



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION I
 831 PARK AVENUE
 KING OF PRUSSIA, PENNSYLVANIA 19406

ALL RELATED CORRESPONDENCE
 SHOULD BE REFERRED TO THIS OFFICE

04 SEP 1984

Docket No. 50-352 *OL*

Philadelphia Electric Company
 ATTN: Mr. John S. Kemper
 Vice President
 Engineering and Research
 2301 Market Street
 Philadelphia, PA 19101

update

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 USNRC

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 09/10/84

Gentlemen:

Subject: Inspection No. 50-352/84-38

This refers to the Preoperational Security Program Review inspection conducted by Mr. R. J. Bailey of this office on July 23-24 and 26-27, 1984 at the Limerick Generating Station, Limerick, Pennsylvania of activities authorized by NRC License No. CPPR-106 and to the discussions of our findings held by Mr. Bailey with members of your staff at the conclusion of the inspection.

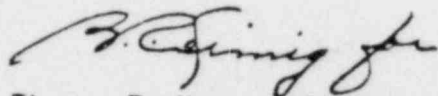
Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations were observed.

A section of the enclosed inspection report contains details of your security program that has been determined to be exempt from public disclosure in accordance with either 10 CFR 73.21 (Safeguards Information) or 10 CFR 9.5(a)(4) (Commercial or Financial Information). Therefore, the section so identified in the inspection report will not be placed in the NRC Public Document Room and will receive limited distribution. The inspection report cover sheet and any remaining portions of the inspection report will be placed in the Public Document Room, in accordance with 10 CFR 2.790(a), unless you notify, by telephone, the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223, within 10 days of the date of this letter and submit written application to withhold information contained in the report within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

No reply to this letter is required. Your cooperation with us in this matter is appreciated.

Sincerely,



Thomas T. Martin, Director
Division of Engineering and
Technical Programs

Enclosure:

NRC Region I Inspection Report No. 50-352/84-38 (Paragraphs 4 and 6 Contain Safeguards Information)

cc (w/o Paragraphs 4 and 6)

V. S. Boyer, Senior Vice President, Nuclear Power

Troy B. Conner, Jr., Esquire

Eugene J. Bradley, Esquire, Assistant General Counsel

Limerick Hearing Service List

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

NRC Resident Inspector (w/encls)

Commonwealth of Pennsylvania

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: *R. J. Bailey*
Roland J. Bailey, Physical Security
Inspector

8/30/84
date

Approved by: *R. R. Keimig*
Richard R. Keimig, Chief
Safeguards Section

8/30/84
date

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.

DETAILS

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 PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND 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.