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U. S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATION

REGION III

RO Inspection Report No. 070-1193/74-04

Licensee: Kerr-McGee Corporation
Kerr-McGee Building
Oklahoma City, Oklahoma

License No. SNM-1174
Category: A (1)

Cimarron Facility
Plutonium Plant
Crescent, Oklahoma

Type of Licensee: Special Nuclear Material

Type of Inspection: Special, Announced Physical Protection Inspection

Dates of Inspection: May 6-9, 1974

Dates of Previous Inspection: February 26-27, 1974 (M&PP)

Lead Inspector: J. F. Donahue

5/24/74
(Date)

Accompanying Inspector: J. P. Patterson

5-24-74
(Date)

Other Accompanying Personnel: None

Reviewed By: J. A. Hind, Chief
Materials and Plant
Protection Branch

5/28/74
(Date)

Attachment: Findings
(Exempt from Disclosure)

REPORT DETAILS

(SECTIONS I THROUGH XVI)

INTRODUCTION AND SCOPE

SECTION I

1. Persons Contacted:

Morgan Moore, Cimarron Facility Manager
Raymond Janka, Manager, Administration and Accountability
Fred Welch, Security Officer
Barbara Harris, Guard
L. J. Kephart, Guard (Shift Supervisor)

2. Scope

This inspection covered the Kerr-McGee (K-M) approved security plan, License Conditions MPP-1 to License No. SNM-1174 (with exceptions) and 10 CFR 73 requirements, as applicable.

3. Introduction

The physical security inspection of the K-M Plutonium Plant, a part of the Cimarron Facility, was conducted on May 6-9, 1974.

The security plan, initially submitted on January 5, 1974 to the Materials and Plant Protection Branch, Directorate of Licensing, was revised following a visit of Dr. Frank A. Costanzi on February 6-8, 1974. The revised security plan was submitted to DL on February 27, and March 6, 1974 and incorporated several modifications suggested by Dr. Costanzi. In order to accept the revised plan, it was found necessary to issue Amendment MPP-1 to License No. SNM-1174 to add a new License Condition 9.0, effective March 6, 1974. Some conditions were effective immediately; certain exceptions were granted with respect to placement of detection equipment and conducting of searches (with acceptable provisions) and certain exceptions were granted on equipment installation, badging and the protective force but only until May 6, 1974 (with acceptable provisions).

The numerous violations disclosed by this inspection relate mainly to the licensee's inability to meet imposed requirements within the time allotted (March 6 or May 6, 1974). Most violations deal with three general areas; alarms, guards and detection aids, all long lead items.

SUMMARY OF FINDINGS

A. Enforcement Actions:

The following apparent violations of AEC requirements are considered to be of Category II severity:

1. 73.60(a)(7) states, "Methods to observe individuals within material access areas to assure that special nuclear material is not diverted shall be provided and used on a continuing basis."

This matter was previously reported to K-M as item No. 3 in the enclosure to RO:III letter dated April 12, 1974. In the K-M response dated April 29, 1974, it was stated that the TV camera presently mounted on the outside of the Pu Building will be moved inside the dock air lock area to enable the guard in the front lobby to have visual capability to survey the area of the dock exit Pu monitor as well as the exit door.

Contrary to the above, at the time of the inspection, the TV camera was not relocated to inside the dock area to provide immediate visual capability of the guard upon activation of the Pu monitor alarm. (See Report Details Page 30a)

2. 73.50(f)(3) states "Communications equipment shall be tested for operability and performance not less frequently than once at the beginning of each security personnel work shift."

In addition, the K-M Security Plan in Part 10.4 states, "All communication equipment is tested at least once each shift."

Contrary to the above, the existing agreement with the Guthrie Police Department provides for conducting weekly tests of the emergency radio rather than once each security personnel work shift. (See Report Details Page 36a)

3. License Condition 9.3.1 requires submission of Drawing SG-2 to include levels of illumination at various points in the isolation zone.

73.50(b)(5) states, "Isolation zones and clear areas between barriers shall be provided with illumination . . . not less than 0.2 foot candles."

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Part 2.1.2.2 of the K-M Security Plan states, "The minimum illumination along the barrier (protected area perimeter fence) is .2 foot candles at ground level. The front of the building and the entrance to the protected area is lighted by the same type of fixtures and minimum illumination is the same."

Contrary to the above, a revised SG-2 drawing has not been submitted to Licensing to date to depict the levels of illumination at points along the barrier. Also, during a night-time inspection on May 7, 1974, the levels of illumination provided the southeast fence corner and fronting the Pu Building main entry area and fence line do not appear to meet the minimum of 0.2 foot candles. (See Report Details Page 20a)

4. License Condition 9.3.2 requires "The sample window in the east wall of the plant shall be alarmed to detect unauthorized opening and locked from the outside. . ."

Contrary to the above, the sample window has not been equipped with an alarm or exterior lock. (See Report Details Page 33a)

5. License Condition 9.3.4 states in part. . . "At the point of the exit search from a material access area, the licensee shall use a metal detector in conjunction with the special nuclear material detector."

Contrary to the above, a metal detector has not been installed to date at the point of exit search from the material access area. (See Report Details Page 28a)

6. License Condition 9.3.5 states, "The licensee shall install a motion detector in the storage vault. . ."

Contrary to the above, the motion detector was only partially installed but was not operable or tied into the alarm console. (See Report Details Page 32a)

7. 73.50(a)(1) states, "The licensee shall establish a security organization, including guards. . ." Part 5.2 of the K-M Security Plan states, "The shift organization will consist of two armed guards at guard posts 1 and 2, and a supervisor. The guards and the supervisor will be armed and uniformed."

Contrary to the above, protective personnel assigned to post and supervisory duties were neither armed nor uniformed and therefore did not meet the definition of "guard" as specified in 73.2(c). (See Report Details Page 13a)

8. License Condition 9.5 states, "The door between the ~~X~~exhaust air fan room (Room 201) and the supply air far (sic) room (Room 202) shall be alarmed to detect unauthorized opening ~~X~~ in accordance with 10 CFR 73.50(d)(2) and 73.60(c)."

Contrary to the above, an ~~X~~alarm had not been installed on the subject door. (See Report Details Page 33a) ~~X~~

9. License Condition 9.7 states, ". . . The licensee ~~X~~ shall install balanced magnetic switch type intrusion alarms on all emergency exits and all normally locked points of ingress and egress ~~X~~ in accordance with 10 CFR 73.50(d)(1) and (2) and 73.60(c).

Contrary to the above, these portals are ~~X~~still equipped with non-acceptable plunger-type alarms which have not been replaced by balanced magnetic switches. (See Report Details Page 33a) ~~X~~

10. License Condition 9.8 states, ~~X~~"The licensee shall provide for both central alarm stations to be continually manned. . . " ~~X~~

73.50(d)(1) states that, "All alarms required pursuant to this part shall annunciate in a continuously manned central alarm station located within the protected area and in at least one other continuously manned station, not necessarily within the protected area. . ."

Also, License Condition 9.18.1 granted an exception from the requirement for a ~~X~~secondary alarm ~~X~~ station only until May 6, 1974, with certain conditions.

Contrary to the above, although both posts ~~X~~(Pu Plant Post No. 1 ~~X~~ and U Plant Post No. 2) are continuously manned, the ~~X~~secondary alarm annunciator was not installed or operable at U Plant Post No. 2 at the time of this inspection. ~~X~~ (See Report Details Page 32a)

11. License Conditions 9.16.1 and .2 - A exception to the requirement for search of individuals and packages at the entrance point into the protected area provided ~~X~~"That a weapon (metal) detector is located outside the guard station (Post No. 1). . . such that an individual is searched for weapons prior to entry into the guard station"; and that "an electric door lock is provided on the outside door to the guard station which is operated from within the guard station." ~~X~~

Contrary to the above, the ~~X~~metal detector, though installed at the location specified, was not operable at the time of this inspection. Also, the electric door lock on the entry door had not been installed ~~X~~ as yet. ~~X~~(See Report Details Page 32a) ~~X~~

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- [REDACTED]
12. License Condition 9.17.2 states that "That storage areas in the fabrication area and in the (inspection and) assembly area shall be protected by intrusion alarms when these areas are unoccupied."

Contrary to the above, intrusion alarms were not installed or operable at these locations at the time of this inspection.
(See Report Details Page 29a)

13. License Condition 9.18.2 - An exception until May 6, 1974 was granted ~~from~~ the commitment to use detectors to search individuals entering the plutonium plant protected area provided a hands on search is performed under the surveillance of a guard. The licensee shall conduct the searches at the points identified in License Condition 9.16." (See Citation No. 11) ~~X~~

Contrary to the above, the ~~metal~~ detector although installed in the exterior breezeway was not operable. (See Report Details Page 32a) ~~X~~

14. License Condition 9.18.3 states, ~~The~~ licensee shall employ the contract guard service as specified in the licensee's security plan, as revised, provided that the size of the temporary guard force is as specified in the licensee's plan (two armed guards and armed shift supervisor) for the permanent guard force." ~~X~~

Contrary to the above, as of May 6, 1974, only ~~one~~ contractor guard was assigned to each shift and the K-M employees who have been trained to act as guards were not armed or uniformed. (See Report Details Page 13a) ~~X~~

The following apparent violations are considered to be of Category III severity.

15. License Condition 9.18.4 - Until May 6, 1974, ~~the~~ licensee is granted an exception to the requirement that all alarms meet Interim Federal Specification W-A-00450B (GSA-FSS) provided existing alarms are maintained until replaced with alarms meeting the above specification. ~~X~~

Contrary to the above, as of May 6, 1974, ~~existing~~ alarms were not replaced with alarms meeting the specifications. (See Report Details Page 33a & 33b) ~~X~~

16. 73.70(d) states, "Each licensee. . . shall keep the following records. A log indicating name, badge number, time of entry, reason for entry and time of exit of all individuals granted access to normally unoccupied vital area."

Contrary to the above, ~~a~~ log containing this information is not maintained. (See Report Details Page 40a) ~~X~~

B. Actions Taken on Previous Items of Noncompliance

RO:III Inspection Report 070-1193/74-02 (March 11-13, 1974) identified the two items of noncompliance, one program weakness and three discussion items:

1. The combination lock of the Material Storage Vault was found to be broken and inoperable and reportedly had been in this condition for approximately three weeks.

Action taken: A new Sargeant-Greenleaf three position, changeable combination lock was installed on the vault door and is operating satisfactorily.

2. The visitor log used to record individuals who visit the Plutonium Plant did not provide a section for "purpose of visit." Also, several log sheets did not indicate the identity of an assigned escort either by name or initials or did not reflect the identity of the person visited within the protected area.

Action taken: The licensee has developed a new form on which to record visitors to the protected area. This new log contains a section for purpose of visitor and the name of the person visited. Security personnel have been instructed to have escorts sign the log to acknowledge responsibility for providing escort while within the protected area.

3. Program Weakness - There is no capability for the watchman (guard) to visually determine the cause for a (Pu monitor) alarm (at the dock exit door) from his vantage point in the Pu Building's front lobby. While it is standard practice to notify personnel within the Pu area that an alarm has been received, there is no assurance or record to indicate that each such alarm is checked out by authorized personnel to determine its cause.

Action taken: The licensee has initiated action to move a TV camera, presently mounted on the building's exterior, to inside the dock area air lock to afford the lobby guard visual capability to survey the area where the dock exit Pu monitor is located, as well as the exit door. Also, the licensee is exploring the use of additional instrumentation on the Pu monitor to compensate for background levels during movement of material within the building corridor and adjacent rooms.

Since prompt and effective remedial action has not been accomplished, a citation for noncompliance with 10 CFR 73.60(a)(7) is in order. (See Citation No. 1)

[REDACTED]

Other matters discussed with licensee representatives at the close-out meeting on March 13, 1974 were also reviewed during the current inspection. The status of these matters is as follows:

4. The system for recording required tests and maintenance of security devices appeared to need revision. Creation of individual records on required tests, responses and inspections was deemed advisable.

Action taken: The licensee has set up separate records for communications tests, daily fence and gate inspections, alarm annunciations and response, alarm and detection aid tests and unusual incident reports.

5. The K-M agreement with the Guthrie Police Department, where a radio receiver has been placed, provides for weekly tests of communications equipment. Since this arrangement did not meet the spirit and intent of 10 CFR 73.50(f)(3) the licensee was requested to resolve this matter.

Action taken: While the licensee is aware that regulations require tests of all communications equipment at the beginning of each security force work shift, no arrangements have been made to date with the Guthrie Police to conduct thrice-daily tests of the radio. Accordingly, a citation for noncompliance with 10 CFR 73.50(f)(3) was made. (See Citation No. 2)

6. Because the configuration of the protected area fence perimeter was changed, the licensee had been requested to re-evaluate protective lighting to assure that illumination requirements are met.

Action taken: A reevaluation of protective lighting had not been made and a plot plan to reflect the levels of lighting (as requested by DL in License Condition 9.3.1) had not been submitted. Visual inspection of the light levels provided at the protected area fence (Southeast Corner) and the front of the Pu Building (Main Entry Point to Protected Area) indicated that acceptable light levels are not apparent. Accordingly, a citation for noncompliance with License Condition 9.3.1 and 10 CFR 73.50(b)(5) appears in order. (See Citation No. 3)

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SECTION II

GENERAL

1. Determine that the facility's plot plan indicates all changes in physical aspects of the security program, since the previous inspection, in accordance with TI-9000, Appendix A. Up to Date

2. Who is the site security officer? [Fred Welch]

3. Does the site security officer have additional responsibilities? If so, what are these responsibilities and how much time is spent on additional responsibilities? yes

Material Accountability	- 20%	} Past 3 Months
Plutonium Security	- 75%	
Uranium Security	- 5%	
Yearly Average about		- 70% Security
		30% Accountability

4. Who is responsible for providing (written or oral) instructions to individuals used to protect:

A. The site against industrial sabotage, and/or [Fred Welch]

B. SNM at the site against theft or diversion? [Fred Welch]

5. Has the licensee been granted specific exceptions from the requirements of 10 CFR 73? (If yes, explain in Section IV.) yes

6. [70.22(h)] Has the licensee audited all phases of their physical protection program for effectiveness during the last 12 months?

Day to day

A. Who performed audit? _____

Operations

B. Did the results of the licensee's audit require corrections? _____

yes

(1) Have all corrections been implemented? _____

yes

If not, explain: _____

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1. [70.22(h)] Does the licensee possess an approved Physical Security Plan (PSP)?

2. [70.32(e)] Did any change in the PSP decrease effectiveness?

If yes, explain:

A. Did the licensee secure AEC approval prior to making changes in the PSP which decreased effectiveness?

(1) If yes, were approvals:

(a) Written, and/or

(b) Verbal?

3. [70.32(d)] For changes in the licensee's PSP which decreased its effectiveness, did the licensee submit an application to amend his license or to change Technical Specifications incorporated in his license?

4. [70.32(e)] Were any changes made to the PSP which did not decrease its effectiveness?

If yes, list changes.

A. _____

B. _____

C. _____

D. _____

5. [70.32(e)] Did the licensee make changes in the PSP which did not decrease its effectiveness without proper notifications?

FACILITY LICENSE CONDITIONS AND EXCEPTIONS

Attach current copy of specific license conditions applicable to the facility.

See attached list.

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9.0 FACILITY SECURITY

- 9.1 The licensee shall implement and comply with the facility security plan for the plutonium plant dated January 5, 1974, as revised February 27, 1974, and as modified by these license conditions.
- 9.2 No statement in the licensee's facility security plan shall relieve the licensee of a requirement of 10 CFR Part 73 unless granted in a specific exemption or exception set forth as a condition of this license.
- 9.3 In addition to the commitments contained in the licensee's facility security plan, as revised, the following additional conditions shall be complied with on and after March 6, 1974. In any conflict between the licensee's facility security plan and a condition below, the condition shall be complied with by the licensee.
- 9.3.1 The licensee shall include drawing SG-2 of the facility security plan dated January 5, 1974 as an addendum to the February 27, 1974 revision to the plan, or modify drawing SG-2 of the February 27, 1974 revision, to include the levels of illumination at the various points in the isolation zone.
- 9.3.2 ~~The~~ sample window in the east wall of the plant shall be alarmed to detect unauthorized opening and locked from the outside. ~~In~~ addition, the licensee shall comply with the search requirements of 10 CFR 73.60(a)(6) and 73.60(b) for any transfers through this access point.
- 9.3.3 ~~All~~ door hinges shall be welded in place or secured in a manner such that removal from the exterior is precluded. ~~X~~
- 9.3.4 The licensee shall select ~~metal~~, explosives, and special nuclear material detectors ~~which~~ have the detection capabilities specified in Regulatory Guide 5.7, "Control of Personnel Access to Protected Areas, Vital Areas, and Material Access Areas."
- At the point of the exit search from a material access area, the licensee shall use a metal detector in conjunction with the special nuclear material detector.

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9.3.5 The licensee s
storage vault
10 CFR 73.50(d)

9.3.6 The licensee s
licensee's sec
as appropriate
from theft and

9.3.7 The licensee sh
supplement to
threats to the

9.3.8 During any emer
access area whe
be met, the lic
conditions whic
observation unt
or until a norm
minimize the op
material during

9.3.9 The licensee sh
been made with
concerning assis

9.4 The inner barrier of th
physical barrier of the
substantial constructio

9.5 The door between the ex
supply air far room (Ro
authorized opening in a
73.60(c).

9.6 In addition to the visit
the licensee's facility
shall require all visit
to be visited in accorda

9.7 The plunger type intrusi
of Interim Federal Speci
not tamper indicating.
magnetic switch type int
all normally locked poin
with 10 CFR 73.50(d)(1)

- 9.8 [The licensee shall provide for both central alarm stations to be continually manned in accordance with 10 CFR 73.50(e)(1) and (3). During a security organization response to a security threat, the central alarm stations are required to be manned.]
- 9.9 The licensee shall assure that an individual is not used as a guard or a watchman unless such individual has been properly trained and equipped.
- 9.10 The licensee shall report security threats to the AEC in accordance with 10 CFR 73.71(b).
- 9.11 The licensee shall submit all changes or revisions to the facility security plan to the AEC in accordance with 10 CFR 70.32(e).
- 9.12 The licensee shall test all intrusion alarms for operability and required performance in accordance with 10 CFR 73.50(f)(2) and 73.60(d)(2).
- 9.13 The licensee shall maintain records of the names and addresses of all authorized individuals as required by 10 CFR 73.70(a).
- 9.14 The licensee is granted an exception from the requirement that the emergency power supply be located within a vital area provided that the licensee complies with the commitment for a secondary emergency power supply as specified in paragraph 2.2 of the licensee's facility security plan, as revised.
- 9.15 The licensee is granted an exception to the requirement that the search for concealed SNM be conducted at the material access area exit point provided:
- 9.15.1 [Such search of all individuals is conducted within the corridor immediately outside the locker rooms as indicated on drawing SG-1 of the licensee's security plan, as revised.] The licensee shall locate the detectors such that the location of the detectors in the corridor precludes any individual from exiting the material access area and not being searched for concealed special nuclear material.
- 9.15.2 [That an SNM detector be maintained and employed within the airlock adjacent to the shipping/receiving dock on the west side of the plutonium building.]

- 9.15.3 All packages exiting the material access area via the corridor shall be searched by the individual manning alarm station #1.
- 9.16 The licensee is granted an exception to the requirement for search of individuals and packages at the entrance point into the protected area provided:
- 9.16.1 [That a weapon (metal) detector is located outside the guard station (alarm station #1) either in the breezeway or within an enclosure constructed within the breezeway such that an individual is searched for weapons prior to entry into the guard station.]
- 9.16.2 [That an electric door lock is provided on the outside door to the guard station which is operated from within the guard station.]
- 9.16.3 That the guard station is protected as specified in Appendix A on the three exposed sides (west, south, and east).
- 9.16.4 [All handcarried packages remain outside the guard station until an authorized individual or the guard supervisor can relieve the guard at the alarm station such that the guard can retrieve and search the packages.]
- 9.17 The licensee is granted an exception to the definition of material access area and the permissible activities therein with respect to the various laboratory and maintenance areas within the plutonium facility as indicated by drawing SG-1 of the security plan provided:
- 9.17.1 That when an area is shut down, after the plutonium has been removed from that area, two individuals, at least one of whom is an authorized individual, inspect the area to verify that no plutonium remains within the area other than residual holdup as allowed during tornado conditions.
- 9.17.2 [The storage areas in the fabrication area and in the assembly area shall be protected by intrusion alarms when these areas are unoccupied.]

* Appendix A contains details which could compromise the effectiveness of the licensee's security program and is therefore withheld from public disclosure in accordance with 10 CFR 2.790(d).

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9.18 The licensee is granted an exception to certain commitments and requirements which are dependent upon the acquisition and installation of equipment and/or completion of new construction. This section does not relieve the licensee from any commitment of the security plan, condition of license, or requirement of 10 CFR Part 73 unless specified below, and such exceptions are granted only until May 6, 1974. If acquisition and installation of equipment or new construction for which a specific exception has been granted is completed prior to May 6, 1974, the licensee shall comply with the security plan, conditions of license, and requirements of 10 CFR Part 73, from which the exception is granted.

9.18.1 The licensee is granted an exception from the requirement for a secondary central alarm station until completion of such construction and the installation of all intrusion alarm systems provided that the licensee follows the conditions set forth in Appendix B**, 9.18.1.

9.18.2 The licensee is granted an exception from the commitment to use detectors to search individuals entering the plutonium facility protected area provided a hands-on search is performed under the surveillance of a guard. The licensee shall conduct the search at the points identified in License Condition 9.16.

9.18.3 The licensee shall employ the contract guard service as specified in the licensee's security plan, as revised, provided that the size of the temporary guard force is as specified in the licensee's plan for the permanent guard force.

9.18.4 The licensee is granted an exception to the requirement that all alarms meet Interim Federal Specification N-A-00450 B (GSA-FSS) provided existing alarms are maintained until replaced with alarms meeting the above specification.

9.18.5 The licensee is granted an exception to the badge requirements of the security plan provided current badge practice is continued until the new badging system is available.

9.18.6 The licensee is granted an exception from the commitment of an intrusion detector in the isolation zone, and from the requirement that emergency exits be alarmed provided that patrols of the perimeter barrier are maintained as specified in Appendix B**.

**Appendix B contains details which could compromise the effectiveness of the licensee's security program and is therefore withheld from public disclosure in accordance with 10 CFR 2.790(d).

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APPENDIX B

This Appendix contains details which could compromise the effectiveness of the licensee's security program and is therefore withheld from public disclosure in accordance with 10 CFR 2.790(d).

9.18.1 The licensee shall station an individual in the uranium plant office area and shall provide for two-way radio communication capability between the primary central alarm station and this individual.

9.18.6 The interior portion of the isolation zone around the perimeter of the protected area shall be patrolled by a guard or watchman at fifteen (15) minute intervals except during the daylight hours when the patrols may be at ~~two~~ (2) hour intervals. The guard or watchman on patrol shall contact the individual in the guard house at least once during each patrol interval.

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SECTION V.

SECURITY ORGANIZATION

1. [PSP][LC-9.1][70.32(e)] Does the current facility organization chart indicate all individuals, groups, or organizations responsible for security?

YES

2. Does the security organization assure continuous responsibility for physical protection practices by:

A. [73.50(a)(1)] Using a security organization including guards, to protect the facility and SNM, and (See attached sheet)

[1 guard 3 watchmen]

B. [73.50(a)(2)] Maintaining at least one (1) security supervisor onsite at all times?

YES

3. [70.50(a)(3)] Has the licensee established written security procedures which document:

A. The structure of the security organization, and

YES

B. The duties of guards, watchmen and other individuals responsible for security at the site?

YES

4. Are the following employees used to protect the facility:

A. Guards,

NO

B. Watchmen, and/or Company employed pending being armed & uniformed

YES

C. Other individuals?

YES

5. Are the following contracted individuals used to protect the facility:

A. Guards,

[Pinkerton 1 per shift]

YES

B. Watchmen, and/or

NO

C. Other individuals?

NO

(See attached sheet)

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of the K-M Security Plan states, "The shift organization of two armed guards at guard posts 1 and 2, and a supervisor and the supervisor will be armed." 73.50(a)(1) states, "The establishment of a security organization, including guards. . ."

At the time of this inspection, K-M was employing a protective 13 individuals. It was also contracting with Pinkerton for one armed guard per shift. While the 13 K-M employees had b function as guards none were armed or uniformed. The Pinkerton not trained in-depth and merely act as a visible armed deterrent licensee did not have a guard force, per se, in the number contained their security plan or as envisioned in the regulations, a citation order (See Citation No. 7 in Summary of Findings).

Basis for Citation - Item V-5

According to License Condition 9.18.3, the licensee was required the contract guard service, provided the size of the temporary guard is as specified in the licensee's plan for the permanent guard for exception was granted only until May 6, 1974.

The security plan specified at least two armed guards and an armed would be assigned to each work shift. Since licensee protective personnel are neither armed nor uniformed and there is only one Pinkerton Guard to each shift, the licensee is in noncompliance with License Condition (See Citation No. 14).

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6. [73.50(a)(4)] Are the fol
protect the facility:

- A. Guards, (Were not arm
- B. Watchmen, and/or
- C. Other individuals?

7. [73.50(a)(4)] Was each of t
provided training prior to s
duties:

- A. Guards, (Were not armed
- B. Watchmen, and/or
- C. Other individuals?

8. Who provided training? Oklah
of Kerr-McGee

9. Was the curriculum used by the
in accordance with AEC furnis

- A. [RG-5.20] Points of Law,
- B. [RG-5.20] Security Skills
- C. [RG-1.17] Local Security ?

10. [73.50(a)(4)] Is the licensee
and watchmen to protect the fac

11. Are qualifications of all indiv
purposes based upon:

- A. Written and oral examination
- B. On-the-job training, and/or
- C. Drills?

12. List equipment used by the following individuals to protect the facility:

A. Guards .38 caliber revolver

Portable Radio

Riot Gun available

B. Watchmen, and/or Portable radio

C. Other individuals. Portable radio

13. [73.2(c)] Is each guard on duty equipped with a loaded firearm? (Pinkerton Guard only)

YES

A. Describe firearm (at least .38 caliber).

Smith and Wesson 6 round

in cylinder.

14. Has supervision of the licensee's security organization inspected all security equipment in the past three (3) months?

YES

15. What were the results of this inspection?

All operable

16. [73.50(a)(4), 73.50(f)(4)] Is the equipment provided to the following individuals by the licensee adequate to aid in protecting the facility?

A. Guards,

YES

B. Watchmen, and/or

YES

C. Other individuals?

YES

17. If the equipment provided by the licensee is considered inadequate, what equipment is needed? _____

DNA

18. [73.50(a)(4)] Have all guards and watchmen employed by the licensee for physical protection purposes:

A. Demonstrated their ability to understand the facility's security procedures, _____

YES

How? Written Examination - classroom participation. _____

B. Demonstrated their ability to execute all required duties, and _____

How? Job performance _____

C. Requalified at least annually? _____

Not to date

19. Has each individual used for security purposes been tested* and requalified according to the following schedule?

A. [73.50(a)(4)] Annually - General duties and responsibilities _____

DNA

B. [RG-5.20] Semi-annually - Specific duties and responsibilities _____

DNA

C. [RG-5.20] Semi-annually - Communications equipment _____

DNA

D. [RG-5.20] Semi-annually - All other security equipment _____

DNA

E. [RG-5.20] Annually - Medical examinations _____

DNA

*Current protective force only employed since early April, 1974.

20. [73.50(g)(2)] During this inspection period, did the security organization detect the abnormal presence or activity of persons or vehicles (unusual occurrences) within an:

A. Isolation zone,

NO

B. Protected area,

NO

C. Material access area, and/or

NO

D. Vital area?

NO

21. Upon detection of unusual occurrences within the PA, Isolation zone, VA and MAA, how did the security organization demonstrate their capability of:

A. [73.50(g)(2)(i)] Determining the existence of a threat,

DNA

B. [73.50(g)(2)(ii)] Assessing the extent of the threat, and

DNA

C. [73.50(g)(2)(iii)] Taking immediate measures to neutralize the threat by one of the following means:

(1) Appropriate action by facility guards, or

DNA

(2) Calling for assistance from LLEA, or

DNA

[REDACTED]

(3) Performing both items 1 and 2 above?

DNA

.....

.....

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[REDACTED]

SECTION VI.

PHYSICAL BARRIERS AND LIGHTING

1. [73.50(b)(1)] Has the facility located Vital Equipment (VE) within Vital Areas (VA's)? YES
2. [73.50(b)(1)] Has the facility located VA's within a PA? YES
3. [73.50(b)(1)] Does access to VA's require passage through at least two physical barriers? YES
4. Are physical barriers surrounding PA's in accordance with 73.2(f)? YES
- If not, explain: _____
5. [73.50(b)(3)] Is each PA physical barrier separated from any other physical barrier designated as a physical barrier for VA's and MAA's? YES
6. [73.50(b)(3)], [73.50(b)(4)] Is an isolation zone established around any portion of a building wall used as a physical barrier to the PA's? NO
7. Do all physical barriers of VA's and MAA's meet the qualifications of 73.2(f)? YES
8. [73.2(f)(2)] Do door, window and opening covers in walls serving as physical barriers to the PA, MAA and VA provide sufficient strength that the integrity of the wall is not lessened? YES

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CR2

9. [73.50(b)(3)] Does the licensee monitor or periodically check (at least once a day) the intervening space between the PA physical barrier and VA and MAA physical barriers? YES

10. [73.50(b)(4)] Does the licensee continuously monitor the PA isolation zone? YES

How? [redacted] inside protected area fence.

11. [73.50(f)(1)], [73.60(d)(1)] Is the licensee maintaining physical barriers in an operable and effective condition? YES

12. [PSP] Does the licensee inspect all physical barriers used for physical protection purposes at a frequency of not less than once per day? YES

13. [73.50(b)(5)] Is each isolation zone and all clear areas illuminated sufficiently to aid guards and watchmen in their response to the breaching of any physical barrier? (See attached sheet) NO

14. [73.50(b)(5)] Are isolation zones and clear areas illuminated not less than 0.2 foot candles at all times? NO

15. Are all entrances to th PA, VA, MAA illuminated sufficiently to aid guards or watchmen in performing access controls? NO

In Part 2.1.2.2 of the K-M Security plan, the licensee is committed to providing 0.2 foot candle illumination along the protected area fence and at the front and entrance to the Pu Building. 73.50(b)(5) requires illumination of not less than 0.2 foot candles for isolation zones and clear areas.

During a nighttime inspection on May 7, 1974, it was noted that a change in the fence perimeter configuration resulted in a darkened area at the southeast corner. Also the clear area and isolation zone fronting the main entry were only indirectly lighted at an illumination level apparently less than 0.2 foot candles. The lighting provided at the entry was deemed insufficient to adequately identify person desiring entry.

K-M had been requested by License Condition 9.3.1 to submit a plot plan drawing of the Pu Plant to depict the levels of illumination at various points in the isolation zone. This drawing had not been submitted as required. (See Citation No. 3).

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16. Does the licensee have emergency lighting that is capable of illuminating all facility access controls points? YES

Describe methods of providing emergency lighting.

Emergency power generator

17. Describe mechanism to turn lighting "on and off."

Automatic switch at onset of darkness.

This page can be released in total

1. [73.50(c)(7)] What controls does the licensee utilize to minimize the possibility of compromise for:
- A. Keys, Restrictive key issuance - Keys issued only when needed and are charged out by supervisory personnel.
- B. Locks, and Padlocks and key ways are rotated periodically.
- C. Combinations? Known solely by authorized personnel. Combination of SNM vault limited to Safeguards Clerks
2. [73.50(c)(7)] Upon evidence of compromise, did the licensee promptly change:
- A. Keys, _____
- B. Locks, and _____
- C. Combinations? _____
3. [73.50(c)(7)] Upon termination of any employee having access, did the licensee promptly change:
- A. Keys, _____ YES
- B. Locks, and _____ YES
- C. Combinations, and _____ YES
- D. Other security related equipment? _____ YES
4. [73.50(c)(7)], [73.70(h)] Are records (procedures) being maintained for controls of keys, locks, and combinations used for physical protection purposes? YES
5. Do all facility locks used for physical protection purposes meet the required specifications of 73.2(m)? YES

have at least one
operations?

(b)(4)] Are parking facilities for both e
and visitors, located outside the isolation zone?

3. [73.50(c)(6)] Under emergency conditions, does the
licensee permit private vehicles within the PA?

4. [73.50(c)(5)] Are drivers of delivery and service ve
escorted at all times while within the PA?

5. [73.50(c)], [73.60(a)(5)] Does the licensee check the
identification and authorization for each vehicle
entering a PA, VA, and MAA?

6. Does the licensee use RG 5.20 as a guide for pre-
employment screening of guards and watchmen?

7. [RG 5.20] Was pre-employment screening performed for
the following individuals responsible for security at
the site?

- A. Guards,
- B. Watchmen, and/or
- C. Other individuals?

8. [73.50(c)(4)] Does the licensee assure that access to VA
and MAA is limited to individuals who require access to
perform their duties?

9. [73.50(c)(5)] Does the licensee physically escort all
visitors within the PA by using:

- A. Guards,
- B. Watchmen, and/or
- C. Other individuals?

YES
YES
YES

YES

NO
NO
YES

10. [73.50(c)(1)], [73.50(c)(5)] Subsequent to search, are drivers of delivery and service vehicles escorted at all times while within the PA? YES

11. [73.50(c)(5)], [73.70(c)], [73.70(d)] Are all visitors required to register prior to being permitted into PA's and VA's? YES

12. [73.60(a)(5)] Are authorized individuals used to control access to each MAA? YES

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SECTION IX

BADGING

1. [73.50(c)(3)] Has the licensee provided picture badges to all individuals who are authorized access to the PA without escort? YES
2. [73.50(c)(4)], [73.50(c)(5)] Has the licensee provided specially coded badges to non-escorted individuals which indicate PA's, VA's and MAA's to which access authorization has been authorized? YES
3. [73.50(c)(5)] Does the licensee provide badges to all visitors to the PA? YES
4. [73.50(c)(5)] Do all non-picture visitor badges indicate that an escort is required? YES
5. [73.50(c)(5)] Are individuals not employed by the licensee who require frequent and extended access to a PA or VA provided picture badges which:
- A. Are picked up on entrance to the PA, and YES
- B. Are returned each time he leaves the PA? YES
6. [73.50(c)(4)], [73.50(c)(5)] Do badges for individuals who require frequent and/or extended access to MAA's, VA's and PA's indicate:
- A. Nonemployee - no escort required, YES
- B. Areas to which access is authorized, and YES
- C. Period for which access is authorized? YES
7. [73.50(c)(3)], [73.50(c)(4)] Do all facility badges indicate areas to which access authorization is granted? ... YES
8. Do all badges used by the licensee display features which are unique to the facility and are easily identifiable? YES

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background issued to U-Plant personnel facility.
I.D. badge-authorized
White background issued to new employees w.
safety courses, escort required. Red film
escort required.

10. Describe badge fabrication procedures. Poloroid ph.
Personnel Division. The badge insert, color coded,
positive within plastic. The badge issuance log indic
code, ID number, Serial number, Gate pass number and au
number.

11. How are badges protected against compromise? ☒ The inserts are
maintained in a key locked cabinet.

SEARCHES

1. [73.50(c)(1)], [73.50(c)(2)] Does the licensee check the identification (ID) and access authorization at entrances to the PA and VA for:

A. Personnel, visitors and employees

B. Packages?

DNA

YES

YES

YES

YES

YES

YES

- SEARCHES

 1. [73.50(c)(1)], [73.50(c)(2)] Does the licensee check the identification (ID) and access authorization at entrances to the PA and VA for:
 - A. Personnel, visitors and employees, and
 - B. Packages?
 2. [73.50(c)(1)] Does the licensee perform searches in the following manner:
 - A. A physical search, or
 - B. Use equipment capable of detecting items which could be used for industrial sabotage?
 3. Does the licensee perform the following searches of personnel and vehicles prior to entry into a PA:
 - A. [73.50(c)(1)] All individuals, except AEC-cleared employees?
 - B. [73.50(c)(1)] A random search (3-5%) of AEC-cleared employees?
 - C. [73.50(c)(1)] All hand carried packages?
 - D. [73.50(c)(2)] A random search (3-5%) of non-hand carried packages?
 4. Are random searches of AEC-cleared employees on such a frequency to assure that each employee who enters the PA is searched at least once per month (licensee must maintain records)?
 5. [73.50(c)(1)] Are drivers of delivery and service vehicles searched prior to entry into the PA?

YES
YES
YES
YES
YES

This page can be released in total

6. [73.60(a)(6)] Except when packages are searched prior to entry into a PA and the package has been tamperproofed and escorted by an AI or is immediately escorted by two (2) AI'S to the MAA, does the licensee perform package searches for the following items prior to entry into any MAA:

A. Firearms, and

..... YES

B. Explosives and incendiary devices, and

..... YES

C. Counterfeit items which could be used for theft or diversion of SNM?

..... YES

7. [73.60(b)] When exiting from a MAA, unless exit is into a contiguous MAA, is the licensee making searches for concealed SNM of the following:

A. Each individual,

..... *YES but

B. Each vehicle, and

..... YES

C. Each package?

..... YES

*(See attached sheet)

8. Are records maintained of all routine searches performed?

..... NO

If not, explain. Since searches performed are 100% as standard practice
creation of such a record would be superfluous.

9. Describe methods employed by the licensee to perform searches.
Open lunch boxes, packages or brief cases for guard inspection. X Hand
carried metal detector X used to scan individuals prior to entry.

Basis for Citation - X-7

License Condition 9.3.4 states in part. . ."At the point of exit search from a material access area, the licensee shall use a metal detector in conjunction with the special nuclear material detector."

The licensee plans to install a metal detector, as well as an explosives detector and SNM detector, in a fully enclosed corridor which forms the entry-exit point of the material access area. At the time of this inspection the metal and explosives detector had not been installed in this corridor. The SNM detector through which all exiting must pass is in the main building lobby. A portable metal detector, while used to search persons entering the building, is not used for exit search. (See Citation No. 5)

This page can be released in total

73.50(b)(2)] Does access to each of the physical barriers and access controls MAA used by the licensee to control the use and of SNM described in the PSP or license condition through at least two (2) physical barriers?

- If no, explain:

- See attached sheet for explanation.

☒ YES
☒ Not at present

Inadequate copy

-29a-

8. [73.60(a)(3)] Is each vault or vault type room used to store SNM controlled as a separate MAA?

YES

9. [73.60(a)(5)] Does the licensee use Authorized Individuals (AI) to control admittance to each MAA?

YES

10. [73.60(a)(7)] Does the licensee use methods which assure that when two individuals occupy a MAA, each individual is subject to observation of the other at all times?

Not at all points

If not, explain current practices: At a portal leading to an air lock in the dock area, there are no means to readily determine the cause of alarms transmitted by an SNM monitor. (See attached sheet for details.)

11. [73.60(a)(4)] Does the licensee store any enriched uranium (EU) scrap in a locked and separately fenced outside storage area?

NO

12. [73.60(a)(4)] Is each outside storage area located within a PA?

DNA

13. [73.60(a)(4)] Is each outside storage area located at least 25 feet from the perimeter fencing of the protected area?

DNA

14. [73.60(a)(4)] Are 30-gallon or larger containers used to store EU scrap in outside storage areas?

DNA

15. [73.60(a)(4)] Is each outside storage area maintained in a locked condition when not in use?

DNA

16. [73.60(a)(4)] Do the containers used for storing EU scrap in an outside storage area contain less than 0.25 grams U-235 per liter (~1 gm U-235/gal) per container?

DNA

This can be released in total

Basis for Citation - XI-10

The exit leading from the corridor of the Pu Building to the dock air lock area is equipped with an SNM monitor. The previous inspection (March 11-13, 1974) identified a program weakness in that the SNM monitor frequently transmitted numerous spurious alarms and there was no assurance or record to establish that the cause for each alarm was checked out by authorized individuals. The licensee was requested to resolve this matter.

In the K-M response dated April 29, 1974 to the RO:III letter dated April 12, 1974, the licensee proposed to install a TV camera inside the dock air lock area to provide the capability of the lobby guard to view the SNM monitor and exit doors immediately upon receipt of a monitor alarm. Since this visual capability was not provided as of the date of this inspection, the licensee was found in violation of 10 CFR 73.60(a)(7). (See Citation No. 1)

This page can be released in total

17. [73.60(a)(4)] Is each perimeter physical barrier of each unoccupied outside storage area used for storing EU scrap protected by:

A. Random guard or watchmen patrols at intervals not exceeding 4 hours, or

DNA

B. An active intrusion alarm?

DNA

18. Describe EU scrap being stored in an outside storage area. DNA

19. How does the licensee control waste SNM? Waste in minute quantities is solidified within building and is stored in a stationary truck trailer at the dock for off loading to the disposal truck. The storage trailer is padlocked with key limited to shift supervisor.

This page can be released in total

SECTION XII

DETECTION AIDS

1. [73.50(b)(4)] Are responses to all unusual occurrences within the isolation zone made by an armed member of the security organization?

YES

2. [73.50(c)(1)][73.60(b)] Are devices and equipment used by the licensee to search individuals and packages capable of detecting the presence of (must meet the requirements of RG 5.7):

A. Firearms, (Portable metal detector)

YES

B. Explosives,

NO

C. Incendiary devices, and

NO

D. Special Nuclear Material (See Attached Sheet)

YES

3. [73.50(d)(1)] Do all facility alarm systems annunciate in at least two (2) continuously manned stations? (See Attached Sheet)

Not at present

4. [73.50(d)(1)] To eliminate the possibility that a single act cannot remove the capability of calling for assistance or otherwise responding to an alarm, are the facility alarm systems annunciators located:

A. Within a protected area and protected as a VA, and

YES

B. At another location, not necessarily onsite?

NO

5. [73.50(d)(2)][73.60(c)] Are emergency exits continuously alarmed for:

A. Protected areas,

YES

B. Vital areas, and

YES

C. Material access areas?

YES

6. [73.60(a)(3)] Are all vaults and vault type rooms used to store SNM equipped with motion detector intrusion alarms? (See Attached Sheet)

NO

Basis for Citation - XII-2

License Conditions 9.16.1 and .2 grant an exception to the requirement to search individuals at the entrance point into the protected area provided that a weapon (metal) detector is located outside the guard station and that an electric door lock is provided on the outside door of the guard station which is operated from within the guard station.

[A metal detector has been installed inside a breezeway immediately outside the main entry door. This detector was not connected or operable at the time of this inspection. Also, the electric door lock was not yet installed on the main door leading to the guard station.]

An exception until May 6, 1974, was granted from the commitment to use detectors to search individuals provided a hands-on search is performed under the surveillance of a guard. Instead of a hands-on search, guards were using a portable electronic squealer (metal detector) to search entering individuals and these searches were conducted inside the building lobby. An explosives detector has not been installed to date. (See Citation Nos. 11 and 13).

Basis for Citation - XII-3

License Condition 9.8 and 10 CFR 73.50(d)(1) address requirements for alarm annunciation at primary and secondary central alarm stations. License Condition 9.18.1 granted an exception from the requirement of a secondary alarm station but only until May 6, 1974.

[The primary alarm station is installed and operable at Guard Post No. 1 in the Pu Plant; however, the secondary alarm station was not installed or operable at Guard Post No. 1 in the Pu Plant. At the time of this inspection, the alarm lines were being run through underground conduit from the Pu Plant to the U-Plant but the console had not been installed in place. The licensee hoped to complete installation by May 24th. Request for time extension beyond the May 6, 1974 deadline for completion was denied by Licensing. (See Citation No. 10)]

Basis for Citation - XII-6

73.60(a)(3) requires that all vaults or vault type rooms used to store SNM be equipped with intrusion alarms.

As pointed out earlier, the fabrication room and the inspection and assembly rooms have SNM which is not in process. Whenever these rooms are unoccupied, they must be locked and protected by intrusion alarms. At the time of this inspection no work was in evidence to install intrusion alarms in these rooms. Also, the SNM vault was being equipped with a motion detector alarm but the system was not completed or tied into the alarm console. (See Citations No. 6 and 12)

7. [73.50(d)(2)][73.60(c)] Are the following areas protected by an active intrusion alarm:

A. Vital areas, and

YES BUT. . .

B. Material access areas?(See Attached Sheet)

NOT ALL

8. Are facility alarms systems installed in a manner such that each alarm system:

A. [73.3(1)] Is capable of annunciating by means of audible and visible signals, and

YES

B. [73.50(d)(1)] Components are self-checking and tamper indicating?

YES

C. [73.50(d)(1)] Is equipped with an emergency power source, that is protected as a VA, and that would permit 24 hours of continuous operation after the loss of primary power?

YES

D. [73.50(d)(1)] Annuciates at the onsite central manned (primary) station to indicate:

(1) The type of alarm (intrusion, emergency, etc.), and

YES

(2) The location of each alarm?

YES

9. [73.50(d)(1)] Do the following alarm systems meet the performance and reliability levels specified by GSA Interim Federal Specification W-A-00450 B (GSA-FSS):

A. Intrusion alarms, (Isolation zone only)

YES

B. Emergency alarms, and(See attached Sheet)

NO

C. Line Supervisory systems?

YES

10. [73.50(f)(2)][73.60(d)(2)] Is each intrusion alarm functionally tested for operability and required performance at the following times:

A. Beginning and end of each interval for which it is used for security, but

YES

B. Not less frequently than once every seven (7) days when in use?

YES

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[REDACTED]

Bases for Citations - XII - 7A and B *OKS*

License Condition 9.5 requires the installation of an alarm on a door which separates Rooms 201 and 202, in the fan loft, a designated Vital area. The only means of entry to the second floor fan rooms are an exterior door leading from an outside stairwell and an escape hatch leading from a 1st floor mechanical room. Both the exterior door and the escape hatch are fitted with intrusion alarms. It appears superfluous to install an alarm on a connecting door which is within an alarm protected perimeter. Accordingly, the licensee plans to submit an exception to License Condition 9.5. Since the alarm had not been installed as specified and in the absence of an exception to the requirement, a citation was made. (See Citation No. 8)

With respect to XII-7B, License Condition 9.3.2 requires that the sample window in the plant's east wall be alarmed and locked from the outside. It is pointed out that this pass-through window is used solely for receipt of solution samples of 5c.c. vials of uranyl nitrate from the Uranium Plant. These samples are destructively tested in a mass spectrometer in the Pu Building since the U Building lacks this capability. The samples are subsequently buried as waste. The pass through has an inner window which may be locked on the inside by wing locks and an outer window which has no locking mechanism. The space between the two windows, approximately 18", is protected by an SNM monitor capable of detecting .5 g. Pu. Neither window is protected by an intrusion alarm, however, this pass through is fitted on the outside by a box-type 3/16" sheet steel cover welded to the outside frame. At the bottom of this steel cover there is a small opening which permits the exterior window to be raised just high enough (approximately 4") to insert the uranyl samples. A call bell notifies area occupants of the sample delivery. The receiving employee assures that only the samples enter the building. The pass through is not used for outgoing materials.

Because of the small opening provided in the sample window, the SNM monitor in the space between the inner and outer window and the searching of receipts by the receiving employee, a question was raised as to the necessity for placing this pass through under intrusion alarm protection and for locking the exterior window. It is understood that the licensee plans to solicit an exception to License Condition 9.3.2. Since at the time of this inspection, the sample window was not under intrusion alarm protection and locked on the outside and, in the absence of a granted exception, the licensee was found to be in noncompliance with License Condition 9.3.2. (See Citation No. 4)

Bases for Citations - XII-9B

Inspection of the alarms installed on the emergency exits and SNM Vault revealed that the non-approved plunger type alarm switches were still in use. License Condition 9.7 requires installation of balanced magnetic switch type alarms on all emergency exits and all normally locked points of ingress and egress. Accordingly the licensee was found to be in noncompliance with this License Condition (See Citation No. 9)

Until May 6, 1974, the licensee was granted an exception to the requirement that alarms meet specification W-A-0045B provided existing alarms are

[REDACTED] [REDACTED]

maintained until replaced with alarms meeting the specifications. Because existing alarms were not replaced, as of May 6, 1974, the Licensee was found to be in noncompliance with this License Condition. (See Citation No. 15)

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11. [73.60(c)] Is each unoccupied MAA locked and protected by an active intrusion alarm? (See attached sheet) Not at present
12. [73.50(d)(1)], [73.60(d)(1)] Is the licensee maintaining intrusion alarms in an operable and effective condition? YES
13. Does each alarm system operate in a manner to adequately protect the area for which it is used? YES
14. Is each mechanical or electrical search device used to perform searches at the facility equipped with an alarm mechanism? YES
15. [73.50(f)(1)], [73.60(d)(1)] When in use, does the licensee make a daily inspection of detection aids used to perform searches? Only the SNM detector is present in use.

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Basis for Citation XII-II

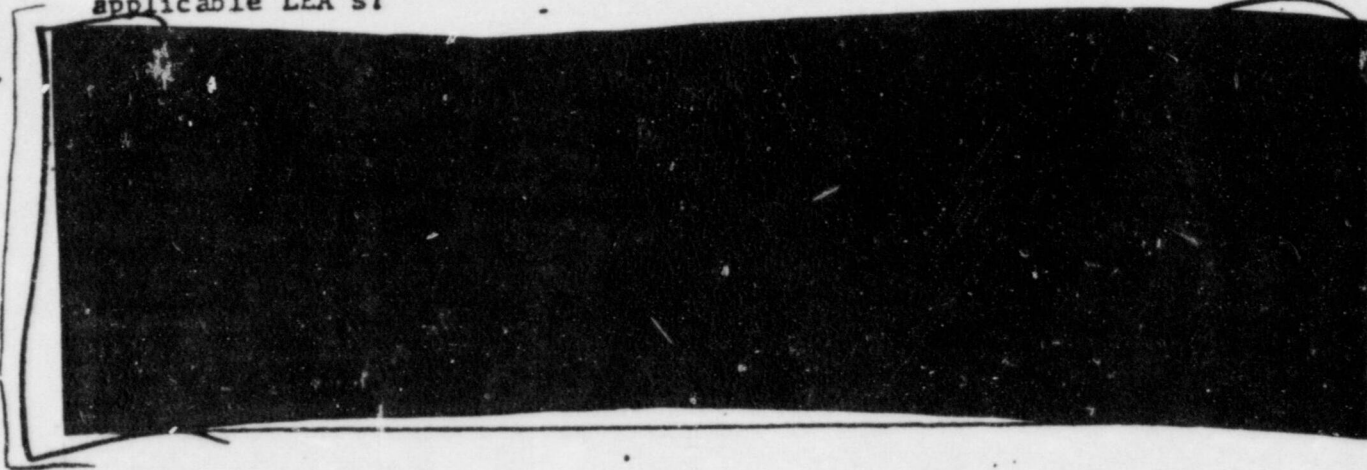
The fabrication and inspection and assembly areas have SNM which is not in process and therefore, when the areas are unoccupied, according to 73.60(c), they must be locked and protected by intrusion alarms. License Condition 9.17.2 specifically identifies these rooms as requiring such protection. Alarms, as of the date of this inspection, had not been installed in the fabrication or inspection and assembly area. (See Citation No. 12)

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CWS

1. [73.50(g)(1)] Has the licensee established liaison with Law Enforcement Authorities (LEA's)? YES

2. What is the response time and manpower available from applicable LEA's?



3. [73.50(e)(1)] Is continuous communications capability provided with the central continuously manned (primary) station for each of the following individuals on duty:

A. Guards, and

YES

B. Watchmen?

YES

4. [73.50(e)(1)] Is an individual on duty at the PA continuously manned (primary) station capable of calling for assistance from:

A. Each guard on duty,

YES

B. Each watchman on duty, and

YES

C. LLEA's

YES

5. Has the licensee provided equipment, delegated authority and responsibility to the individual on duty at the PA continuously manned (primary) station for calling for assistance from the above persons?

YES

6. [73.50(e)(3)] Is the continuously manned (primary) alarm station equipped with conventional telephone service and two-way radio voice communication with LLEA's?

YES

7. [73.50(e)(3)] Does each two-way radio voice communications system that is used for physical protection purposes terminate within the continuously manned central (primary) station that is located within a PA? YES

8. [73.50(e)(4)], [73.50(f)(1)] Does each communications system have the capability of remaining in an operable and effective condition after the loss of the primary power source? YES

9. [73.50(f)(3)] Is all communications equipment tested for operability and performance not less frequently than once at the beginning of each security personnel work shift? (See Attached Sheet) NO

10. [73.50(f)(1)], [73.60(d)(1)] Are all security related devices maintained in an operable condition? YES

11. Is each point of entry into the PA and the alarm stations equipped with a panic button alarm mechanism? NO

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[REDACTED]

Basis for Citation - XIII-9

In the K-M Security Plan in Part 10.4, ~~the~~ licensee is committed to test all communications equipment at least once each shift. This commitment is consonant with 73.50(f)(3).

Existing procedures do in fact provide for tests of conventional telephones and portable radios at the beginning of each shift. The present arrangement for test of the emergency radio with the Guthrie Police Department is at a frequency of once each week. This matter was discussed previously with the licensee at the conclusion of the RO:III inspection on March 13, 1974 and it was agreed that the Guthrie Police would be requested to permit thrice-daily tests. At the time of this inspection, the licensee had not negotiated this matter with the Guthrie Police and therefore a citation was issued. (See Citation No. 2)

This page can be released in total

SECTION XIV

SECURITY EDUCATION

1. Does each member of the security organization have a clear understanding of physical protection practices employed by the licensee? YES
2. Does the licensee routinely indoctrinate new employees on physical protection practices employed at the facility? NOT ALL
3. Is the indoctrination given prior to being permitted access to vital equipment, VA's, MAA's, and SNM? ON THE JOB
4. Is there a continuing security education program in effect at the facility? NOT AT PRESENT
5. Are termination security interviews conducted? NOT AT PRESENT
6. What actions are taken for corrections of security violations by employees and visitors? _____
Written reprimand for employees. _____
Verbal admonition for visitors. _____

7. Does the licensee have an outline of all security indoctrinations used at the facility? NOT AT PRESENT

This page can be released in total

SECTION XV

RECORDS AND REPORTS

1. [73.50(a)(3)] Does the licensee's possess written security procedures which document:

A. The structure of the physical protection organization,

YES

B. The detailed duties of the following individuals responsible for security at the site:

(1) Guards (in-house or contract),

YES

(2) Watchmen, and

YES

(3) Other individuals used for physical protection purposes?

YES

2. [73.50(a)(4)] Does the licensee maintain records of training for:

YES

A. Guards, and

YES

B. Watchmen?

3. [73.50(a)(4)] Does the licensee maintain records of the qualifications for:

YES

A. Guards, and

YES

B. Watchmen?

4. [73.50(a)(4)] Does the licensee keep requalification records of all guards and watchmen used for physical protection purposes?

YES

5. [73.70(a)] Does the licensee maintain records of the names and addresses of all AI's?

YES

6. [73.70(b)] Does the licensee maintain records which indicate names, addresses and badge numbers of individuals authorized to have access to vital equipment, SNM, MAA's, and VA's?

YES

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7. Are records maintained to indicate control of all badges issued and to employees who have been furnished picture badges to the PA?

YES

8. Are records maintained of specially coded and numbered badges for employees and non-employees which indicate VA's and MAA's to which authorization has been granted?

YES

9. [73.70(c)] Do records of the registration of visitors to each PA include:

A. Name of visitor,

YES

B. Purpose of visit,

YES

C. Date,

YES

D. Time in and out,

YES

E. Employment affiliation,

YES

F. Citizenship,

YES

G. Name and badge number of escort, and

YES

H. Name of individual visited?

YES

10. [73.70(h)] Does the licensee maintain up-to-date records and written procedures used for the control keys, locks and communications?

YES

11. ¹¹⁰ [73.70(h)] Does the licensee's procedures reflect access controls for individuals, vehicles and packages at each entrance to the PA's?

YES

12. [73.70(e)] Does the licensee maintain records which indicate the condition of all security related equipment?

YES

13. [73.50(g)(1)] Has the licensee documented time and manpower available for responses from the security organization and from LEA's?

YES

14. [73.70(e)] Does the licensee maintain records of random guard patrols?

YES

15. [73.70(d)] Are records being maintained of all individuals granted access to a normally unoccupied VA, which include:

- A. Name, See Attached Sheet
- B. Badge number,
- C. Time of entry,
- D. Reason for entry, and
- E. Time of exit?

NO

16. [73.70(e)] Does the licensee maintain records which document the results of:

- A. Routine Security tours and inspections, and
- B. Tests, inspections and maintenance on:

YES

(1) Physical barriers,

YES

(2) Intrusion alarms,

YES

(3) Communications equipment, and

YES

(4) Other security related devices?

YES

17. [73.70(e)] Does the licensee have records of tests performed which indicate that the isolation zone and clear areas are illuminated to not less than 0.2 feet candles at all times? (See Citation No. 3)

NO

18. Are records maintained of emergency situations where a private vehicle was permitted within the PA?

YES

19. [73.70(f)] Do records of alarm system activities include:

A. Each onsite alarm annunciation,

YES

B. Location of each alarm, false alarm and alarm checks, and

YES

C. Tamper indication alarms?

YES

Basis for Citation - XV-15

73.70(d) requires that records be kept to reflect the name, badge number, time of entry, reason for entry and time of exit of all individuals granted access to a normally unoccupied vital area.

The licensee does not maintain such a log and holds the position that to log the limited number of people who require access would be superfluous. Only a few operating and maintenance employees are on the authorized access list and they require access in the normal performance of their surveillance rounds or maintenance checks. The licensee indicated intent to solicit an exception to this requirement. In the absence of such an exception, the licensee was found to be in noncompliance with 73.70(d). (See Citation No. 16)

20. [73.70(f)] Do records indicate the following data on each alarm annunciated:

A. Type of alarm,

YES

B. Location of each alarm,

YES

C. Alarm circuit,

YES

D. Date of alarm, and

YES

E. Time of alarm?

YES

21. [73.70(f)] Does the licensee maintain a detailed record of response by facility guards and/or watchmen to each alarm and/or other security incident?

YES

22. Does the licensee maintain an outline of all aspects of the security education program (See PSP)?

NO

23. [73.71(b)] During this inspection period were there security incidents which involved:

A. Attempted thefts of SNM,

NO

B. Suspected thefts of SNM,

NO

C. Attempted diversion of SNM,

NO

D. Suspected diversion of SNM, and

NO

E. Acts of:

NO

(1) Industrial sabotage and

(2) Suspected or attempted acts of industrial sabotage?

NO

24. [73.71(b)] Did the licensee immediately report security incidents of any of the above items to RO?

DNA

25. [73.71(b)] Was a written report of investigation of the above items reported to RO within 15 days from the date of the initial report?

DNA

Only domestic shipments of trigger quantities by road have been made by the licensee since March 6, 1974. A total of 4 shipments were made between the licensee's facility and Atlantic Richfield (ARCHO), Richland Washington. These shipments consisted of two round trips. The two shipments from K-M contained UO_2/PuO_2 fuel pins and pellets. The return trips from ARCHO were considered F.O.B. the shipper's dock and contained $PuNO_3$ feed material for the FFTF program at K-M.

Documentation was reviewed which contained information required by the licensee's physical security plan for shipments in transit. Included were the E.T.A. (Estimated Time of Arrival) and A.T.A. (Actual Time of Arrival) as recorded by the licensee, routing including check call locations, telephone numbers of State Police along route used, telephone call log sheets, utilization of radio telephone communication between drivers and escort vehicle, plus similar communication equipment between each radio telephone and the Tri-State Motor Transit Company terminal in Joplin, Missouri.

Other pertinent, required information reviewed included the tractor and trailer identification, seal numbers on tractor compartments as well as on the SNM containers, guards and drivers names, and telephone numbers of key personnel (home and business both) for the licensee, Tri-State and the recipient. Bills of lading and accountability documents were also reviewed.

Equipment provided to protect the shipment included ~~X~~ tamper indicating seals on van door and the SNM containers, two uniformed, armed Wells Fargo guards in a 16,000 lb. armored escort vehicle, two armed drivers, and radio-telephone communication between tractor and escort vehicle. Each vehicle was capable of independently contacting the Tri-State Dispatcher's office. According to Welch, the trailer used for the last shipment had bold identifying numbers on the top but similar markings were not applied to the sides and rear of the trailer. Welch claimed he inquired of the Tri-States Dispatcher's office as to why markings were not on the sides and rear of the trailer as prescribed by 73.31(e). He was told by the Dispatcher that carriers obtained an exception to side and rear markings from the AEC. Welch was reminded that it is the licensee's responsibility to assure adherence to requirements and he was instructed to obtain documentation that would confirm an exception to marking requirements. This matter will be explored further when in-transit inspections are made by RO:III.

Security equipment features and actual implementation of sealing the shipping containers and the trailer van itself were described to the AEC inspector by Fred Welch. There were no AEC inspectors present at the actual time the shipments left the licensee's premises or when the F.O.B. shipments arrived from Richland, Washington.

[REDACTED]

All applicable records and security provisions required are apparently being instituted by the licensee for protection of SNM in transit. One minor exception should be reported. A letter from the carrier, Tri-State, stated that their representative in the Dispatcher's office had not recorded two official call-ins from the Tri-State driver while a shipment was enroute to Richland, Washington. The letter also stated that this oversight would not be repeated, and that those responsible will be reinstructed concerning Tri-State's responsibility under their plan, "SNM Security Transportation Plan No. 1."

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26. [73.71(b)] Was substantive additional information gathered subsequent to the written report immediately reported to RO?

DNA

27. [70.32(e)] Has the licensee submitted all reports to RO which contain descriptions and the effects of all changes in the facility PSP?

DNA

28. [70.32(e)] Were all changes in the facility PSP submitted to RO within two months after the effective date of the changes?

DNA

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CNS)

ENCLOSURE 1

OK
333

Kerr-McGee Corporation
License No. SNM-1174

The following apparent violation of AEC requirements is considered to be of Category II severity:

1. 10 CFR 73.3(j) (April 30, 1973) defines a security container as a "safe, vault, vault-type room or security cabinet". The term "locked" is defined in 73.3(e) as "protected by an operable lock".

Contrary to the above, the combination lock of the Material Storage Vault was found to be broken and inoperable and reportedly had been in that condition for approximately three weeks.

The following apparent violation of AEC requirements is considered to be of Category III severity:

2. License Condition 9.3.7 requires that visitors, vendors and other non-employees entering the protected area be registered and a record made of the name, date, time, purpose of visit and person visited. Also, License Condition 9.3.8 states that visitors, vendors and other non-employees shall be escorted by a guard, watchman or authorized individual while within the protected area.

Contrary to the above, the visitor log sheet used to record individuals who visit the Pu Plant does not provide a section for purpose of visit. Over the past year, several sheets fail to indicate the identity of an assigned escort by signed name or initials or fail to reflect the identity of the person visited within the protected area.

The following item has been identified as a program weakness:

3. [At the exit point within the Pu plant leading to the dock area, the Pu monitor has apparently given numerous spurious alarms for a period of several months. The security log maintained by the Pu Plant watchman indicates that, on occasion, as many as 20 false alarms were transmitted during a given shift. While it is standard procedure to notify personnel within the Pu area that an alarm has been received, there is no assurance or record to indicate that each such alarm is checked out by authorized personnel to determine its cause.]

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Possible causes for alarms have been identified as:

- (1) Weather conditions.
- (2) Material movement or storage within the corridor inside the exit door.
- (3) Material received at the shipping dock.
- (4) Poor or faulty calibration or instrumentation.

Presently there is no capability for the watchman to visually determine the cause for an alarm at his vantage point in the front building lobby. We feel that this matter should be resolved to assure that prompt and effective response to portal monitor alarms is realized.

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carryall. The tractor/trailer was a special vehicle with [REDACTED]

[REDACTED] The [REDACTED] key lock doors, radio telephone (communications with central station), citizen band radio (communications with escort vehicle), and [REDACTED]

[REDACTED] The trailer had locking doors and a burglar alarm. Tamper seals were provided for all containers and cargo doors.

c. Training

Drivers and guards were crossed trained to provide maximum flexibility. Based on interviews, all had attended Missouri Southern University where they received 80 hours of training. All had fired both weapon qualification courses as outlined in Regulatory Guide 5.20. All guards performed their duties with no deficiencies noted.

d. Communications

A total of 35 check calls were made between the shipment vehicle and the central station. Of those, 13 were made from pay telephones and none of the 35 calls exceeded a two-hour interval.