November 11. 1987

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NOTE TO: C. Ader. OCM/TR

C. Miller, OCM/FB

T. Elsasser, OCM/KC

J. Scarborough, OCM/KR Fat Gwynn, OCM/LZ 195

FROM:

SUBJECT: INFORMATION CONCERNING STOP WORK ORDER AT FILGRIM

I understand that Boston Edison Company stopped certain work being performed by contractor employees at Filgrim yesterday (11/9/87). The basis for the stop work, according to the NRR Licensing Froject Manager, was a desire on the part of BECo management to assure they had firm control of work being performed by contractors after a series of 8 minor events that occurred recently at the plant.

Attached is a copy of information received from Region I concerning each of the events leading up to the BECo decision to stop work for your use.

Attachment: As stated.

8812070016 881201 PDR FOIA JOHNSON88-198 PDR

> Information in the record was deleted in accordance with the Freedom of Information Act, exemptions $\frac{4}{198}$ FOLA- $\frac{38}{198}$

Overview

There were a serie: of events at the Pilgrim Station that occurred during the last several days that NRC is following closely. Although each of the events is of relatively minor significance and not unique to nuclear power plant operations, collectively they are of concern to us because they occurred over a relatively short period and are similar to other problems that have occurred over the past year.

We believe that BECo's decision to shutdown activities until it could assess the overall root causes of the problems is positive. This is significant to us in that it represents a distinct shift in the senior management approach to control of activities at the plant as opposed to reacting to NRC observations. We will continue to monitor these activities closely.

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OFFICIAL RECORD COPY

PILGRIM EVENT - 0001.0.0 11/10/87

- 1. Locked High Radiation Area Door Latch Taped
 - -- On November 8, at 12:30 a.m., a contractor security guard accessing the the the former of the fidentified that the latch on the door to the area had been taped open.
 - The door was considered a locked high rad door at the time of the incidents. Based on licensee surveys, it appears that the area may not have been required to be posted this conservatively.
 - -- A CRD unlatching tool and two hot chips reading greater than 1R were present on the However, the licensee stated that they were stored in a locked tool cage requiring HP clearance for access.
 - -- A contractor security guard was posted near the door in question with a second guard posted inside the area on the licensee's investigation indicates that security guards posted on the taped the door latch to allow easy access for their watch relief.
 - -- On November 9 at about 4:45 a.m., licensee health physics personnel identified that security guards were routinely opening this same locked high rad door to admit watch relief for the guard stationed on the security. This was being done without H.P. permission and constituted an additional violation of locked high rad area controls.

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PILGRIM EVENT - 0002.0.0

2. Intake Structure Security Degradation

-- At about 4:00 p.m., 11/8/87, security guard noted that a ventilation fan and duct work inside the the security barrier at the ventilation intake. Only a "bird screen" remained in place.

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- -- Appropriate response was made after discovery.
- -- Event had been caused by contractor maintenance personnel starting work without a security review, this violated licensee procedures.
- -- No unauthorized access occurred.

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PILGRIM EVENT - 0003.0.0 11/10/87

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3. Possible Missed Surveillance Test

- A reactor protection system surveillance test scheduled for completion by BECo no later than November 7 was not performed until November 9 due to surveillance tracking program weaknesses.
- -- The test is required to be performed once per refueling outage by Technical Specifications. The licensee's scheduling system required performance once per week. The test had been performed last on October 30, so that it appears that no Technical Specification violation occurred and the problem is of minor safety significance.
- -- The scheduled test however, was not consciously deferred. It was missed due to failure of several of the checks and controls built into the licensee's tracking program which has been a problem in the past.

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PILGRIM EVENT - 0004.0.0 11/10/87

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4. Reassembly Problem of 'A' Recirc MG Sat

- -- GE reworked MG sets during outage.
- -- During initial runs of 'A' MG set on 11/7, set was damaged apparently due to improper asserbly (e.g., inadequate clearances, improper installation of cooling water and lube oil lines).
- -- 'B' MG has not been run (sets are non-safety related).

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OFFICIAL RECORD COPY

PILGRIM EVENT - 0005.0.0 11/10/87

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Chemical Waste Pump Contamination 5.

- On November 6, two A priority maintenance requests were written to repair the chemical waste pumps. These MRs were completed by BECo ... maintenance on November 6.
- On November 7, at about 1:00 a.m., the A pump was run. Licensee investigations indicated that plugs were not installed in the pump mechanical seal as required. When the pump was run, fluid sprayed out of the area of the missing plugs, contaminating the pump room. Two operators may have been slightly contaminated at this time.
- On November 7, sometime between 1:00 a.m. and 3:00 a.m., a health physics technician performed a survey of the chem waste pump room and identified general area radiation levels had increased by a factor of 5 to 10 and contamination levels had also significantly increased from previous surveys. No air samples were taken and the nealth physics technician entered the room without a RWP contrary to procedures which constitutes a potential violation.
- On November 7, at about 3:30 a.m., contamination of 1 to 10K dpm was identified in the hallway just outside the chemical waste pump room. - -
- On November 7, the two operators and the health physics technician mentioned above were given whole body counts. This was done because of the increased contamination levels in the room, uncertainty as to the specific cause and the lack of air sample data. No uptake was identified. Seven other individuals were identified as having been in the general area at the time and were required to have WBC. No results of these have been received.
- On November 8, at about 14:20, a maintenance worker repairing the A pump received minor contamination to his shorts to 3K dpm.

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OFFICIAL RECORD COPY

PILGRIM EVENT - 0006.0.0 11/10/87

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6. Spills From RHR/Fire Water Tie-In

-- At 2:00 p.m., 11/8, licensee was attempting to letdown torus water to rad waste. Water leaked in two places:

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- From the open drain valves, via drain hose -- sprayed two BECo operators slightly, contaminating skin and clothes.
- (2) From valve (recently installed as an SEP mod) which had not been repacked.
- -- Event recurred early on 11/9, when operators tried evolution again after shutting all valves (packing still leaked).
- -- Contamination of area led to about f minor personnel contaminations (BECo and contractor's).
- Event involved poor control of work and system turnovers, probably in violation of BECo procedures.

OFFICIAL RECORD COPY

PILGRIM EVENT - 0007.0.0

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- 7. Flatbed Area Contamination
 - -- About Noon, 11/8, BECo rad waste operators wanted to dump flatbed filter media to a high integrity cask, but noticed the chute was clogged with diatomaceous earth from previous work. Attempted to wash chute with water which resulted in diatomaceous earth and water on floor and then thru floor drain system.
 - -- Floor contamination was 500 mR/hr contact (area is normally highly contaminated).
 - -- Chute washing may have been normal work practice; was poorly controlled.

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PILGRIM EVENT - 0008.0.0 11/10/87

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8. Unexplained Contamination in the Rad Waste Corridor

- -- On November 8, 1987, between 3:00 and 4:00 p.m., 12 to 14 people were identified at the radiological control point with detectable shoe contamination ranging from less than 1K to 10K dpm/100 cm2. BECO HP review found indications of diatomaceous earth on the shoes and identified contaminated areas near the chemical waste pump room.
- -- The safety significance of this issue is low, but the events do indicate weaknesses in radiological work practices. Weaknesses in these practices and in ALARA controls were the subject of a 1984 Radiological Improvement Order.

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PILGRIM EVENT - 0009.0.0 11/10/87 -

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			OFFIC	E MEMORANDU		98 630	4262
Boston	Edison Comp	any			infi	RMG Cont	rol Number
To:	A. Pedersen		From:	E Stefemia	insk1	Record T	ype A4.08
Date:	9/5/86		Dept.	NMSS 86-183	-		ty Related
	Subject:	Security	Program 1	Improvements	Status Repo	ort #8	>
Distrit	bution:	a deserve		3475	Randon in the state of	*	
	E.T. Graham	Τ.	Nicholson	n P.	Hamilton	M.N.	Brosee
	R. Swanson	э.	McEacherr	n M.	McBride	D.L.	Myers

Attached is the eighth monthly status report on planned security program improvements. It is recommended that this report be forwarded to Messrs. Oxsen and Lydon for review and comment.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 and 2 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of these items in Attachment 3 have been discussed with Regional NRC Security Management.

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Attachments: 1. Plan and Schedule of Security Program Improvements

- 2. Compensatory Measure on Loss of Security Computer
- 3. Augmentations to Security Improvement Plan

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 4 FUIA- 88-198



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SUMMARY OF STATUS

ITEMS ON ATTACHMENT 1

- Additional BECo oversight of Security . Force.
- Establish a Corrective Action System to ٠ address Security Deviations.
- Perform Regulatory Regulrements Analysis. ٠
- Evaluate Security Training Methods. ٠
- Increase Oversight by Corporate Security. ٠
- Establish a program for Corporate Security Complete . to audit the Security Plan on a regular basis.
- Proceduralize Existing Surveillance ٠ Program.

ITEMS ON ATTACHMENT 2

- Perform Requirements Analysis ٠ of Security Computer System.
- Establish interim corrective action ٠ on loss of Security Computer.

ITEMS ON ATTACHMENT 3

- Vital Area Barriers modify ٠
- Intrusion Detection System modify ٠
- ٠
- ٠ Lighting - modify
- ٠ Facilities - supplement/upgrade.
- ٠ Training
- Security Program Objectives-establish ٠
- ٠ Intercompany Visits
- Compensatory Measures establish ٠ evaluation process.

STATUS

4 of 5 individuals on board. One remaining is pending medical clearance.

Procedure in place - 48 deviations reported.

On schedule - Plan to meet with NRC in Mid November to discussed proposed plan changes.

Complete

Complete - 1 person added to staff.

Complete

STATUS

Estimated Completion -May 1987

Complete

STATUS

Scheduled Completion 12/86

In Progress

In Progress

Plan and Schedule of Security Program Improvements

ADDITIONAL BECO OVERSIGHT OF SECURITY FORCE

Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

	Original Scheduled Completion	Current Status
Planned Milestones		
- Develop job description and app	prove Jan. 1986	Complete
- Commence hiring process for Bos Edison site security supervisor	ston Feb. 1986 's.	Complete
 First Additional Boston Edison security supervisors on board. (4 hired - 1 to go) 	site April 1986	Complete
 Remaining Boston Edison site se supervisors on board. 	ecurity July 1986	Offer accepted pending Medical clear- ance

CORRECTIVE ACTIONS SYSTEM

Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

	Original Scheduled Completion	Current Status
Planned Milestones		
- Identify and evaluate requirement the corrective action system.	s Mar. 1986	Complete
 Develop and approve procedure, including form for reporting deviations. 	June 1986	Complete July 3, 1986
- Incorporate into NOP 83A9	Complete	Complete 8/1/86 Effective 9/1/86

CORRECTIVE ACTIONS SYSTEM (continued) Planned Milestones (con't)	Original Scheduled Completion	Current Status
- Indoctrination and imp ementation of process.	July 1986	Complete - 48 deviations identified on new form as of 8/26/86
- Perform first trend analysis of deviations to identify recurring	Jan. 1986	Cchedule

problems.

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP). Safeguards Contingency Plan, and Training and Qualification (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

	Scheduled Completion	Current Status_
Planned Milestones		
- Obtain resources to perform anal	ysis. Jan. 1986	Complete
- Determine methodology of perform analysis.	ing Feb. 1986	Complete
 Perform regulatory requirements analysis. 		On schedule 9 of 10 modules Complete
- Prepare changes to Security Plan	Oct. 1986	
- Incorp. proposed changes Req'd b 8/4/86 Fed. Register into Plan.	y Oct. 1986	
- Finalize 10CFR50.54p Evaluation.	Nov. 2, 1986	
- ORC Review Security Plan.	Nov. 5, 1986	
- Meet with NRC on proposed plan changes.	Nov. 12, 1986	
- Incorp. NRC comments & final type	e. Nov. 18, 1986	
- Final ORC Review.	Nov. 19, 1986	
- Prepare 50.54p evaluation on T&Q and Contingency Plans.	To be Determined	

STATUS

Training

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Plan to evaluate the present approach to training such that:

- Security force personnel have a greater sense Complete of awareness of the bases behind their duties (i.e. why they are here).
- (2) Security force personnel understand the need to initiate aggressive corrective action and to follow-up thoroughly.

Increased Management Oversight - Corporate Security

Plan to establish a Corporate Security Representative Complete to strengthen the interface between site and corporate security personnel. This individual will be responsible to perform audits in accordance with a structured audit plan, review program document changes, and maintain a state-of-the-art knowledge of security methodologies. This change will be reflected in the Corporate Bulletin Book.

Self-Audits

Plan to audit the sections of the security plan on a Complete regular basis such that the entire plan is addressed by corporate security once/year.

Proceduralize Existing Programs

Plan to establish procedures for the existing internal Complete surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Compensatory Measure on Loss of Security Computer

A concern was raised by our Senior NRC Resident Inspector, Dr. M. McBride regarding establishment of compensatory measure within 10 minutes if the security computer becomes inoperable. The concern is that in 1985, six security event reports were filed because full compensatory limits were not established within 10 minutes after loss of the security computer.

The following corrective actions have been taken or are planned:

		Original Scheduled Completion	Current Status
P	lanned Atlestones		
-	Evaluate the reliability of the security computer		Complete
-	Develop recommendations for computer improvement.		Complete
•	Decision on optimal recommendation. (Pending requirements analysis by NED.)	Mar. 1986	May 1987

- Implement optimal recommendation Pending NED reqt's analysis

- As stated in our November 27, 1985 letter, Boston Edison reviewed the situation and implemented the following corrective actions:
 - Reviewed and revised the response methodology allowing security personnel to man the required posts within 10 minutes.
 - Temporarily increased staffing levels as an interim measure to ensure the 10-minute response time can be met.
 - Provided pre-established compensatory zone assignments on each shift in the event the computer becomes inoperable.
 - Trained security force on the revised methodology of response.
 - Conducted drills and verified that less than 10-minute response is achieved.

Page 1 of 1

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	ity Management.		no negional
		Scheduled Completion	Current Status
BARRI	ERS		
9		12/86	Complete Complete In Progress (Note 1)
	- Protected Area		
	- Incorp Fence Survey into Maintenance PM Program.	9/86	In Progress
	- Install Bottom Rail on Fence.	12/86	In Progress
	- Implement NED Recommendation on Wash Concern.	10/86	In Progress
INTRUS	ION DETECTION		
	- Obtain Response to ESR 86-253.	9/85	Complete
	- Develop (Maintenance) Repair Schedule.	10/86	In Progress
	 Develop Eng. Modification Schedule (Integrating with Requirements Analysis for Computer). 	5/87	Bids Due to NED on 9/15/86
	- Issue FRN to PDC 82-20D.	7/86	Complete
	- Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment.	11/86	In Progress
5			
	Obtain Response to ESR's 86-212 and 86-305.	9/86	In Progress

Attachment 3 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

Page 1 of 3

• •	Develop Implementation Plan (Integrating with require- ments Analysis for Computer)	5/87	Bids due to NED 9/15/86
•	Achieve resolution with NRC regarding Interim Compensatory Measures.	9/86	NRC reviewing BECo proposal
LIGHT	ING		
•	Restore yard lighting to original design requirements.		Complete
•	Revise OMG work instruction to include yard lighting considera- tions on trailers.		Complete
•	Obtain response to ESR 86-252.	8/86	Complete
•	Schedule completion of modifi- cations (PDC 83-09).	9/86	In Progress
•	Ferform lighting adequacy survey.	(after PDC)	
FACILI	TIES		
•	Establish private office location for BECo security management.	•	Complete
•	Request additional office/working lunchroom space for Security Force.	9/86	In Progress
•	Request upgrade of Security Facilities at Bechtel Warehouse Gate. Alternate Access Gate, (i.e., heat, light, a/c. furniture, painting).	9/86	In Progress
ADOITI	ONAL TRAINING		
•	Establish overview training module for BECo senior manage- ment.	9/86	In Progress
•	Establish initial technical training module for Security management.	1/87	In Progress
SECURI	TY PROGRAM C JECTIVES		
	Develop initial plan.	7/86	Complete
•	Establis iitial objectives includ e ecommendations.	9/86	Complete

SECURITY PROGRAM OBJECTIVES (continued)

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SECONTIT	PROGRAM ODDECTIVES (CONCINCTION		
•	Final decision on key objectives.	10/86	-
•	Develop Implementation Plan.	12/86	10.0
INTERCOM	PANY COMPARISONS		
•	Develop schedule for security shift supervisors to visit other sites.	10/86	In Progress
COMPENSA	TORY MEASURES		
·	Revised Procedure 3.10 to include the (7) seven criteria of NUREG 1045.	•	Complete
•	Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compli- ance.	1/87	In Progress
•	Security perform a periodic review of open MR's & Issue Report to management.	10/86	In Progress
	Initiate attendance of Security manage- ment personnel at seminars (e.g. indus- trial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete

NOTE 1: Original verbal commitment to NRC was given as 11/1/86. Schedule was impacted by fire protection damper modifications.

Q	1.1.1.1.1.1.1.1.1.1	OFFICE MEMO	RANDUM	98 6304670
	Boston Edison Company		mark	RMG Control Number
	To: A. Pedersen	From: E.S.	ziemianski	Record Type A4.08
	Date: 10/14/86	Dept. NM35	80-110	Non-salety herates
	Subject: Sec	urity Program Improve	ments Status Repo	ort #9

Attached is the ninth monthly status report on planned security program improvements. It is recommended that this report be forwarded to Messrs. Oxsen and Lydon for review and comment.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 and 2 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of these items in Attachment 3 have been discussed with Regional NRL Security Management.

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Attachments: 1. Plan and Schedule of Security Program Improvements 2. Compensatory Measure on Loss of Security Computer 3. Augmentations to Security Improvement Plan

Additional NED Distribution "Incline") - eap. Atl. #3 - Paulok - Note Pozz AH.3 5. Traget - ala AH# 2 ; vois pol-30 ft. 3 C. H. Minot - Tiste Pg Sm +1.3 (00 ... D. A. Bugant (malang) T. Friedarch

Plan and Schedule of Security Program Improvements

ADDITIONAL BECO OVERSIGHT OF SECURITY FORCE

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Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

	Original Scheduled Completion	Current Status
Planned Milestones		
- Develop job description and approve	Jan. 1986	Complete
- Commence hiring process for Boston Edison site security supervisors.	Feb. 1986	Complete
 First Additional Boston Edison site security supervisors on board. (4 hired - 1 to go) 	April 1986	Complete
 Remaining Borton Edison site security supervisors on board. 	July 1986	Failed Medical Reinitiating search with professional firm.

CORRECTIVE ACTIONS SYSTEM

Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

	Original Scheduled Completion	Current Status
Planned Milestones		
 Identify and evaluate requirements the corrective action system. 	Mar. 1986	Complete
 Develop and approve procedure. including form for reporting deviations. 	June 1986	Complete July 3, 1986
- Incorporate into NOP 83A9	Complete	Complete 8/1/86 Effective 9/1/86

CORRECTIVE ACTIONS SYSTEM (continued)

Planned Milestones	Original Scheduled Completion	Current Status
- Indoctrination and implementation of process.	July 1986	Complete
- Perform first trend analysis of deviations to identify recurring	Jan. 1987	Complete

problems.

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REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualification (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

	the second se	1.00	1986	Complete
*	Obtain resources to perform analysis.	Jan.	1300	comprese
	Determine methodology of performing analysis.	Feb.	1986	Complete
-	Perform regulatory requirements analysis.	Oct.	1986	On schedule 9 of 10 modules Complete
*	Prepare changes to Security Flan.	Oct.	1986	On schedule draft in typing
•	Incorp. proposed changes req'd by 8/4/86 Fed. Register into Plan. (Miscellaneous Amendments) Note (1)	Oct.	1986	On schedule draft complete
	Finalize 10CFR50.54p Evaluation. for changes to security plan.	Nov .	2, 1986	On schedule after submittal of draft
	ORC Review Security Plan changes. required by Federal Register (Miscellaneous Amendment) Note (1)	Nov.	5, 1986	On schedule
	Meet with NRC on proposed plan changes.(not those required by Federal Register)	Nov.	19, 1986	On schedule

Page 2 of 3

Plann	ed Milestones	Original Scheduled Completion	Current Status
- Sub	mit proposed changes to (Miscellaneous Amendments) e (1)	Dec. 2, 1986	On schedule
	orp. NRC comments & final type.	Dec. 2, 1986	Dependent upon extent of NRC comments
- F1r	al ORC Review.	Dec. 17, 1986	On schedule
- Pre and	pare draft changes to T&Q Contingency Plans	To be determin after Security submittal	
- Pre	pare 50.54p evaluation on and Contingency Plans.	To be Determin	ed
Train	ing		
Plan to tr	to evaluate the present approach aining such that:		
(1)	Security force personnel have a of awareness of the bases behind (i.e. why they are here).	greater sense their duties	Complete
(2)	Security force personnel underst to initiate aggressive correctiv to follow-up thoroughly.	and the need e action and	Lesson plan(s) to be delivered to TJN for evaluation November, 1986
Incre	eased Management Oversight - Corpo	rate Security	
to s' secur sibir audi main	to establish a Corporate Security trengthen the interface between si rity personnel. This individual w e to perform audits in accordance t plan, review program document ch tain a state-of-the-art knowledge odologies. This change will be re orate Bulletin Book.	with a structured anges, and of security	Complete
Self	-Audits		
CE OU	to audit the sections of the secu lar basis such that the entire pla orporate security once/year.	rity plan on a n is addressed	Complete
comm	: (1) This submittal is of a e different from the original itment. It is shown here for the ose of issuing a single, rehensive report. Page 3 of		
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Proceduralize Existing Programs

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Plan to establish procedures for the existing internal Complete surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Compensatory Measure on Loss of Security Computer

A concern was raised by our Senior NRC Resident Inspector, Dr. M. McBride regarding establishment of compensatory measure within 10 minutes if the security computer becomes inoperable.

The following corrective actions have been taken or are planned:

		Original Scheduled Completion	Current Status
Planned Milestones			
- Evaluate the reliability security computer	of the		Complete
- Develop recommendations f improvement.	or computer		Complete
- Decision on optimal recom (Pending requirements ana NED.)			Feb. 1987 based on NED inputs and as communicated to NGC via telecon on 10/20/86
- Implement optimal recomme	ndation	Pending NED req (ref Attachment	i's analysis 3)
As stated in our November 2 situation and implemented t	7, 1985 letter he following c	, Boston Edison orrective action	reviewed the
 Reviewed and revised the personnel to man the requ 	response metho ired posts wit	dology allowing hin 10 minutes.	security
- Temporarily increased sta the 10-minute response ti	ffing levels a me can be met.	s an interim mea	isure to ensure
 Provided pre-established in the event the computer 	compensatory z becomes inope	one assignments rable.	on each shift
- Trained security force on	the revised m	ethodology of re	sponse.
- Conducted drills and veri achieved.	fied that less Page 1 of 1	than 10-minute	response is

 BIRTERS Protected Area Protected Area Incorp Fence Survey Into Maintenance PM Program. Install Bottom Rail on Fence. Implement NED Recommendation on Wash Concern. 	Scheduled Completion 1/87 9/86	Complete Complete Complete Sent letter to NRC as follow-up to phone call (extending completion to 1/87).
 Protected Area Incorp Fence Survey into Maintenance PM Program. Install Bottom Rail on Fence. Implement NED Recommendation on Wash Concern. 		Complete Sent letter to NRC as follow-up to phone call (extending completion to 1/87).
 Incorp Fence Survey into Maintenance PM Program. Install Bottom Rail on Fence. Implement NED Recommendation on Wash Concern. 		Complete Sent letter to NRC as follow-up to phone call (extending completion to 1/87).
 Incorp Fence Survey into Maintenance PM Program. Install Bottom Rail on Fence. Implement NED Recommendation on Wash Concern. 	9/86	Complete
Maintenance PM Program. - Install Bottom Rail on Fence. - Implement NED Recommendation on Wash Concern.	9/86	Complete
- Implement NED Recommendation on Wash Concern.		comprete
on Wash Concern.	12/86	On schedule started 9/22
INTRUSION DETECTION	10/86	On schedule started 9/30
IN RUSTOR DETECTION		
- Obtain Response to ESR 86-253.	9/86	Complete
 MNB Develop (Maintenance) repair schedule. Initiated short-term repairs in conjunction with fence work. 	10/86	On schedule
 Develop Eng. Modification Schedule (Integrating with Requirements Analysis for Computer). 	2/87	On schedule . (improved original sched- ule of 5/87)
 Issue FRN to PDC 82-20D. (This installation was considered temporary because it was unknown if the system would be effective in this unique application). 	7/86	Installation complete but still getting false alarms

Page 1 of 4

			· · · · · · · · · · · · · · · · · · ·
•	Vendor adjustment of hardware installation. NED (John Turn providing followup.	/ 10/86 er)	Hardware shipped to vendor 10/86.
	Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment	11/86	On schedule - obtaining vendor recommendation for testing equipment.
00	otain Response to ESR's 5-212 and 86-305.	9/86	Have received response to 86-212.
			S Expect response to 86-305 by 10/86 (to utilize consultant input).
•	Develop Implementation Plan (Integrating with require- ments Analysis for Computer)	2/87	On schedule P.O. placed 10/85 with consultant.
	Achieve resolution with NRC regarding Interim Compensator Measures.	9/86 y	NRC reviewing BECo verbal proposal.
•	Issue formal letter to NRC regarding Interim Compensator Measures. (W. Lobo)	10/17/86 y	Complete - letter issued.
LIGHT.	ING		
•	Restore yard lighting to orig design requirements.	inal -	Complete
•	Revise OMG work instruction t include yard lighting conside tions on trailers.	o - ra-	Complete
•	Obtain response to ESR 86-252	, 8/86	Complete
•	Schedule completion of modifications (PDC 83-09).	- 10/86	Delayed one > month. Maintenance reviewing schedule sub- mitted by Bechtel.
		Page 2 of 4	

			· · · · · · · · · · · · · · · · · · ·
	Perform lighting adequacy survey.	After PDC	On schedule as part of NED comprehensive review
FACILITI	<u>15</u>		
•	Establish private office location for BECo security management.	•	Complete
	Request additional office/working lunchroom space for Security Force.	9/86	Complete trailer request re- submitted (outside pro- tected area) OMG has been requested to evaluate labor impact on use of alternate access Gate.
•	Confirming request maintenance upgrade of Security Facilities at Bechtel Wareho Gate, Alternate Access Gate, (i.e., heat light, a/c, furniture, painting).	9/86 buse	Complete
•	Inform NED of Security long-term space needs.	10/86	Complete. Verbally communicated to C.J. Minott.
ADDITION	AL TRAINING		
	Establish overview training module for BECo senior manage- ment.	11/86	Final comments resubmitted to Training Group Implementation delayed one month (to November)
	Establish initial technical training module for Security management.	1/87	On schedule learning objectives in preparation; to be submitted to training 10/86

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Page 3 of 4

SECURITY PROGRAM OBJECTIVES

1. 1.

	•	Develop initial plan.	7/86	Complete
	•	Establish initial objectives including recommendations.	9/86	Complete
	•	Final decision on key objectives.	10/86	With E.J. Ziemianski for decision
	•	Develop Implementation Plan.	12/86	Pending final decision
INTERC	OMP	ANY COMPARISONS		
	•	Develop schedule for security shift supervisors to visit other sites.	10/86	On schedule - Have had discussion with about eight other plants.
COMPEN	NSAT	ORY MEASURES		
	•	Revised Procedure 3.10 to include the (7) seven criteria of NUREG 1045.	•	Complete
	•	Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compli- ance.	1/87	On schedule - Procedure in preparation
	•	Security perform a periodic review of open MR's & Issue Report to management.	1/87	Changed schedule - will need work instruction.
	•	Initiate attendance of Security manage- ment personnel at seminars (e.g. indus- trial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete (will continue)

Boston	Edison Company	File	Premianski	RMG Control Number
To: Date:	A. Pedersen	From: E.J. Dept. NMSS	Bremianski 86-218	Record Type A4.08 Non-Safety Related
		urity Program Improv	ements status Repo	rt #10
Distri	bution: E.T. Graham R. Swanson D.A. Bryant	T. Nicholson R.V. Fairbank C.E. Higgins	P. Hamilton M. McBride	M.N. Brosee D.L. Myers

Attached is the tenth monthly status report on planned security program improvements. It is recommended that this report be forwarded to Messrs. Oxsen and Lydon for review and comment.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 and 2 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of these items in Attachment 3 have been discussed with Regional NRC Security Management.

PJH/la

Attachments:

1. Plan and Schedule of Security Program Improvements 2. Compensatory Measure on Loss of Security Computer

3. Augmentations to Security Improvement Plan

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Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _ 4 FOIA- 88- 198

Plan and Schedule of Security Program Improvements

ADDITIONAL BECO OVERSIGHT OF SECURITY FORCE

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Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

		Original Scheduled Completion	Current Status
Planned Milestones			
- Develop job description	and approve	Jan. 1986	Complete
- Commence hiring process Edison site security sup	for Boston pervisors.	Feb. 1986	Complete
- First Additional Boston security supervisors on		April 1986	Complete
- Remaining Boston Edison supervisors on board (4	site security hired to date)	July 1986	Search for last hire continues. Expect offer to be made to minority candidate December

CORRECTIVE ACTIONS SYSTEM

Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

	Original Scheduled Completion	Current Status
Planned Milestones		
 Identify and evaluate requirements the corrective action system. 	Mar. 1986	Complete
 Develop and approve procedure, including form for reporting deviations. 	June 1986	Complete July 3, 1986
- Incorporate into NOP 83A9	Complete	Complete 8/1/86 Effective 9/1/86

CORRECTIVE ACTIONS SYSTEM (continued)

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Planned Milestones	Original Scheduled Completion	Current Status
- Indoctrination and implementation of process.	July 1986	Complete
- Establish monthly trends		Complete
 Perform first trend analysis of deviations to identify recurring security deficiencies from SDR. 	Jan. 1987	On Schedule

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP). Safeguards Contingency Plan, and Training and Qualification (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

	Obtain resources to perform analysis.	Jan.	1986	Complete
ļ	Determine methodology of performing analysis.	Feb.	1986	Complete
-	Perform regulatory requirements analysis.	Oct.	1986	Complete Summary Report Issued
*	Prepare changes to Security Plan (rev. 19) based on regulatory regts analysis.	Oct.	1986	Complete
	Incorp. proposed changes req'd by 8/4/86 Fed. Register into Plan. (Rev. 18) (Miscellaneous Amendments) Note (1)	Oct.	1986	Complete Sent to Licensing
1	Finalize 10CFR50.54p Evaluation. for (Rev. 18) changes to security plan.		2, 1986	Not required
-	ORC Review Security Plan (Rev. 18) changes required by Federal Register (Miscellaneous Amendment) Note (1) (Rev. 18)	Nov.	12, 1986	Complete
	Meet with NRC on proposed plan changes.(not those required by Federal Register)	See stat	current us	Meeting held on Dec. 4, 1986 at NRC offices.

(Rev. 19)

Dec. 2, 1986 Revised to after NRC receives our transmittal	Complete Informal comments are being incorporated
after NRC receives our transmittal	comments are being
Feb. 18, 1987	Revised to accommodate unanticipated workload
Feb. 27, 1987	On schedule
To be determine after Security submittal	
To be Determine	ed
greater sense their duties	Complete
and the need e action and	Evaluation to be completed in January 1987
rate Security	
Representative te and corporate ill be respon- with a structured anges, and of security flected in the	Complete
	To be determine after Security submittal To be Determine To be Determine their duties and the need e action and rate Security Representative te and corporate ill be respon- with a structured anges, and of security

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Self-Audits

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Plan to audit the sections of the security plan on a regular basis such that the entire plan is addressed by corporate security once/year.

Note (1): This submittal is of a scope different from the original commitment. It is shown here for the purpose of issuing a single, comprehensive report. Complete

Proceduralize Existing Programs

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Plan to establish procedures for the existing internal Complete surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Compensatory Measure on Loss of Security Computer

A concern was raised by our Senior NRC Resident Inspector. Dr. M. McBride regarding establishment of compensatory measure within 10 minutes if the security computer becomes inoperable. The concern is that in 1985, six security event reports were filed because full compensatory limits were not established within 10 minutes after loss of the security computer.

The following corrective actions have been taken or are planned:

Original	A
Scheduled	Current
Completion	Status

Planned Milestones

- Evaluate the reliability of the Complete security computer
- Develop recommendations for computer Complete improvement.
- Decision on optimal recommendation. Mar. 1986 (Pending requirements analysis by NED.)
- Implement optimal recommendation

Pending NED reqt's analysis (ref Attachment 3)

Feb. 1987 based on

NED inputs and

as communicated to NRC via telecon on 10/20/86

- As stated in our November 27, 1985 letter, Boston Edison reviewed the situation and implemented the following corrective actions:
 - Reviewed and revised the response methodology allowing security personnel to man the required posts within 10 minutes.
 - Temporarily increased staffing levels as an interim measure to ensure the IO-minute response time can be met.
 - Provided pre-established compensatory zone assignments on each shift in the event the computer becomes inoperable.
 - Trained security force on the revised methodology of response.
 - Conducted drills and verified that less than 10-minute response is achieved.

Page 1 of 1

Attachment 3 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

		Scheduled Completion	Current Status
BARRIER	5		
		1/87	Complete Complete Complete
۰.	Protected Area		
	- Incorp Fence Survey into Maintenance PM Program.	9/86	Complete
	- Install Bottom Rail on Fence.	12/86	Schedule changed to be completed January, 1987
	- Implement NED Recommendation on Wash Concern.	10/86	Specific concern and corrective action was addressed and completed. However, long term fix is still required and will be incorporated into PDC86-74
	OF DETECTION		

INTRUSION DETECTION

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*	Obtain Response to ESR 86-253.	9/86
•	Implement short-term repairs in conjuction with fence work.	10/86
•	Develop Eng. Modification Schedule (Integrating with Requirements Analysis for Computer).	2/87
	Issue FRN to PDC 82-200. (This installation was considered temporary because it was unknown if the system would be effective in this unique application). Page 1 of	7/86

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On schedule factored into PDC86-77

Installation complete but still getting false alarms

	Install vendor adjusted hardware	10/86	Completed in December, 1986.
	Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment.	11/86	Still Awaiting vendor test recommendation. 1&C has been requested and has agreed to assist in resolving this issue. New completion will be scheduled.
	tain Response to ESR's -212 and 86-305.	9/86	Complete
•	Develop Implementation Plan (Integrating with require- ments Analysis for Computer)	2/87	On schedule factored into PDC86-78
•	Achieve resolution with NRC regarding Interim Compensatory Measures.	9/86	Letter issued in October. Still awaiting NRC feedback.
LIGHTI	NG		
•	Restore yard lighting to original design requirements.	-	Complete
•	Revise OMG work instruction to include yard lighting considera- tions on trailers.	-	Complete
•	Obtain response to ESR 86-252.	8/86	Complete
	Schedule completion of modifi- cations (PDC 83-09).	10/86	Revised preliminary schedule under review and indicates completion during RFO 7

Page 2 of 4

	Perform lighting adequacy survey.	After PDC	NUS survey results submitted to NED on 12/10/86
FACILITIE	s		
•	Establish private office location for BECo security shift supervisors.		Complete
	Request additional office/working lunchroom space for Security Force.	9/86	Trailer is now available and assigned in contractor parking lots. Plan to move into facility in January. Existing administration trailer to be used for locker and lunchroom space.
•	Confirming request maintenance upgrade of Security Facilities at Bechtel Wareho Gate, Alternate Access Gate, (e., hea light, a/c, furniture, painting).		Complete
•	Completion of facility upgrades	* **	Complete
	Inform NED of Security long-term space needs.	10/86	Complete. Verbally communicated to C.J. Minott.
ADDITIONA	L TRAINING		
·	Establish overview training module for BECo senior manage- ment.	11/86	Trial run session scheduled for February, 1987
	Establish initial technical training module for Security management. Page 3 of 4	1/87	Learning objectives were in preparation. Task post- poned until after Senior Level Management training module is ready for presentation

SECURITY	PROGRAM OBJECTIVES		
•	Develop initial plan.	7/86	Complete
•	Establish initial objectives including recommendations.	9/86	Complete
	Final decision on key objectives.	10/85	Twelve key performance objectives have been approved in January, 1987
•	Develop Implementation Plan.	12/86	Postponed until second quarter 1987
INTERCOMP	ANY COMPARISONS		
	Develop schedule for security shift supervisors to visit other sites.	10/86	Three (3) supervisors scheduled to visit Sequoyoh in January, 1987
COMPENSAT	TORY MEASURES		
· · ·	Revised Procedure 3.10 to include the (7) seven criteria of NUREG 1045.		Complete
•	Initiate attendance of Security manage- ment personnel at seminars (e.g. indus- trial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete (will continue)
	Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compli- ance.	1/87	Procedure completion was pre-empted by unanticipated workload increases resulting from audits and self- identified findings. Effort will be factored into overall procedure rewrite effort
	Security perform a periodic review of open MR's & Issue Report to management.	1/87	Process is in place; planning to prepare work instructions
	Page 4 of 4		

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OFFICE MEMORANDUM

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A.L. Oxsen

From: C.E. Higgins

NMSS 87-35

RMG Control Number

Record Type A4.08 Non-Safety Related

Date: 2/12/87

To:

Subject: Security Program Improvements Status Report #11

Dept.

Distribution:

J.M. Lydon E.T. Graham K. Roberts M.N. Brosee M. McBride (NRC) D.L. Myers J. Joyner (NRC Region 1) E.J. Ziemlanski

T. Nicholson R. Swanson D.A. Bryant

P. Hamilton R.V., Fairbank C.E. Higgins

Attached is the tenth monthly status report on planned security program improvements. It is recommended that this report be forwarded to Mr. Lydon for review and comment.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 and 2 of this report sore developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of these items in Attachment 3 have been discussed with Regional NRC Security Management. In our March report, closed items will be taken out of this report and included as a separate "close-out" report.

CEH/1a

- Attachments: 1. Plan and Schedule of Security Program Improvements
 - 2. Compensatory Measure on Loss of Security Computer
 - 3. Augmentations to Security Improvement Plan



PIL

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _ 4 FOIA- 88-198

P'an and Schedule of Security Program Improvements

ADDITIO AL BECO OVERSIGHT OF SECURITY FORCE

Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

	Original Scheduled Completion	Current Status_
Planned Milestones		
- Develop job description and approve	Jan. 1986	Complete
- Commence hiring process for Boston Edison site security supervisors.	Feb. 1986	Complete
 First Additional Boston Edison site security supervisors on board. 	Apr11 1936	Complete
- Boston Edison site security supervisors on board.	July 1986	Complete Feb. 2, 1987

CORRECTIVE ACTIONS SYSTEM

Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

	Original Scheduled Completion	Current Status
Planned Milestones		
 Identify and evaluate requirements the corrective action system. 	Mar. 1986	Complete
 Develop and approve procedure, including form for reporting deviations. 	June 1986	Complete July 3, 1986
- Incorporate into NOP 83A9	Complete	Complete 8/1/86 Effective 9/1/86

Page 1 of 4

CORRECTIVE ACTIONS SYSTEM (continued)

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Planned Milestones	Original Scheduled Completion	Current Status
- Indoctrination and implementation of process.	July 1986	Complete
- Establish monthly trends		Complete
 Perform first trend analysis of deviations to identify recurring security deficiencies from SDR. 	Jan. 1987	Complete Jan. 1987

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualification (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

	Obtain resources to perform analysis.	Jan.	1986	Complete
•	Determine methodology of performing analysis.	Feb.	1986	Complete
-	Perform regulatory requirements analysis.	Oct.	1986	Complete Summary Report Issued
-	Prepare changes to Security Plan (rev. 19) based on regulatory regts analysis.	Oct.	1986	Complete
*	Incorp. proposed changes req'd by 8/4/86 Fed. Register into Plan. (Rev. 18) (Miscellaneous Amendments) Note (i)	Oct.	1986	Complete Sent to Licensing
*	Finalize 10CFR50.54p Evaluation. for (Rev. 18) changes to security plan.		2, 1986	Not required
*	ORC Review Security Plan (Rev. 18) changes required by Federal Register (Miscellaneous Amendment) Note (1) (Rev. 18)	Nov.	12, 1986	Complete
*	Meet with NRC on proposed plan changes.(not those required by Federal Register) (Rev. 19)	See of state	current us	Meeting held on Dec. 4, 1986 at ARC offices.

Planned Milestones	Scheduled Completion	Current Status
- Submit proposed changes to NRC (Miscellaneous Amendments) Note (1) (Rev. 18)	Dec. 2, 1986	Complete
- Incorp. NRC comments & final type.	Revised to after NRC receives our transmittal	Informal comments are being incorporated
- Complete Independent Review of Rev.19	March 16, 1987	On schedule
- Final ORC Review.	March 25, 1987	Revised to accommodate unanticipated workload
- Submit Revision 19 to NRC	March 30, 1987	On schedule
- Prepare draft changes to T&Q and Contingency Plans	To be determine after Security submittal	
- Prepare 50.54p evaluation on T&Q and Contingency Plans.	To be Determine	d
Training		
Plan to evaluate the present approach to training such that:		
 Security force personnel have a gr of awareness of the bases behind t (i.e. why they are here). 	eater sense heir dutles	Complete
(2) Security force personnel understan to initiate aggressive corrective to follow-up thoroughly.		Completed January 1987
Increased Management Oversight - Corpora	te Security	
Plan to establish a Corporate Security R to strengthen the interface between site security personnel. This individual will sible to perform audits in accordance will audit plan, review program document chan maintain a state-of-the-art knowledge of methodologies. This change will be refl Corporate Bulletin Book.	and corporate 1 be respon- th a structured ges. and security	Complete

Self-Audits

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Plan to audit the sections of the security plan on a regular basis such that the entire plan is addressed by corporate security once/year.

Note (1): This submittal is of a scope different from the original commitment. It is shown here for the purpose of issuing a single. comprehensive report. Complete

Proceduralize Existing Programs

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Plan to establish procedures for the existing internal Complete surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Compensatory Measure on Loss of Security Computer

A concern was raised by our Senior NRC Resident Inspector. Dr. M. McBride regarding establishment of compensatory measure within 10 minutes if the security computer becomes inoperable. The concern is that in 1985, six security event reports were filed because full compensatory limits were not established within 10 minutes after loss of the security computer.

The following corrective actions have been taken or are planned:

	Original Scheduled Completion	Current Status
Planned Milestones		
 Evaluate the reliability of the security computer 		Complete
- Develop recommendations for computer improvement.		Complete
- Decision on optimal recommendation. (Pending requirements analysis by NED.)	Mar. 1986	Closed Dec. 22, 1986
- Implement optimal recommendation		Complete
As stated in our November 27, 1985 le situation and implemented the followi	tter, Boston Edis ng corrective act	on reviewed the tions:
- Reviewed and revised the response m personnel to man the required posts	ethodology allowi within 10 minute	ing security

- Temporarily increased staffing levels as an interim measure to ensure the 10-minute response time can be met.

- Provided pre-established compensatory zone assignments on each shift in the event the computer becomes inoperable.
- Trained security force on the revised methodology of response.
- Conducted drills and verified that less than iO-minute response is achieved.

Page 1 of 1

Attachment 3 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

		Scheduled Completion	Current Status
BARRIERS			
		- 1/87	Complete Complete Complete
- 1	Protected Area		
	- Incorp Fence Survey into Maintenance PM Program.	9/86	Complete
	- Install Bottom Rail on Fence.	Rescheduled March 1987	Schedule changed to be completed March, 1987
	- Implement NED Recommendation on Wash Concern.	10/86	Complete
INTRUSIO	N DETECTION		
-	Obtain Response to ESR 86-253.	9/86	Complete
	Implement short-term repairs in conjuction with fence work.	Rescheduled to March 1987	•
-	Develow Eng. Modification Schedule (Integrating with Requirements Analysis for Computer).	2/87	On schedule factored into PDC86-77
-	Issue FRN 35 to PDC 82-20D. (This installation was considered temporary because it was unknown if the system would be effective in this unique application).	7/86	Installation complete but still getting false alarms
	Page 1 of	4	

	- Install vendor adjusted hardware	10786	Completed in December, 1986.
	 Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment. 	11/86	Still Awaiting vendor test recommendation 1&C has been requested and has agreed to assist in resolving this issue. New completion will be scheduled.
8			
1	Obtain Response to ESR's 86-212 and 86-305.	9/86	Complete
	 Develop Implementation Plan (Integrating with require- ments Analysis for Computer) 	2/87	On schedule factored into PDC86-78
	 Achieve resolution with NRC regarding interim Compensatory Measures. 	9/86	Letter issued in October. Still awaiting NRC feedback.
	LIGHTING		
	 Restore yard lighting to original design requirements. 	•	Complete
	 Revise OMG work instruction to include yard lighting considera- tions on trailers. 	-	Complete
	• Obtain response to ESR 86-252.	8/86	Complete
•	 Schedule completion of modifi- cations (PDC 83-09). 	10/86	Revised preliminary schedule under review and indicates completion during RFO 7
	COMPUTER AND ACCESS CONTROL		
	 Obtain response to ESR 86-253 	9/86	Complete
	 Develope computer specification 	2/87	On schedule
	• Obtain bids	4/87	On schedule
	* Issue purchase order	5/87	On schedule
	 Schedule completion of modification 	6/87	Revise as needed
	Page 2 c	of 4	

•	•	Perform lighting adequacy survey.	After PDC	NUS survey results submitted to NED on 12/10/86
FACILI	TIE	<u>s</u>		
	•	Establish private office location for BECo security shift supervisors.	•	Complete
	•	Request additional office/working lunchroom space for Security Force.	9/86	Complete 2/6/87
	•	Confirming request maintenance upgrade of Security Facilities at Bechtel Warehous Gate, Alternate Access Gate, (i.e., heat, light, a/c, furniture, painting).	9/86 e	Complete
	•	Completion of facility upgrades		Complete
	•	Inform NED of Security long-term space needs.	10/86	Complete. Verbally communicated to C.J. Minott.
ADDITI	ONA	L TRAINING		
	•	Establish overview training module for BECo senior manage- ment.	11/86	Trial run session scheduled for February, 1987
	•	Establish initial technical training module for Security management.	1/87	Post-poned until 3rd quarter 1987

SECURITY	PROGRAM OBJECTIVES		
	Develop initial plan.	7/86	Complete
•	Establish initial objectives including recommendations.	9/86	Complete
•	Final decision on key objectives.	10/86	Twelve key performance objectives have been approved in January, 1987
•	Develop Implementation Plan.	12/86	Postponed until second quarter 1987
INTERCOM	PANY COMPARISONS		
•	Develop schedule for security shift supervisors to visit other sites.	10/86	January, 1987 Complete
COMPENSA	TORY MEASURES		
•	Revised Procedure 3.10 to include the (7) seven criteria of NUREG 1045.	-	Complete
•	Initiate attendance of Security manage- ment personnel at seminars (e.g. indus- trial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete (will continue)
•	Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compli- ance.	1/87	Complete (will continue)
•	Security perform a periodic review of open MR's & Issue Report to management.	1/87	Proce < is in place; planning to prepare work instructions
	Page 4 of 4		

Page 4 of 4

		OFFICE MEMORANDUM	1	Place mail ha	Region I
	n Edison Company A. L. Oxsen	From: C. E. Higgi	->- RMO	Control Number	Inter
Date:	3/9/87 Subject: Security	Dept. Doc. NSGL-87 Program Improvements	-68 . Non	ord Type A4.08 -Safety Related os Status Report	
Distri	bution: J. M. Lydon K. Roberts M. McBride (NRC) E. J. Ziemianski		T. Nicholson R. Swanson D. A. Bryant	P. Hamilton R. Fairbank NSGL-File	

Attached is the monthly status report on planned security program improvements. It is recommended that this report be forwarded to Mr. Lydon for review and comments.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachments 1 and 2 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of the items in Attachment 3 have been discussed with Regional NRC Security Management. Closed items only are in this report. A second report for this month includes only those open items. This report will not be published monthly.

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CEH/np

- Attachments: (1) Plan and Schedule of Security Program Improvements
 - (2) Compensatory Measure on Loss of Security Computer
 - (3) Augmentations to Security Improvement Plan

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _____ FOIA- 88-198

Plan and Schedule of Security Program Improvements - The following items are closed out.

ADDITIONAL BECO OVERSIGHT OF SECURITY FORCE

Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

	Original Scheduled Completion	Current Status
Planned Milestones		
- Develop job description and approve.	January 1986	Complete
- Commence hiring process for Boston Edison security supervisors.	February 1986	Complete
 First additional Boston Edison site security supervisors on board. 	April 1986	Complete
 Boston Edison site security supervisors on board. 	July 1986	Complete February 2, 1987

CORRECTIVE ACTIONS SYSTEM

Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

		Original Scheduled Completion	Current Status
<u>P1</u>	anned Milestones		
-	Identify and evaluate requirements of the corrective action system.	March 1986	Complete ·
•	Develop and approve procedure including form for reporting deviations.	June 1986	Complete July 3, 1986
-	Incorporate into NOP 83A9.	Complete	Complete 8/1/86 Effective 9/1/86
-	Indoctrination and implementation of process.	July 1986	Complete
-	Establish monthly trends.		Complete
-	Perform first trend analysis of deviations to identify recurring security deficiencies from SDR.	January 1987	Complete January 1987

ATTACHMENT 1 Page 2 of 2

Current Status

Increased Management Oversight - Corporate Security

Plan to establish a Corporate Security Representative to strengthen the interface between site and corporate security personnel. This individual will be responsible to perform audits in accordance with a structured audit plan, review program document changes, and maintain a state-of-the-art knowledge of security methodologies. This change will be reflected in the Corporate Bulletin Book.

Self-Audits

Plan to audit the sections of the security plan on a regular basis such that the entire plan is addressed by corporate security once/year.

Note (1): This submittal is of a scope different from the original commitment. It is shown here for the purpose of issuing a single, comprehensive report. Complete

Complete

Page 1 of 1

Current Status

Proceduralize Existing Programs

Plan to establish procedures for the existing internal Complete surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Compensatory Measure on Loss of Security Computer

A concern was raised by our Senior NRC Resident Inspector, Dr. M. McBride, regarding establishment of compensatory measure within 10 minutes if the security computer becomes inoperable.

The following corrective actions have been taken or are planned:

	Original Scheduled Completion	Current Status
Planned Milestones		
- Evaluate the reliability of the security computer.		Complete
- Develop recommendations for compute improvement.	r	Complete
 Decision on optimal recommendation. (Pending requirements analysis by N 		Closed 12/22/86
- Implement optimal recommendation.		Complete

As stated in our November 27, 1985 letter, Boston Edison reviewed the situation and implemented the following corrective actions:

- Reviewed and revised the response methodology allowing security personnel to man the required posts within 10 minutes.
- Temporarily increased staffing levels as an interim measure to ensure the IC-minute reponse time can be met.
- Provided pre-established compensatory zone assignments on each shift in the event the computer becomes inoperable.
- Trained security force on the revised methodology of response.
- Conducted drills and verified that less than 10-minute response is achieved.

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Attachment 3 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

		Scheduled Completion	Current Status
FACI	LITIES		
۰	Establish private office location for BECo security shift supervisors.		Complete
۰	Request additional office/working lunchroom space for Security Force.	9/86	Complete 2/6/87
•	Confirming request maintenance upgrade of Security Facilities at Bechtel Warehouse Gate, Alternate Access Gate (i.e., heat, light, a/c, furniture,	9/86	Complete
	painting).		
•	Completion of facility upgrades.		Complete
۰	Inform NED of Security long-term - space needs.	10/86	Complete. Verbally communicated to C.J. Minott

	n Edison Company A. L. Oxsen	OFFICE MEMORANI	/	RMG Control Number
Date:	3/9/87	Dept. Doc. NSGL	-87-69	Record Type A4.08 Non-Safety Related Status Report No. 12
Distri	lbution: J. M. Lydon K. Roberts M. McBride (NR E. J. Ziemianski	M. N. Brosee D. L. Myers (NRC Kegion I)	T. Nicholson R. Swanson D. A. Bryant	P. Hamilton R. Fairbank NSGL-File

Attached is the monthly status report on planned security program improvements. It is recommended that this report be forwarded to Mr. Lydon for review and comment.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachments 1 and 2 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 3 is a list of Security Program Augmentations. Many of these items in Attachment 3 have been ciscussed with Regional NRC Security Management. A similar meeting is scheduled for March 11, 1987, in King-of-Prussia. This report only contains open items. Closed items have been taken out of this report and are included as a separate "close-out" report.



PIL

CEH/np

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Compensatory Measure on Loss of Security Computer

(3) Augmentations to Security Improvement Plan

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 4 FOIA- 88-198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

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Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

<u>P1</u>	anned Milestones	Original Scheduled Completion	Current Status
-	Obtain resources to perform analysis.	January 1986	Complete
-	Determine methodology of performing analysis.	February 1986	Complete
-	Perform regulatory requirements analysis.	October 1986	Complete - Summary Report Issued
•	Prepare changes to Security Plan (Rev. 19) based on regulatory reqts analysis.	October 1986	Complete
1	Incorp. proposed changes required by 8/4/86 Fed. Register into Plan. (Rev. 18) (Miscellaneous Amendments) Note (1).	October 1986	Complete - Sent to Licensing
-	Finalize 10CRF50.54p Evaluation for (Rev. 18) changes to security plan.	November 2, 1986	Not Required
-	ORC Review Security Plan (Rev. 18) changes required by Federal Register (Miscellaneous Amendment) Note (1) (Rev. 18)	November 12, 1986	Complete
*	Meet with NRC on proposed plan changes (not those required by Federal Register) (Rev. 19)	See current status	Meeting held on December 4, 1986 at NRC offices
-	Submit proposed changes to NRC (Miscellaneous Amendments) Note (1) (Rev. 18)	December 2, 1986	Complete
	Incorp. NRC comments & final type.	Revise after NRC approves our transmittal.	Informal comments are being incor- porated.
	Complete Independent Review of Rev. 19	March 16, 1987	On schedule

ATTACHMENT 1 Page 2 of 2

	Original Scheduled Completion	Current Status
Planned Milestones (cont'd)		
- Final ORC Review.	March 25, 1987	Revised to accommodate unanticipated workload.
- Submit Revision 19 to NRC	March 30, 1987	On schedule
 Prepare draft changes to T&Q and Contingency Plans 	To be determined after Security Plan submittal.	
- Prepare 50.54p evaluation on T&Q and Contingency Plans.	To be determined.	

Compensatory Measure on Loss of Security Computer

- CLOSED OUT -

	Scheduled Completion	Current Status
BARRIERS		
·		
		Complete
		Complete
	1/87	Complete
- Protected Area		
- Incorporate Fence Survey into Maintenance PM Program.	9/86	Complete
- Install Bottom Rail on Fence.	Rescheduled March 1987	Schedule changed to be completed March 1987.
- Implement NED Recommendation on Wash Concern.	10/86	Complete
INTRUSION DETECTION		
- Obtain Response to ESR 86-253.	9/86	Complete
 Implement short-term repairs in conjunction with fence work. 	Rescheduled to March 1987	completion in March 1987.
- Develop Engineering Modification Schedule (Integrating with Require- ments Analysis for Computer).	2/87	On schedule - factored into PDC86-77.
- Issue FRN 35 to PDC 82-20D. (This installation was considered temporary because it was unknown if the system would be effective in this unique application.)	7/86	Installation complete but still getting false alarms.
- Install vendor adjusted hardware	10/86	Completed in December 1986

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Atttachment 3 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

ATTACHMENT 3 Page 2 of 4

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	Scheduled Completion	Current Status
INTRUSION DETECTION (cont'd)		
- Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment.	11/86	Still awaiting vendor test recommendation. I&C has been requested and has agreed to assist in resolving this issue. New comple- tion will be scheduled.
Obtain Response to ESR's 86-212 and 86-305.	9/86	Complete
 Develop Implementation Plan (Integrating with requirements Analysis for Computer). 	2/87	On schedule - factored into PDC86-78.
 Achieve resolution with NRC regarding Interim Compensatory Measures. 	9/86	Letter issued in October. Still awaiting NRC feedback.
LIGHTING		
 Restore yard lighting to original design requirements. 		Complete
 Revise OMG work instruction to include yard lighting considerations on trailers. 		Complete
• Obtain response to ESR 86-252.	8/86	Complete
 Schedule completion of modifications (PDC 83-09). 	10/86	Revised preliminary schedule under review and indicates completion during RFO 7.

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ATTACHMENT 3 Page 3 of 4

		Scheduled Completion	Current Status
COMPL	TER AND ACCESS CONTROL		
۰	Obtain response to ESR 86-253	9/26	Complete
•	Develop computer specification	2/87	On schedule
۰	Obtain bids	4/87	On schedule
•	Issue purchase order	5/87	On schedule
۰	Schedule completion of modification	6/87	Revise as needed
ø	Perform lighting adequacy survey	After PDC	NUS survey results submitted to NED on 12/10/86.
ADDIT	TIONAL TRAINING		
٥	Establish overview training module for BECo senior management.	11/86	Trial run session scheduled for February 1987.
٠	Establish initial technical training module for Security management.	1/87	Postponed until until 3rd quarter 1987.
SECUR	RITY PROGRAM OBJECTIVES		
	Develop initial plan	7/86	Complete
۰	Establish initial objectives including recommendations.	9/86	Complete
•	Final decision on key objectives.	10/86	Twelve key performance objectives have been approved in January 1987.
•	Develop Implementation Plan.	12/86	Posponed until 2nd quarter 1987
INTER	RCOMPANY COMPARISONS		
*	Develop schedule for security shift supervisors to visit other sites.	10/86	January 1987 Complete

		Scheduled Completion	Current Status
COMPE	INSATORY MEASURES		
•	Revised Procedure 3.10 to include the 7 criteria of NUREG 1045.		Complete
•	Initiate attendance of Security management personnel at seminars (e.g., industrial security) on state- of-the-art security equipment/ compensatory measures.	9/86	Complete (will continue)
•	Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compliance.	1/87	Complete (will continue)
•	Security perform a periodic review of open MR's and issue report to management.	1/87	Process is in place; planning to prepare work instructions.

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		ORER	Security
		OFFICE MEMORANDUM	sterne
Boston	Edison Company	Celining	RMG Control Number
To:	R. G. Bird	From: C. E. Higgins	
			Record Type A4.08
Date:	4/10/87	Dept. Doc. NSGL87-105	Non-Safety Related
	ject: Security	Program Improvements - Open Items	Status Report #13
	P. Roberts	M. N. Brosee T. Nicholson P	. Hamilton
	V. Morisi		. Fairbank
	McBride (NRC)	R. Andrew D. A. Bryant C	. Minot
	J. Ziemianski	P. Ondash S. Dascupta R	. Hird
	MacCormack	J. Joyner (NRC Region 1) J	. Kehoe
			NSGL-File

Attached is the monthly status report for the month of March 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

CEH/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Plan

	RELEASED
	((APR 1 6 1987))
toformation in this reco	rd was deleted
in accordance with the F Act, exemptions 4 FOIA 88-19	and the second se

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

PL	ANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
-	Obtain resources to perform analysis.	January 1986	Complete
-	Dutermine methodology of performing analysis.	February 1986	Complete
-	Perform regulatory requirements analysis.	October 1986	Complete - Summary Report Issued
-	Prepare changes to Security Plan (Rev. 19) based on regulatory reqts, analysis.	October 1986	Complete
7	Incorp. proposed changes required by 8/4/86 Fed. Register into Plan. (Rev. 18) (Miscellaneous Amendments) Note (1).	October 1986	Complete - Sent to Licensing
1	Finaliz: 10CRF50.54p Evaluation for (Rev. 18) changes to Security Plan.	November 2, 1986	Not Required
-	ORC Review Security Plan (Rev.18) changes required by Federal Register (Miscellaneous Amendment) Note (1) (Rev. 18).	November 12, 1986	Complete
•	Meet with NRC on proposed plan changes (not those required by Federal Register) (Issue 2, Rev. 0)	See current status	Complete - Meeting held on December 4, 1986 and on March 11, 1987 at NRC Offices

ATTACHMENT 1 Page 2 of 2

PLANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
 Submit proposed Security Plan changes to NRC (Miscellaneous Amendments) (Rev. 18) Note (1) 	December 2, 1986	Complete
- Incorporate NRC comments & final type.	Revise after NRC approves our transmittal.	Informal comments are being incorporated.
- Complete Independent Review of Security Plan, Issue 2, Rev. O	March 16, 1987	Complete
- Final ORC Review.	March 25, 1987	April 1, 1987 Revised to accommodate unanticipated workload.
- Submit Security Plan, Issue 2, Rev. 0 to NRC	March 31, 1987	On schedule April 6, 1987
 Prepare draft changes to T&Q and Contingency Plans 	To be determined after Security Plan submittal.	
 Prepare 50.54p evaluation on T&Q and Contingency Plans. 	To be determined.	

* Note (1): There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

> SCHEDULED CURRENT COMPLETION STATUS

BARRIERS

INT

- Protected Area

Incorporate Fence Survey into Maintenance PM Program.	9/86	Complete
Install Bottom Rail on Fence.	Rescheduled March 1987	Completed March 1987
Implement NED Recommendation on Wash Concern.	10/86	Complete
TRUSION DETECTION		
Obtain Response to ESR 86-253.	9/86	Complete
Implement short-term repairs in conjunction with fence work.	Rescheduled to March 1987	Completed March 1987
Develop Engineering Modification Schedule (Integrating with Requirements Analysis for Computer).	2/87	On schedule - factored into PDC86-77.
Issue FRN 35 to PDC 8 (This installation w dered temporary because it nown if the system would cive in this unique application.)	7/86	Completed March 1987
Install vendor adjusted hardware	10/86	Completed in December 1986

ATTACHMENT 2 Page 2 of 5

	RUSION DETECTION (con't)	SCHEDULED COMPLETION	CURRENT STATUS
INI	RUSION DETECTION (CON C)		
	Evaluate Technical Adequacy of Surveillance Procedure for Intrusion Detection Equipment.	11/86	Still awaiting vendor test recommendation. I&C has been requested and has agreed to assist in resolving this issue. New completion date will be scheduled.
Margar.			
		1.11	
	Obtain Response to ESR's 86-212 and 86-305.	9/86	Complete
	 Develop Implementation Plan (Integrating with requirements Analysis for Computer). 	2/87	On schedule - factored into PDC86-78. Scheduled for ORC April 87
	 Achieve resolution with NRC regarding Interim Compensatory Measures. 	9/86-1.14.1 Lu Maralli	Letter issued in October. Still awaiting NRC feedback.
		1/20/87 1 4-7 40	58.011.1
LI	GHTING	4) JU WIN	2/2
	 Restore yard lighting to original design requirements. 		Complete
	 Revise OMG work instruction to include yard lighting considerations on trailers. 		Complete
	* Obtain response to ESR 86-252.	8/86	Complete
	* Schedule completion of modifications (PDC 83-09).	10/86	Revised preliminary schedule under review and indicates completion during
			RFO 7

ATTACHMENT 2 Page 3 of 5

MODIFI	CATIONS TO GATEHOUSES AND	SCHEDULED CCMPLETION	CURRENT STATUS
•	Obtain Response to ESR 86-516 (PDC 87-17)	9/86	Complete
C		9/87	On Schedule
	Added x-ray machines and full length turnstiles Dec. 2, 1986	9/87	On Schedule
•	Modifications to Contractor Gatehouse	9/87	On Schedule
	S J A Approved	3/87	Complete
•	Schedule Completion of Modification	RFO 7	On Schedule
•	Requested Reassessment of Vital Areas as a response to IE Bulletin 86-91. (Add to ESR 86-516)	6/87	On Schedule
COMPU	TER AND ACCESS CONTROL		
	Obtain response to ESR 86-253	9/86	Complete
•	Develop computer specification	March 23, 1987	Complete
	Obtain bids	4/87	On Schedule
	Issue purchase order	5/87	On Schedule
•	Schedule completion of modification	6/87	Revise as needed
•	Perform lighting adequacy survey	After PDC	NUS Survey results submitted to NED

ATTACHMENT 2 Page 4 of 5

PERIMETER FUNCE AND GRADE/ UNDERGROUND PASSAGES	SCHEDULED COMPLETION	CURRENT STATUS
 Obtained Responses to ESR-86-212 and 86-305 	9/86	Complete
<pre>* Completed PDC 86-77 (ORC)</pre>	February 1987	Complete
Install Modifications	June 1987	On Schedule
ADDITIONAL TRAINING		
 Establish overview training module for BECo Senior Management. 	11/86	Complete March 1987
 Establish initial technical training module for Security Management. 	1/87	Postponed until 3rd guarter, 1987
SECURITY PROGRAM OBJECTIVES		
* Develop initial plan	7/86	Complete
 Establish initial objectives including recommendations. 	9/86	Complete
 Final decision on key objectives. 	10/86	Twelve key performance objectives have been approved in January 1987
 Develop Implementation Plan 	12/86	Posponed until 3rd guarter 1987
INTERCOMPANY COMPARISONS		
 Develop schedule for Security Shift Supervisors to visit other sites. 	10/86	On Going

ATTACHMENT 2 Page 5 of 5

4P	ENS	SATORY MEASURES	SCHEDULED COMPLETION	CURRENT STATUS
	•	Revised Procedure 3.10 to include the 7 criteria of NUREG 1045.		Complete
	•	Initiate attendance of Security Management Personnel at Seminars (e.g., industrial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete (will continue)
	•	Establish formal, regular re- evaluation of compensatory measures to determine alternative methods of achieving compliance.	1/87	Complete (will continue)
	•	Security perform a periodic review of open MR's and issue report to management.	1/87	Process is in place; planning to prepare work instructions.

3.8

COM

Boston Edison Company	ny /	E Diggins	RMG Control Numbe
To: R. G. Bird Date: 5/5/87		C. E. Worggins	Record Type A4.08 Non-Safety Relate
Subject: Securi	Progras, Improven	ments - Open It	ems Status Rep :t #14
/	Prograf, Improven	nents - Open It	ems Status Rep it #14
Distribution: K. P. Roberts	M. N. Brosee	T. Nicholson	P. Hamilton
Distribution:	M. N. Brosee D. L. Myers		

Attached is the monthly status report for the month of April 1987 on planned security program improvements.

EXECUTIVE SUMMARY

the Security Program Improvements listed in Attachment 1 of this report te developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

H/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Flan

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 4 FOIA- 88- 198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

PLANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
 Ferform regulatory requirements analysis. 	October 1986	Complete - Summary Report Issued
 Frepare changes to Security Plan r sed on regulatory regts, analysis, (Issue 2, Rev. 0) 	October 1986	Complete
 Incorp. proposed changes required by 4/80 Fed. Register into Plan. Fet. 18) (Miscellaneous Amendments) Note (1). 		Complete - Sent to NR:
- Nee! with NRC on proposed plan chanses (not those required by Federal Register) (Issue 2, Rev. O)	See current status	Complete - Meeting hold on December 4, 1986 and on March 11, 1987 at NRC Offices
- Submit proposed Security Flam changes to NRC (Miscellaheous Amendments) (Rev. 18) (te (1))	December 2. 1986.	Complete.
 Incorporate NRC (Rev. 18) comments 4 final type. 	Rovise after .nC approves our transmittal.	Informal comments are being incorporated.
 Security Plan. Issue 1, Rev. 0 	North 16, 170°	iomplete.

PL	ANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CU'RENT STATUS
-	Final ORC Review.	March 25, 1987.	Complete as of 4/3/87.
-	Submit Security Plan, Issue 2, Rev. 0 to NRC.	March 31, 1987.	Complete. April 27, 1987.
-	Prepare draft changes to T&Q and Contingency Plans.	July 31, 1987.	Started. 5/4/87.
•	Frepare 50.54p evaluation on Tag and Contingency Plans.	July 31, 1987.	Started. 5/4/87.
4	Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	Started. 5/4/8/.

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

Protected and Vital Area Barriers Α.

> Modify the protected area perimeter fence. 11

Action

PDC 86-74 issued.

Started -\$/21/87. CMG Projected Completion 10/21/87.

Scheduled for

Status

Status

8/15/87

Re. sess Vital Areas per IE Notice 86-91. 2)

Action

ACTION

Action

(PDC 83-09)

Add to ESR 86-516.

PDC 86-77 issued.

Έ.

Completion

Status

CMG Projected Start -5/11/87 Scheduled Completion. 12/4/87.

C. Improve the protected area and perimeter lighting system.

Status To complete by Schedule completion of modifications. start-up from RFO T.

Page 2 of 4

ATTACHMENT 2

SECURITY PROGRAMS IMPROVEMENTS (con't)

Engineering to evaluate use of high mast lighting to support and Intrusion Detection System. High Mast Study Complete. (4 Possible Areas). Detailed design in progress: to complete 6/15/87. Pending Town of Plymouth Permits.



Action

PDC 86-78 issued.

Status

Start = 4/30/87 CMG Projected Completion 12/15/87.

E. Redesign the Security Main Access Point and Alternate Access Point.

ACTION

Obtain response to ESR 86-516. (FDC 87-17)

Added x-ray machines and full length turnstiles. (PDC 87-17)

Modifications to Contractor Gatehouse. (Post RFO #7) (FDC-87-17)

FUC to FAFS for appreval

Schedule Completion of Modification

Status

Complete 9/---

On Schedule 9/87.

(in Schedule 9/87.

On Schedule 9/87.

On Schedule. 5/87.

On Schedule. RFO #7 (Partial) Post RFO #1 (Total).

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F .	Roplace the Security Computer and	Access Control	System.
	Action		Status
	Obtain response to ESR 86-253.		Complete. 9/86.
	Develop computer specification.		Complete. March 23, 1987.
	Obtain bids.		Rescheduled to 5/87.
	Issue purchase order		Rescheduled to 6/87.
L. T10"	AL TRAINING		
•	Establish initial technical training module for Security Management.	1/87	Postponed until 3rd quarter, 1987
e UUI	PROGRAM OBJECTIVES		
		SCHEDULED COMPLETION	CURRENT STATUS
	Establish initial objectives including recommendations.	9786	Complete.
	Final decision on key objectives.	10/86	Twelve key performance objectives have been approved in January 1981,
•	Develop Implementation Plan.	12/86	Postponed until 3rd quarter 198°.
TER	HANY COMPARISONS		
*	Develop schedule for Security Shift Supervisors to visit other sites.	10/86	On Going.

C

SECURITY PROGRAMS IMPROVEMENTS (con't)

COMPEN	SATORY MEASURES	SCHEDULED COMPLETION	CURRENT STATUS
•	Revised Procedure 3.10 to include the 7 criteria of NUREG 1045.		Complete.
	Initiate attendance of Security Management Personnel ct Seminars (e.g., industrial security) on state-of-the-art security equipment/compensatory measures.	9/86	Complete. On-Going.
•	Establish formal, regular re- evaluation of compensatory measures to determine alternative methods of achieving compliance.	1/87	Complete. (will continue).
	Security perform a periodic review of open MF's and issue report to management.	1/87	Frocess is in place: planning to prepare work instructions.

MEMORANDUM OFFIC RMG Control Number Boston Edison Company To: . R. G. Bird From: Record Type A4.08 Date: 6/1/87 Dept. Doc. NSGL87-247 Non-Safety Related Subject: Security Program Improvements - Open Items Status Report #15 Distribution: T. Nicholson P. Hamilton K. P. Roberts M. N. Brosee D. L. Myers R. Swanson R. Fairbank A. V. Morisi J. Kehoe M. McBride (NRC) R. Andrew C. Minotc S. Dasgupta P. Ondash R. Hird E. MacCormack NSGL File

Japlayner +NRO Region-14

Attached is the monthly status report for the month of May 198? on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

CEH/mep

(1) Plan and Schedule of Security Program Improvements Attachments: (2) Augmentations to Security Improvement Plan

NEN EASED OR USE RUL STATION

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _____ FOIA- 88- 198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

PL	ANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
-	Perform regulatory requirements analysis.	October 1986	Complete - Summary Report Issued
•	Prepare changes to Security Plan based on regulatory reqts. analysis. (Issue 2, Rev. 0)	October 1986	Complete
	Incorp. proposed changes required by 8/4/86 Fed. Register into Plan. (Rev. 19) (Miscellaneous Amendments) Note (1).	October 1986	Complete - Sent to NRC
	Meet with NRC on proposed plan changes (not those required by Federal Rogister) (Issue 2, Rev. O)	See current status	Complete - Meeting held on December 4, 1986 and on March 11, 1987 at NRC Offices
	Submit proposed Security Plan changes to NRC (Miscellaneous Amendments) (Rev. 18) Note (1)	December 2, 1986.	Complete.
•	Incorporate NRC (Rev. 18) comments & final type.	Revise after NRC approves our transmittal.	Waiting NRC approval.
÷	Complete Independent Review of Security Plan, Issue 2, Rev. O	March 16, 1987	Complete.

PLANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
- Final ORC Review.	March 25, 1987.	Complete as of 4/3/87.
- Submit Security Plan,	March 31,	Complete.
Issue 2, Rev. 0 to NRC.	1987.	April 27, 1987.
- Prepare draft changes to T&Q	July 31,	Started.
and Contingency Plans.	1987.	5/4/87.
 Prepare 50.54p evaluation on	July 31,	Started.
T&Q and Contingency Plans.	1987.	5/4/87.
- Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	On schedule.

Note (1)

There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was ?o satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2. Revision 0.

Page 1 of 4

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers

1) Modify the protected area perimeter fence.

Action

PDC 86-74 issued.

Started -4/21/87. CMG Projected Completion 10/21/87.

2) Reassess Vital Areas per IE Notice 86-91.

Action

Action

Add to ESR 86-516.

PDC 86-77 issued.

Status

Status

Scheduled for 8/15/87 Completion

F .

Status

Long lead materials -Delivery date 7/1/87. <u>Task Ready</u> 7/1/87. Scheduled completion 12/4/87.

Achie e resolution with NRC regarding Inter.m Compensatory Measures. Letter issued in 10/86. Still awaiting NRC feedback.

C. Improve the protected area and perimeter lighting system.

Action Status
Schedule completion of modifications. To complete by
start-up from
RFO 7.

SECURITY PROGRAMS IMPROVEMENTS (con't)

Engineering to evaluate use of high mast lighting to support and Intrusion Detection System. High Mast Study Complete. Detailed design in progress: to complete 6/15/87. Pending Town of Plymouth Permits. 3 minor FRN's IORC not required). Task ready 7/31/87.

D.

Action

PDC 86-78 issued.

Status

Start -4/30/87 CMG Projected Completion 12/15/87. Material delivery by 6/15/87. Task ready 6/15/87. F0 514.

E. Redesign the Security Main Access Point and Alternate Access Point.

Action

Obtain response to ESR 86-516. (PDC 87-17)

Added x-ray machines and full length turnstiles. (PDC 87-17)

Modifications to Contractor Gatehouse. (Fost RFO #7) (PDC-87-17)

PDC to PNPS for approval

Schedule Completion of Modification

Status

Complete 9/86.

On Schedule 9/87.

On Schedule 9/87.

On Schedule 9/87.

On Schedule. 5/87.

Design completed 5/11/87. Due for ORC 6/18/87. Long lead materials (X-Ray and protective sheilding). PO 514 delivery 8/1/87. Task ready 8/1/87.

AFTACHMENT 2

SECURITY PROGRAMS IMPROVEMENTS (con't)

F.	Replace the Security Computer and	Access Control S	vstem.
	Action		Status
	Obtain response to ESR 86-253.		Complete. 9/86.
	Develop computer specification.		Complete. March 23, 1987.
	Obtain bids.		Bids received Bid evaluation in progress.
	Issue purchase order		Rescheduled to 6/87.
ADDITIO	NAL TRAINING		
	Establish initial technical training module for Security Management.	1/87	Postponed until 3rd quarter, 1987
SECUR: :	Y PROGRAM OBJECTIVES		
		SCHEDULED COMPLETION	CURRENT STATUS
	Establish initial objectives including recommendations.	9/86	Complete.
	Final decision on key objectives.	10/86	Twelve key performance objectives were approved in January 1987.
•	Develop Implementation Plan.	12/86	Postponed until 3rd guarter 1987.
INTERCO	MPANY COMPARISONS		
	Develop schedule for Security Shift Supervisors to visit other sites.	10/86	On Going.

SECURITY PROGRAMS IMPROVEMENTS (con't)

COMPENSATORY MEASU	RES	SCHEDULED COMPLETION	CURRENT STATUS
- Revised Pro- include the NUREG 1045.	cedure 3.10 to 7 criteria of		Complete.
Management (e.g., indu state-of-th	tendance of Security Personnel at Seminars strial security) on e-art security ompensatory measures.	9/86	Complete. On-Going.
evaluation measures to	ormal, regular re- of compensatory determine methods of achieving	1/87	Complete. (will continue).
	rform a periodic pen MR's and issue anagement,	1/87	Process is in place; planning to prepare work instructions.

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Page 4 of 4

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OFFICE MEMORANDUM

Boston Edison Company

R. G. Bird To:

From:

Rich

RMG Control Number

Date: 7/3/87

Dept. Doc. NSGL87-325

Record Type A4.08 Non-Safety Related

Subject: Security Program Improvements - Open items Status Report #16

Distribution:			
K. P. Roberts	M. N. Brosee	T. Nicholson	P. Hamilton
A. V. Morisi	D. L. Myers	R. Swanson	R. Fairbank
M. McBride (NRC)	R. Andrew	J. Kehoe	C. Minott
E. MacCormack	P. Ondash	S. Dasgupta	R. Hird
	J. Joyner (NRC	Region I)	NSGL File

Attached is the monthly status report for the month of May 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

CEH/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Plan



Plu

Information in this record, was deleted in accordance with the Freedom of Information FOIA. 88-198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

PLAN	NED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
- S 1	Submit Security Plan, Issue 2, Rev. O to NRC.	March 31, 1987.	Complete. April 27, 1987. Waiting NRC Approval/Comments.
- 1	Prepare draft changes to T&Q and Contingency Plans.	July 31, 1987.	Complete 6/25/87.
- 1	Prepare 50.54p evaluation on T&Q and Contingency Plans.	July 31, 1987.	Started. p/4/87.
	Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	On schedule.

Note (1)

There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

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Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers

1) Modify the protected area perimeter fence.

Action

PDC 86-74 issued.

Status

Started -4/21/87. CMG Projected Completion 12/87.

On Schedule.

Milestones for completion by 9/30/87.

- Construction 90% - Fence work 90% - IDS cutover/tie-in 50%

 Reassess Protected and Vital Areas per IE Notice 86-91.

Action

Action

Add to ESR 86-516. (Protected Area)

Vital Area Analysis

PDC 86-77 issued.

4

Status

Complete.

Scheduled for 8/15/87 Completion.

в.

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Status

Long lead materials -Delivery date 7/1/87. <u>Task Ready</u> 7/1/87. Scheduled completion 12/87.

Complete.

Achieve resolution with NRC regarding Interim Compensatory Measures.

C. Improve the protected area and perimeter lighting system.

Page 2 of 4

ATTACHMENT 2

D

SECURITY PROGRAMS IMPROVEMENTS (con't)

Engineering to evaluate use of high mast lighting to support and Intrusion Detection System. High Mast Study Complete. Problems obtaining permits for high mast lighting resulted in a new design using 40 ft. roadway lighting. Design is in process. Schedule to be developed.

Status

PDC issued on 4/30/87 CMG Projected Completion 12/15/87. Received partial delivery. Freliminary schedule issued.

E. Redesign the Security Main Access Point and Alternate Access Point.

Action

Action

Issue PDC 86-78 .

Obtain response to ESR 86-516. (PDC 87-17)

PDC to PNPS for approval

Added x-ray machines and full length turnstiles. (PDC 87-17)

Modifications to Contractor Gatehouse. (Post RFO #7) (PDC-87-17)

Schedule Completion of Modification

S'.atus

Complete

Awaiting submittal

Pending PDC approval

Pending PDC approval

Awaiting submittal

Design completed 5/11/87. Long lead materials (X-Ray and protective sheilding). delivery 8/1/87. Task ready 8/1/87.

SECURITY PROGRAMS IMPROVEMENTS (con't)

F.	Replace the Security Computer and	Access Control S	System.
	Action		Status
	Obtain response to ESR 86-253.		Complete. 9/86.
	Develop computer specification.		Complete. March 23, 1987.
	Obtain bids.		Bids received Bid evaluation complete.
	Issue purchase order		Rescheduled to 7/87.
ADDITIC	DNAL TRAINING		
•	Establish initial technical training module for Security Management.	1/87	Postponed until 3rd guarter, 1987
SECURI	TY PROGRAM OBJECTIVES		
		SCHEDULED COMPLETION	CURRENT STATUS
1	Establish initial objectives including recommendations.	9/86	Complete.
	Final decision on ker objectives.	10/86	Twelve key performance objectives were approved in January 1987.
·	Develop Implementation Plan.	12/86	Postponed until 4th quarter 1987.
INTERC	OMPANY COMPARISONS		
*	Develop schedule for Security Shift Supervisors to visit	10/86	Complete.
	other sites.	1	

SECURITY PROGRAMS IMPROVEMENTS (con't)

CUM	IPEN	SATORY MEASURES	SCHEDULED COMPLETION	CURRENT STATUS
	•	Establish formal, regular re- evaluation of compensatory measures to determine alternative methods of achieving compliance.	1/87	Complete. (will continue).
		Security perform a periodic review of open MR's and issue report to management.	1/87	Completed. Continuing.

**	•	OFFICE MEMORANDUM	G Keinig RMG Control Number
Boston	Edison Company	From: C.E. Hitkins	RMG Control Number
ro:	R. G. Bird	From: C. E. Highins	Record Type A4.08

Date: 8/10/87

Dept. Doc. NSGL87-423 Non-Safety Related

P. /11

Subject: Security Program Improvements - Open Items Status Report #17

Distribution: K. P. Roberts A. V. Morisi M. McBride (NRC) E. MacCormack	M. N. Brosee T. Nichol D. L. Myers R. Swanso R. Andrew J. Kehoe P. Ondash S. Dasgup J. Joyner (NRC Region I)	n R. Fairbank C. Minott
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Attached is the monthly status report for the month of July 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

CEH/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Plan

> Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _ FOLA- 88- 198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This nualysis is to assure that the regulatory requirements are met by existing programs and procedures.

PLANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURBENT STATUS
- Submit Security Plan, Issue 2, Rev. 6 to NRC. (1)	March 31, 1987.	Complete. April 27, 1987. Waiting NRC Approval/Comments.
- Prepare draft changes to T&Q and Contingency Plans.	July 31, 1987.	Final comments received on draft nlans. T&Q being prepared for final typing. Review of final comments on T&Q complete. Final comments review for Contingency Plan scheduled for 8/12/87.
 Frepare 50.54p evaluation on T&Q and Contingency Plans. 	July 31, 1987.	Started. 5/4/87. Completion date requires extension. To be completed after review of final product but prior to submittal to NRC.
- Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	On schedule.

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers

Protected and tital area batter

Action PDC 86-74 issued. (Perimeter Fence) PDC 86-77 issued (CCTV) PDC 86-78 issued (Intrusion Detection System) System) System System

Projected milestone for completion by 9/30/87. On Schedule. - Construction 90% - Fence work 90%

- 1DS cutover/tie-in 50%

21 Reassess Protected and Vital Areas per IE Notice 86-91.

Action

Add to ESR 86-516. (Protected Area)

Vital Area Analysis

Status

Status

Status

Complete.

items delivered.

B. Improve the protected area and perimeter lighting system.

Action

Implement PDC 83-09

Problems obtaining permits for high mast lighting resulted in a new design using 40 ft. roadway lighting.

Design is in process. Schedule to be developed.

ATTACHMENT 2 (con't)

SECURITY PROGRAM IMPROVEMENTS

Redesign the Security Main Access Point and Alternate Access Point. C. Status Action Obtain response to ESR 86-516. Complete (PDC 87-17) Awaiting submittal PDC to PNPS for approval Pending PDC approval Added x-ray machines and full length Pending PDC approval turnstiles. (PDC 87-17) Modifications to Contractor Gatehouse. Awaiting submittal (Post RFO #7) (PDC-87-17) Design completed Schedule Completion of Modification 5/11/87. Long lead materials (X-Ray and protective sheilding). delivery 8/1/87. Task ready 8/1/87. Replace the Security Computer and Access Control System. D. Status Action Complete. Obtain response to ESR 86-253. 9/86. Complete .. . Develop computer specification. March 23, 1987. Bids received Obtain bids. Bid evaluation complete. Rescheduled Issue purchase order to 8/10/87

ADDITIONAL TRAINING

Establish initial technical 1/87 Postponed training module for Security quarter, 1987. Management. Working.

Page 2 of 3

ATTACHMENT 2 (con't)

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SECURITY PROGRAM IMPROVEMENTS

SECURITY PROGRAM OBJECTIVES

	SCHEDULED	CURRENT STATUS
 Establish initial objectives including recommendations. 	9/86	Complete.
- Final decision on key objectives.	10/86	Twelve key performance objectives were approved in January 1987.
- Develop Implementation Plan.	12/86	Postponed until 4th . quarter 1987.

Page 3 of 3

OFFICE MEMORANDUM

Boston Edison Company

R. G. Bird

From

RMG Control Number

TO

Record Type A4.08 Non-Safety Related

Date: 9/15/87

Dept. Doc. NSSM87-478

Subject: Security Program Improvements - Open Items Status Report #18

Distribution: P. Hamilton M. N. Brosee T. Nicholson K. P. Roberts R. Swanson J. D. Keyes D. L. Myers A. V. Morisi C. Minott J. Kehoe J. Lyash (NRC) R. Andrew S. Dasgupta R. Hird P. Ondash E. MacCormack J. Joyner (NRC Region I) . R. A. Ledgett NSSH File R. M. Deacy

Attached is the monthly status report for the month of August 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concurning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

Gr JN/mep

Attachments: (1) Plan and Schedule of Security Program Improvements

(2) Augmentations to Security Improvement Plan

DOCUMENT RELEASED EP 1 5 1987 FOR USE ROL STATION

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions _ 4 FOIA- 88-198

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Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

OBTOTALL

ORIGINAL SCHEDULED COMPLETION	STATUS
March 31, 1987.	Complete. April 27, 1987. NRC comments received. Rev. to issue 2 being prepared.
October 1986	Complete - sent to NRC.
	Comments rec'd from NRC - Add'' info required.
October 1987	Comments formulated, ORC approved 9/9/87.
July 31, 1987.	Completed. Revi of final comment completed and incorporated in final form.
July 31, 1987.	Started. 5/4/87. Completion date requires extension. To : completed after review of final product but pric to submittal to NRC.
Oct. 1, 1987.	On schedule. Meeting with Region 1 schedul for 9/24/87 concerning both Plans.
	SCHEDULED COMPLETION March 31, 1987. October 1986 October 1987 July 31, 1987. July 31,

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Page 1 of 3

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

Protected and Vital Area Barriers Α. Status Action (Perimeter Fence) Working and on PDC 86-74 issued. schedule. CMG projected completion date on all three (Intrusion Detection PDC 86-78 issued PDC's 12/87. System) CCTV long lead items delivered. Projected milestone for completion by 9/30/87. On Schedule. 90% - Construction 90% - Fence work - CCTV cutover/tie-in 50% - IDS cutover/tie-in 50% 2) Reassess Protected and Vital Areas per IE Notice 86-91. Status Action Complete. Add to ESR 86-516. (Protected Area) Rescheduled for vital Area Analysis 9/30/87 Completion. Improve the protected area and perimeter lighting system. 8. Status Action Implement PDC 83-09

Problems obtaining permits for high mast Design is in lighting resulted in a new design using 40 process. ft. roadway lighting. Schedule to be developed.

ATTACHMENT 2 (con't)

SECURITY PROGRAM IMPROVEMENTS

Redesign the Security Main Access Point and Alternate Access Point. C.

Action

Obtain response to ESR 86-516. (PDC 87-17)

PDC to PNPS for approval

Added x-ray machines and full length turnstiles. (PDC 87-17)

Modifications to Contractor Gatehouse. (Post RFO #7) (PDC-87-17)

Schedule Completion of Modification

Status

Complete

Awaiting submittal

Pending PDC approval

Pending PDC approval

Awaiting submittal

Design completed 5/11/87. Long lead materials (X-Ray and protective sheilding). delivery 8/1/87. Task ready 8/1/87.

C. Replace the Security Computer and Access Control System.

Action Obtain response to ESR 86-253.

Develop computer specification.

Obtain bids.

Issue purchase order

ADDITIONAL TRAINING

1/87 Establish initial technical training module for Security Management.

Status Complete. 9/86.

Complete. March 23. 1987.

Bids received Bid evaluation complete.

P.O. issued to Kidde Automated Systems Inc. en 8/17/87.

Pescheduled until 4th quarter, 1987. RFQ issued by NTD on 8/21/87.

Page 2 of 3

ATTACHMENT 2 (con't)

SECURITY PROGRAM IMPROVEMENTS

SECURITY PROGRAM OBJECTIVES

		SCHEDULED	CURRENT STATUS
-	Establish initial objectives including recommendations.	9/86	Complete.
-	Final decision on key objectives.	10/86	Twelve key performance objectives were approved in January 1987.
-	Develop Implementation Plan.	12/86	Postponed until 4th quarter 1987.

NOTE: Initial evaluation was conducted in August 1987. The approved Security Objectives were initially believed to be in conformance with the PNPS Security Plan.

Buston Edison Company RMG Control Number To: R. G. Bird From: ggins Record Type A4.08 Date: 10/9/87 Dept. Doc. NSSM87-540 Non-Safety Related Subject: Security Program Improvements - Open Items Status Report #19 Distribution:

K. P. Roberts M. N. Brosee T. Nicholson P. Hamilton A. V. Morisi D. L. Myers J. D. Keyes R. Swanson J. Lyash (NRC) R. Andrew J. Kehoe C. Minott E. MacCormack F. Ondash S. Dasgupta D. D. Zinter R. M. Deacy J. Joyner (NRC Region I) R. A. Ledgett NSSM File

Attached is the monthly status report for the month of September 1987 on planned security program inprovements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Cecurity Management. Closed items have been taken out of this report.

N/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Plan

DOCUMENT RELEASED OCT 1 3 1987 OR USE ROL STATION

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions ____ 4 FOLA- 88-198

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amerded Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

PL	LANNED MILESTONES	CL TION	CURRENT STATUS
-	Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)	У .1 31, 1987.	Complete. April 27, 1987. NRC comments received. Rev. to issue 2 submitted to address comment
-	Incorp. proposed changes required by 8/4/86 Fed. Register into Security Plan. (Rev.18) Miscellaneous Amendments (1)	October 1986	Complete - sent to NRC. Comments rec'd from NRC - Add'. info required.
-	Prepare and submit add'l comments to address miscellaneous Amendments.	October 1987	Complete.
	Prepare draft changes to T&Q and Contingency Plans.	July 31, 1987.	Completed. Pett of final comment completed and incorporated in final form.
	Prepare 50.54p evaluation on T&Q and Contingency Plans.	July 31, 1987.	Started. 5/4/87. Completion date requires extension. To P completed after review of final product but pric to submittal to NRC.
-	Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	Reschedule to 10/23/87. Met with Region I or 9/23/87 for revi of both plans.
Inte	(1) There were two separate tasks to	be completed con	corning the

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Page 1 of 3

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

Protected and Vital Area Barriers λ. Status Action Working and on PDC 86-74 issued. (Perimeter Fence) schedule. CMG projected completion date PDC 86-78 issued (Intrusion Detection on all three System) PDC's 12/87. Projected milestone for completion by 9/30/87. Reschedule to - Construction 908 prior to start-908 - Fence work up. A State of the second second IDS cutover/tie-in 50% Reassess Protected and Vital Areas 2) per IE Notice 86-91. Status Action Complete. Add to ESR 86-516. (Protected Area) Vital Area Analysis redirected to verify Rescheduled for prior to start-up Barrier Integrity. Complete on Submit ESR (87-688) 9/22/87. B . Improve the protected area and perimeter lighting system. Status Action Implement PDC 83-09 Problems obtaining permits for high mast · ~ 15 Work lighting resulted in a new design using 40 do scarted on ft. roadway lighting. pole foundation. Schedule to be developed.

ATTACHMENT 2 (con't)

SECURITY PROGRAM IMPROVEMENTS

C. Redesign the Security Main Access Point and Alternate Access Point.

Action

Obtain response to ESR 86-516. (PDC 87-17)

PDC to PNPS for approval



Added x-ray machines and full length turnstiles. (PDC 87-17)

Modifications to Contractor Gatehouse. (Post RFO #7) (PDC-87-17)

Schedule Completion of Modification

Status

Complete

Complete. Under security review.

Pending PDC 87-17 approval and completion.

Pending PDC 87-17 approval and completion.

Pending final Mgt. decision (Post RFO #7).

Design completed 5/11/87. Long lead materials (X-Ray and protective sheilding) on site. Implementation of PDC 87-17 pending station approval.

8/21/87.

D. Replace the Security Computer and Access Control System.

	Action		Status
	Obtain response to 197 NG-253.		Complete. 9/86.
	Develop computer specification.		Complete. March 23, 1987.
	Obtain bids.		Complete
	Issue purchase order		Complete
ADDITI	ONAL TRAINING		
-	Establish initial technical training module for Security Management.	1/87	Rescheduled until 4th quarter, 1987. RFQ issued by NTD on

Page 2 of 3

ATTACHTERT & ICON CT

SECURITY PROGRAM IMPROVEMENTS

SECURITY PROGRAM OBJECTIVES

		SC. EDULED	CURRENT STATUS
-	Establish initial objectives including recommendations.	9/86	Complete.
-	Final decision on key objectives.	20/86	Twelve key performance objectives were approved in January 1987.
•	Develop Implementation Plan.	12/86	Postponed until 4th quarter 1987.

NOTE: Initial evaluation was conducted in August 1987. The approved Cocurity Objectives were initially believed to be in conformance with the PNPS Security Plan. OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: R. G. Bird

From:

Record Type A4.08 Non-Safety Related

Date: 11/17/87

Dept. Doc. NSSM87-626

Subject: Security Program Improvements - Open Items Status Report #20

fistribution: T. Nicholson P. Hamilton M. N. Brosee K. P. Roberts R. Swanson J. D. Keyes D. L. Myers A. V. Morisi J. Kehoe C. Minott R. Andrew J. Lyash (NRC) S. Dasgupta D. D. Zinter S. MacCormack P. Ondash R. A. Ledgett NSSM File W. Russell (NRC Region I) R. M. Deacy

Attached is the monthly status report for the month of October 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been taken out of this report.

TJN/mep

Attachments: (1) Plan and Schedule of Security Program Improvements (2) Augmentations to Security Improvement Plan

RELEASED V 1 8 1987 Information in this record was deleted

in accordance with the Freedom of Information Act, exemptions

Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Traini and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulatory This analysis is to assure that the regulatory requirements are sting programs and procedures.

ORIGINAL

Complete. April 27, 1987. NRC comments
received. Rev. to issue 2 submitted to address comments
36 Complete - sent to NRC.
Comments rec'd from NRC - Add'l info required.
37 Complete.
Initial review completed. Fina comments being incorporated. Final draft rescheduled to 1/30/87.
Started. 5/4/87. Completion date requires extension To b completed after review of final product but prio to submittal to NRC.

Page 2 of 2

ATTACHMENT 1 Regulatory Requirements Analysis (con't)

ORIGINAL	
SCHEDULED	CURRENT
COMPLETION	STATUS

PLANNED MILESTONES

- Submittal of Contingency Plan and Tag to NRC.

Oct. 1, 1987.

Reschedule to 12/15/87. Met with Region I on 9/23/87 for revie of both plans.

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

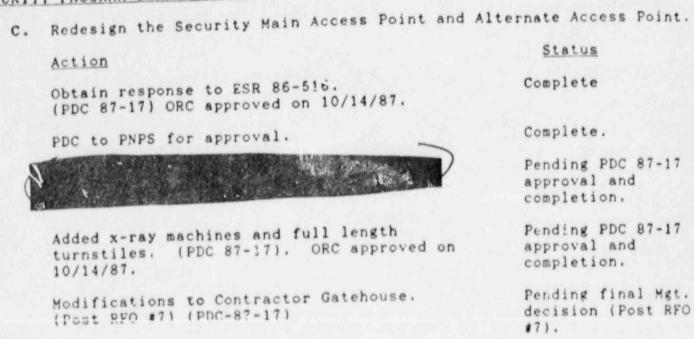
Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SICURITY SYSTEMS HARDWARE/FACILITIES:

Protected and Vital Area Barriers Α. Status Action PDC 86-74 issued. (Perimeter Fence) 85% Complete Working and on schedule. CMG projected 20% Complete completion date PDC 86-78 issued (Intrusion Detection on all three 65% Complete PDC's 12/87. System) Projected milestone for completion by 11/16/87. Reschedule to 90% prior to start-- Construction 90% Up. - Fence work - IDS cutover/tie-in Reassess Protected and Vital Areas 2) per IE Notice 86-91. Status Action Add to ESR 86-516. (Protected Area) Complete. Vital Area Analysis redirected to verify Rescheduled for prior to Barrier Integrity. start-up Complete on ESR (87-688) - Scheduled to begin work on 12/23/87. 11/23/87. Improve the protected area and perimeter lighting system. E. Status Action 50% Complete Implement PDC 83-09 Problems obtaining permits for high mast Design is lighting resulted in a new design using 40 complete. Work has started and ft. roadway lighting. schedule is sequenced with CCTV schedule for PDC 86-77.

ATTACHMENT 2 (con't)

SECURITY PROGRAM IMPROVEMENTS



Schedule Completion of Modification

D. Replace the Security Computer and Access Control System.

Action

Obtain response to ESR 86-253.

Develop computer specification.

Obtain bids. Issue purchase order.

ADDITIONAL TRAINING

Establish initial technical training module for Security Management.

1/88

Ongoing -Scheduled completion date \$ 100

Page 2 of 2

Pending PDC 87-17 approval and

Pending PDC 87-17 approval and completion.

Pending final Mgt. decision (Post RFO

Design completed 5/11/87. Long lead materials (X-Ray and protective sheilding) on site. Implementation of PDC 87-17 pending station approval.

Status

Complete. 9/86.

Complete. March 23, 1987.

Complete

Complete - P.O. #63784 issued

Kidde Automated Systems. Preliminary schedule being developed by HED.

OFFICE	MEMO	RANDUM
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Boston Edison Company

1/19/88

From:

RMG Control Number

To: E. S. Kraft

Dept. Doc. NSSM88-020

Record Type A4.08 Non-Safety Related

PII.

Subject: Security Program Improvements - Open Items Status Report #22

Distribution:

Date:

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Attached is the monthly status report for the month of December 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report were developed in response to the civil penalty resulting from events of August 1985, concerning vital area barriers. Attachment 2 is a list of Security Program Augmentations. Many of these items in Attachment 2 have been discussed with Regional NRC Security Management. Closed items have been take out of this report.

N/atf

Attachments:

Plan and Schedule of Security Program Improvements
 Augmentations to Security Improvement Plan

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Plan and Schedule of Security Program Improvements

REGULATORY REQUIREMENTS ANALYSIS

Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Cafeguards Contingency Plan, and Training and Qualifications (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

	LANNED MILESTONES	ORIGINAL SCHEDULED COMPLETION	CURRENT STATUS
-	Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)	March 31, 1987.	Complete. April 27, 1987. NRC comments received. Rev. 1 to issue 2 submitted to address comments.
-	Incorporate proposed changes required by 8/4/86 Fed. Register into Security Plan. (Rev.18) Miscellaneous Amendments (1)	October 1986	Complete - sent to NRC. Comments rec'd from NAC - Add'1 info required and resubmitted.
-	Prepare and submit add'1 comments to address miscellaneous Amendments.	October 1987	Complete.
-	Prepare draft changes to T&Q and Contingency Plans.	July 31, 1987.	T&Q delivered to RA&P on 1/19/88. Contingency Plan scheduled to be delivered to RA&P on 1/20/88.
	Prepare 50.54p evaluation on T&Q and Contingency Plans.	July 31, 1987.	Estimated completion date is 1/22/88.
	Submittal of Contingency Plan and T&Q to NRC.	Oct. 1, 1987.	Rescheduled to 1/30/88.

Note (1) There were two separate tasks to be completed concerning the Security Plan. The first, Revision 18, was to satisfy the Miscellaneous Amendments to be submitted to the NRC by December 2, 1986. The other was a complete reissue of the Security Plan, identified as Issue 2, Revision 0.

Attachment 2 is a list of Augmentations to the Security Improvement Plan. Many of these items have been periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

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A. Protected and Vital Area Barriers

Action	status
PDC 86-74 issued. (Perimeter Fence) 85% Complete 50% Complete	schedule. CMG
PDC 86-78 issued (Intrusion Detection System) 65% Complete	completion date on all three
Projected milestone for completion by 11/16/87. - Construction 90% - Fence work 90% - IDS cutover/tie-in 50%	Rescheduled to 2/7/88
 Reassess Protected and Vital Areas per IE Notice 86-91. 	
Action	Status
Add to ESR 86-516. (Protected Area)	Complete.
Vital Area Analysis redirected to verify Barrier Integrity.	Rescheduled to 2/7/88 start-up
ESR (87-688) - Rescheduled to begin work on 12/15/87.	Projected completion 2/7/88.
Improve the protected area and perimeter lighting	g system.
Action	Status
Implement PDC 83-09 50% Complete	
Problems obtaining permits for high mast lighting resulted in a new design using 40 ft. roadway lighting.	Design is complete. Work has started and schedule is sequenced with CCTV schedule for PDC 86-77.

ATTACHMENT 2 (con't)

SECURITY PROCRAM IMPROVEMENTS

C. Redesign the Security Main Access Point and Alternate Access Point.

Action Obtain response to ESR 86-516. (PDC 87-17) ORC approved on 10/14/87.

PDC to PNPS for approval.

Added x-ray machines and full length turnstiles. (PDC 87-17). ORC approved on 10/14/87.

Modifications to Contractor Gatehouse. (Post RFO #7) (PDC-87-17)

Schedule Completion of Modification

<u>Status</u> Complete

Complete.

Pending PDC 87-17 approval and completion.

Pending PDC 87-17 approval and completion.

Perding final Mgt. decision (Post RFO #7).

Design completed 5/11/87. Long lead materials (X-Ray and protective shielding) on site. Implementation of PDC 87-17 pending station approval.

D. Replace the Security Computer and Access Control System.

Action Obtain response to ESR 86-253.

Develop computer specification.

Obtain bids.

Issue purchase order.

ADDITIONAL TRAINING

 Establish initial technical training module for Security Management. <u>Status</u> Complete 9,86.

Complete 3/23/87.

Complete.

1/88

Complete - P.O. #63784 issued Kidde Automated Systems. Preliminary schedule being developed by NED.

Module Complete. Training scheduled for completion February 1988. OFFICE MEMORANDUM

Boston Edison Company

From: D.

RMG Control Number

lo: E. S. Kraft

Dept. Doc. 155M 88-122

Record Type A4.08 Non-Safety Related

Unte: h/2/88

Subject: Security Program Improvements - Open Items Status Report #26

Distribution:

T. Nicholson C. Warren (NRC) NSSM File W. Russell (NRC Region 1)

Attached is the status report for the month of May 1988 on planned security program improvements.

EXECUTIVE SUMMARY

The attached are augmentations to the Security Program Improvements which were developed in response to a civil penalty due to events of August 1985, concerning vital areas. These planned improvements have been discussed with Regional NRC Security Management at length. Completed items are not included in this report.



Attachments: (1) Augmentations to Security Improvement Plan

This Attachment is a list of Augmentations to the Security Improvement Plan. These items are periodically discussed with NRC Regional Security Management.

SECURITY SYSTEMS HARDWARE/FACILITIES:

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A. Protected and Vital Area Barriers

Action	Construction Status
PDC 86-74 issued. (Perimeter Fence)	99% Complete.
	* 80% Complete.
PDC 86-78 issued. (IDS)	95% Complete.
	Target for 100% operability is 8/88.



2) Reassess Protected and Vital Areas per 1E Notice 86-91.

Action

Vital Area Analysis redirected to verify Barrier Integrity. (ESR 87-688)

Status

Walkdown • omplete. Report issued. No discrepancies noted.

ATTACHMENT 1 JEON 11

B. Improve the protected area and perimeter lighting system.

Action

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Implement PDC 83-09.

Status

95% Complete. (Four poles remain to be installed.

C. Modify Areas at Main and Alternate Access Points.

Action

Obtain response to ESR 86-516.

ORC approve PDC 87-17 and issue for construction.

Schedule Completion of Modification associated with PDC 87-17.

- X-ray Machines

- New Explosive and Metal Detectors
- Full-length Turnstiles at Main Access Point
- Upgrade of Barriers for Security Back-up power
- D. Replace the Security Computer and Access Control System

Action

Obtain response to ESR 86-253.

Develop computer specification.

Obtain bids.

Issue purchase order.

Conceptual construction study.

Status

Complete.

Complete.

Scheduled for completion 9/30/88.

Status Complete 9/86. Complete 3/23/87.

Complete.

Complete - F.O. #63784 issued Kidte Automated Systems. Preliminary schedul being developed by NED.

In progress. Estimated completic date 9/88.

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