

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/88-10

Docket No. 50-352

License No. NPF-27

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

Facility Name. Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: April 11-15, 1988

Inspector: W. K. Lancaster 5-2-88
W. K. Lancaster, Physical Security Inspector date

Approved by: R. R. Keimig 5-2-88
R. R. Keimig, Chief, Safeguards Section date
Division of Radiation Safety and
Safeguards

Inspection Summary: Routine Unannounced Physical Security Inspection
on April 11-15, 1988 (Report No. 50-352/88-10)

Areas Inspected: Management Effectiveness; Organization; Physical Barriers -
Protected Area; Lighting; Alarm Stations; Personnel Training and
Qualifications; Access Control - Personnel; Access Control - Packages; and
Access Control - Vehicles.

Results: The licensee was in compliance with NRC requirements in the areas
examined.

Details

1. Key Personnel Contacted

A. Philadelphia Electric Company (PECO)

G. M. Leitch, Vice President, Limerick Generating Station
J. H. King, Jr., Support Manager, LGS
F. J. Larkin, Nuclear Security Specialist
R. J. Weindorfer, Director, Nuclear Plant Security
P. R. Supplee, Analyst, Nuclear Plant Security
G. A. Bird, Nuclear Quality Assurance
V. M. Vitale, Protection Technology, Inc., Program Manager

B. U. S. Nuclear Regulatory Commission (NRC)

T. J. Kenny, Senior Resident Inspector

The inspector also interviewed other Philadelphia Electric Company personnel and members of the Protection Technology, Inc. (PTI), contract security force.

2. Management Effectiveness - Security Program

A. The licensee has developed an action plan and tracking program for implementing NRC physical security at the Limerick Generating Station Unit No. 2. A portion of this action plan includes revising the Limerick Generating Station's Physical Security Plan (the Plan). The licensee anticipates submitting it to the NRC for approval during the summer of 1988. The licensee has taken the following actions in preparation for Unit No. 2 licensing:

- A Security Coordinator, Shift Security Assistant, Nuclear Security Analyst and two contract security specialists are presently assigned to monitor Unit No. 2 construction activities, evaluate and assign compensatory posts for all Unit No. 1 / Unit No. 2 protected area barrier interfaces, and to provide coordination, as needed.
- General Employee Training (GET) has been updated to address the Unit No. 1 / Unit No. 2 final configuration and personnel processing.
- Security procedures have been revised to reflect Unit No. 2 requirements, as well as anticipated Plan changes.
- The present security system has been upgraded to enable handling of Unit No. 2 system activities.

- Weekly interface meetings with Engineering have been initiated in order to provide Unit No. 2 security system integration and equipment upgrades.
- B. The following actions have been taken by the licensee since the last NRC routine physical security inspection to enhance the existing security program:
- The Shift Security Assistants are assuming more of the day-to-day security auditing functions previously performed by the security force contractor.
 - The Security Technical Assistant has become a qualified CAS/SAS operator.
 - The Shift Security Assistants will all receive CAS/SAS familiarization training beginning in May, 1988.
 - All of the Shift Security Assistants have been trained in the station's Surveillance Testing program to ensure that all security systems and equipment are maintained in a operable condition as required by the Plan.
 - All of the Shift Security Assistants have been trained as Emergency Preparedness Security Team Leaders.
 - Card reader key pads for personal identification codes have been installed on the Protected Area entrance turnstiles to ensure against the potential of issuing a wrong badge/key card.
 - The licensee security representatives are meeting with the station's Instrumentation and Control (I&C) group to exchange information, prioritize work support activities, and provide input to enhance the preventive maintenance program for security systems and equipment.
- C. The following actions have been taken by the licensor's security force contractor since the last NRC routine physical security inspection to enhance the existing security program:
- Additional training aids have been incorporated into the security force training program. They include walk-through metal and explosive detectors, intrusion detection system components and specimens of various physical barriers. Other training enhancements are being planned for use in the training program, such as videos and overheads.
 - Establishment of a equipment issue/arms room system and a full-time equipment issue/maintenance officer.

- Establishment of a sixth Shift Sergeant to maintain continuity of daily security force operations.
 - Rotation of Shift Sergeants on a quarterly schedule in order to enhance familiarity with all aspects of station operations.
 - Development of a qualified and trained supervisory pool to provide succession planning.
 - Establishment of a radio battery maintenance program.
 - Identification and requisition of additional contingency equipment to include additional response weapons.
 - Upgrading the weapons training program to include the use of the state-of-the-art weapons training facility offsite.
 - Upgraded security patrol vehicles.
 - Development and implementation of Emergency Preparedness (EP) task training to enhance ability of the security force to perform EP tasks and to provide an objective testing method to evaluate the capabilities of security force members.
 - Completion of the annual program of sampling security force members' abilities to perform the required critical security tasks.
- D. On April 15, 1988, the Limerick Generating Station had a nuclear security force consisting of 270 members (263 qualified plus 7 trainees). A review of the security force contractors records revealed that the contractor has been experiencing a average monthly attrition rate of 5.75 since January 1, 1988.
- E. In summary, the licensee and the licensee's security force contractor appear to have the common goal of establishing and maintaining a high quality and effective performance-based security program rather than a compliance oriented program. Both the licensee and the security force contractor continue to demonstrate initiative by instituting new measures to improve their respective program responsibilities. Both appear intent upon identifying problems indicators and correcting those before they become problems. As an example, the inspector noted that when he found a security computer problem in the CAS on April 13, 1988, the security force contractor had already identified it, and the licensee had taken corrective measures to upgrade the system and eliminate it.

3. Security Organization

The licensee reorganized the nuclear security organization on April 1, 1988. The organization currently in place is different than the security organization that is described in Chapter 1 of the licensee's NRC-approved Security Plan (the Plan). As a part of this reorganization, the station's Nuclear Security Specialist reports to station management instead of to the Director of Nuclear Plant Security. The licensee stated at the exit interview that the Plan would be revised to reflect the new station security organization and responsibilities by June 1, 1988, as required by 10 CFR 50.54(p).

4. Physical Barriers - Protected Area

The inspector conducted a physical inspection of the protected area barriers. The inspector determined, by observation, that the barriers were installed and maintained as described in the Plan.

5. Lighting

The inspector conducted a physical inspection of the security lighting system in the protected area and isolation zones on April 13, 1988, from 8:00 p.m. to 11:45 p.m. The inspector determined, by observation, that the lighting system was installed and maintained as described in the Plan.

6. Alarm Stations

The inspector observed the operation of both the CAS and SAS and found them to be operated as committed to in the Plan. CAS and SAS operators were interviewed by the inspector and were found to be knowledgeable of their duties and responsibilities.

7. Personnel Training and Qualification - General Requirements

The inspector examined the PTI Personnel Training and Qualification program. This examination consisted of the following: observation of several initial training classes for watchmen, interviews of security force trainees, PTI instructors, PTI management personnel, security force members on post and PECO Security Shift Assistants on duty; observation of initial on-the-job-training (OJT) being conducted for watchmen and CAS/SAS Operators; observation of annual Training and Qualification Plan recertifications being conducted on watchmen, security officers and CAS/SAS operators; and by reviewing training records, lesson plans and PTI policies concerning promotions.

The inspector determined that all required training had been conducted in accordance with security program plans and that all such training was properly documented.

8. Access Control - Personnel and Packages

The inspector reviewed the personnel and package access control procedures and determined that they were consistent with commitments in the Plan. This determination was made by observing personnel access processing during shift changes, visitor access processing, and discussions with members of the security force about personnel and package procedures.

9. Access Control - Vehicles

The inspector reviewed the vehicle access control procedure and determined that it was consistent with commitments in the Plan. This determination was made by observing vehicle access processing into the Protected area, and discussions with members of the security force about vehicle procedures.

10. Exit Interview

The inspector met with the licensee representatives listed in Paragraph 1.A. at the conclusion of the inspection on April 15, 1988, and reviewed the purpose and scope of the inspection and presented the inspection findings.

No written material was provided to the licensee during this inspection.