

November 11, 1987

NOTE TO: C. Ader, OCM/TR  
C. Miller, OCM/FB  
T. Elsasser, OCM/KC  
J. Scarborough, OCM/KR

FROM: Pat Gwynn, OCM/LZ *TPG*

SUBJECT: INFORMATION CONCERNING STOP WORK ORDER AT PILGRIM

I understand that Boston Edison Company stopped certain work being performed by contractor employees at Pilgrim yesterday (11/9/87). The basis for the stop work, according to the NRR Licensing Project 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 this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 4  
FOIA- 88-198

R/17

## Pilgrim Events Leading to BECo Decision to Stop Work

### Overview

There were a series 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.

1. Locked High Radiation Area Door Latch Taped

- On November 8, at 12:30 a.m., a contractor security guard accessing the [REDACTED] identified 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 [REDACTED]. 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 [REDACTED]. The licensee's investigation indicates that security guards posted on the [REDACTED] 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 [REDACTED]. This was being done without H.P. permission and constituted an additional violation of locked high rad area controls.

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 [REDACTED] had been removed, degrading the security barrier at the ventilation intake. Only a "bird screen" remained in place.
- 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.

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.

4. Reassembly Problem of 'A' Recirc MG Set

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

5. Chemical Waste Pump Contamination

- 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 health 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.

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:
  - (1) 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 5 minor personnel contaminations (BECo and contractor's).
- Event involved poor control of work and system turnovers, probably in violation of BECo procedures.



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.

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 cm<sup>2</sup>. 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.

Boston Edison Company

RMG Control Number

To: A. Pedersen

From: E. J. Ziemiński

Date: 9/5/86

Dept. NMSS 86-183

Record Type A4.08  
Non-Safety RelatedSubject: Security Program Improvements Status Report #8Distribution:E.T. Graham  
R. SwansonT. Nicholson  
J. McEachernP. Hamilton  
M. McBrideM.N. Brosee  
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.

PJH/a1

- 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



## SUMMARY OF STATUS

### ITEMS ON ATTACHMENT 1

### STATUS

- Additional BECo oversight of Security Force. 4 of 5 individuals on board. One remaining is pending medical clearance.
- Establish a Corrective Action System to address Security Deviations. Procedure in place - 48 deviations reported.
- Perform Regulatory Requirements Analysis. On schedule - Plan to meet with NRC in Mid November to discussed proposed plan changes.
- Evaluate Security Training Methods. Complete
- Increase Oversight by Corporate Security. Complete - 1 person added to staff.
- Establish a program for Corporate Security to audit the Security Plan on a regular basis. Complete
- Proceduralize Existing Surveillance Program. Complete


### ITEMS ON ATTACHMENT 2

### STATUS

- Perform Requirements Analysis of Security Computer System. Estimated Completion - May 1987
- Establish interim corrective action on loss of Security Computer. Complete

### ITEMS ON ATTACHMENT 3

### STATUS

- Vital Area Barriers - modify Scheduled Completion 12/86
- Intrusion Detection System - modify In Progress
-  In Progress
- Lighting - modify In Progress
- Facilities - supplement/upgrade. In Progress
- Training In Progress
- Security Program Objectives-establish In Progress
- Intercompany Visits In Progress
- Compensatory Measures - establish evaluation process. In Progress

ATTACHMENT 1

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.

|  | <u>Original Scheduled Completion</u> | <u>Current Status</u>                    |
|--|--------------------------------------|--|
| <u>Planned Milestones</u>  |                                      |  |
| - 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 Boston Edison site security supervisors on board.                            | July 1986                            | Offer accepted pending Medical clearance |

• 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.

|   | <u>Original Scheduled Completion</u> | <u>Current Status</u>            |
|---|--------------------------------------|----------------------------------|
| <u>Planned Milestones</u>   |                                      |                                  |
| - 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 |

| <u>CORRECTIVE ACTIONS SYSTEM (continued)</u>                                 | <u>Original Scheduled Completion</u> | <u>Current Status</u>   |
|--|--------------------------------------|---|
| <u>Planned Milestones (con't)</u>  |                                      |   |
| - Indoctrination and implementation 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 problems. | Jan. 1986                            | 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.

|   | <u>Original Scheduled Completion</u> | <u>Current Status</u>                   |
|---|--------------------------------------|---|
| <u>Planned Milestones</u>   |                                      |   |
| - Obtain resources to perform analysis.                             | Jan. 1986                            | Complete                                |
| - Determine methodology of performing analysis.                     | Feb. 1986                            | Complete                                |
| - Perform regulatory requirements analysis.                         | Oct. 1986                            | On schedule<br>9 of 10 modules Complete |
| - Prepare changes to Security Plan.                                 | Oct. 1986                            |   |
| - Incorp. proposed changes Req'd by 8/4/86 Fed. Register into Plan. | 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.                                | Nov. 18, 1986                        |   |
| - Final ORC Review.   | Nov. 19, 1986                        |   |
| - Prepare 50.54p evaluation on T&Q and Contingency Plans.           | To be Determined                     |   |

STATUS

- Training  
Plan to evaluate the present approach to training such that:
  - (1) Security force personnel have a greater sense of awareness of the bases behind their duties (i.e. why they are here). Complete
  - (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 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. Complete
  
- 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. Complete
  
- Proceduralize Existing Programs  
Plan to establish procedures for the existing internal surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program. Complete

ATTACHMENT 2

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:

|   | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u> |
|---|--|---------------------------|
| <u>Planned Milestones</u>   |  |                           |
| - 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.



ATTACHMENT 3

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.

|   | <u>Scheduled Completion</u> | <u>Current Status</u>                           |
|---|-----------------------------|---|
| <u>BARRIERS</u>   |                             |   |
|    | -<br>-<br>12/86             | Complete<br>Complete<br>In Progress<br>(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                                     |
| <u>INTRUSION DETECTION</u>  |                             |   |
| - Obtain Response to ESR 86-253.  | 9/86                        | 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                                     |
|  Obtain Response to ESR's 86-212 and 86-305. | 9/86                        | In Progress                                     |

- |   |      |                             |
|---|------|-----------------------------|
| • Develop Implementation Plan (Integrating with requirements 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 |

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).                                | 9/86        | In Progress |
| • Perform lighting adequacy survey.  | (after PDC) |             |

FACILITIES

- |   |      |             |
|---|------|-------------|
| • 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 |

ADDITIONAL TRAINING

- |  |      |             |
|--|------|-------------|
| • Establish overview training module for BECo senior management.       | 9/86 | In Progress |
| • Establish initial technical training module for Security management. | 1/87 | In Progress |

SECURITY PROGRAM OBJECTIVES

- |   |      |          |
|---|------|----------|
| • Develop initial plan.                                   | 7/86 | Complete |
| • Establish initial objectives including recommendations. | 9/86 | Complete |

SECURITY PROGRAM OBJECTIVES (continued)

- |                                     |       |   |
|-------------------------------------|-------|---|
| • Final decision on key objectives. | 10/86 | - |
| • Develop Implementation Plan.      | 12/86 | - |

INTERCOMPANY COMPARISONS

- |   |       |             |
|---|-------|-------------|
| • Develop schedule for security shift supervisors to visit other sites. | 10/86 | In Progress |
|---|-------|-------------|

COMPENSATORY 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 compliance.                                | 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 management personnel at seminars (e.g. industrial 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.

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OFFICE MEMORANDUM

98 6304670

Boston Edison Company

RMG Control Number

To: A. Pedersen

From: E. J. Ziemiński

Record Type A4.08  
Non-Safety Related

Date: 10/14/86

Dept. NMS 86-218

Subject: Security Program Improvements Status Report #9

Distribution:

E.T. Graham  
R. Swanson  
D.L. Bryant

T. Nicholson  
J. McEachern

P. Hamilton  
M. McBride

M.N. Brosee  
D.L. Myers

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.

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

Additional NED Distribution:

Carl rate News & interest in "Belmont" - esp. Att. #3

J. Boudk - Note pg 2 of Att. 3

S. Truark - also Att #2; note pg 1-3 of Att. 3

P.D. Andrew - also Att. #2

C. H. Minatt - Note pg 5 of Att. 3

D. A. Bryant (mailing)

T. Furber



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in accordance with the Freedom of Information  
Act, exemptions 4  
FOIA- 88-198

ATTACHMENT 1

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.

|  | <u>Original Scheduled Completion</u> | <u>Current Status</u>                                      |
|--|--------------------------------------|--|
| <u>Planned Milestones</u>  |                                      |  |
| - 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 Boston 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.

|   | <u>Original Scheduled Completion</u> | <u>Current Status</u>            |
|---|--------------------------------------|----------------------------------|
| <u>Planned Milestones</u>   |                                      |                                  |
| - 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)

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

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     | On schedule<br>9 of 10 modules<br>Complete |
| - Prepare changes to Security Plan.  | Oct. 1986     | On schedule<br>draft in typing             |
| - Incorp. proposed changes req'd by 8/4/86 Fed. Register into Plan. (Miscellaneous Amendments)<br>Note (1) | Oct. 1986     | On schedule<br>draft complete              |
| - Finalize 10CFR50.54p Evaluation for changes to security plan.  | Nov. 2, 1986  | On schedule<br>after submittal<br>of draft |
| - ORC Review Security Plan changes required by Federal Register (Miscellaneous Amendment)<br>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                                |

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u>           | <u>Current Status</u>                 |
|--|--|---------------------------------------|
| - Submit proposed changes to NRC (Miscellaneous Amendments) Note (1) | Dec. 2, 1986                                   | On schedule                           |
| - Incorp. NRC comments & final type.                                 | Dec. 2, 1986                                   | Dependent upon extent of NRC comments |
| - Final ORC Review.  | Dec. 17, 1986                                  | 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                               |                                       |

• Training

Plan to evaluate the present approach to training such that:

- |   |   |
|---|---|
| (1) Security force personnel have a greater sense of awareness of the bases behind their duties (i.e. why they are here). | Complete  |
| (2) Security force personnel understand the need to initiate aggressive corrective action and to follow-up thoroughly.    | Lesson plan(s) to be delivered to TJN for evaluation November, 1986 |

• 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. Complete

• 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. Complete

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.

ATTACHMENT 2

Proceduralize Existing Programs

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

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:

|   | <u>Original Scheduled Completion</u>            | <u>Current Status</u>  |
|---|---|--|
| <u>Planned Milestones</u>   |   |  |
| - 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                                       | Feb. 1987 based on NED inputs and as communicated to NRC via telecon on 10/20/86 |
| - Implement optimal recommendation  | Pending NED req't's analysis (ref Attachment 3) |  |

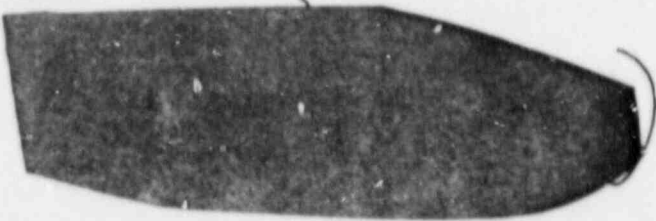
As stated in our November 27, 1985 letter, Boston Edison reviewed the situation and implemented the following corrective actions:

- 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.



ATTACHMENT 3

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.

|   | <u>Scheduled Completion</u> | <u>Current Status</u>   |
|---|-----------------------------|---|
| <u>BARRIERS</u>   |                             |   |
|    | -<br>-<br>1/87              | Complete<br>Complete<br>Sent letter to NRC as follow-up to phone call (extending completion to 1/87). |
| - Protected Area  |                             |   |
| - Incorp Fence Survey into Maintenance PM Program.  | 9/86                        | Complete  |
| - Install Bottom Rail on Fence.   | 12/86                       | On schedule started 9/22  |
| - Implement NED Recommendation on Wash Concern.   | 10/86                       | On schedule started 9/30  |
| <u>INTRUSION DETECTION</u>  |                             |   |
| - 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 schedule 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  |

- Vendor adjustment of hardware/ installation. NED (John Turner) providing followup. 10/86 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.



- Obtain Response to ESR's 86-212 and 86-305. 9/86 Have received response to 86-212. Expect response to 86-305 by 10/86 (to utilize consultant input).

- Develop Implementation Plan (Integrating with requirements Analysis for Computer) 2/87 On schedule P.O. placed 10/86 with consultant.
- Achieve resolution with NRC regarding Interim Compensatory Measures. 9/86 NRC reviewing BECo verbal proposal.
- Issue formal letter to NRC regarding Interim Compensatory Measures. (W. Lobo) 10/17/86 Complete - letter issued.

LIGHTING

- Restore yard lighting to original design requirements. - Complete
- Revise OMC 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 Delayed one month. Maintenance reviewing schedule submitted by Bechtel.

- Perform lighting adequacy survey. After PDC On schedule as part of NED comprehensive review

FACILITIES

- 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 protected area) OMG has been requested to evaluate labor impact on use of alternate access Gate.
- Confirming request maintenance upgrade of Security Facilities at Bechtel Warehouse Gate, Alternate Access Gate, (i.e., heat, light, a/c, furniture, painting). 9/86 Complete
- Inform NED of Security long-term space needs. 10/86 Complete. Verbally communicated to C.J. Minott.

ADDITIONAL TRAINING

- Establish overview training module for BECo senior management. 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

### SECURITY PROGRAM OBJECTIVES

- |   |       |                                   |
|---|-------|-----------------------------------|
| • 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            |

### INTERCOMPANY COMPARISONS

- |   |       |  |
|---|-------|--|
| • Develop schedule for security shift supervisors to visit other sites. | 10/86 | On schedule - Have had discussion with about eight other plants. |
|---|-------|--|

### COMPENSATORY 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 compliance.                                | 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 management personnel at seminars (e.g. industrial security) on state-of-the-art security equipment/compensatory measures. | 9/86 | Complete (will continue)                       |

## OFFICE MEMORANDUM

Boston Edison Company

To: A. Pedersen

Date: 1/12/86

From: E.J. *Zimanski*

Dept. NMSS 86-218

RMG Control Number

Record Type A4.08  
Non-Safety RelatedSubject: Security Program Improvements Status Report #10Distribution:E.T. Graham  
R. Swanson  
D.A. BryantT. Nicholson  
R.V. Fairbank  
C.E. HigginsP. Hamilton  
M. McBrideM.N. Brosee  
D.L. Myers

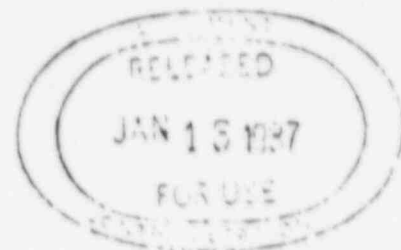
Attached is the tenth monthly status report on planned security program improvements. It is recommended that this report be forwarded to Messrs. Oxsen and Lydon for review and comment.

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/1a

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 ImprovementsADDITIONAL BECo OVERSIGHT OF SECURITY FORCE

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

|   | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>  |
|---|--|--|
| <u>Planned Milestones</u>   |  |  |
| - 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.            | April 1986                                   | Complete   |
| - Remaining Boston Edison site security supervisors on board (4 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.

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

CORRECTIVE ACTIONS SYSTEM (continued)

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u> | <u>Current Status</u> |
|--|--------------------------------------|-----------------------|
| - 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                                     |
| - Determine methodology of performing analysis.  | Feb. 1986          | Complete                                     |
| - Perform regulatory requirements analysis.  | Oct. 1986          | Complete<br>Summary Report Issued            |
| - Prepare changes to Security Plan (rev. 19) based on regulatory reqts 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<br>Sent to Licensing                |
| - Finalize 10CFR50.54p Evaluation. for (Rev. 18) changes to security plan.   | Nov. 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 current status | Meeting held on Dec. 4, 1986 at NRC offices. |

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u>           | <u>Current Status</u>                         |
|--|--|---|
| - 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      |
| - Final ORC Review.  | Feb. 18, 1987                                  | Revised to accommodate unanticipated workload |
| - Submit Revision 19 to NRC  | Feb. 27, 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                               |   |

• Training

Plan to evaluate the present approach to training such that:

- |   |  |
|---|--|
| (1) Security force personnel have a greater sense of awareness of the bases behind their duties (i.e. why they are here). | Complete                                   |
| (2) Security force personnel understand the need to initiate aggressive corrective action and to follow-up thoroughly.    | Evaluation to be completed in January 1987 |

• 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. | Complete |
|--|----------|



• 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.

Complete

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.

ATTACHMENT 2

Proceduralize Existing Programs

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

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:



|   | <u>Original Scheduled Completion</u>           | <u>Current Status</u>  |
|---|--|--|
| <u>Planned Milestones</u>   |  |  |
| - 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                                      | Feb. 1987 based on NED inputs and as communicated to NRC via telecon on 10/20/86 |
| - Implement optimal recommendation  | Pending NED reqt's analysis (ref Attachment 3) |  |

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.

ATTACHMENT 3

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.

|   | <u>Scheduled Completion</u> | <u>Current Status</u>   |
|---|-----------------------------|---|
| <u>BARRIERS</u>   |                             |   |
|    | -<br>-                      | Complete<br>Complete  |
| - Protected Area  | 1/87                        | Complete  |
| - 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 |
| <u>INTRUSION DETECTION</u>  |                             |   |
| - Obtain Response to ESR 86-253.  | 9/86                        | Complete  |
| - Implement short-term repairs in conjunction with fence work.  | 10/86                       | <br>for completion in January, 1987.                           |
| - Develop Eng. Modification Schedule (Integrating with Requirements Analysis for Computer).   | 2/87                        | On schedule factored into PDC86-77  |
| - 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). | 7/86                        | 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. I&C has been requested and has agreed to assist in resolving this issue. New completion 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 OMC 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

- Perform lighting adequacy survey. After PDC NUS survey results submitted to NED on 12/10/86

FACILITIES

- 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 Warehouse Gate, Alternate Access Gate, (i.e., heat, light, a/c, furniture, painting). 9/86 Complete
- Completion of facility upgrades --- Complete
- Inform NED of Security long-term space needs. 10/86 Complete. Verbally communicated to C.J. Minott.

ADDITIONAL TRAINING

- Establish overview training module for BECo senior management. 11/86 Trial run session scheduled for February, 1987
- Establish initial technical training module for Security management. 1/87 Learning objectives were in preparation. Task postponed 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.                       | 10/86 | Twelve key performance objectives have been approved in January, 1987 |
| • Develop Implementation Plan.                            | 12/86 | Postponed until second quarter 1987                                   |

### INTERCOMPANY COMPARISONS

- |   |       |  |
|---|-------|--|
| • Develop schedule for security shift supervisors to visit other sites. | 10/86 | Three (3) supervisors scheduled to visit Sequoyah in January, 1987 |
|---|-------|--|

### COMPENSATORY MEASURES

- |   |      |   |
|---|------|---|
| • Revised Procedure 3.10 to include the (7) seven 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 | 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  |

## OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: A.L. Oxsen

From: *C.E. Higgins*  
C.E. Higgins

Record Type A4.08

Date: 2/12/87

Dept. NMSS 87-35

Non-Safety Related

Subject: Security Program Improvements Status Report #11Distribution:

|                  |                          |              |               |
|------------------|--------------------------|--------------|---------------|
| J.M. Lydon       | E.T. Graham              | T. Nicholson | P. Hamilton   |
| K. Roberts       | M.N. Brosee              | R. Swanson   | R.V. Fairbank |
| M. McBride (NRC) | D.L. Myers               | D.A. Bryant  | C.E. Higgins  |
| E.J. Ziemianski  | J. Joyner (NRC Region 1) |              |               |

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 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. 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



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

R/14

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.

|  | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u> |
|--|--|---------------------------|
| <u>Planned Milestones</u>  |  |                           |
| - 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.   | April 1986                                   | Complete                  |
| - Boston Edison site security supervisors on board.                    | July 1986                                    | Complete<br>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.

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



CORRECTIVE ACTIONS SYSTEM (continued)

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u> | <u>Current Status</u> |
|--|--------------------------------------|-----------------------|
| - 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<br>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<br>Summary Report Issued            |
| - Prepare changes to Security Plan (rev. 19) based on regulatory reqts 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<br>Sent to Licensing                |
| - Finalize 10CFR50.54p Evaluation. for (Rev. 18) changes to security plan.   | Nov. 2, 1986       | Not required                                 |
| - ORC Review Security Plan (Rev. 18) changes required by Federal Register (Miscellaneous Amendment) Note (i) (Rev. 18) | Nov. 12, 1986      | Complete                                     |
| - Meet with NRC on proposed plan changes. (not those required by Federal Register) (Rev. 19)                           | See current status | Meeting held on Dec. 4, 1986 at NRC offices. |

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u>           | <u>Current Status</u>                         |
|--|--|---|
| - 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 determined after Security Plan submittal |   |
| - Prepare 50.54p evaluation on T&Q and Contingency Plans.                      | To be Determined                               |   |

• Training

Plan to evaluate the present approach to training such that:

- |   |                           |
|---|---------------------------|
| (1) Security force personnel have a greater sense of awareness of the bases behind their duties (i.e. why they are here). | Complete                  |
| (2) Security force personnel understand the need to initiate aggressive corrective action and to follow-up thoroughly.    | Completed<br>January 1987 |

• 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. Complete

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.

Complete

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.

• 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:

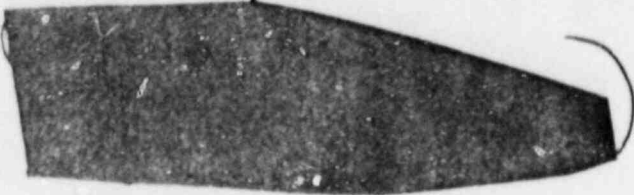
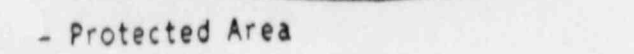
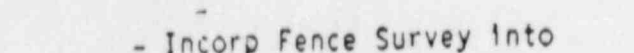
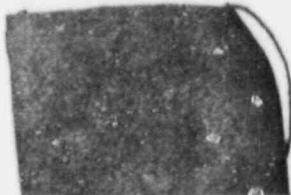
|   | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u> |
|---|--|---------------------------|
| <u>Planned Milestones</u>   |  |                           |
| - Evaluate the reliability of the security computer                           |  | Complete                  |
| - Develop recommendations for computer improvement.                           |  | Complete                  |
| - Decision on optimal recommendation. (Pending requirements analysis by NED.) | Mar. 1986                                    | Closed<br>Dec. 22, 1986   |
| - 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 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.

ATTACHMENT 3

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

|  | <u>Scheduled Completion</u> | <u>Current Status</u>   |
|--|-----------------------------|---|
| <u>BARRIERS</u>  |                             |   |
|   | -                           | Complete  |
|   | -                           | Complete  |
|   | 1/87                        | Complete  |
| - 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  |
| <u>INTRUSION DETECTION</u>   |                             |   |
| - Obtain Response to ESR 86-253.   | 9/86                        | Complete  |
| - Implement short-term repairs in conjunction with fence work.   | Rescheduled to March 1987   |  |
| - Develop Eng. Modification Schedule (Integrating with Requirements Analysis for Computer).  | 2/87                        | On schedule factored into PDC86-77  |
| - Issue FRN 33 to PDC 82-200. (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.
- 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 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

COMPUTER AND ACCESS CONTROL

- Obtain response to ESR 86-253 9/86 Complete
- Develop 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

- Perform lighting adequacy survey. After PDC NUS survey results submitted to NED on 12/10/86

FACILITIES

- 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 Warehouse Gate, Alternate Access Gate, (i.e., heat, light, a/c, furniture, painting). 9/86 Complete
- Completion of facility upgrades --- Complete
- Inform NED of Security long-term space needs. 10/86 Complete. Verbally communicated to C.J. Minott.

ADDITIONAL TRAINING

- Establish overview training module for BECo senior management. 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                                   |

INTERCOMPANY COMPARISONS

- |   |       |                           |
|---|-------|---------------------------|
| • Develop schedule for security shift supervisors to visit other sites. | 10/86 | January, 1987<br>Complete |
|---|-------|---------------------------|

COMPENSATORY MEASURES

- |   |      |  |
|---|------|--|
| • Revised Procedure 3.10 to include the (7) seven 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 & Issue Report to management.   | 1/87 | Process is in place; planning to prepare work instructions |



OFFICE MEMORANDUM

June 3 1987  
Please mail to Region I  
Mutter

Boston Edison Company

RMG Control Number

To: A. L. Oxsen

From: *re Higgins*  
C. E. Higgins

Record Type A4.08  
Non-Safety Related

Date: 3/9/87

Dept. Doc. NSGL-87-68

Subject: Security Program Improvements - Closed Items Status Report No. 12

Distribution:

|                  |                |              |             |
|------------------|----------------|--------------|-------------|
| J. M. Lydon      | M. N. Brose    | T. Nicholson | P. Hamilton |
| K. Roberts       | D. L. Myers    | R. Swanson   | R. Fairbank |
| M. McBride (NRC) | [REDACTED]     | D. A. Bryant | NSGL-File   |
| E. J. Ziemianski | (NRC Region I) |              |             |

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.



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

R15

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.

|  | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>    |
|--|--|------------------------------|
| <u>Planned Milestones</u>  |  |                              |
| - 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<br>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.

|  | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>           |
|--|--|-------------------------------------|
| <u>Planned Milestones</u>  |  |                                     |
| - Identify and evaluate requirements of the corrective action system.                              | March 1986                                   | Complete                            |
| - Develop and approve procedure including form for reporting deviations.                           | June 1986                                    | Complete<br>July 3, 1986            |
| - Incorporate into NOP 83A9.   | Complete                                     | Complete 8/1/86<br>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<br>January 1987            |

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.

Complete

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.

Complete

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.

Current  
StatusProceduralize Existing Programs

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

Complete

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:

|  | <u>Original<br/>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u> |
|--|--|---------------------------|
| <u>Planned Milestones</u>  |  |                           |
| - Evaluate the reliability of the security computer.                             |  | Complete                  |
| - Develop recommendations for computer improvement.                              |  | Complete                  |
| - Decision on optimal recommendation.<br>(Pending requirements analysis by NED.) | March 1986                                   | Closed<br>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 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.

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.

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

OFFICE MEMORANDUM

please mail to

Boston Edison Company

RMG Control Number

To: A. L. Oxsen

From: C. E. Higgins

Record Type A4.08  
Non-Safety Related

Date: 3/9/87

Dept. Doc. NSGL-87-69

Subject: Security Program Improvements - Open Items Status Report No. 12

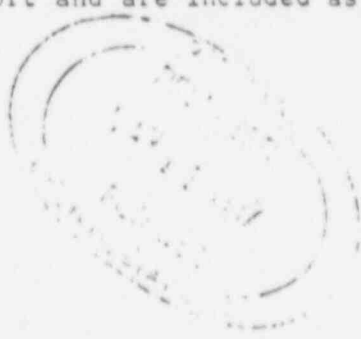
Distribution:

|                            |                |              |             |
|----------------------------|----------------|--------------|-------------|
| J. M. Lydon                | M. N. Brose    | T. Nicholson | P. Hamilton |
| K. Roberts                 | D. L. Myers    | R. Swanson   | R. Fairbank |
| M. McBride (NR [redacted]) | [redacted]     | D. A. Bryant | NSGL-File   |
| E. J. Ziemianski           | (NRC Region I) |              |             |

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 discussed 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.



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

P/16

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

| <u>Planned Milestones</u>  | <u>Original Scheduled Completion</u>       | <u>Current Status</u>                           |
|--|--|---|
| - 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  |
| - 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 incorporated.       |
| - Complete Independent Review of Rev. 19   | March 16, 1987                             | On schedule                                     |

|   | <u>Original<br/>Scheduled<br/>Completion</u>    | <u>Current<br/>Status</u>                      |
|---|---|--|
| <u>Planned Milestones</u> (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.                               |  |





ATTACHMENT 2


Compensatory Measure on Loss of Security Computer

- CLOSED OUT -

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.

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

INTRUSION DETECTION (cont'd)

|   | <u>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>   |
|---|---------------------------------|---|
| - 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 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. |

|   | <u>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>   |
|---|---------------------------------|---|
| <u>COMPUTER AND ACCESS CONTROL</u>                                      |                                 |   |
| ° Obtain response to ESR 86-253   | 9/86                            | Complete  |
| ° Develop 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  |
| ° Perform lighting adequacy survey                                      | After PDC                       | NUS survey results submitted to NED on 12/10/86.                      |
| <u>ADDITIONAL TRAINING</u>  |                                 |   |
| ° Establish overview training module for BECo senior management.        | 11/86                           | Trial run session scheduled for February 1987.                        |
| ° Establish initial technical training module for Security management.  | 1/87                            | Postponed until until 3rd quarter 1987.                               |
| <u>SECURITY PROGRAM OBJECTIVES</u>                                      |                                 |   |
| ° 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 2nd quarter 1987                                       |
| <u>INTERCOMPANY COMPARISONS</u>   |                                 |   |
| ° Develop schedule for security shift supervisors to visit other sites. | 10/86                           | January 1987 Complete   |

|  | <u>Scheduled<br/>Completion</u> | <u>Current<br/>Status</u>                                   |
|--|---------------------------------|---|
| <u>COMPENSATORY MEASURES</u>   |                                 |   |
| • 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. |

OKK 1305

~~Security~~  
Security

OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: *CE Higgins*  
C. E. Higgins

Date: 4/10/87

Dept. Doc. NSGL87-105

Record Type A4.08  
Non-Safety Related

Subject: Security Program Improvements - Open Items Status Report #13

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                | D. A. Bryant | C. Minot    |
| E. J. Ziemianski | P. Ondash                | S. Das Gupta | R. Hird     |
| E. MacCormack    | J. Joyner (NRC Region F) |              | 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



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

*0/1*

Plan and Schedule of Security Program ImprovementsREGULATORY 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.


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

| <u>PLANNED MILESTONES</u>  | <u>ORIGINAL SCHEDULED COMPLETION</u>            | <u>CURRENT STATUS</u>   |
|--|---|---|
| - 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. 0                              | March 16, 1987                                  | Complete  |
| - Final ORC Review.  | March 25, 1987                                  | April 1, 1987<br>Revised to accommodate unanticipated workload. |
| - Submit Security Plan, Issue 2, Rev. 0 to NRC   | March 31, 1987                                  | On schedule<br>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.

|  | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>                   |
|--|---------------------------------|---|
| <u>BARRIERS</u>  |                                 |   |
| - Protected Area   |                                 |   |
| Incorporate Fence Survey into Maintenance PM Program.  | 9/86                            | Complete                                    |
| Install Bottom Rail on Fence.  | Rescheduled<br>March 1987       | Completed<br>March 1987                     |
| Implement NED Recommendation on Wash Concern.  | 10/86                           | Complete                                    |
| <u>INTRUSION DETECTION</u>   |                                 |   |
| - Obtain Response to ESR 86-253.   | 9/86                            | Complete                                    |
| - Implement short-term repairs in conjunction with fence work.   | Rescheduled<br>to March 1987    | Completed<br>March 1987                     |
| -  Develop Engineering Modification Schedule (Integrating with Requirements Analysis for Computer). | 2/87                            | On schedule -<br>factored into<br>PDC86-77. |
| - Issue FRN 35 to PDC 8 (This installation was considered temporary because it was down if the system would be active in this unique application.)                                     | 7/86                            | Completed<br>March 1987                     |
| - Install vendor adjusted hardware   | 10/86                           | Completed in<br>December 1986               |

INTRUSION DETECTION (con't)

SCHEDULED  
COMPLETION

CURRENT  
STATUS

- 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.



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 Letter issued in October. Still awaiting NRC feedback.

*Talked to Manelli 4/30/87 - will try to resolve shortly JPS*

LIGHTING

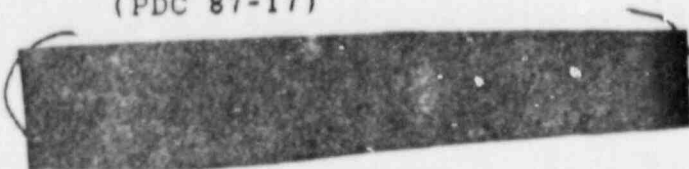
\* Restore yard lighting to original design requirements. --- Complete

\* 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

MODIFICATIONS TO GATEHOUSES AND  
SECURITY DIESEL GENERATOR

|  | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u> |
|--|---------------------------------|---------------------------|
| * Obtain Response to ESR 86-516<br>(PDC 87-17)   | 9/86                            | Complete                  |
|                         | 9/87                            | On Schedule               |
| * Added x-ray machines and full<br>length turnstiles Dec. 2, 1986  | 9/87                            | On Schedule               |
| * Modifications to Contractor<br>Gatehouse   | 9/87                            | On Schedule               |
| * S J A Approved   | 3/87                            | Complete                  |
| * Schedule Completion of<br>Modification   | RFO 7                           | On Schedule               |
| * Requested Reassessment of<br>Vital Areas as a response<br>to IE Bulletin 86-91.<br>(Add to ESR 86-516) | 6/87                            | On Schedule               |

COMPUTER AND ACCESS CONTROL

|  |                   |   |
|--|-------------------|---|
| * Obtain response to<br>ESR 86-253       | 9/86              | Complete                                  |
| * Develop computer<br>specification      | March 23,<br>1987 | Complete                                  |
| * Obtain bids                            | 4/87              | On Schedule                               |
| * Issue purchase order                   | 5/87              | On Schedule                               |
| * Schedule completion of<br>modification | 6/87              | Revise as needed                          |
| * Perform lighting adequacy<br>survey    | After PDC         | NUS Survey<br>results submitted<br>to NED |

PERIMETER FENCE AND GRADE/  
UNDERGROUND PASSAGES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u> |
|---|---------------------------------|---------------------------|
| * Obtained Responses to ESR-86-212 and 86-305 | 9/86                            | Complete                  |
| * Completed PDC 86-77 (ORC)                   | February 1987                   | Complete                  |
| * Install Modifications                       | June 1987                       | On Schedule               |

ADDITIONAL TRAINING

|  |       |                                      |
|--|-------|--------------------------------------|
| * Establish overview training module for BECo Senior Management.       | 11/86 | Complete<br>March 1987               |
| * Establish initial technical training module for Security Management. | 1/87  | Postponed until<br>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 | Posponed until<br>3rd quarter 1987                                   |

INTERCOMPANY COMPARISONS

|   |       |          |
|---|-------|----------|
| * Develop schedule for Security Shift Supervisors to visit other sites. | 10/86 | On Going |
|---|-------|----------|

COMPENSATORY MEASURES

|  | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>                                   |
|--|---------------------------------|---|
| * 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. |

→ G Smith return to

S Turner

OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: C. E. Higgins

Date: 5/5/87

Dept. Loc. NSGL87-188

Record Type A4.06  
Non-Safety Related

Subject: Security Program Improvements - Open Items Status Report #14

Distribution:

- |                  |              |              |             |
|------------------|--------------|--------------|-------------|
| K. P. Roberts    | M. N. Brosee | T. Nicholson | P. Hamilton |
| A. V. Morris     | D. L. Myers  | R. Swanson   | R. Fairbank |
| M. McBride (NRC) | R. Andrew    | J. Kehoe     | C. Minott   |
| E. MacCormack    | P. Ondash    | S. Dasgupta  | R. Hird     |
|                  |              |              | NSGL File   |

→ P. Kerney

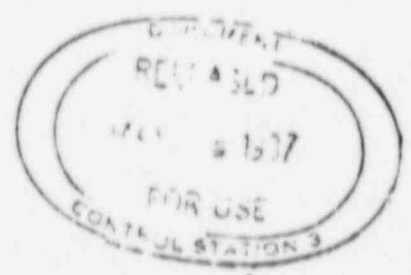
Attached is the monthly status report for the month of April 1987 on planned security program improvements.

EXECUTIVE SUMMARY

The Security Program Improvements listed in Attachment 1 of this report 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.

H/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 7  
 FOIA- 88-198

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

| <u>PLANNED MILESTONES</u>   | <u>ORIGINAL SCHEDULED COMPLETION</u>       | <u>CURRENT STATUS</u>  |
|---|--|--|
| - 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 § 4780 Fed. Register into Plan. (Rev. 18) (Miscellaneous Amendments) Note (1). | October 1986                               | Complete - Sent to NRC   |
| - 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 |
| - 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. | Informal comments are being incorporated.  |
| - Complete Independent Review of Security Plan. Issue 2, Rev. 0   | March 16, 1987                             | Complete.  |

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

## 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

- 1) Modify the protected area perimeter fence.

Action

PDC 86-74 issued.

Status

Started -  
1/21/87.  
CMG Projected  
Completion  
10/21/87.

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

Action

Add to ESR 86-516.

Status

Scheduled for  
8/15/87  
Completion

E.



Action

PDC 86-77 issued.

Status

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

C. Improve the protected area and perimeter lighting system.

Action

Schedule completion of modifications.  
(PDC 83-09)

Status

To complete by  
start-up from  
RFO 1.

SECURITY PROGRAMS IMPROVEMENTS (con't)

Engineering to evaluate use of high mast lighting to support [REDACTED] 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.

D. [REDACTED]

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.  
(PDC 87-17)

Status

Complete 9/87.

[REDACTED]

On Schedule 9/87.

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

On Schedule 9/87.

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

On Schedule 9/87.

PDC to FNPS for approval

On Schedule. 5/87.

Schedule Completion of Modification

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

SECURITY PROGRAMS IMPROVEMENTS (con't)

## F. Replace the Security Computer and Access Control System.

| <u>Action</u>                   | <u>Status</u>                   |
|---------------------------------|---------------------------------|
| Obtain response to ESR 86-253.  | Complete.<br>9/86.              |
| Develop computer specification. | Complete.<br>March 23,<br>1987. |
| Obtain bids.                    | Rescheduled<br>to 5/87.         |
| Issue purchase order            | Rescheduled<br>to 6/87.         |

ADDITIONAL TRAINING

|  |      |                                   |
|--|------|-----------------------------------|
| * Establish initial technical training module for Security Management. | 1/87 | Postponed until 3rd quarter, 1987 |
|--|------|-----------------------------------|

SECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>   |
|---|-----------------------------|---|
| * 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 3rd quarter 1987.                                     |

INTER-COMPANY COMPARISONS

|   |       |           |
|---|-------|-----------|
| * Develop schedule for Security Shift Supervisors to visit other sites. | 10/86 | On Going. |
|---|-------|-----------|

SECURITY PROGRAMS IMPROVEMENTS (con't)

| <u>COMPENSATORY MEASURES</u>   | <u>SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>  |
|--|-----------------------------|--|
| * 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.<br>On-Going.   |
| * Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compliance.                                 | 1/87                        | Complete.<br>(will continue).                                  |
| * Security perform a periodic review of open MF's and issue report to management.  | 1/87                        | Process is in place;<br>planning to prepare work instructions. |

OFFICE MEMORANDUM

~~SECRET~~

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: C. E. Higgins

Date: 6/1/87

Dept. Doc. NSGL87-247

Record Type A4.08  
Non-Safety Related

Subject: Security Program Improvements - Open Items Status Report #15

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. Minot    |
| E. MacCormack    | P. Ondash                           | S. Dasgupta  | R. Hird     |
|                  | <del>J. Joyner (NRC Region 1)</del> |              | 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



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

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.

| <u>PLANNED MILESTONES</u>   | <u>ORIGINAL SCHEDULED COMPLETION</u>       | <u>CURRENT STATUS</u>  |
|---|--|--|
| - 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. 18) (Miscellaneous Amendments) Note (1). | October 1986                               | Complete - Sent to NRC   |
| - 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 |
| - 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. 0   | March 16, 1987                             | Complete.  |

| <u>PLANNED MILESTONES</u>                                 | <u>ORIGINAL SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>     |
|---|--------------------------------------|---------------------------|
| - 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.          |
| - Prepare 50.54p evaluation on T&Q and Contingency Plans. | July 31, 1987.                       | Started. 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 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

- 1) Modify the protected area perimeter fence.

Action

PDC 86-74 issued.

Status

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

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

Action

Add to ESR 86-516.

Status

Scheduled for  
8/15/87  
Completion

F.

Action

PDC 86-77 issued.

Status

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

Achieve resolution with NRC regarding  
Interim Compensatory Measures.

Letter issued in  
10/86. Still  
awaiting NRC  
feedback.

C. Improve the protected area and perimeter lighting system.

Action

Schedule completion of modifications.  
(PDC 83-09)

Status

To complete by  
start-up from  
RFO 7.



## SECURITY PROGRAMS IMPROVEMENTS (con't)

Engineering to evaluate use of high mast lighting to support [REDACTED] 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 (ORC 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.  
PO 514.

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

Action

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

Status

Complete 9/86.

On Schedule 9/87.

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

On Schedule 9/87.

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

On Schedule 9/87.

PDC to PNPS for approval

On Schedule. 5/87.

Schedule Completion of Modification

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

SECURITY PROGRAMS IMPROVEMENTS (con't)

## F. Replace the Security Computer and Access Control System.

| <u>Action</u>                   | <u>Status</u>                                   |
|---------------------------------|---|
| Obtain response to ESR 86-253.  | Complete.<br>9/86.                              |
| Develop computer specification. | Complete.<br>March 23,<br>1987.                 |
| Obtain bids.                    | Bids received<br>Bid evaluation<br>in progress. |
| Issue purchase order            | Rescheduled<br>to 6/87.                         |

ADDITIONAL TRAINING

|  |      |   |
|--|------|---|
| - Establish initial technical training module for Security Management. | 1/87 | Postponed<br>until 3rd<br>quarter, 1987 |
|--|------|---|

SECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>  |
|---|---------------------------------|--|
| - 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<br>until 3rd<br>quarter 1987.                          |

INTERCOMPANY COMPARISONS

|   |       |           |
|---|-------|-----------|
| - Develop schedule for Security Shift Supervisors to visit other sites. | 10/86 | On Going. |
|---|-------|-----------|

SECURITY PROGRAMS IMPROVEMENTS (con't)

| <u>COMPENSATORY MEASURES</u>   | <u>SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>  |
|--|-----------------------------|--|
| - 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.<br>On-Going.   |
| - Establish formal, regular re-evaluation of compensatory measures to determine alternative methods of achieving compliance.                                 | 1/87                        | Complete.<br>(will continue).                                  |
| - Security perform a periodic review of open MR's and issue report to management.  | 1/87                        | Process is in place;<br>planning to prepare work instructions. |

OFFICE MEMORANDUM

*Rick - pls  
evaluate. Tm.*  
RMG Control Number 8

Boston Edison Company

To: R. G. Bird

From: *C. E. Higgins*  
C. E. Higgins

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



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

*R111*

Plan and Schedule of Security Program ImprovementsREGULATORY 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

|   | <u>ORIGINAL<br/>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>   |
|---|--|---|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC.           | March 31, 1987.                              | Complete.<br>April 27, 1987.<br>Waiting NRC<br>Approval/Comments. |
| - Prepare draft changes to T&Q and Contingency Plans.     | July 31, 1987.                               | Complete<br>6/25/87.  |
| - Prepare 50.54p evaluation on T&Q and Contingency Plans. | July 31, 1987.                               | Started.<br>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 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

- 1) Modify the protected area perimeter fence.

Action

PDC 86-74 issued.

Status

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

Milestones for completion by 9/30/87.

On Schedule.

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

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

Action

Add to ESR 86-516. (Protected Area)

Vital Area Analysis

Status

Complete.

Scheduled for  
8/15/87  
Completion.

B. [REDACTED]

Action

PDC 86-77 issued.

Status


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

Achieve resolution with NRC regarding  
Interim Compensatory Measures.

Complete.

- C. Improve the protected area and perimeter lighting system.

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.

D. Action

Issue PDC 86-78 .

Status


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

E. 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

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 System.

| <u>Action</u>                   | <u>Status</u>                                |
|---------------------------------|--|
| Obtain response to ESR 86-253.  | Complete.<br>9/86.                           |
| Develop computer specification. | Complete.<br>March 23,<br>1987.              |
| Obtain bids.                    | Bids received<br>Bid evaluation<br>complete. |
| Issue purchase order            | Rescheduled<br>to 7/87.                      |

ADDITIONAL TRAINING

|  |      |   |
|--|------|---|
| - Establish initial technical training module for Security Management. | 1/87 | Postponed<br>until 3rd<br>quarter, 1987 |
|--|------|---|

SECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>  |
|---|---------------------------------|--|
| - 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<br>until 4th<br>quarter 1987.                          |

INTERCOMPANY COMPARISONS

|   |       |           |
|---|-------|-----------|
| - Develop schedule for Security Shift Supervisors to visit other sites. | 10/86 | Complete. |
|---|-------|-----------|



SECURITY PROGRAMS IMPROVEMENTS (con't)

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

OFFICE MEMORANDUM

Greg  
Keenig  
RMG Control Number

Boston Edison Company

To: R. G. Bird

From: C. E. Higgins

Record Type A4.08  
Non-Safety Related

Date: 8/10/87

Dept. Doc. NSGL87-423

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

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 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 4  
FOIA- 88-198

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

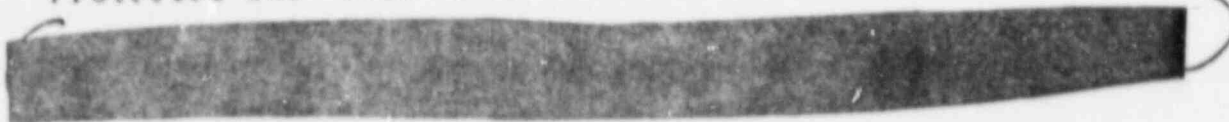
| <u>PLANNED MILESTONES</u>                                 | <u>ORIGINAL SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>  |
|---|--------------------------------------|--|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)       | March 31, 1987.                      | Complete. April 27, 1987. Waiting NRC Approval/Comments.   |
| - Prepare draft changes to T&Q and Contingency Plans.     | July 31, 1987.                       | Final comments received on draft plans. 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. |
| - Prepare 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



| <u>Action</u>                                  | <u>Status</u>  |
|--|--|
| PDC 86-74 issued. (Perimeter Fence)            | Working and on schedule. CMG projected completion date on all three PDC's 12/87. |
| PDC 86-77 issued (CCTV)                        | CCTV long lead items delivered.  |
| PDC 86-78 issued (Intrusion Detection System)  |  |
| Projected milestone for completion by 9/30/87. | On Schedule.   |
| - Construction 90%                             |  |
| - Fence work 90%                               |  |
| - IDS cutover/tie-in 50%                       |  |

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

| <u>Action</u>                       | <u>Status</u>                             |
|-------------------------------------|---|
| Add to ESR 86-516. (Protected Area) | Complete.                                 |
| Vital Area Analysis                 | Scheduled for 8/15/87 — . . . Completion. |

B. Improve the protected area and perimeter lighting system.

| <u>Action</u>   | <u>Status</u>                                   |
|---|---|
| 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. |

SECURITY PROGRAM IMPROVEMENTS

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

ActionStatus

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

Complete

PDC to PNPS for approval

Awaiting submittal



Pending PDC  
approval

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

Pending PDC  
approval

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

Awaiting submittal

Schedule Completion of Modification

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

## D. Replace the Security Computer and Access Control System.

ActionStatus

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 8/10/87

ADDITIONAL TRAINING

- Establish initial technical  
training module for Security  
Management.

1/87

Postponed  
until 3rd  
quarter, 1987.  
Working.

SECURITY PROGRAM IMPROVEMENTSSECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>  |
|---|---------------------------------|--|
| - 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.                                |

OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: C. E. Higgins

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:

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

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, 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

TJN/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 4  
 FOIA- 98-198

D/11

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

| <u>PLANNED MILESTONES</u>   | <u>ORIGINAL SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>   |
|---|--------------------------------------|---|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)   | March 31, 1987.                      | Complete. April 27, 1987. NRC comments received. Rev. to issue 2 being prepared.  |
| - 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'l info required.  |
| - Prepare and submit add'l comments to address miscellaneous Amendments.  | October 1987                         | Comments formulated. ORC approved 9/9/87.   |
| - Prepare draft changes to T&Q and Contingency Plans.   | July 31, 1987.                       | Completed. Rev. 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 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. Meeting with Region 1 scheduled for 9/24/87 concerning 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.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers

Action

Status

PDC 86-74 issued. (Perimeter Fence)

Working and on schedule. CMG projected completion date on all three PDC's 12/87. CCTV long lead items delivered.

PDC 86-78 issued (Intrusion Detection System)

Projected milestone for completion by 9/30/87.

On Schedule.

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

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

Action

Status

Add to ESR 86-516. (Protected Area)

Complete.

Vital Area Analysis

Rescheduled for 9/30/87 Completion.

B. Improve the protected area and perimeter lighting system.

Action

Status

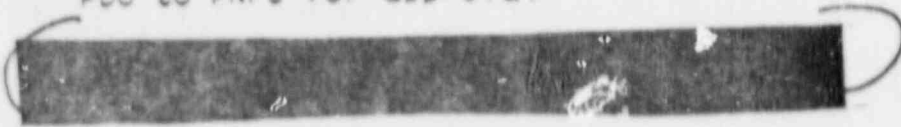
Implement PDC 83-09

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.

SECURITY PROGRAM IMPROVEMENTS

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

| <u>Action</u>  | <u>Status</u>   |
|--|---|
| Obtain response to ESR 86-516.<br>(PDC 87-17)                                      | Complete  |
| PDC to PNPS for approval   | Awaiting submittal  |
|  | Pending PDC approval  |
| Added x-ray machines and full length turnstiles. (PDC 87-17)                       | Pending PDC approval  |
| Modifications to Contractor Gatehouse.<br>(Post RFO #7) (PDC-87-17)                | Awaiting submittal  |
| Schedule Completion of Modification  | Design completed 5/11/87. Long lead materials (X-Ray and protective shielding), delivery 8/1/87. Task ready 8/1/87. |

## C. Replace the Security Computer and Access Control System.

| <u>Action</u>                   | <u>Status</u>   |
|---------------------------------|---|
| Obtain response to ESR 86-253.  | Complete.<br>9/86.  |
| Develop computer specification. | Complete.<br>March 23,<br>1987.                                       |
| Obtain bids.                    | Bids received<br>Bid evaluation<br>complete.                          |
| Issue purchase order            | P.O. issued to<br>Kidde Auto-<br>mated Systems<br>Inc. on<br>8/17/87. |

ADDITIONAL TRAINING

|  |      |  |
|--|------|--|
| - Establish initial technical training module for Security Management. | 1/87 | Rescheduled until 4th quarter, 1987. RFQ issued by NTD on 8/21/87. |
|--|------|--|

SECURITY PROGRAM IMPROVEMENTSSECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>  |
|---|---------------------------------|--|
| - 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.

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: *C. E. Higgins*  
C. E. Higgins

Date: 10/9/87

Dept. Doc. NSSM87-540

Record Type A4.08  
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              | R. Swanson    | J. D. Keyes  |
| 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 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.

*(Handwritten initials)*  
TJN/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 4  
 FOIA- 88-198

*0112*

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

| <u>PLANNED MILESTONES</u>   | <u>ORIGINAL SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>   |
|---|--------------------------------------|---|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)   | March 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 reg. Register into Security Plan. (Rev.18) Miscellaneous Amendments (1) | October 1986                         | Complete - sent to NRC. Comments rec'd from NRC - Add'l 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. Rev. 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 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.                        | Reschedule to 10/23/87. Met with Region I on 9/23/87 for review 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.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers

Action

PDC 86-74 issued. (Perimeter Fence)

Status

Working and on schedule. CMG projected completion date on all three PDC's 12/87.

PDC 86-78 issued (Intrusion Detection System)

Projected milestone for completion by 9/30/87.

- Construction 90%

- Fence work 90%

- IDS cutover/tie-in 50%

Reschedule to prior to start-up.

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

Action

Add to ESR 86-516. (Protected Area)

Status

Complete.

Vital Area Analysis redirected to verify Barrier Integrity.

Rescheduled for prior to start-up

Submit ESR (87-688)

Complete on 9/22/87.

B. Improve the protected area and perimeter lighting system.

Action

Implement PDC 83-09

Status

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

Work is as started on pole foundation. Schedule to be developed.

SECURITY PROGRAM IMPROVEMENTS

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

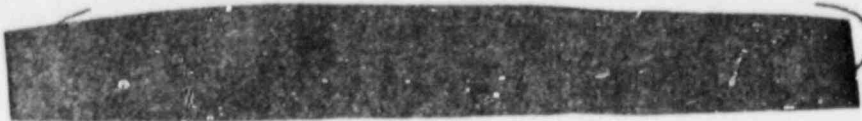
ActionStatus

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

Complete

PDC to PNPS for approval

Complete. Under security review.



Pending PDC 87-17 approval and completion.

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

Pending PDC 87-17 approval and completion.

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

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

Schedule Completion of Modification

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.

ActionStatus

Obtain response to ESR 86-253.

Complete.  
9/86.

Develop computer specification.

Complete.  
March 23,  
1987.

Obtain bids.

Complete

Issue purchase order

Complete

ADDITIONAL TRAINING

- Establish initial technical training module for Security Management.

1/87

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

ATTACHMENT 2 (cont.) Page 1 of 1

SECURITY PROGRAM IMPROVEMENTS

SECURITY PROGRAM OBJECTIVES

|   | <u>SCHEDULED<br/>COMPLETION</u> | <u>CURRENT<br/>STATUS</u>  |
|---|---------------------------------|--|
| - 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.



OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: R. G. Bird

From: C. E. Higgins

Date: 11/17/87

Dept. Doc. NSSM87-626

Record Type A4.08  
Non-Safety Related

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

Distribution:

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

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



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 ImprovementsREGULATORY 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 being met by existing programs and procedures.

PLANNED MILESTONESORIGINAL  
SCHEDULED  
COMPLETION

- |   |                 |   |
|---|-----------------|---|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)   | March 31, 1987. | Complete. April 27, 1987. NRC comments received. Rev. to issue 2 submitted to address comments                                    |
| - 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'l 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.  | Initial review completed. Final comments being incorporated. Final draft rescheduled to 1/30/87.                                  |
| - Prepare 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. |

PLANNED MILESTONES

ORIGINAL  
SCHEDULED  
COMPLETION

CURRENT  
STATUS

- Submittal of Contingency Plan and T&Q to NRC.

Oct. 1, 1987.

Reschedule to 12/15/87. Met with Region I on 9/23/87 for review 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.

SECURITY SYSTEMS HARDWARE/FACILITIES:

A. Protected and Vital Area Barriers



Action

Status

PDC 86-74 issued. (Perimeter Fence) 85% Complete

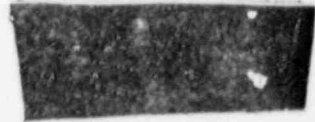
Working and on schedule. CMG



20% Complete

projected completion date on all three PDC's 12/87.

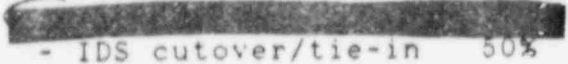
PDC 86-78 issued (Intrusion Detection System) 65% Complete



Projected milestone for completion by 11/16/87.

- Construction 90%

- Fence work 90%



- IDS cutover/tie-in 50%

Reschedule to prior to start-up.

2) 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 for prior to start-up

ESR (87-688) - Scheduled to begin work on 11/23/87.

Complete on 12/23/87.

E. Improve the protected area and perimeter lighting 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 PROGRAM IMPROVEMENTS

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

| <u>Action</u>   | <u>Status</u>   |
|---|---|
| Obtain response to ESR 86-516.<br>(PDC 87-17) ORC approved on 10/14/87.                 | Complete  |
| PDC to PNPS for approval.   | Complete.   |
|       | Pending PDC 87-17 approval and completion.  |
| Added x-ray machines and full length turnstiles. (PDC 87-17). ORC approved on 10/14/87. | Pending PDC 87-17 approval and completion.  |
| Modifications to Contractor Gatehouse. (Post RFO #7) (PDC-87-17)                        | Pending final Mgt. decision (Post RFO #7).  |
| Schedule Completion of Modification   | 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.

| <u>Action</u>                   | <u>Status</u>   |
|---------------------------------|---|
| Obtain response to ESR 86-253.  | Complete. 9/86.   |
| Develop computer specification. | Complete. March 23, 1987.   |
| Obtain bids.                    | Complete  |
| Issue purchase order.           | Complete - P.O. #63784 issued   |
|                                 | Kidde Automated Systems. Preliminary schedule being developed by HED. |

ADDITIONAL TRAINING

|  |      |                                     |
|--|------|-------------------------------------|
| - Establish initial technical training module for Security Management. | 1/88 | Ongoing - Scheduled completion date |
|--|------|-------------------------------------|

OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: E. S. Kraft

From: *D. J. Long*

Date: 1/19/88

Dept. Doc. NSSM88-020

Record Type A4.08  
Non-Safety Related

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

Distribution:

|                |              |                |                           |
|----------------|--------------|----------------|---------------------------|
| K. P. Roberts  | M. N. Brosee | T. Nicholson   | P. Hamilton               |
| R. Swanson     | J. D. Keyes  | P. Lord-Ondash | W. Russell (NRC Region 1) |
| J. Lyash (NRC) | R. Andrew    | J. Kehoe       | NSSM File                 |

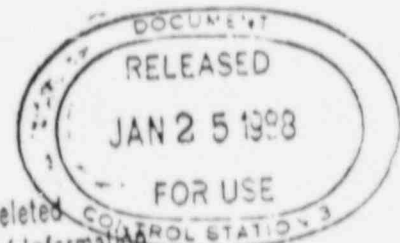
Attached is the monthly status report for the month of December 1987 on planned security program improvements.

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 taken out of this report.

*TJN*  
TJN/atf

- 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 88-198-4  
FOIA- \_\_\_\_\_

Plan and Schedule of Security Program ImprovementsREGULATORY 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.

| <u>PLANNED MILESTONES</u>   | <u>ORIGINAL SCHEDULED COMPLETION</u> | <u>CURRENT STATUS</u>   |
|---|--------------------------------------|---|
| - Submit Security Plan, Issue 2, Rev. 0 to NRC. (1)   | March 31, 1987.                      | Complete.<br>April 27, 1987.<br>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.<br><br>Comments rec'd from NRC - Add'l info required and resubmitted.           |
| - 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.                       | 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:

A. Protected and Vital Area Barriers

| <u>Action</u>  | <u>Status</u>  |
|--|--|
| PDC 86-74 issued. (Perimeter Fence) 85% Complete           | Working and on schedule. CMG projected completion date on all three PDC's 12/87. |
| [REDACTED] 50% Complete                                    |  |
| PDC 86-78 issued (Intrusion Detection System) 65% Complete |  |
| Projected milestone for completion by 11/16/87.            | Rescheduled to 2/7/88  |
| - Construction 90%   |  |
| - Fence work 90%   |  |
| - IDS cutover/tie-in 50%                                   |  |

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

| <u>Action</u>   | <u>Status</u>                  |
|---|--------------------------------|
| 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.   |

B. Improve the protected area and perimeter lighting system.

| <u>Action</u>   | <u>Status</u>  |
|---|--|
| 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. |



SECURITY PROGRAM 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

Status

Complete

Complete.

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  
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.

Status

Complete 9/86.

Complete 3/23/87.

Complete.

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

ADDITIONAL TRAINING

- Establish initial technical  
training module for Security  
Management.

1/88

Module Complete.  
Training scheduled  
for completion  
February 1988.

OFFICE MEMORANDUM

Boston Edison Company

RMG Control Number

To: E. S. Kraft

From: D. J. Long

Record Type A4.08  
Non-Safety Related

Date: 6/2/88

Dept. Doc. NSSM 88-122

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.

TJN

TJN:hc

Attachments: (1) Augmentations to Security Improvement Plan

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

R/16

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:

A. Protected and Vital Area Barriers

1)

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 IE Notice 86-91.

Action

Status

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

Walkdown complete. Report issued. No discrepancies noted.

- B. Improve the protected area and perimeter lighting system.

ActionStatus

Implement PDC 83-09.

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

- C. Modify Areas at Main and Alternate Access Points.

ActionStatus

Obtain response to ESR 86-516.

Complete.

ORC approve PDC 87-17 and issue for construction.

Complete.

Schedule Completion of Modification associated with PDC 87-17.

Scheduled for completion 9/30/88.

- 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

ActionStatus

Obtain response to ESR 86-253.

Complete 9/86.

Develop computer specification.

Complete 3/23/87.

Obtain bids.

Complete.

Issue purchase order.

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

Conceptual construction study.

In progress.  
Estimated completion date 9/88.