

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/85-33

Docket No. 50-352

License No. NPF-27

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

Facility Name: Limerick Generating Station Unit 1

Inspection At: Limerick, Pennsylvania

Inspection Conducted: August 7, 1985

Inspectors:

DJ Vito
D. J. Vito
Senior Emergency Preparedness Specialist

10/7/85
date

C. G. Amato
C. G. Amato
Emergency Preparedness Specialist

10/7/85
date

Approved by:

T. L. Harpster for
T. L. Harpster, Chief
Emergency Preparedness Section

10/7/85
date

Inspection Summary: Inspection on August 8, 1985
(Inspection Report No. 50-352/85-33)

Areas Inspected: Special, announced inspection of the Emergency Preparedness training program for the security force at the Limerick site. The inspection involved 18 inspector hours onsite by two region based inspectors.

Results: No violations were identified.

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DETAILS

1. Persons Contacted

Philadelphia Electric Company

- *J. Basilio, Administrative Engineer
- *K. Behr, Emergency Preparedness Instructor
- *R. Kankus, Director - Emergency Preparedness
- *G. Louderback, QA Engineer
- *J. Rubert, Electric Production QA Site Supervisor
- *K. Schlecker, Site Emergency Preparedness Coordinator
- *P. Supplee, Administrative Assistant - Security
- *M. Uhland, Emergency Preparedness Instructor (Stone and Webster)
- *V. Warren, Test Engineer - Regulatory

YOH Security

- G. Jackson, YOH Training Department
- R. Nagle, YOH Training - EP Training and Coordination

*Denotes those who attended the exit meeting on August 7, 1985

The inspectors also interviewed several members of the YOH security guard force with regard to EP training and knowledge of duties in an emergency situation.

2.0 Emergency Preparedness (EP) Training of the Limerick Security Guard Force

2.1 Scope of Review

The inspectors conducted a review of the Emergency Preparedness training program for all ranks and types of security officers assigned to Limerick Unit 1. The inspection included a review of the administration and organization of the program, lesson plans, examinations, course handouts, qualification tracking procedures and records, trainer qualification, QA review, and interviews with both PECO and YOH personnel related to the EP training area. The inspectors also interviewed six armed security guards, on an individual basis, to determine their opinions of the EP training program and their knowledge of duties in an emergency situation.

2.2 Program Administration and Organization

Station security for Limerick Unit 1 is provided by YOH, Inc. YOH also provides security control for the Limerick Unit 2 construction area. Security officers assigned to Unit 1 are trained and qualified to a higher degree than those assigned to the construction site.

Each group is commanded by a Captain who reports to a PECO Administrative Assistant for Security. The Administrative Assistant for Security reports to a Nuclear Security Specialist who in turn reports to the PECO Administrative Engineer. An inspector review of correspondence indicated that the existing organizational structure has provided a clearly defined path of communication between PECO and YOH.

The Administrative Assistant for Security oversees YOH activities onsite with his staff of Security Coordinators. This group checks all tests, test results, and training against the YOH training matrix. In addition, security force activities are also subject to review by a five person PECO Site Performance Analysis Group and to a yearly overview by the YOH internal QA department. At present, PECO corporate QA performs periodic audits of the program while PECO site QC is reviewing each guard training record before approval of past assignment. While this 100% training record review is still ongoing, it has not been indefinitely committed to by the licensee.

The full training program for a new security guard/watchperson at Limerick Unit 1 includes, General Employee Training (GET), General Radworker Training (GRT), Security Training and Qualification (T&Q), and Emergency Preparedness Training. This program is adequately addressed in both the Limerick Emergency Plan and in the Emergency Plan Implementation Procedures. Each new security employee must be trained in the full training program before being assigned a post.

2.3 Course Information and Documentation

The inspectors reviewed the lesson plans, course handouts, and examinations related to the security force Emergency Preparedness training program. The lesson plans are of good quality and based on drill performance. The results of interviews with selected security force members indicate that the lesson plans are effective. Course handout material is well presented and relevant. The examinations are good in content and stress what security personnel should do in an emergency situation. Steps have been taken to limit the possibility of cheating (use of different tests, physical separation of trainees, same day testing). The lesson plans, exams, and handouts are prepared, reviewed, and approved, in part, by the PECO Corporate Emergency Preparedness group. Thereafter, with the exception of PECO QA/QC review, security force training is totally a YOH responsibility.

2.4 Trainer Qualification

Security Force Emergency Preparedness training is provided by a single YOH instructor. A backup instructor is being developed. The

current instructor is degreed, articulate and generally knowledgeable of effective training techniques. Although there is no formal policy requiring auditing of a training session, this is done on an occasional basis by the instructor's supervisor.

The inspector concluded that the security force EP training instructor is adequately qualified. However, the instructor should be given every opportunity to attend courses in training techniques and radiation protection fundamentals and terms.

2.5 Training Records

Training qualification records for the security force EP training program are retained and maintained by the YOH EP instructor. Training is tracked manually for a guard force of approximately 200 members. The inspector found the training records to be accurate and up to date. The inspector also found the YOH EP instructor to be quite aware of his training schedule and of the training needs of the entire security staff.

No unacceptable conditions were identified.

2.6 Conclusions

The inspectors concluded that an effective performance-based Emergency Preparedness Training Program has been developed and implemented for the security force at Limerick Generating Station Unit 1. Past deficiencies have been corrected and effective steps have been taken to ensure that these deficiencies will not recur.

The inspectors concluded that security personnel are being initially qualified and requalified thereafter in a timely manner. Also, the quality assurance/quality control functions which are being implemented for the EP Training of Limerick Security personnel are acceptable and will ensure the integrity of the processing and qualification of the security staff.

3.0 Exit Meeting

An exit meeting was held on August 7, 1985, with those persons delineated in Section 1 of this report to discuss the scope and findings of the inspection. At no time during the inspection was written material presented to the licensee by the inspector.