

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. Enforcement Conference for 30-247/86-02  
Docket No. 50-247 License No. DPR-26  
Licensee: Consolidated Edison Company of New York, Inc.  
4 Irving Place  
New York, New York 10003

Facility Name: Indian Point Nuclear Generating Station, Unit 2

Type of Meeting: Enforcement Conference

Meeting At: NRC Region I, King of Prussia, Pennsylvania

Meeting Date: February 13, 1986

Prepared by: *James M. Dunlap*  
for W. Madden, Physical Security Inspector

3/10/86  
date

Approved by: *R. R. Keimig*  
R. R. Keimig, Chief, Safeguards Section,  
Nuclear Materials Safety and Safeguards  
Branch

3/11/86  
date

Meeting Summary: An Enforcement Conference was held at NRC Region I, King of Prussia, Pennsylvania, on February 13, 1986 to discuss the violations of NRC requirements identified in Region I Inspection Report No. 50-247/86-02. The meeting was attended by NRC and licensee management representatives and lasted about two hours, during which the circumstances surrounding the violations and the licensee's corrective actions were discussed.

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## DETAILS

### 1.0 Meeting Attendees

#### a. Consolidated Edison Company of New York, Inc.

M. Selman, Vice President, Nuclear Power  
A. Budnick, General Manager, Administrative Services  
M. Blatt, Director, Regulatory Affairs  
M. Drexel, Manager, Security, Fire Protection and Safety  
G. Hayes, Security Representative/Corporate Security Directorate

#### b. Nuclear Regulatory Commission

J. Allan, Deputy Regional Administrator  
T. Martin, Director, Division of Radiation Safety and Safeguards  
R. Starostecki, Director, Division of Reactor Projects  
W. Kane, Deputy Director, Division of Reactor Projects  
J. Joyner, Chief, Nuclear Materials Safety and Safeguards Branch  
S. Collins, Chief, Projects Branch No. 2  
R. Keimig, Chief, Safeguards Section  
L. Norrholm, Chief, Reactor Projects Section 2B  
J. Gutierrez, Regional Attorney  
D. Holody, Enforcement Specialist  
D. Limroth, Project Engineer, Reactor Projects Section 2B  
W. Madden, Physical Security Inspector

### 2.0 Summary of Discussion

Mr. Allan opened the meeting and the attendees were introduced. Mr. Martin described the purpose of the enforcement conference. Mr. Madden then summarized the findings of the inspection conducted January 13-17, 1986 (Inspection No. 50-247/86-02), including three violations of vital area access control and barrier integrity and one violation of vehicle search procedures.

Mr. Budnick, at Mr. Selman's request, reviewed the causes of the violations and the licensee's corrective actions, as follows:

#### a. Vital Area Access Control and Barrier Integrity Violations

Mr. Budnick stated that one of the access control breakdowns occurred because of changes made for the current outage. Because of an unplanned reactor trip, the outage schedule was initiated about 24 hours earlier than had been previously planned. The attendance at the first outage meeting was limited and did not include a representative from the security organization. This resulted in a breakdown in communications among various plant functional groups which ultimately led to the violation. He stated that, to prevent recurrence of such a violation in the future, a member of the licensee's security

group will attend all outage meetings; the site General Education Training program has been upgraded to increase the awareness of all employees and contract personnel to the general requirements of the security program, and a mechanism will be established to identify security barriers.

Another of the vital area access control violations resulted from a breakdown in field supervision and oversight of compensatory measures, combined with the use of a new member of the security force. This resulted in the loss of effectiveness of a compensatory measure that was established for access control. The security force member could not see two NRC inspectors as they entered the vital area through a degraded barrier because the post was improperly located and this was not recognized or brought to the attention of security supervision. Mr. Budnick stated that the following corrective actions have been implemented:

- (1) All compensatory posts, when established and during each shift thereafter, will receive close supervisory attention from both the contract security supervisors and the licensee's proprietary oversight personnel.
- (2) Security supervision was realigned to provide for better awareness of current plant conditions and, particularly, changing plant conditions.

Mr. Budnick attributed the third vital area access violation to poor administrative handling of previously identified NRC concerns regarding several barrier deficiencies. Because of the internal review process and safety engineering considerations, the licensee's response and plan of action underwent several modifications. The final (and correct) plan of action was not approved until early January 1986, but work had not yet been initiated at the time of the NRC inspection (86-02) and, apparently, the onsite security force was not aware of the status of the proposed action and, therefore, could not respond to the inspector's questions. The violations were corrected before the conclusion of the inspection. As corrective action, the licensee has revised its administrative procedures.

In response to a question from Mr. Martin regarding the licensee's understanding of the obligation to implement compensatory measures for perceived weaknesses, Mr. Budnick stated that he could not accurately recall the commitments in the security plan. Mr. Madden indicated the appropriate commitment from the NRC-approved security plan. Mr. Budnick agreed to review the matter and to report his understanding to Region I by February 18, 1986. Mr. Budnick reiterated that the previously identified vital area barrier deficiencies were corrected by January 17, 1986 and added that a survey of all other vital area barriers was conducted, and repairs/modifications have been accomplished to ensure that their integrity is in accordance with NRC requirements.

b. Inadequate Search of Vehicle

Mr. Budnick stated that, although the security force member had searched the truck cab in question, he had not searched under the bed in the sleeper compartment, but did feel the top of the bed. Mr. Martin and other NRC staff members emphasized the requirements for a complete search and stressed the need to improve training in vehicle search procedures. Mr. Budnick agreed and stated that the following corrective actions had been taken:

- (1) Vehicle search procedures were revised and extraneous material was removed from the procedures.
- (2) The revised search procedure was reviewed with all members of the security organization.

c. Other NRC Perceived Program Needs

Mr. Martin and Mr. Starostecki enumerated several additional perceived needs to improve the program. These were:

- Need to improve the effectiveness of procedures for all plant activities in integrating general and specific security program requirements during routine and nonroutine periods.
- Need for immediate improvement in the security organization's supervisory effectiveness and management control to ensure that program objectives and standards are achieved.
- Need to insure management attention and effective review of program commitments, including the quality of event reports transmitted to the NRC.
- Need to insure effective technical support for the security systems and equipment, including installation, testing and preventive maintenance.

Mr. Selman and Mr. Budnick agreed and stated that these needs were included in their general security program improvement plan that was discussed in a meeting with the Region I staff on December 13, 1985. Mr. Budnick stated that, as a result of the recent security inspection, the program improvements were being accelerated. Mr. Selman committed his full support to the accelerated improvements. Mr. Budnick stated that the primary thrust of the improvement actions would be directed toward: (1) Management and Supervisory Control; (2) Personnel Qualification and Performance; and (3) Hardware Evaluation. Mr. Budnick reported the appointment of Mr. Mark Drexel to the new position of Manager, Security, Fire Protection and Safety and added that a job task analysis of security supervisory positions will be conducted by a third party and will be initiated in about two weeks.

### 3.0 Conclusion of Meeting

Mr. Martin thanked the representatives of the licensee for their comprehensive presentations and frank responses to NRC questions. He concluded the meeting by stating that the Region I staff would evaluate the licensee's corrective action and that a decision regarding the appropriate enforcement action would be forthcoming.