

REVIEWED BY:

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/87-20

Docket No. 50-352

License No. NPF-37

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

Facility Name: Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: July 27-30, 1987

Type of Inspection: Routine, Unannounced Physical Security

Inspectors:

Roland J. Bailey
R. J. Bailey, Physical Security Inspector

11-10-87
date

W. K. Lancaster
W. K. Lancaster, Physical Security Inspector

12-1-87
date

Approved by:

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

12-3-87
date

Inspection Summary: Routine, Unannounced Physical Security Inspection
on July 27-30, 1987 (Inspection No. 50-352/87-20)

Areas Inspected: Follow-up on a security event report; Implementing Procedures; Organization; Access Control (Personnel); Training and Qualifications Records; Contingency Plan (Response Drills); and the protection of Safeguards Information (SGI).

Results: The licensee was in compliance with NRC requirements in the areas inspected except that the security contractor was not storing Safeguards Information in an approved storage container.

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DETAILS

1. Key Personnel Contacted

Philadelphia Electric Company (PECO)

J. Doering - Superintendent of Operations
D. Neff - Compliance Engineer
J. Burke - Quality Assurance
J. Rubert - Supervisor, Quality Assurance
K. Mandl - Supervisor, Corporate Auditing
R. Weindorfer - Director, Nuclear Security
P. Supplee - Nuclear Security Analyst
R. Carter - Corporate Security Investigator
W. Skych - Chief, Security Coordinator
V. Vitale - PTI Program Manager
T. Straub - PTI Security Force Captain
C. Manila - PTI Performance Analysis Group

U.S. Nuclear Regulatory Commission (NRC)

E. Kelly - Senior Resident Inspector
S. Kucharski - Resident Inspector

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

2. Follow-up on a Security Program Event

The inspectors reviewed records and discussed a security event which occurred on July 3, 1987 and was reported to the NRC in accordance with 10 CFR 73.71, on July 8, 1987. The event involved the discovery of an unlicensed, loaded handgun, and extra ammunition, in a gym bag belonging to a construction company employee, who was attempting to enter the Unit 1 protected area. The weapon and the individual were turned over to local law enforcement authorities (LLEA). The licensee informed the inspectors that no charges were brought against the individual by LLEA and the handgun was returned. The licensee withdrew the individual's access to the protected area.

3. Security Procedures

The inspectors reviewed eight of thirty-seven security procedures, selected randomly, for adequacy and completeness. In addition, the lesson plans used to conduct security force training in these procedures were reviewed. The results of the review are as follows:

Procedure

Results

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The identified inconsistencies were discussed with the licensee. While no deficiencies in actual practices were noted, the inspectors stated that a review of the security procedures and lesson plans should be conducted to ensure that they are consistent and accurately reflect what is expected of SFMs. The licensee agreed.

4. Security Organization

During a review of the security force manpower status, the inspectors determined that 57 individuals left the contract security force since January 1987. In reviewing the reasons given by those who terminated, the inspectors did not identify any security program deficiencies.

5. Access Control (Personnel)

The inspectors observed that the licensee was maintaining, in an active status, twenty-eight security identification badges that had been assigned to employees who are no longer employed or affiliated with PECO. The inspectors determined that the badges had not been used after the ex-employees' access was withdrawn. Security procedures prohibit the issuance of security identification badges without health physics personal monitoring devices and these devices had been immediately removed by health physics staff personnel upon timely oral and written notification that unescorted access to the Limerick Station for these individuals had been withdrawn. The inspectors determined, through a review of records and procedures, that personnel who are authorized to request unescorted access to protected and vital areas were not prompt in orally notifying the Chief, Security Coordinator, when an employee's unescorted access to the Limerick Station was no longer required. Also, written notification from these employing personnel was not being received by the Chief, Security Coordinator, in some cases, until several days after access was no longer required. The inspectors verified that the licensee invalidated the identification badges on July 29, 1987. The licensee informed the inspectors that the procedures on terminating unescorted access to Limerick will be reemphasized to employing personnel within PECO and with all contractors. Also, administrative methods to ensure the prompt notification and invalidation of security badges for terminated employees will be reviewed.

6. Maintenance of Training and Qualification Records

The inspectors observed that the training records continue to be maintained in good order and information concerning qualification and requalification is easily retrievable.

7. Security Contingency Plan (Response Drills)

The licensee informed the inspectors of the actions taken as a result of previous inspector observations that are identified in NRC Inspection Report No. 50-352/87-10. The actions are summarized as follows:

- a. Security supervisors were briefed on March 31, 1987, on the importance of following written security procedures and the dangers associated with conducting unapproved activities;
- b. Security instructions 33 and 37 were revised to require PECO management approval before a drill or exercise can be conducted;
- c. A Security Incident Review Committee (SIRC) was established to provide management overview and to analyze all security events for safeguards significance and possible degradations of security program effectiveness.

The inspectors reviewed the SIRC meeting minutes of May 1, 1987 and found that the committee had discussed a problem concerning the lock and key program. The supplier of locks and keys went out of business and, therefore, maintenance support was no longer available. The licensee was in the process of seeking a new supplier. The SIRC committee determined that there are sufficient reserves of locks and keys and that in-house maintenance can provide adequate support; therefore, no degradation of the security program should result.

8. Physical Protection of Safeguards Information

On July 28, 1987, the inspector observed that a licensee designated storage container safe containing Safeguards Information, located outside of the protected/vital areas of the Limerick Generating Station, was not approved by the GSA (General Services Administration). The licensee took immediate corrective action and removed the contents to other approved storage facilities.

10 CFR 73.21(d)(2) states, in part, that when Safeguard Information is left unattended, it shall be stored in a locked security storage container. Philadelphia Electric Company Corporate Procedure 5-3(6)A states, in part, that Safeguards Information located in an uncontrolled area is required to be stored in a GSA approved security container (Class 6 or equivalent).

Protection Technology, Inc. Limerick Generating Station procedure states, in part, "when Safeguards Information is stored outside of the Protected/Vital area at Limerick Generating Station, it will be locked in a GSA approved storage container safe."

The licensee was advised that this was an apparent violation of NRC requirements. 50-352/87-20-01

9. Exit Interview

The inspectors met with the licensee representatives listed in paragraph 1 on July 30, 1987, and discussed the scope and results of the inspection.

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