

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Nos. 50-277/88-03
50-278/88-03

Docket Nos. 50-277 License Nos. DPR-44
50-278 DPR-56

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

Facility Name: Peach Bottom Atomic Power Station, Units 2 and 3

Inspection At: Delta, Pennsylvania

Inspection Conducted: January 19-22, 1988

Date of Last Physical Security Inspection November 16-19, 1987

Type of Inspection: Routine, Unannounced Physical Security

Inspectors: *Roland J. Bailey* 2-26-88
Roland J. Bailey, Physical Security date
Inspector

William K. Lancaster 2-26-88
William K. Lancaster, Physical Security date
Inspector

Approved by: *R. R. Keimig* 2-26-88
R. R. Keimig, Chief, Safeguards Section date
Division of Radiation Safety and Safeguards

Inspection Summary: Routine, Unannounced Physical Security Inspection on
January 19-22, 1988 (Combined Report Nos. 50-277/88-03 and 50-278/88-03)

Areas Inspected: Follow-up on security program event reports; Management
Effectiveness; Security Organization; Security Program Audit; Testing and
Maintenance; Locks and Keys; Physical Barriers (Protected and Vital Areas);
Access Control (Personnel, Packages, and Vehicles); and Alarm Stations.

Results: The licensee was in compliance with the NRC-approved physical
security plan in the areas inspected.

DETAILS

1. Key Personnel Contacted

a. Licensee and Contractor Personnel

D. Smith, Vice President
R. Weindorfer, Corporate Director, Nuclear Plant Security
P. Supplee, Corporate Analyst, Nuclear Plant Security
R. Bixler, Corporate Analyst, Nuclear Plant Security
R. Carter, Corporate Security
G. Bird, Nuclear Quality Assurance Department
C. Cuthbert, Nuclear Quality Assurance Department
A. Donell, Nuclear Quality Assurance Department
J. Oddo, Nuclear Security Specialist
S. Tharpe, Chief, Security Coordinator
T. Cribbe, Regulatory Engineer
D. Foss, Compliance Engineer
V. LaMantia, Security Shift Supervisor
L. Lantzy, Regional Manager, Burns International Security Services, Inc.
A. Miller, Program Manager, Burns International Security Services, Inc.

b. U.S. Nuclear Regulatory Commission Personnel

L. Myers, Resident Inspector

The inspectors also interviewed other licensee and contractor security personnel.

2. Followup on Security Program Event Reports

During this inspection, the inspectors reviewed records and discussed eight security events (87-1 through 87-7 and 88-1) reported to NRC in accordance with 10 CFR 73.71. Five events involved members of the security force either being found asleep or being observed to be inattentive on duty. Two events involved malfunctions of the security computer due to hardware and software problems. The remaining event involved a member of the security force abandoning a security post. The individuals involved in the events concerning personnel performance were either terminated or counseled and disciplined. The inspectors determined that the licensee took timely and appropriate compensatory and corrective action with respect to all eight events.

3. Management Effectiveness

The inspectors discussed the following actions undertaken by the licensee to enhance the effectiveness of the security program at Peach Bottom since the last inspection.

- The licensee's security shift supervisors are assigned administrative duties to allow the licensee's nuclear security specialist to devote more time to managing the program.
- The licensee implemented a Security Incident Review Committee to review all reportable security related events for significance and impact on the security program.
- The licensee completed the revision and issuance of all security program implementing procedures.
- The security force contractor has assigned an individual who is dedicated to monitor the testing of security systems and equipment to ensure it performs properly.
- The security force contractor has assigned each armed member of the security force with a weapon for which he/she is responsible for and will use during annual requalification.
- The security force contractor has assigned an administrative assistant to each security shift to allow the security shift sergeant to devote more time to supervising the shift.
- The security force contractor has increased the hourly wage of its employees.

4. Security Organization

The inspectors reviewed the security organization and found it to be in conformance with the NRC-approved physical security plan. During a review of the Weekly Report of Overtime by Burns Security for the period January 8-14, 1988, the inspectors observed that an unusually large number of security force members were failing to report for scheduled duty on each of the three shifts. The security shift sergeants had to make post assignments by using volunteers who, on an overtime basis, in many cases, were just completing an eight hour tour of duty. Further review of the overtime records found no evidence of forced overtime to make these post assignments. However, the number of absences caused the sergeants to spend a significant part of the shift to ensure adequate manning. The inspectors met with the Burns Regional Manager, Program Manager and the Corporate Security Director to discuss this matter and to determine if any corrective actions were in progress. The Corporate Security Director acknowledged that there was a problem and stated that a consultant was being retained to study the situation. The Burns representatives ensured the inspectors that they were trying to resolve this and other performance related problems. Further, the licensee and security force contractor agreed to discuss progress on performance problems at management meetings and at each security force personnel formation until substantial improvement is realized. The inspectors advised the licensee that this will be reviewed during future inspections.

The inspectors determined that twenty-one individuals left the security force since November 16, 1987; one resigned, three were terminated for cause, and seventeen terminated for personal reasons. A security force representative stated that no adverse information about the security force or program surfaced during exit interviews with the employees.

5. Security Program Audit

The inspectors reviewed Quality Assurance Audit Report No. AP 87-80-PL and found that the licensee had properly and adequately audited the security program between June 1 - July 10, 1987 to determine its continued effectiveness and to prepare for the NRC Regulatory Effectiveness Review (RER) that was conducted on September 28-October 2, 1987. Two violations of the NRC-approved security plan were identified during the audit. The report indicated that prompt Compensatory security measures were taken. The inspector observed that the nuclear security specialist had adequately addressed the findings of the audit and was in the process of responding to the recommendations for improvements. The Corporate Security Director stated that the date for the forthcoming annual security program audit will be moved up and a comprehensive audit, covering all aspects of the security program, will be conducted to prepare for returning the plant to operation.

6. Testing and Maintenance

The inspectors reviewed records and observed that only ten work orders for repair of security related equipment were open. The oldest work order was dated January 9, 1988. The inspectors found that the plant maintenance staff was promptly responding to security related equipment problems, based on priorities established by licensee security management, and that this represented a significant improvement over past experience.

7. Locks and Keys

The inspectors conducted a random review of the administrative controls for protected and vital area keys and determined that the controls and their implementation are appropriate to prevent compromise, except as follows:

The procedure for key control does not clearly describe how the security shift sergeant is to conduct an inventory of vital keys that have been signed out for temporary use. The nuclear security specialist acknowledged this omission and promptly issued a temporary instruction to correct it. The licensee indicated that the procedure will be revised and submitted to the Plant Operating Review Committee (PORC) for approval, at an early date.

8. Physical Barriers (Protected Area)

The inspectors observed that the licensee maintained the physical barriers surrounding the protected area in accordance with the NRC-approved physical security plan.

9. Physical Barriers (Vital Areas)

The inspectors toured several vital areas and determined that the licensee was maintaining the physical barriers surrounding these vital areas in accordance with the NRC-approved security plan.

10. Access Control (Personnel)

Observations by the inspectors determined that personnel access control was being carried out as committed to in the NRC-approved physical security plan.

11. Access Control (Packages)

The inspectors determined that the licensee was meeting the commitments in the NRC-approved physical security plan concerning access control of packages entering the protected area. The inspectors made this determination by observing the security force members conducting both physical and electronic searches of hand-carried packages at the main gate house and searches of large packages at the warehouse throughout this inspection.

12. Access Control (Vehicles)

The inspectors determined that the licensee was meeting the commitments in the NRC-approved physical security plan concerning access control of vehicles entering the protected area. The inspectors made this determination by observing security force members conducting physical searches and logging vehicles into the protected area. The inspectors reviewed the vehicle access control procedures and determined that they were consistent with the commitments in the NRC-approved physical security plan.

13. Alarm Stations

The inspectors observed the operation of both the Central and Secondary Alarm Stations (CAS/SAS) and found them to be operating in accordance with the NRC-approved physical security plan. The nuclear security specialist stated that during the recent upgrade of the security computer, a problem with alarms from fire doors and doors that lead to high radiation areas was experienced. A technician stated that this was the result of a software problem and that the problem would be corrected shortly. The inspectors observed that although the CAS/SAS operators had to contend with the alarms, their primary and emergency security duties were not

affected. The licensee was advised that this will be reviewed during a future inspection of the security program.

14. Exit Interview

The inspectors met with the licensee representatives listed in paragraph 1 at the conclusion of the inspection on January 22, 1988. At that time, the purpose and scope of the inspection were reviewed and the findings were presented.

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