

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-483/93013(DRSS)

Docket Nos. 50-483

License No. NPF-30

Licensee: Union Electric Company
St. Louis, MO 63166

Facility Name: Callaway County Nuclear Power Station, Unit 1

Inspection Dates: August 16-20, 1993 onsite
August 24, 1993 in NRC Region III Office

Type of Inspection: Announced Physical Security Inspection

Date of Previous Physical Security Inspection: April 12-20, 1993

Inspector: Gary L. Pirtle
Gary L. Pirtle
Physical Security Inspector

9/13/93
Date

Approved By: James R. Creed
James R. Creed, Chief
Safeguards and Incident Response
Section

9/13/93
Date

Inspection Summary

Inspection Between August 16-24, 1993 (Report No. 50-483/93013(DRSS))

Areas Inspected: Routine, announced physical security inspection involving: Personnel Access; Vehicle Control; Power Supply; Security Training and Qualification; and Planning Preparations for Fitness For Duty (FFD) and Access Authorization (AA) Program Requirements for an Upcoming Outage.

Results: The licensee was found to be in compliance with NRC requirements within the areas examined, except for one violation for failure to comply with the provisions of a post instruction for a temporary security post.

Two inspection followup items (IFIs) were identified during the inspection. One of the items pertained to the need to revise the security plan to correctly describe the secondary power supply for the exterior remote multiplexer unit buildings. The other item pertained to the need to revise the Security Force Training and Qualification (SFT&Q) Plan and some job task certification forms to correctly identify how job task evaluations are performed.

Excellent planning was evident in reference to assuring that FFD and AA program requirements would be completed in preparation for the outage scheduled for October 1993.

Three program strengths were identified during the inspection and pertained to: excellent FFD facilities; excellent audits of the security program; and safe operations on the weapon firing range.

The security program continues to receive strong management support and personnel observed on post, except for the temporary security post, were knowledgeable of their duties and responsibilities. Equipment observed functioned as designed, and security procedural guidance was generally detailed and adequate in scope to address all appropriate security responsibilities.

REPORT DETAILS

1. Key Persons Contacted

In addition to the key members of the licensee's staff listed below, the inspector interviewed other employees, contractor personnel, and members of the security organization. The asterisk (*) denotes those present at the onsite Exit Interview conducted on August 20, 1993:

- *J. Pevey, Manager, Operations Support, Union Electric (UE)
- *J. Laux, Manager, Quality Assurance, UE
- *G. Pendergraff, Superintendent, Security, UE
- *J. Clark, Assistant Superintendent, Security, UE
- *G. Hamilton, Supervising Engineer, Quality Assurance, UE
- *D. Knoepflein, Supervisor, Personnel, UE
- *P. Davis, Registered Nurse, Fitness For Duty, UE
- *R. Mertz, Security Supervisor (Access Authorization), UE
- *G. Snavely, Vice President, Operations, Burns International Security Services, Inc. (BISSI)
- *G. Hill, District Manager, BISSI
- *B. Scott, Site Supervisor, BISSI
- *L. Walling, Administrative Supervisor, BISSI
- *M. Dunbar, Systems Supervisor, BISSI

- *B. Bartlett, Senior Resident Inspector, USNRC Region III
- *D. Calhoun, Resident Inspector, USNRC Region III

2. Entrance and Exit Interviews

- a. At the beginning of the inspection, Mr. Gary Pendergraff and other members of the licensee's staff were informed of the purpose of this inspection, it's scope and the topical areas to be examined.
- b. The inspector met with the licensee representatives, denoted in Section 1, at the conclusion of onsite inspection activities. A general description of the scope and conduct of the inspection was provided. Briefly listed below are the findings discussed during the exit interview. The licensee representatives were invited to provide comments on each item discussed. Those comments are included. The details of each finding listed below are referenced, as noted, in the report.
 - (1) Personnel present were advised that a violation had been noted pertaining to failure to comply with the requirements of a post instruction for a temporary security post (Refer to Section 4.a).
 - (2) Two inspection followup items (IFIs) were noted. One of the items pertained to the need to revise the security plan to accurately describe the secondary power supply source for the perimeter remote multiplexer unit buildings. The other

IFI pertained to the need to revise the Security Training and Qualification Plan and some training certification forms to correctly identify how job task evaluations are performed (Refer to Sections 4.b and c).

- (3) Three program strengths were noted and pertained to audits of the security program, safety measures observed at the firing range, and the FFD facilities (Refer to Sections 4.d and 5.b).
- (4) The planning effort to assure that Fitness For Duty (FFD) and Access Authorization requirements could be met in preparation for the upcoming outage were considered adequate (Refer to Section 5.a).

At the conclusion of the exit meeting, some licensee representatives expressed the concern that some nonregulatory requirements may be in post instructions and that they could be cited for not complying with those requirements even when a NRC regulatory basis did not exist for the item. They were advised that the issues leading to the violation cited for not complying with the post instruction for Gate 16 had, in the inspector's judgement, a regulatory basis, based on their security plan commitment. They were advised that their concern would be reviewed during the review process for the inspection report.

On September 1, 1993, the Superintendent of Security was advised that the report would, in its entirety, be published as a public document and placed in the Public Document Room since our review determined that the report does not contain Safeguards Information. The Superintendent of Security was requested to advise the inspector if they considered the subjects to be addressed in the inspection report to be Safeguards Information.

3. Program Areas Inspected:

Listed below are the areas examined by the inspector in which no findings (strengths, violations, deviations, unresolved items or inspection followup items) were identified. Only findings are described in subsequent Report Details sections.

The below listed clear areas were reviewed and evaluated as deemed necessary by the inspector to meet the specified "Inspection Requirements" (Section 02) of the applicable NRC Inspection Procedure (IP). Sampling reviews included interviews, observations, and document reviews that provided independent verification of compliance with requirements. Gathered data was also used to evaluate the adequacy of the reviewed program and practices to adequately protect the facility and the health and safety of the public. The depth and scope of inspection activities were conducted as deemed appropriate and necessary for the program area and operational status of the security system. Additional testing of security systems was not requested by the inspector.

IP 81700-Physical Security Inspection Program for Power Reactors

- a. Vital Area Physical Barriers and Detection: (1) VA Barrier Resistance; (2) VA Detection Functional and Effective.
 - b. Protected and Vital Area Access Control of Personnel and Vehicles
 - (1) Personnel Access: (a) Trustworthiness, Reliability Determined By Background Investigation and are Part of Behavioral Observation Program; (b) Rapid Ingress and Egress in Emergencies; (c) Access limited to need.
 - (2) Vehicle Control For Temporary Access Point (Gate 16): (a) Vehicles Are Searched; (b) Authorization Verified Prior to Entry; (c) Sufficient Officers at Open Gates; (d) All Self-Propelled and Towed Vehicles Are Controlled.
 - c. Power Supply: (1) Alarms and Nonportable Communications Equipment on Standby Power System, Equipment Located in VA, Automatic Indication of Failure or Use.
4. Physical Security Inspection Program for Power Reactors (IP 81700)

One violation and two inspection followup items were noted and are described below. No written response to the violation is required since adequate corrective actions were completed prior to the close of the inspection. Two program strengths were also identified.

- a. The violation pertains to noncompliance with the post instruction prepared for the gate 16 temporary vehicle access point. Section 1.2.2.1 of the Callaway Security Plan states in part "Security Force Post Instructions and memoranda may be utilized by the security organization for specific guidance to fulfill the responsibilities of established security posts. These instructions and memorandums shall not conflict with the Security plans or procedures and require written approval of UE management."

A post instruction was prepared for security personnel manning gate 16 (temporary vehicle access point) which described the responsibilities for that security post. The post instruction was placed at the security post for use by security personnel manning the gate. The post instruction was of excellent quality and adequately described the responsibilities to fulfill the security requirements for the post. Contrary to the requirements contained in the post instruction:

- A Security Authorization List, which identifies who has the authority to approve certain security activities, was not at the post.

- A lock box for storage of self-disclosed contraband (explosives, firearms, drugs, etc.) was not available at the post.
- 3"X 5" cards advising vehicle drivers of contraband restrictions and how to dispose of contraband prior to entry into the protected area were not available for use and retention by vehicle drivers entering the protected area.
- The vehicle access record on the post incorrectly showed that two vehicles were not accurately logged when they entered or left the protected area, and the one temporary designated vehicle that entered the protected area was logged into the protected area as a licensee designated vehicle.
- The only two temporary designated vehicle authorization forms on the post were incorrectly dated in September 1993, rather than August 1993.

Additionally, the security manning required by the post instruction for the open gate agreed with the security plan requirements but conflicted with the security manning requirements identified in Section 4.16.5.1 of Procedure APA-ZZ-01105, "Protected and Vital Area Entry and Exit." The procedure had not been changed even though the security plan change pertaining to such open gate manning had been approved on May 5, 1993, three months prior to the inspection.

Collectively, the above deficiencies indicated inadequate attention to detail by the security force members that manned the gate 16 post, and inadequate checks of the post by security supervisory personnel. The gate 16 post had been manned 24 hours a day for about a week prior to the inspection, which offered ample opportunity for several of the above noted deficiencies to have been identified by the security officers or supervisors (483/93013-01).

Prior to the completion of the inspection, adequate corrective actions had been implemented to correct the deficiencies noted above. The required Security Authorization List was placed on the post, a lock box and 3" X 5" contraband advisement cards were placed at the post, errors in logs and records required by the post instruction were corrected, and a temporary change notice to APA-ZZ-01105 was initiated to assure that security measures in section 4.16.5.1 of the procedure agreed with the security plan requirements. By memorandum dated August 17, 1993, security force personnel were advised of the need for increased attention to detail, and supervisors were advised of the need for adequate checks of temporary posts. The gate 16 temporary post was terminated subsequent to the onsite inspection.

We have no further questions pertaining to this issue at this time and a written response to the violation is not required.

- b. One of the inspection followup items pertained to the need to revise the security plan to correctly describe the secondary power supply systems for the exterior remote multiplexer unit (RMU) buildings. The current security plan describes two different secondary power supplies for the exterior RMU buildings. The security staff agreed with the need to revise the security plan (483/93013-02).
- c. The second inspection followup item pertained to the need to revise the Security Force Training and Qualification (SFT&Q) Plan and some training task certification forms to correctly identify how job task evaluations are performed. The current job task evaluations are adequate to demonstrate the required knowledge of the task, but in some cases are conducted under conditions and standards other than those identified in the SFT&Q Plan. The example observed by the inspector involved evaluations of task number 03 "Operate and perform a functional test of security communications systems" which requires use of the plant security communications system to complete certain elements of the task. Several elements of the task were simulated by use of other available communications systems. Although adequate, the security communication system was not used. The security staff agreed on the need to revise the SFT&Q Plan and some of the task certification forms to comply with the conditions and standards in the T&Q plan (483/93013-03).
- d. Two strengths were noted in the area of physical security for power reactors and are addressed below.
 - Audits of the security program continued to be a program strength. The Quality Assurance audits have been and continue to be of excellent scope and depth, are well documented and audit findings are aggressively monitored until adequately closed. The recent security contractor audit conducted between May 3-7, 1993 was also of excellent quality, scope and depth, and was well documented.
 - Two weapon firing sessions were observed during the inspection. Stress and formal qualification courses were observed. The firing range operations were closely controlled and personnel safety was the predominate consideration. Personnel on the firing range were very familiar with the weapons involved and the course of fire. The range instructor and assistants provided excellent oversight and control of the firing range operations.

5. Access Control - Personnel (IP 81070)

The licensee's planning efforts to assure that Fitness-For-Duty (FFD) and Access Authorization (AA) regulatory requirements could be met in preparation for the upcoming outage (October 1993) were reviewed. The FFD facilities were considered a strength.

- a. Review of the planning efforts to comply with FFD and AA regulatory requirements in preparation for the outage showed that adequate planning has been completed. Staffing levels and facilities for both departments appear adequate. Both departments appear to have correctly identified their maximum performance levels and the levels appear adequate to support the projected outage personnel training and processing needs. Both departments have also identified contingency options in case the number of personnel requiring processing exceeds the projected numbers. The greatest demands for the FFD and AA processing appear to be the 3rd and 4th weeks in September 1993. The FFD nurse supervisor and the AA Supervisor are thoroughly familiar with their program regulatory requirements and have experienced outage processing demands during at least two previous outages. The supervisors estimated that approximately 800 personnel would require FFD testing and approximately 500 personnel would require some level of AA processing in accordance with 10 CFR 73.56 and their security plan.
- b. The FFD facilities were considered excellent. They are spacious, clean, functionally organized, and provide an image of professionalism and efficiency. Adequate office space was available for the Medical Review Officer and adequate record storage space was also available within the FFD facility.