

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/85-42

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: October 28 - November 1, 1985

Type of Inspection: Routine, Unannounced Physical Security

Date of Last Physical Security Inspection: August 7, 1985

Inspector:

Roland Bailey
R. J. Bailey, Physical Security Inspector

1-22-86
date

Approved by:

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

1-22-86
date

Inspection Summary: Routine, Unannounced Physical Security Inspection on
October 28 - November 1, 1985 (Inspection Report No. 50-352/85-42)

Areas Inspected: Security Organization; Physical Protection of Safeguards Information; and, Status of Inspector Follow-up Items. The inspection involved 32 hours on site by one region-based inspector of which 3 hours were during off shift periods and 4 hours in the licensee's corporate offices.

Results: The licensee was found to be in compliance with NRC requirements in the areas inspected.

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DETAILS

1. Key Persons Contacted

G. M. Leitch, Plant Manager
J. Franz, Superintendent - Operations
N. R. Carter, PECO Corporate Security
J. A. Basilio, Administrative Engineer
C. Endriss, Regulatory Engineer
B. Kirkpatrick, Quality Assurance
V. Warren, Test Engineer
G. Lauderback, Quality Assurance
J. F. Rubert, Supervisor, Quality Assurance
F. Larkin, Nuclear Security Specialist
P. Supplee, Administrative Assistant - Security
M. V. Annast - Vice President, Nuclear, Yoh Security, Inc.
D. F. Johnson, Yoh Security, Inc. Project Manager

NRC

G. Kelly, Senior Resident Inspector

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

2. MC 30703 - Exit Interview

The inspector met with the licensee representatives listed in paragraph 1 at the conclusion of the inspection on November 1, 1985. At that time, the purpose, scope and results of the inspection were reviewed.

At no time during this inspection was written material provided to the licensee by the inspector.

3. MC 92701 - Status of Inspector Follow-up Item

(Closed) Inspector Follow-up Item (50-352/85-29-01): The licensee previously reported to NRC Region I of finding two potential vulnerabilities in the protected area barrier. The inspector determined that effective and timely compensatory security measures were taken at the time of discovery. During this inspection, the inspector observed that the licensee had permanently corrected the vulnerabilities.

4. MC 81022 - Security Organization

The inspector interviewed Yoh Security, Inc. management personnel and reviewed on site security program audits, resignation/termination interview records of security force members and procedures for review of approved security post orders. The inspector found that the security program audits performed by members of the Performance Analysis Group

(PAG) were very professional in terms of scope, depth, documentation and follow-up and that corrective actions for findings were being taken in a timely manner.

The inspector also reviewed the contractor's system for maintaining post orders. The post orders were found to have been entered into a computerized system to effect easy change/modification and prompt dissemination. The system includes a tracking system to identify when post orders are due for review. Responsibility for monitoring of post orders has been assigned to the PAG Supervisor. The individual assigned to this position recently left Yoh Security; however, the on-site Yoh representative stated that his replacement would be expedited in order to preclude a decline in the effectiveness of the group. The inspector also audited the administrative procedures pertaining to and records of resignation and/or termination interviews of security force members. No discrepancies were noted.

In addition, the licensee stated that the Quality Assurance staff will include the Safeguards Information Protection Program into the forthcoming annual audit of the Physical Security Program. (Inspector Follow-up Item 50-352/85-42-01).

6. MC 81810 - Protection of Safeguards Information

The inspector conducted a review of the Safeguards Information Protection Program and procedures maintained at the Limerick Generating Station, Limerick, Pennsylvania and at the Philadelphia Electric Company, Corporate Headquarters (PECo) located in Philadelphia, Pennsylvania. This review included previous commitments made by the licensee to NRC Region I as a result of Region I's follow-up of allegations regarding the removal of potentially sensitive security drawings from the site (NRC Region I Inspection Report No. 50-352/85-34).

During this inspection the inspector toured each location and held discussions with safeguards information repository managers on October 30 and 31, 1985. No violations were identified. However, the inspector identified two potential weaknesses with the protection features on a few storage cabinets in Corporate Headquarters. The licensee acknowledged these and promptly initiated action to correct them.

The inspector further observed that the licensee had issued a written administrative procedure which established requirements for positive accountability, control, delivery, receipt and storage procedures and assurance that there were no uncontrolled avenues of entry into offices in which safeguards information was stored.

The licensee committed to convening the PECO Safeguards Information Committee to conduct an annual review of the overall protection program for handling and control of Safeguards Information at both facilities.