

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No. 50-395

License No. NPF-12

Report No. 50-395/97-09

Licensee: South Carolina Electric & Gas Company (SCE&G)

Facility: V. C. Summer Nuclear Station

Location: P. O. Box 88
Jenkinsville, SC 29065

Dates: July 7-11, 1997

Inspectors: W. W. Stansberry, Safeguards Inspector
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Approved by: C. Julian, Acting Chief, Special Inspections Branch
Division of Reactor Safety

EXECUTIVE SUMMARY

Virgil C. Summer Nuclear Station
NRC Inspection Report 50-395/97-09

This special announced inspection was conducted in the area of plant support by two regional safeguards inspectors. The specific area evaluated was the Access Authorization Program.

- The licensee had implemented and staffed an organization that was very capable of managing and implementing the Access Authorization Program requirements. (S1.2.1)
- The licensee was good in providing Background Investigation elements designed to assure that the personnel who were granted unescorted access to the facility met regulatory requirements. (S1.2.2)
- The licensee was implementing an adequate Behavioral Observation Program that could detect individual behavioral changes. (S1.2.3)
- The licensee's practice of psychological testing was adequate. (S1.2.4)
- The records were secured, complete, well organized, and readily available as required by Physical Security Plan. (S1.2.5)
- The licensee's appeal process of revocation or denial of access was appropriate and well documented. (S1.2.6)
- The licensee effectively audited its Access Authorization Program, and those of its contractors. The licensee's and regulatory requirements were being adequately met. (S1.2.7)

REPORT DETAILS

S1 CONDUCT OF SECURITY AND SAFEGUARDS ACTIVITIES

S1.2 Access Authorization

S1.2.1 Program Administration and Implementation

a. Inspection Scope (il 2515/127)

Determine how the Access Authorization Program (AAP) is administered, including applicable organizational and contractor responsibilities.

b. Observations and Findings

The licensee's Station Administration Procedure (SAP) 1005, "Unescorted Access Authorization Program," Rev. 7; Management Directive 19, "Fitness for Duty/Statement of Alcohol and Drug Abuse Policy," Rev. 14; Physical Security Plan, (PSP), Amendment 34; Security Plan Procedure (SPP) 009, "Fingerprinting," Rev. 6; and SPP 232, "Unescorted Access Authorization Program," Rev. 0 provided guidance for grandfathering, reinstating, updating, transfer, and granting temporary access. These references were reviewed by the inspectors and found well written and to have clearly defined the licensee's program and regulatory requirements.

The AAP was organized under the Manager, Nuclear Protection Services (NPS). According to the organizational chart, the Administrator, AAP reported to the Manager NPS. During the inspection, the administrator was found experienced, dedicated and fully capable of administering the program. The security staff was interviewed during the inspection and found to have been well trained and capable of doing the specific requirements they are tasked to do.

The licensee uses proprietary screening agents to conduct the background investigations and credit checks of licensee personnel. The licensee reviewed the outside screening agents used by the contractors to ensure that they met program requirements.

c. Conclusion

The licensee had implemented and staffed an organization that was very capable of managing and implementing the AAP requirements. There were no violations of regulatory requirements identified in this area.

S1.2.2 Background Investigations (BI) Elements

a. Inspection Scope (TI 2515/127)

Review the BI elements and verify that the program has been adequately designed and implemented according to the licensee's PSP requirements.

b. Observation and Findings

The inspectors determined that the licensee could verify identity and develop information concerning employment, education, credit, criminal history, military service, and the character and reputation of individuals before granting unescorted access to protected and vital areas. The inspectors reviewed 24 of the licensee's Access Authorization (AA) records involving grandfathering, reinstatement, updating, transfer, denial or revocation, appeals and temporary unescorted AA. BI elements associated with the above reviewed conditions were complete and adequately investigated. The licensee reviewed and considered information obtained during its BI process before granting unescorted access (UA). Comparison of the information on the security application and results of the BI, to including the FBI criminal history information, was accomplished in the screening process. There was a mechanism for identifying and resolving derogatory information resulting from the BI process and information provided by the applicant in the security questionnaire. Any discrepancies that were found were discussed with the applicant and properly resolved. Except for two incidences, the documentation of the resolving actions by the licensee was definitive and complete. The licensee concurred that documentation in these two cases, could have better.

c. Conclusion

The licensee was good in providing BI elements designed to assurance that the personnel who were granted unescorted access to the nuclear facility met licensee and regulatory requirements. There were no violations of regulatory requirements found in this area.

S1.2.3 Behavioral Observation Program (BOP)

a. Inspection Scope (TI 2515/127)

Review the BOP and determine if the program is implemented according to the PSP and contains elements to enable the licensee, contractor, or vendor to detect individual behavioral changes that, if not addressed, could lead to acts detrimental to public health and safety

b. Observation and Findings

Regulatory requirements and licensee's PSP and procedures required all personnel, prior to being granted access, be given training in the detection of aberrant behavior,

to include signs of drug and alcohol abuse and observing personnel for changing behavioral traits and patterns indicative of an adverse trend of their trustworthiness and reliability. This was also an annual requirement. Additionally, it is required that individuals with unescorted access authorization be notified of their responsibility to report any arrest that may affect their trustworthiness.

The inspectors reviewed the licensee's lesson plans for training personnel in detecting aberrant behavior. The inspectors verified that aberrant behavior training was provided to all personnel when they are granted access and annually during the Station Orientation Training (SOT)/Fitness For Duty/Continued Behavioral Observation Program training. The inspectors substantiated the training requirement during interviews of six site personnel, to include three supervisors, that the training for detecting aberrant behavior was based upon detecting the signs of drug and alcohol abuse. The signs were relative to the behavioral changes indicative of a lack of trustworthiness and reliability of personnel.

Additionally, the six individuals were interviewed as to their understanding of personnel reliability and their responsibility to report any arrests. The individuals had a good recall of this responsibility. The SOT indicated that personnel were to report any felony or misdemeanor conviction or any arrest that may affect their trustworthiness. Overall, the personnel interviewed recalled that their responsibility for reporting any arrest varied from any contact with law enforcement personnel to the need to report all arrests. During the record review, as indicated above, the inspectors noted that because of a procedural lack of a definitive time when a person must report an arrest to their supervisor, the licensee was not being informed of arrests in a timely manner. The licensee acknowledged the inspectors' observation and agreed to require arrest notification by the next working day.

c. Conclusion

The licensee was implementing an adequate BOP program that could detect individual behavioral changes. There were no violations of regulatory requirements noted in this area.

S1.2.4 Psychological Testing

a. Inspection Scope (TI 2515/127)

Determine if psychological evaluations are properly administered and completed, according to the PSP, before granting individuals UA to protected and vital areas.

b. Observation and Findings

The licensee and the contractors administer the Minnesota Multiphasic Personality Inventory (MMPI), which if warranted, is followed by a clinical interview. The inspectors reviewed testing procedures and visited the place where the evaluations are administered at the site. All personnel responsible for testing required positive

identification from the applicant. Facilities, used for the proctoring of the tests, were appropriately secure, and test materials were secured when not in use. Required certification of successful completion of the MMPI was present in all records reviewed.

c. Conclusion

The licensee's practice of psychological testing was found adequate. There were no violations of regulatory requirements noted in this area.

S1.2.5 Records and Privacy Information

a. Inspection Scope (TI 2515/127)

Verify the establishment and maintenance of a system of files and procedures, for the protection of personal information collected for AA purposes, according to the PSP.

b. Observation and Findings:

Review of records, discussion with licensee and contractor personnel and review of records' storage facilities and methods of storage revealed that information was safeguarded against unauthorized disclosure and accessible only to those involved in the access authorization process or those auditing the program. Licensee clearance records were stored in combination locked containers, within a locked room.

c. Conclusion

The records were secured, complete, well organized, and readily available according to the PSP. There were no violations of regulatory requirements identified in this area.

S1.2.6 Revocations/Denials and Appeals

a. Inspection Scope (TI 2515/127)

Verify that the licensee has an adequate procedure for the review, at the request of the affected individual, of a denial or revocation of unescorted access authorization that adversely affects employment. Verify that the review procedure is conducted according to the PSP.

b. Observation and Findings

The inspectors reviewed four revocations or denial of access actions. It was noted that in all occasions the reasons were explained to the applicant, and the review process for appeal was clearly stated. One example of an appeal being upheld (and

the original denial overturned) was reviewed. All of the 24 individuals interviewed knew of the appeal process. Also at the time a person is informed of the denial or revocation, the licensee provides in writing the right to appeal.

c. Conclusion

The licensee's appeal process of revocation or denial of access was appropriate and well documented. There were no violations of regulatory requirements identified in this area.

S1.2.7 Audits

a. Inspection Scope (TI 2515/127)

Verify that the licensee effectively audits its AAP, and those of its contractors that have been accepted, according to the PSP.

b. Observation and Findings

The inspectors reviewed eight audits and four surveillances of the licensee's AAP, and six audits of contractors' AAP. The licensee's procurement personnel audited contractors. The procurement auditors used audit procedures furnished by the Nuclear Energy Institute (NEI). Contractor records, procedures and processes were reviewed. Interviews were conducted with knowledgeable personnel. The auditing of both AAPs was found acceptable.

c. Conclusion

The licensee effectively audited its AAP, and those of its contractors. The licensee's and regulatory requirements were being adequately met. There were no violations of regulatory requirements found in this area.

Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to licensee management at the conclusion of the inspection on July 11, 1997. The licensee acknowledged the findings presented. Although reviewed during this inspection, proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

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D. Lavigne, General Manager, Nuclear Support Services
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NRC

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INSPECTION PROCEDURES USED

TI 2515/127: Access Authorization

ITEMS OPEN, CLOSED, AND DISCUSSED

None