



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAY 31 1985

MEMORANDUM FOR: Thomas E. Murley  
Regional Administrator  
Region I

FROM: Robert F. Burnett, Director  
Division of Safeguards, NMSS

SUBJECT: REGULATORY EFFECTIVENESS REVIEW PROGRAM

A Regulatory Effectiveness Review (RER) for Vermont Yankee 1 has been scheduled for July 15 through July 19, 1985. Enclosed is a draft letter to Vermont Yankee Nuclear Power Company which explains the purpose and schedule of the review. Your assistance in forwarding this letter is appreciated.

In addition, the RER team reviews the possible impact of security on plant safety. In view of this responsibility, our team needs the full time support of an individual from your regional office with technical power reactor safety expertise, who will be a member of the RER team. The enclosed "Guidelines for the Safety/Safeguards Interface Member of a Regulatory Effectiveness Review" provides information on the duties of this individual. Your support in this regard is important to this aspect of the program.

A list of logistical matters is also enclosed, which we would appreciate your help in resolving.

Many thanks for your cooperation and assistance.

Robert F. Burnett, Director  
Division of Safeguards, NMSS

Enclosures: As stated

cc: D. Eisenhut, NRR  
J. Partlow, IE  
C. Thomas, NRR  
V. Rooney, Project Manager

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PDR ADOCK 05000271  
Q PDR

Dear

The NRC is in the process of conducting safeguards Regulatory Effectiveness Reviews at nuclear power reactors. I wish to inform you that the Vermont Yankee facility has been chosen for such a review scheduled for the week of July 15 through 19, 1985.

The prime purpose of the review program is to evaluate the overall effectiveness of the Vermont Yankee safeguards program and to determine whether existing safeguards regulations yield the level of protection intended by NRC. The team performing the review supports NRC's quality assurance program for safeguards, both as it applies to the Vermont Yankee security system and to NRC's regulations. The review will complement, but be independent of, the licensing and inspection functions.

The review at Vermont Yankee will be conducted by a team with representatives from the Division of Safeguards, Region I, and U.S. Army Special Forces personnel from Fort Bragg, NC. The review team will be comprised of two groups. One group will look at the facility's safeguards from the perspective of an insider, while the other will view safeguards from an external adversary's perspective.

The review will initiate with an entrance briefing. You may wish to have a representative of your corporate staff present during this briefing, as it will provide an overview of the team's objectives and anticipated activities for the duration of the visit. Any questions that may arise concerning the team's review technique or other matters, will be addressed at that time. For

the remainder of the first day, the team would like to have a plant orientation tour with emphasis on safeguards areas and systems, and begin the examination of plant vital areas. During the remainder of the on-site assessment, the team will continue reviewing vital areas and components, and the entire safeguards program. The last day is reserved for any activities the team has been unable to accomplish and for a briefing of plant and corporate personnel on the preliminary results of the review.

Please provide appropriate plant personnel support for both groups of the team during the scheduled review. The external group will require an escort from the security department who can communicate with alarm stations. The internal group will need escorts from both security and plant operations. The latter should be individuals familiar with the locations and detailed operation of the engineered safety feature systems and components at each Unit. The team will make every effort to schedule its activities so as to minimize disruption of normal plant operations. The time that various team members will spend on-site will vary, but generally will range from four to seven hours per day.

Listed below are the names of the participants, badge number and level of clearance.

<u>Name</u>	<u>Organization</u>	<u>Social Security #</u>	<u>Badge #</u>	<u>Clearance</u>
Barry T. Mendelsohn	NRC/HQ			
Nicholas A. Paradiso	NRC/HQ			
John E. Johnson	US Army			
Richard L. Maywald	US Army			
Jack D. Pope	US Army			

<u>Name</u>	<u>Organization</u>	<u>Social Security #</u>	<u>Badge #</u>	<u>Clearance</u>
Zan-Shing Ray Hsu	NRC/HQ			
Kathleen A. McConnell	NRC/HQ			

If you have any questions regarding the conduct of these regulatory effectiveness reviews, which you wish to have answered prior to the team's visit, please contact Elizabeth Ten Eyck, Safeguards Special Projects Branch, at (301) 427-4723 or of the Region staff.

Sincerely,

cc: R. F. Burnett, NMSS  
C. O. Thomas, NRR

Guidelines for a Safety/Safeguards Interface Member  
of a Regulatory Effectiveness Review

One of the purposes of the RER program is to ensure that plant security and safety assets cooperate, to maximum extent practicable, in achieving the dual goals of prevention of radiological sabotage and safe operation of the plant. This is done by investigating the interaction between operational safety and security. You will do this initially through occasional discussions during the facility tour with plant personnel, asking similar questions of several operational and security personnel to get a variety of perspectives. This should be supplemented with a review of these issues in an office setting before leaving the site. Concerns identified will be discussed with the team at synthesis meetings usually held at the end of each day, discussed with plant management at the exit briefing, and incorporated into the formal RER report.

Issues you should address include:

1. The manner in which security procedures and safety procedures provide an integrated response to indications of unusual plant conditions.
  - control room procedures for responding to malfunctions or alarms
  - allowable times for correcting malfunctions
  - operational personnel consideration of security assets to assist in investigating the cause of an unusual condition
  - use of access control computer and security officers for personnel accountability
  - use of security officers for fire brigade

2. Identification of any security procedures that may interfere with plant safety during routine or emergency conditions and the extent of that interface.
  - operator actions when normal access to vital areas is prevented
  - procedures for access to key cards for vital areas
  - procedures for access to keys for administrative locks
  - security procedures normally implemented when access computer is not operational.
  - anti-passback features and capability for over-ride in emergencies
  - time delays caused by security access controls for on-site and off-site response of licensee personnel
  - procedures so that off-site emergency response (non-licensee) personnel are not delayed -- badging, escorts
  - familiarization of licensee personnel relative to site manager's ultimate authority in emergency situations
  - procedures to accommodate expanded work force during outages
  
3. General interaction of security and operational personnel
  - rapport and appreciation of the needs for safety and security procedures
  - program for review of safeguards procedures by operational departments affected and/or by safety committee
  - security participation in review of operational procedures and system changes
  - attitudes of site personnel towards level of security at site
  - attitudes of site personnel regarding removing access controls from vital equipment

- attitudes of site personnel regarding wider availability of key cards for operational staff for access to vital areas
- attitudes towards benefits of screening programs in general and in particular in lieu of access controls
- attitudes towards fitness for duty programs - benefits, objections

4. Equipment Concerns

- adverse impact of security equipment on safety (e.g., EMI from security radios effecting safety systems)
- adverse impact of plant equipment on security systems (e.g., EMI from pump start-up tripping the security access computer)
- any safety problems caused by patrols of armed security officers in vital areas
- would radiological habitability requirements for Central Alarm Station permit smoother handling of safety-related emergency situations?
- means for unimpeded egress from vital areas even during security systems failures
- positive/negative safety aspects of hardened chains and padlocks for protection of Engineered Safety Feature valves and motor controls

Regulatory Effectiveness Review Administrative Concerns

1. Dispatch letter to licensees confirming visit and identifying team members.
2. Arrange for bringing cameras on-site.
3. Inform licensees that aerial photographs will be taken.
4. Inform licensees that the external group will want to make an appointment to meet with a senior representative of the primary local law enforcement authority at their office.
5. Confirm that licensees will provide at least two security escorts, one for the internal group and one for the external group.
6. Confirm that the licensees will provide an additional internal group escort who is familiar with the location and detailed operation of each unit's engineered safety feature systems and components.
7. Inform the licensees that the team will be on-site one evening during the second shift, probably Wednesday, and will need a knowledgeable security escort.
8. Determine what, if any, health physics documents, training, whole body counts, etc. will be needed for escorted access to these equipment areas.
9. Determine for which equipment, if any, respirator protection would be required for access.
10. After consultation with the RER team leader, schedule any health physics appointments with the licensees that might be necessary.
11. Determine what personnel information the licensees will need to facilitate access control requirements for team members.
12. Ask the licensees to select a time and place for a single entrance briefing in the early morning of the first day on-site (8:30 AM - 9:30 AM). The location should be suitable for showing a slide-sound presentation (the RER team will provide the projector).