

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-298
License No.: DPR 46
Report No.: 50-298/98-20
Licensee: Nebraska Public Power District
Facility: Cooper Nuclear Station
Location: P.O. Box 98
Brownville, Nebraska
Dates: August 31 to September 4, 1998
Inspector: T. W. Dexter, Senior Physical Security Specialist
Plant Support Branch
Approved By: Blaine Murray, Chief, Plant Support Branch
Division of Reactor Safety
Attachment: Supplemental Information

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EXECUTIVE SUMMARY

Cooper Nuclear Station
NRC Inspection Report 50-298/98-20

This routine, announced inspection focused on the licensee's physical security program. The areas inspected included review of access authorization, protected area access control of personnel, packages and vehicles, testing and maintenance, protected area barrier and detection aids, security training and qualifications, fitness-for-duty audit and the fitness-for-duty program. Overall, performance in the physical security area remained strong.

Plant Support

- The Access Authorization Program was effectively implemented. Strong senior management support for the program was evident. An excellent program for searching personnel, packages, and vehicles was maintained. Security procedures in place properly controlled personnel, package, and vehicle access to the protected area. Security personnel were well trained on program requirements (Sections S1.1 and S1.2).
- An effective testing and maintenance program was conducted and properly documented. Excellent protected area barriers and detection systems were maintained. During performance testing of the detection system at the protected area, all attempts to intrude into the protected area were detected (Sections S2.1 and S2.2).
- A comprehensive security training program had been implemented. Security personnel were well trained on program requirements (Section S5.1).
- The fitness-for-duty program audit was intrusive and performance based. A technical specialist was included as a member of the audit team (Section S2.3).
- An excellent fitness-for-duty program was in place. Behavior observation training for supervisors was being changed from training by computer to in-class attendance (Section 8.1).

Report Details

IV. Plant Support

S1 Conduct of Security and Safeguards Activities

S1.1 Access Authorization Program Activities and Organization

a. Inspection Scope (81700 02.01)

Portions of the access authorization program were reviewed to determine compliance with 10 CFR 73.56 and the physical security plan.

b. Observations and Findings

The inspector conducted interviews with senior managers to determine senior management support for the program. Strong senior management support was evident. The licensee recently relocated access authorization processing to a remodeled processing facility. To determine adequacy of the program, the access authorization supervisor and members of the program staff also were interviewed and observed performing processing of personnel for unescorted access. The inspector also conducted a review of information concerning the licensee's verification of identity, employment history, educational history, credit history, criminal history, military service, and the character and reputation of the applicants before granting individuals unescorted access to protected and vital areas. Documentation and verification of information were current and readily available for retrieval.

c. Conclusion

The Access Authorization Program was being effectively managed. Strong senior management support for the program was evident.

S1.2 Protected Area Access Control of Personnel, Packages, and Vehicles

a. Inspection Scope (81700-02.01)

The access control program for personnel packages and vehicles was inspected to determine compliance with the requirements of the physical security plan.

b. Observations and Findings

Observations by the inspector of security practices at the primary access facility and at the vehicle sallyport confirmed that security procedures in place properly controlled personnel, package, and vehicle access to the protected area. The inspector also observed use of the X-ray machine and search of packages and material at the main access facility. The operators were efficient and well trained.

c. Conclusions

An excellent program for searching personnel, packages, and vehicles was maintained. Security procedures in place properly controlled personnel, package, and vehicle access to the protected area. Security equipment operators were efficient and well trained.

S2 Status of Security Facilities and Equipment

S2.1 Testing and Maintenance

a. Inspection Scope (81700)

The inspector reviewed the testing and maintenance program to determine compliance with the requirements of the security plan.

b. Observations and Findings

The inspector determined through interviews with security officers and supervisors and a review of records that repairs to security equipment were completed in a timely manner. The timely response to repair detection aids, access control equipment, and vital area door locks and closures was instrumental in the low number of compensatory posting.

The inspector determined through interviews and review of records that the licensee's daily tests and checks included the following: fixed metal detectors, X-ray machines, outdoor lighting, duress alarms, communication equipment, and individual equipment assigned to security personnel.

The inspector also determined through a review of records that annual maintenance surveillances had been completed on tamper alarms.

c. Conclusions

An effective security system testing and maintenance program was conducted and properly documented.

S2.2 Protected Area Barrier and Detection Aids

a. Inspection Scope (71750 and 81700)

The inspector reviewed the protected area barriers and detection aids to determine compliance with the requirements of the physical security plan. The areas inspected included the features of the protected area barriers and the design and capabilities of the detection aids system.

b. Observations and Findings

The inspector, accompanied by the resident inspector, conducted a walkdown inspection of the protected area barriers and determined that the barriers were installed and maintained as described in the physical security plan. Additionally, the inspector determined that the protected area barriers provided penetration resistance to both forced and surreptitious entry and was adequate to ensure delay of a potential adversary.

The inspector observed the licensee test the protected area perimeter microwave system. The detection system was well designed and maintained. All attempts to intrude into the protected area were detected. The licensee's tests of the system were performance based to ensure that system failures were discovered and corrected.

c. Conclusions

Excellent protected area barriers and detection systems were maintained. During performance testing of the detection system at the protected area, all attempts to intrude into the protected area were detected.

S5 Security and Safeguards Staff Training and Qualification

S5.1 Security Training and Qualification

a. Inspection Scope (81700)

The inspector reviewed the licensee's security training and qualification program to determine adequacy and compliance with the requirements of the security, training, and qualification plan and the contingency plan.

b. Observations and Findings

The security organization conducted all required training in accordance with its approved security, training, and contingency plans. The inspector confirmed, by a review of composite security training records that the required training was conducted every 12 months.

The inspector observed security officers during the performance of their duties. All security officers displayed excellent conduct and knowledge of the program requirements.

The inspector also observed various security defensive positions throughout the protected area. These positions were manned or planned to be manned by designated armed security officers in the event of an attack upon the plant.

c. Conclusions

A comprehensive security training program had been implemented. Security personnel were well trained on program requirements.

S7 Quality Assurance in Security and Safeguards Activities

S7.1 Security Program Audit

a. Inspection Scope (81700-02.07)

The audit of the fitness-for-duty program was inspected to determine compliance with the requirements of 10 CFR Part 26 and the requirements of the physical security plan.

b. Observations and Findings

Cooper Nuclear Station Fitness-for-Duty/Access Authorization Quality Assurance Audit Report 98-11 dated July 28, 1998, performed by the licensee's quality assurance staff was reviewed. In addition, it was confirmed that fitness-for-duty audits were conducted at least every 12 months. By a review of licensee's records and interviews with licensee personnel, the inspector confirmed that the audit team personnel were independent of plant security management. The audit was comprehensive, intrusive, self critical, and appeared to accurately characterize the fitness-for-duty and access authorization programs. A technical specialist in the field of fitness-for-duty and access authorization was employed as a consultant to provide expertise to the audit team.

c. Conclusion

The licensee's audit of the fitness-for-duty program was intrusive and performance based. A technical specialist in the fitness-for-duty program area was employed as a consultant to provide technical expertise to the audit team.

S8 Miscellaneous Security and Safeguards Issues

S8.1 Fitness-for-Duty

a. Inspection Scope (81502)

A review of the fitness-for-duty program was conducted to determine compliance with 10 CFR Part 26.

b. Observations and Findings

The inspector observed the operation of the fitness-for-duty testing facility, reviewed procedures, and interviewed the individuals on duty at the facility. The collection facility was being operated effectively. Precautions had been taken to insure that all testing was properly conducted and monitored to detect if individuals attempted to circumvent

the test with false specimens. The licensee's fitness-for-duty procedures were current and comprehensive. The fitness-for-duty staffs were highly trained professionals.

Behavioral observation training for managers and supervisors was also discussed with senior managers, the security manager, and the general employee training lead instructor. The inspector determined that the licensee was in the process of changing the behavior observation training required for managers and supervisors from computer-based training to a lecture discussion method of annual training. The effectiveness of the change will be assessed during a future inspection.

c. Conclusions

An excellent fitness-for-duty program was in place. Behavior observation training for supervisors was being changed from training by computer to in-class attendance.

S8.2 (Closed) Violation 298/9817-01: Personnel Access Control

During a previous security inspection, the inspector noted that a tour group was not issued visitor badges as required by both the rule and the physical security plan. The members of the tour group were not processed as visitors. They did not card in and did not enter the protected area through the personnel turnstiles. During this inspection, the inspector verified that the licensee had revised their procedure and that it now contained clear guidance on actions to process and control all visitors entering the protected area.

V. Management Meetings

X1 Exit Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on September 3, 1998. The licensee acknowledged the findings presented. No proprietary information was identified.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. Hale, Senior Manager, Site Support
M. Hamm, Security Manager
J. Harrington, Security Services Supervisor
D. Madsen, Licensing Engineer
T. Milke, Security Shift Supervisor
L. Patzel, Access Authorization/Fitness-for-Duty Technician
M. Peckham, Plant Manager
J. Peters, Licensing Secretary
J. Robinson, Quality Assessment Manager
J. Swailes, Vice President Nuclear

NRC

E. Merschoff, Regional Administrator
C. Skinner, Resident Inspector

INSPECTION PROCEDURES USED

71750 Plant Support Activities
81700 Physical Security Program for Power Reactors

ITEMS CLOSED

50-285/9817-01 VIO Personnel Access Control.

LIST OF DOCUMENTS REVIEWED

Physical Security Plan, Revision 36

Plant Access Training Information Manual, Revision 17

Cooper Nuclear Station Quality Assurance Audit Report, Fitness-for-Duty/Access Authorization Audit 98-11, dated July 28, 1998

Administrative Procedure O-NPG-2.3, NPG Fitness-for-Duty Program

Maintenance Work Requests Records on Security Components for the period January 1, through September 1, 1998

Security Procedure 2.5, Revision 15.4, "Personnel Entry/Exit"