

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.: 50-445; 50-446
License Nos.: NPF-87; NPF-89
Report No.: 50-445/97-21; 50-446/97-21
Licensee: TU Electric
Facility: Comanche Peak Steam Electric Station, Units 1 and 2
Location: FM-56
Glen Rose, Texas
Dates: October 27-31, 1997
Inspector: A. B. Earnest, Security Specialist, Plant Support Branch
Approved By: Blaine Murray, Chief, Plant Support Branch
Division of Reactor Safety
ATTACHMENT: Supplemental Information

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EXECUTIVE SUMMARY

Comanche Peak Steam Electric Station, Units 1 and 2
NRC Inspection Report 50-445/97-21; 50-446/97-21

This was an announced inspection of the licensee's physical security program. The areas inspected included records and reports, test and maintenance, access control - vehicles, access control - personnel, access control - packages, training and qualifications, lighting, and followup of previously identified findings.

Plant Support

- An excellent records and reports system were in place. A noncited violation was identified involving the failure to temporarily deactivate access authorization of personnel with only occasional access to the plant if they are not on site to be immediately tested (Section S1.1).
- A good test and maintenance program was implemented that ensured security systems were maintained at their maximum effectiveness. A noncited violation was identified involving the failure to inspect all vital area doors every 8 hours (Section S2.1).
- An efficient vehicle access control program was in place (Section S2.2).
- Personnel access to the protected area was effectively controlled (Section S2.3).
- An effective program was in place for searching hand carried packages and material (Section S2.4).
- A noncited violation was identified involving the failure to properly requalify security officers on the semiautomatic pistol (Section S2.5).
- The protected area lighting system was excellent (Section S2.6).

Report Details

IV. Plant Support

S1 Conduct of Security and Safeguards Activities

S1.1 Record and Reports

a. Inspection Scope

The security event logs were inspected to determine compliance with the requirements of 10 CFR 73.71(b) and (c), 10 CFR 73.70(a)-(c), and the physical security plan. The inspector reviewed the safeguard's event logs for the second, third, and portions of the fourth quarter of 1997.

b. Observations and Findings

The inspector determined that the licensee conformed to the regulatory and license requirements to report security events. The licensee's security staff was correctly identifying security events. In addition, the licensee used the information contained in their records and reports to track and trend problem areas. During a review of the safeguards event logs, the inspector noted that two examples of fitness-for-duty requirement failures were identified. Station Procedure STA-910, Revision 3, paragraph 6.10.6 requires, in part, that personnel, who only occasionally access the site and are selected for random drug and alcohol screening, will have their access authorization temporarily deactivated in the security computer if they are not on site to be immediately tested. The deactivation will remain until they next arrive on site at which time they will be tested prior to having the unescorted access restored.

On June 20 and June 27, 1997, the licensee identified two examples where contractor personnel access authorization was not deactivated when they were unavailable for testing upon being selected for random testing. Security Field Report 0530-97 indicated that the first individual was supposed to have had his unescorted access deactivated on May 17, 1997. Computer records indicated that the individual accessed the plant on May 23, June 5, and June 17, 1997. Security Field Report 0557-97 indicated that a second individual was supposed to have had unescorted access deactivated on June 25, 1997. A review of the computer records indicated that the second individual accessed the plant on June 27, 1997. Both individuals accessed the plant without being tested.

The licensee determined that problems existed with the computer commands necessary for deactivation of access authorization. Corrective actions included computer program changes and security instruction changes for the alarm station operators to require that a copy of the computer deactivation be attached to the memorandum requesting deactivation and returned to the fitness-for-duty supervisor. The inspector reviewed all reportable events in the safeguard's event logs and determined that there were no recurrences of this nature from June 1997

to the date of this inspection. The failure to correctly authorize entry into the protected area is a violation of Station Procedure STA 910 (50-445; -446/9721-01). This nonrepetitive, licensee-identified and corrected violation is being treated as a noncited violation consistent with Section VII.B.1 of the NRC Enforcement Policy.

c. Conclusion

An excellent records and reports system were in place. A noncited violation was identified involving the failure to temporarily deactivate access authorization of personnel with only occasional access to the plant if they are not on site to be immediately tested.

S2 Physical Security Program for Power Reactors (81700)

S2.1 Testing and Maintenance

a. Inspection Scope

The testing and maintenance programs were inspected to determine compliance with the requirements of 10 CFR 73.55(a), (g)(1) through (3), and the physical security plan.

b. Observations and Findings

The inspector reviewed testing and maintenance records and confirmed that the records committed in the physical security plan were on file, well documented, and readily available for review. The licensee provided instrumentation and controls technicians to repair or replace any security equipment that required corrective maintenance. The inspector determined through a review of work records and interviews with security officers and supervisors that repairs were completed in a timely manner. A quarterly preventive maintenance program was in place for the security systems.

The inspector observed the testing of metal detectors during the inspection. The tests observed by the inspector were completed in a professional and competent manner.

Based on interviews of security personnel and a review of procedures, the inspector determined that prior to July 1997, two vital area doors were not tested as required. Paragraph 3.5.2.4 of Security Instruction Procedure 3.5, Revision 5, requires security patrols to physically inspect vital area doors every 8 hours. A security self assessment determined that for several years after both units at the plant were licensed, vital area doors 227 and 527 were not inspected every 8 hours as required by the procedure. The doors in question are outside doors on the roof of the power building and provide emergency egress from containment. To get to the doors, a person must enter and exit through two other vital areas within the power block. There was no viable path way up the outside of the power block or containment

buildings. The doors were locked and alarmed, but were not equipped with card readers. Security testing and maintenance personnel tested the alarm system on the doors every 7 days. Security officers have been trained and briefed to ensure that all vital area doors are inspected at least once each 8-hour period. The failure to inspect all vital area doors is a violation of Security Instruction Procedure 3.5. This nonrepetitive, licensee-identified and corrected violation is being treated as a noncited violation consistent with Section VII.B.1 of the NRC Enforcement Policy (50-445; -446/9721-02).

c. Conclusion

A good test and maintenance program was implemented that ensured security systems were maintained at their maximum effectiveness. A noncited violation was identified involving the failure to inspect all vital area doors every 8 hours.

S2.2 Access Control - Vehicles

a. Inspection Scope

The vehicle access control program was inspected to determine compliance with the requirements of 10 CFR 73.55 (d)(4) and the physical security plan.

b. Observations and Findings

The inspector observed searches of two vehicles to ensure that they were properly searched prior to entering the protected area. The security officers conducted the search in compliance with their procedural requirements.

c. Conclusion

An efficient vehicle access control program was in place.

S2.3 Access Control - Personnel

a. Inspection Scope

The personnel access control program was inspected to determine compliance with the requirements of 10 CFR 73.55(d)(1), (2), (3), (5), (6), and (7), and the physical security plan.

b. Observations and Findings

The inspector determined through observation that personnel access to the protected area was properly controlled. The protected area access control equipment was inspected and found to be functional and well maintained. The last control area for access to the plant was contained within a bullet resistant enclosure. The inspector confirmed by interview and observation that the security

officers clearly understood their responsibilities as related to controlling personnel access.

c. Conclusion

Personnel access to the protected area was effectively controlled.

S2.4 Access Control - Packages

a. Inspection Scope

The package access control program was inspected to determine compliance with the requirements of 10 CFR 73.55 (d)(3) and the physical security plan.

b. Observations and Findings

The inspector observed the searching of packages and materials at the personnel access control points. The package and material search process was very efficient. Tests indicated that the X-ray equipment performed in an adequate manner. The security officers operating the equipment were well trained and answered all of the inspector's questions.

c. Conclusion

An effective program was in place for searching hand carried packages and material.

S2.5 Security Training and Qualifications

a. Inspection Scope

The security training and qualification program was inspected to determine compliance with the requirements of Appendix B of 10 CFR Part 73, 73.55(b)(4), (h)(5), and the training and qualifications plan.

b. Observations and Findings

The inspector reviewed the current training and qualification records of 10 security officers. The training and qualifications records of the officers were complete and readily available for inspection.

The inspector determined through a review of the safeguards event logs and security officer training records that 48 security officers were requalified on the handguns in a manner contrary to that required in the training and qualification plan. Paragraph 4.3.1 of the Training and Qualification Plan, Revision 9, requires all armed officers to requalify annually. Paragraph 4.2.1 of the Training and Qualification Plan requires security officers to requalify annually with the revolver or semiautomatic pistol by successfully completing the applicable course described in Appendix D to

the Training and Qualification Plan. Appendix D, Stage 2, requires each officer to fire three rounds from a kneeling, strong-hand supported position.

On September 4, September 11, and September 18, 1997, 48 security officers were requalified on the semiautomatic pistol without firing from the kneeling strong-hand supported position as required by the Training and Qualification Plan. The security officers were certified as having successfully requalified.

A security officer informed a member of security management who informed the training supervisor of the failure to qualify in accordance with the approved course of fire. Security Field Report 0791-97 was completed that documented the violation of the Training and Qualification Plan. The inspector reviewed licensee investigations of the issue and determined that the range sergeant thought that he had the option to fire the three rounds from a standing position. The licensee immediately determined that corrective action was necessary and started requalifying the 48 security officers. At the time of the inspection, 30 of the 48 security officers had been properly requalified in accordance with the Training and Qualification Plan. The other 18 officers will be requalified as scheduling permits, probably within 2 weeks. The failure to properly requalify the security officers is a violation of the Training and Qualifications Plan. This nonrepetitive, licensee-identified and corrected violation is being treated as a noncited violation consistent with Section VII.B.1 of the NRC Enforcement Policy (50-445; -446/9721-03).

c. Conclusion

A noncited violation was identified involving the failure to properly requalify security officers on the semiautomatic pistol.

S2.6 Lighting (71750)

a. Inspection Scope

The lighting system was inspected to determine the licensee's compliance with the requirements of 10 CFR 73.55(c)(5) and the physical security plan.

b. Observations and Findings

The inspector observed the lighting along the perimeter barrier and associated isolation zones. The lighting effectively ensured cameras and security officers can visually inspect the areas. The entire protected area was inspected, and the lighting was at least 0.2-foot candlepower throughout. Access control points, alarm stations, and vital area portals were lighted in an adequate manner.

c. Conclusion

The protected area lighting system was excellent.

S3 Followup (92904)

S3.1 (Closed) Violation 50-445; -446/9523-01: Protection of Safeguards Information

The inspector reviewed licensee records and a root cause analysis of the event described in the violation. The inspector reviewed the safeguard's event logs and determined that there were no recurrences. The inspector confirmed that corrective actions were complete and effective.

S3.2 (Closed) Inspection Followup Item 50-445; -446/9703-01: Signature Authority

Licensee personnel were signing for supervisors, not by signing their own names but by signing the supervisor's name. The inspector reviewed corrective action including training for supervisors. No recurrences have been reported.

S3.3 (Closed) Violation 50-445; -446/9717-04: Protected Area Lighting

The inspector determined that two trailers were not properly lighted under the trailers. The inspector walked down the entire protected area and determined that the licensee had effective corrective actions in place. All vehicles had temporary lighting under the vehicles.

V. Management Meetings

X1 Exit Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on October 31, 1997. The licensee acknowledged the findings presented. No proprietary information was identified.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Alps, Security Manager
J. Ardizzoni, Administrative Security Supervisor
J. Ayres, Plant Support Overview Manager
G. Bell, Regulatory Affairs
J. Braun, Security Coordinator
J. Britt, Corporate Security
J. Brown, Fitness-for-Duty Supervisor
W. Cravey, Training Security Coordinator
B. Grace, Safety Services
N. Harris, Licensing Engineer
T. Hope, Regulatory Compliance Manager
M. Lucas, Maintenance
M. Marcinak, SMART Team 1 - Security
P. Mills, Senior Quality Assurance Specialist, Operations Quality Assurance
D. Moore, Plant Operations
D. Walling, Plant Engineering

Contractor

B. Bodeker, Burns Lieutenant
K. Hayes, Burns Security Chief
R. Jeffus, Burns Security Training Sergeant
G. Willis, Security Training Sergeant

NRC

R. Nease, Resident Inspector

INSPECTION PROCEDURES USED

IP 81700	Physical Security Program for Power Reactors
IP 92904	Followup - Plant Support
IP 71750	Plant Support Activities

ITEMS OPENED, CLOSED, OR DISCUSSED

Opened

50-445; -446/9721-01	NCV	Fitness-for-Duty
50-445; -446/9721-02	NCV	Test and Maintenance
50-445; -446/9721-03	NCV	Training and Qualification

Closed

50-445; -446/9721-01	NCV	Fitness-for-Duty
50-445; -446/9721-02	NCV	Test and Maintenance
50-445; -446/9721-03	NCV	Training and Qualification
50-445; -446/9523-01	VIO	Protection of Safeguards Information
50-445; -446/9703-01	IFI	Signature Authority
50-445; -446/9717-04	VIO	Protected Area Lighting

LIST OF DOCUMENTS REVIEWED

Security Instruction/Procedure 4.0, "Compensatory and Contingency Instructions," Revision 4

Station Administrative Procedure STA 190, "Fitness-for-Duty Program," Revision 4

Security Instruction Procedure 3.2, "Access Control," Revision 10

Security Instruction Procedure 3.5, "Protected and Vital Area Patrols," Revision 5

Safeguards Event Logs, Second, Third and Fourth Quarters of 1997

Safeguards Field Reports, 0557-97, 0530-97, 0549-97, 0791-97, 0531-97, 0296-97

Physical Security Plan, Revision 27

Training and Qualification Plan, Revision 9