

REVIEWED BY:

R. R. Keimig

(NAME)

[Signature]

(SIGNATURE)

NRC Region I

(ORGANIZATION)

3-4-88

(DATE)

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-293/88-06

Docket No. 50-293

License No. DPR-35

Licensee: Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

Facility Name: Pilgrim Nuclear Power Station

Inspection At: Plymouth, Massachusetts

Inspection Conducted: January 25-28, 1988

Inspectors:

[Signature]
for G. Smith, Safeguards Specialist

2-25-88
date

[Signature]
T. Madden, Physical Security Inspector

2-26-88
date

Approved by:

[Signature]
R. R. Keimig, Chief, Safeguards Section
Division of Radiation Safety and Safeguards

2-26-88
date

Inspection Summary: Routine, Unannounced, Physical Security Inspection on
January 25-28, 1988 (Report No. 50-293/88-06)

Areas Inspected: Security Program Upgrades, Security Organization, Program
Audits, Testing and Maintenance, Physical Barriers - Protected Area; Lighting,
Access Control-Personnel and Packages, Alarm Stations, Training and
Qualifications, Compensatory Measures, and Communications.

Results: The licensee was in compliance with NRC requirements in the areas
examined. Progress on security program upgrades continues to be made.

DETAILS

1. Key Persons Contacted

K. Highfill, Station Director
P. Hamilton, Compliance Group Leader
M. Brosee, Maintenance Support Manager
R. Barrett, Station Manager
E. Kraft, Jr., Plant Support Manager
D. Long, Security Manager
T. Nicholson, Security Compliance Specialist
T. Flaherty, Security Operations
S. Bilo, QA Audit Group Leader
R. Andrew, Sr. I&C Engineer

The inspectors also interviewed other licensee and contractor security personnel.

2. Review of Security Program Upgrades

The inspectors discussed the progress made to date on the security program improvements committed to by the licensee as a result of previous NRC enforcement action. The licensee was advised that progress on these improvements will continue to be monitored during future inspections.

Project

Status

Protected area barriers	The upgrade to the perimeter barriers is approximately 90% complete; the Intrusion Detection System is approximately 75% complete; and the Assessment Aids System is approximately 60% complete. Installation of components for the protected area perimeter upgrade is scheduled for completion by February 7, 1988. After installation, testing and turnover of the systems are expected to take approximately one month.
Protected area and perimeter lighting	Installation of upgraded lighting is approximately 95% complete. Completion is scheduled for February 7, 1988.
Main and alternate access control points	Design of the upgraded access control points is complete and new package search equipment is on site but not installed. There is no scheduled completion date for this project at this time.

<u>Project</u>	<u>Status</u>
Vital area analysis	The vital area analysis is complete. The walk-down of all vital areas to verify barrier integrity is scheduled for completion by February 8, 1988. The report of the results of the vital area walk down is scheduled to be issued on March 7, 1988.
New security computer	The selection of a new security computer has been made and a purchase order for the computer has been issued. A schedule for this project is being developed.
Technical training for BECO Supervisors	Technical training modules are complete and the training is scheduled to start by the end of February, 1988.

3. Security Organization

The inspectors found that the structure of the licensee's security organization was not fixed as the result of various plant-wide reorganizations designed to address specific regulatory concerns. The inspectors determined that this did not reduce the effectiveness of the overall security program and that the current reporting responsibilities were at an appropriate plant-wide organizational level.

Although a review of QA documents indicates that in 1986 and 1987 the licensee's organization was not as depicted by the NRC-approved Physical Security Plan (the plan), the inspectors determined that appropriate and timely plan changes had been made as required by NRC regulations. As such, programmatic deficiency was not indicated by this apparently repetitive finding.

The inspectors reminded the licensee of the requirements of both 10 CFR 50.54(p) and 10 CFR 50.90 as they pertain to implementing and documenting plan changes.

4. Program Audits

The inspectors reviewed security program audit reports and verified that the audits had been conducted in accordance with the plan. The audits were comprehensive in scope with the results reported to the appropriate level of management. The review included the response of the security organization to the audit findings and the corrective action taken to remedy any adverse findings. The documented corrective actions appeared appropriate for the findings.

5. Testing and Maintenance

The inspectors reviewed testing and maintenance records and procedures. The inspectors determined that the licensee had developed preventive maintenance procedures for installed security equipment. These procedures were approved by the onsite review committee in November and December, 1987 but had not been in place long enough to assess their impact on security equipment maintenance. The review of maintenance records disclosed that approximately ten maintenance requests (MRs) per week were generated for security equipment and that the completion time for the security MRs appeared to be improving. Security equipment maintenance will continue to be reviewed during subsequent inspections.

6. Physical Barriers - Protected Area

The inspectors conducted a physical inspection of the protected area barriers. It was determined by observation that the barriers were installed and maintained as described in the plan. Progress on upgrading the barriers is described in Paragraph 2 of this report.

7. Lighting

The inspectors observed lighting within the protected area. All areas observed appeared to be lighted in accordance with commitments in the plan. Progress on upgrading the lighting is discussed in Paragraph 2 of this report.

8. Compensatory Measures

The inspectors reviewed the licensee's use of compensatory measures and determined their use to be consistent with the commitments in the plan. As a result of the security program upgrades described in Paragraph 2 of this report, the use of compensatory measures is high. As the upgrades are completed, the use of compensatory measures should decline. This will be monitored during subsequent inspections.

9. Access Control - Personnel and Packages

The inspectors reviewed the access control procedures for personnel and packages and determined that they are consistent with commitments in the plan. This determination was made by observing personnel assess processing during shift change, visitor access processing, and by discussions with the security personnel about package access procedures. The status of upgrades in the access control points is discussed in Section 2 of this report.

THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE. IT IS INTENTIONALLY
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE. IT IS INTENTIONALLY
LEFT BLANK.

10. Alarm Stations

The inspectors observed the operation of both the Central and Secondary Alarm Stations (CAS and SAS) and found them to be operating as committed to in the plan. Operators were interviewed and were found to be knowledgeable of their duties.

11. Communications

The inspectors observed tests of all communication capabilities in both the CAS and the SAS. Also, the inspectors reviewed testing records for the various means of communication available to the security force and found them to be as committed to in the plan.

12. Personnel Training and Qualifications

The inspectors examined the training files for thirty members of the security organization. The files were found to contain all necessary records. However, the records were inconsistent as to form and content, from file to file. The inspectors determined that these inconsistencies resulted from failure to establish and implement written procedures for the maintenance of security training records.

The inspectors advised the licensee that the absence of a record-keeping procedure could result in a failure to conduct required requalifications in a timely fashion because of the difficulty in monitoring records of non-similar formats. The licensee agreed with the inspectors' observation and agreed to develop a written procedure for maintaining security training records.

13. Exit Interview

The inspectors met with the licensee's representatives listed in paragraph 1 at the conclusion of the inspection on January 28, 1988. At that time, the purpose and scope of the inspection were reviewed and the findings were presented.

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