process. The licensee's representatives took immediate interim measures to isolate uncleared personnel from cleared personnel by erecting a rope barrier. A permanent floor to ceiling divider was installed by December 15, 1984. The search area is now physically separated from the visitor lobby of the Main Guard House.

4. MC 92702 - Follow-up on Violations

(Closed) Violation (50-352/84-64-02): A security supervisor reassigned an officer serving as a compensatory security measure for a vital area door while the door lock was being repaired, thinking the door alarm was no longer in the "access" mode (not in an alarm state). The licensee's representative stated that security shift supervision was reminded of the potentially serious consequence of not maintaining adequate security and counseled them as to (a) the requirement to read the list at the start of the shift that contains those areas which are being compensated for because of inoperative equipment and (b) the obligation to keep abreast of changes as they occur so that they are aware of any impact on compensatory posting requirements. In addition, the Plant Superintendent issued a letter on November 8, 1984, to all plant personnel advising them on the correct manner of using and working on security doors. The contents of the Plant Superintendent's letter will be included in the Site General Education Training Program.

5. MC 92703 - Follow-up In Response To Confirmatory Action Letter  
(CAL No. 84-24)

Because of the finding that a member of the security force had falsified his employment history record, NRC Region I issued CAL No. 84-24 on November 9, 1984, to confirm the corrective actions committed to by the licensee. These were to:

1. Conduct a review of information obtained during background investigations (BIs) on all presently employed security force personnel, within five working days.
2. Initiate prompt action to resolve any discrepancy between information provided by a member of the security force and information obtained during the BI.

3. Initiate prompt action to verify any instance where the previous employment of a security force member was not definitely confirmed during the BI.
4. Establish and implement measures to improve the effectiveness of BIs for security force personnel.
5. Inform this office of the results of these actions, in writing, within 10 days of completion.

In response to the CAL, the licensee replied on November 26, 1984, with the following information:

On November 9, 1984, there were 162 members of the contract security organization (Yoh Security, Inc.). Philadelphia Electric Company (PECO) auditors reviewed the BI records of all Yoh security officers and identified 23 individuals who had listed previous employment, varying from one to several years, which had not been confirmed. Subsequently, all 23 records were confirmed.

Before this review, the contractor was required to review the results of each background investigation and certify to PECO that the individual was eligible for unescorted access. Since this review, PECO, in conjunction with the security contractor, has initiated an audit of each background investigation and is making a determination on whether the scope of the investigation or information submitted as employment history is sufficient. The licensee has applied an additional restriction on the contractor that does not permit an individual to be a member of the operational security force until unresolved discrepancies or employment gaps are satisfactorily addressed.

6. MC 81018 - Security Plan and Implementing Procedures

The inspector noted that those changes discussed in paragraph 5 will require revisions to the security procedures and the Physical Security Plan. The licensee is in the process of making these revisions. (Inspector Follow-up Item 85-12-01.)

7. MC 81020 - Management Effectiveness

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8. MC 81022 - Security Organization

The inspector noted that the Assistant Security Coordinator position has been vacant for more than three months. The inspector identified this as a contributing factor to the poor performance of the security force observed during this inspection.

9. MC 81034 - Security Program Audit

The licensee presented the inspector several independent security program audits that provided an assessment of the security program. Additionally, the inspector reviewed a comprehensive "punch list" that identified hardware and software inadequacies and deficiencies with security equipment.

The inspector observed several comprehensive audits of selected facets of the security program. The inspector discussed with the licensee the conduct of a full security program evaluation prior to the startup phase of the plant to ensure adequate performance. (Inspector Follow-up Item 85-12-03.)

10. MC 81038 - Records and Reports

10 CFR 73.71(c), "Reporting of Physical Security Events, states, in part, "Each licensee under either a specific or general license shall notify the NRC Operations Center via the Emergency Notification System as soon as possible, and in all cases within one hour, of any event which significantly threatens or lessens the effectiveness of a physical security system as established by regulations in this chapter, or by the licensee's approved physical security, contingency, and security personnel qualification and training plans or by both". The licensee's security plan commits to follow this requirement.

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That omission has not yet been corrected and could have contributed to this failure to report. Failure to generate and forward information on an event reportable by NRC regulations is an apparent violation. (50-352/85-12-06)

11. MC 81046 - Locks, Keys and Combinations

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12. MC 81052 - Physical Barrier - Protected Area

The licensee maintained the physical barriers surrounding the protected area in accordance with the security plan.

13. MC 81064 - Compensatory Measures

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14. MC 81070 - Access Control - Personnel

The licensee controlled personnel access to the protected area in accordance with security plan requirements. Search equipment was adequate and appropriate for the detection of firearms, explosives, and incendiary devices during searches of personnel entering the protected area.

15. 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.



16. MC 81074 - Access Control - Vehicles

The licensee properly controlled access of vehicles entering the protected area in conformance with the physical security plan.

17. MC 81501 - Personnel Training and Qualification - General Requirements (T&Q)

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18. MC 81601 - Security Contingency Plan

The licensee's Security Contingency Plan (SCP) was adequate and appropriate to meet the general performance requirements and objectives.