

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/84-51

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: September 9-14, 1984

Date of Last Physical Security Inspection: July 23-27, 1984

Type of Inspection: Preoperational Security Program Review

Inspector:

Roland J. Bailey
Roland J. Bailey
Physical Security Inspector

11-7-84
date

Approved by:

R. R. Keimig
R. R. Keimig, Chief
Safeguards Section

11/8/84
date

Inspection Summary: Preoperational Security Program Review on September 9-14, 1984
(Report No. 50-352/84-51)

Areas Reviewed: Preoperational inspection to evaluate progress toward security systems completion including: Security Program Audit; Locks, Keys and Combinations; Physical Barriers, (Vital Areas); Lighting; Assessment Aids; Access Control (Personnel), (Packages), and (Vehicles); Communications; Training and Qualification, Security Contingency Plan; and follow-up on allegations concerning the contract guard force. The security program review involved 35 inspection hours on site by one NRC region-based inspector, including 6 inspection hours during non-regular hours.

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

8412110059 841119
PDR ADDCK 05000352
Q PDR

DETAILS

1. Persons Contacted

V. S. Boyer, Senior Vice President, Nuclear Power
G. M. Leitch, Plant Superintendent
C. R. Endress, Regulatory Engineer
J. C. Spinelle, Engineer, Electric Production
C. B. Harmon, Quality Assurance
F. Prawlocki, Quality Assurance
J. L. Phillabaum, Engineer
R. J. Deneen, Director of Security
R. J. Weindorfer, Assistant Director of Security
J. A. Basilio, Administrative Engineer
P. Supplee, Assistant Administrative Engineer (Security)
G. O. Williams, Project Manager, Yoh Security
P. E. Therriault, Site Security Captain, Yoh Security
M. D. Berner, Yoh Security, Access Control Branch
J. T. Wiggins, NRC Senior Resident Inspector
R. W. Borchardt, NRC Reactor Inspector

All were present at the exit interview.

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

2. 30703 - Exit Interview

The inspector met with licensee representatives (listed in paragraph 1) at the conclusion of the review on September 14, 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. In addition to the above, the licensee was advised to notify Region I when they felt the security program was complete and ready for final evaluation. The licensee stated that as soon as they accept and test the security system, evaluate the training program, and determine the reliability of all equipment, they will notify Region I for final NRC program review.

3. 81034 - Security Program Audit

At the time of the previous inspection, the licensee had not revised the physical security plan to reflect that the security program would be reviewed at least every 12 months by individuals independent of both security management and supervision. The security plan now reflects this requirement. Inspector Follow-up Item 50-352/83-14-05 is closed.

4. 81046 - Locks, Keys, and Combinations

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

5. 81054 - Physical Barriers (Vital Areas)

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

6. 81062 - Lighting

During the previous inspection, the lighting system had not been completed. A tour of the protected area and its' environs during the hours of 7:00 p.m. - 10:30 p.m. on September 12, 1984 revealed that the protected area is illuminated as required by the Security Plan. Inspector Follow-up Item 83-14-13 is closed.

7. 81066 - Assessment Aids

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

8. 81070 - Access Control (Personnel)

The licensee had not developed the access control and badging system at the time of the last inspection. During this inspection it was observed that:

- a. Contractors proposing to do business with the licensee were advised to challenge their background screening procedures and ensure information submitted to the licensee is valid. The licensee also instituted a quality assurance surveillance procedure that will randomly audit contractor access control procedures on a monthly basis. Inspector Follow-up item 50-352/83-14-15 is closed.

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

9. 81072 - Access Control (Packages)

The licensee had not developed the procedures for package control into the protected area via the warehouse or other authorized entry control points. The licensee has implemented security procedures 13 & 23 which provide details for package control into the protected area. X-ray machines are available at each location to aid security force members in their search of personnel and/or packages into the protected area. Follow-up Item 83-14-17 is closed.

10. 81074 - Access Control (Vehicles)

The licensee had not developed procedures for vehicle control into the protected area. Security Procedure 19 provides details for vehicle access to the protected area. Inspector Follow-up Item 50-352/83-14-18 is closed.

11. 81088 - Communications

**THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE, IT IS INTENTIONALLY
LEFT BLANK.**

12. 81501/2 - Training and Qualification Plan

- a. A representative of Philadelphia Electric Company attended a portion of the initial firearms qualification of the guard force. In addition, during this inspection, an independent Quality Assurance audit of training records was in progress. The licensee advised that upon completion of the audit, the Site Security Supervisor will attest that all security organization personnel are certified to perform

duties in accordance with the Physical Security Plan and Training and Qualification Plan. Inspector Follow-up Item 50-352/83-14-24 is closed.

- b. Security Procedure 39 has been written to incorporate the steps required to administer the Training and Qualification Plan. Inspector Follow-up Item 50-352/84-38-03 remains open pending completion of other issues identified by the inspector that are being controlled by this inspection number.

13. 81601 - Security Contingency Plan

Security Procedure 35 and SE-11 now outline the duties and responsibilities of operating, maintenance and security personnel relative to their response to unusual security related events. Inspector Follow-up Item 50-352/83-14-27 is closed.

14. 92706 - Independent Inspection Effort

During the course of this inspection, the inspector conducted a followup on information reported to the NRC Resident Inspector on August 10, 1984 by the Limerick Plant Superintendent, Philadelphia Electric Company (PECO), relating to the finding by PECO of overtime irregularities. In pursuing the irregularities, PECO became aware of possible falsification of training records for security personnel. The licensee stated that there was no official investigation conducted by PECO, however, the security contractor (Yoh Security Service) had followed up.

The inspector questioned the senior representative of Yoh Security Service about the falsified guard training records. The Yoh Security representative provided the following results of Yoh's investigation:

- (1) Several guards were found to have been certified as being qualified on the basis that the Yoh Training Officer, Training Sergeant and Captain of the Guard Force felt the individuals had received sufficient "on-the-job" training and, therefore, did not have to take a test. Their training records were made to appear that a test was taken and a grade was recorded.
- (2) Five individuals had received tests with answer sheets.
- (3) Four individuals, who were considered trained guards, flunked several tests. The Training Sergeant altered their scores without their knowledge so that they received passing grades.
- (4) One individual had received all required training and tested via on-the-job training, but should have had classroom instruction as described in the Training and Qualification Plan.

The Yoh Security representatives stated that after their inquiry, the following corrective actions were taken:

- (1) Nine personnel were identified as being involved in the training irregularities and were allowed to resign. One individual refused resignation so he was terminated from employment.
- (2) Yoh Security brought a training expert in from an engineering firm (SECOR) who specializes in instructional materials.
- (3) Two associate professors from Westchester State College were hired who specialize in Industrial Security.
- (4) The training expert and associate professors developed a three-hour review and one-hour test covering the requirements outlined in the Training and Qualification Plan.
- (5) The associate professors taught the specialized training classes which were monitored by Yoh Security and PECO.
- (6) Five guards previously identified as failing the training modules were trained and retested and requalified.
- (7) A total of 77 people were retrained by the special training staff and requalified.
- (8) As of this preoperational security program review, two guards of the original guard force still require additional training and requalification.
- (9) A new training staff was hired which is composed of one training lieutenant and two sergeants.
- (10) An open door policy was created so that the Yoh Area Security representatives can be contacted and be able to followup on allegations or employee grievances.

The PECO Corporate Security Director stated that a PECO Quality Assurance audit was in progress to determine full compliance before the Site Security Supervisor makes written certification that all security organization personnel have been properly trained in accordance with the approved Training and Qualification Plan.