

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/86-06

Docket No. 50-352

License No. NPF-39

Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Facility Name: Limerick Generating Station, Unit 1

Inspection At: Limerick, Pennsylvania

Inspection Conducted: March 3-7 and 10, 1986

Date of Last Physical Security Inspection: January 2-4 and 8-9, 1986

Type of Inspection: Routine, Unannounced Physical Protection

Inspectors: *Roland J. Bailey* 4/17/86
R. J. Bailey, Physical Security Inspector date
W. G. Martin 4/17/86
W. G. Martin, Physical Security Inspector date
C. Tavares 4/17/86
C. Tavares, Physical Security Inspector date
Approved by: *R. Keimig* 4-22-86
R. Keimig, Chief, Safeguards Section, date
DRSS

Inspection Summary: Routine, Unannounced Physical Security Inspection on March 3-7 and 10, 1986 (Inspection No. 50-352/86-06)

Areas Inspected: Follow-up on security program event reports and previously identified violations; status of Inspector Follow-up Items; security plan and implementing procedures; management effectiveness; organization; program audits; physical barriers (protected and vital areas); compensatory measures; assessment aids; access control (personnel, packages and vehicles); detection aids (protected and vital areas); alarm stations; and the training and qualification program.

Results: The licensee was in compliance with NRC requirements in the areas inspected.

DETAILS

1. Key Persons Contacted

G. M. Leitch, Plant Manager
J. A. Basilio, Administrative Engineer
R. J. Weindorfer, Assistant Director, Corporate Security
J. M. Corcoran, Quality Assurance Manager, Unit #2
P. R. Supplee, Administrative Assistant, Security
D. F. Johnson, YOH Program Manager
R. L. Cobb, YOH Performance Group
C. J. Mannila, YOH Performance Analysis Group
M. D. Berner, YOH Security Force Captain

NRC

E. Kelly, Senior Resident Inspector, Unit #1

The inspectors also interviewed other licensee personnel and YOH security personnel.

2. MC 30703 - Exit Interview

The inspectors met with the licensee representatives listed in paragraph 1 on March 7, 1986, and discussed with them the scope and the results of the inspection. On March 10, 1986, one inspector returned to the facility for a short period to complete the inspection.

No written material was provided to the licensee during the inspection.

3. MC 92700 - Follow-up on Security Program Event Reports

The inspectors conducted in-office and onsite reviews of Security Program Event Report Numbers 85-12, 85-13 and 86-01 that had been submitted by the licensee to the NRC in accordance with 10 CFR 73.71(c). These reviews were conducted to verify that adequate compensatory measures had been taken and that corrective measures to prevent recurrence had been implemented. The licensee adequately documented each event, including closeout actions.

4. MC 92701 - Follow-up on Previously Identified Violations

(Closed) Violation 50-352/85-12-04: Control of vital area keys. The inspectors found that the licensee had adequate security procedures to control vital area keys. To supplement these procedures, the doors to the security controlled key cabinet were modified to permit a more easily observable inventory status. In addition, the key rings were modified to make it more difficult to inadvertently leave the facility with a key ring in a person's possession.

(Closed) Violation 50-352/85-12-05 and 06: Failure to change vital area door locks and failure to report security related events to NRC. The inspectors found that the licensee had adequate security procedures to ensure proper reporting of security related events to NRC. In addition, the inspectors determined that the licensee had restructured the security shift supervisors on when to report events to the NRC, conducted random weekend reviews of the security event log to ensure each event was documented properly and revised the Security Contingency Plan to clarify the language in the event reporting matrix.

(Closed) Violation 50-352/85-12-07: Failure to provide compensatory security measures. The inspectors determined that the licensee had retrained all security shift supervisors on March 15-18, 1985, on Plant Procedure 35 (Safeguards Contingency Events) and Plant Procedure 45 (Reporting of Physical Security Events). The inspectors found no failure to provide adequate compensatory security since March 1985.

(Closed) Violation 50-352/85-12-08: Failure to certify watchpersons prior to entry on duty. The inspectors determined that those watchpersons who were identified as not being fully certified were immediately removed from duty and subsequently, trained and certified in those duties to which they were assigned.

(Closed) Violation 50-352/86-01-01: Degradations of the Protected and Vital Area Boundaries.

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The inspectors also observed the licensee perform successful operational and performance tests on those intrusion alarms on March 5, 1986. No discrepancies were noted.

(Closed) Violation 50-352/86-01-02: Failure to provide adequate monitoring of an unalarmed vital area barrier. The inspectors found that the licensee had retrained all personnel on the purpose and scope of the subject vital area barrier.

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(Open) Violation 50-352/86-01-03: Failure to report a violation of the Security Contingency Plan and NRC Regulations. The inspectors found that the licensee's security contractor had conducted a remedial training course for all its supervisors on the requirements and their responsibility for notifying the NRC whenever they were aware of a security related event.

that constituted a degradation of security program effectiveness. The inspectors noted that a similar failure to report an event to the NRC had also been cited as a violation. In each case, the licensee promptly documented and reported the event to the NRC once they were informed of the event by the security contractor. This matter will remain open until the effectiveness of the recent remedial supervisor training is satisfactorily demonstrated.

5. MC 92702 - Status of Inspector Follow-up Items

(Closed) Inspector Follow-up Item 50-352/85-12-01: The licensee committed to submitting changes to the Training and Qualification Plan (T&Q) that established requirements for the completion of background investigations prior to employment in the security organization. The inspectors observed that the licensee had changed paragraph 1.1c of the T&Q Plan which had been submitted to NRC and concurred in by Region I on August 29, 1985. The changes included specific requirements on the scope of background investigations and how they are to be submitted by the security contractor to the licensee.

(Closed) Inspector Follow-up Item 50-352/85-12-02: Identify and remedy causal factors which led to the violations discussed in paragraph 4 above. The licensee identified the following corrective actions: the procedures for the recruitment of security officers required revision; the number of PECC and contract supervisory personnel needed to be increased; the roles, duties and responsibilities of various corporate departments needed to be reaffirmed; and the security contractor needed to provide additional oversight of security shift operations. The inspectors determined that, as discussed elsewhere in this report and in NRC Inspection Report No. 50-352/85-42, the licensee had adequately addressed each of the corrective actions identified above.

(Closed) Inspector Follow-up Item 50-352/85-12-03: The licensee made a commitment to conduct a security program evaluation prior to NRC issuance of a full power license. The inspectors determined that the licensee conducted the security program evaluation between August 28 and September 26, 1985. NRC issued a full power license on December 27, 1985.

6. MC 81018 - Security Plan and Implementing Procedures

During this inspection, the inspectors reviewed the following changes to the Physical Security Plan that were submitted in accordance with 10 CFR 50.54(p):

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7. MC 81020 - Management Effectiveness

During this inspection, the inspectors found that several initiatives and improved employee benefits had been implemented in an effort to stabilize the security contractor's work force and to improve employee morale. Additionally, the contractor implemented new hiring and employment processing procedures.

8. MC 81022 - Security Organization

During this inspection, the inspectors reviewed the security contractor's termination/resignation exit interview records from January 1 to March 6, 1986. The inspectors observed that the security contractor had developed an in-depth questionnaire. The contractor's Program Manager stated that they had received valuable feedback as a result of these interviews. The inspectors found that the records indicated that policies and procedures were generally being followed, but that communications with the security force was a problem. The licensee stated that the recently implemented employee benefits (addressed in paragraph 7 of this report) should reduce personnel turnover and that a management study by a consultant will address the issue of poor communications and make recommendations to alleviate the problem.

9. MC 81034 - Security Program Audit

The inspectors observed that the licensee was in the process of conducting the 1986 independent security program audit. Findings were not yet available. The licensee was reminded by the inspectors to include the control, handling and protection of Safeguards Information in the audit.

10. MC 81052 - Physical Barriers (Protected Area)

During this inspection, the inspectors observed that the licensee had extended the expanded metal barrier on a plant elevation, adjacent to the Administrative Building, to include a small portion of the PA which had been overlooked. The barrier previously in this area had been identified by the licensee as not meeting the standards committed to in the physical security plan. The inspectors determined that the licensee had taken adequate compensatory security measures until the barrier was corrected.

The inspectors also observed that the licensee, on its own initiative, was maintaining an isolation zone adjacent to selected protected/vital area barriers throughout the plant. The inspectors observed that plant personnel were observing these isolation zones.

11. MC 81054 - Physical Barriers (Vital Areas)

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12. MC 81064 - Compensatory Measures

The inspectors reviewed the Informational Shift Assignment Roster for March 6, 1986 and found that there were four permanently manned security posts on Unit 1 and seven temporary security posts throughout Unit 1 and 2. Several security force personnel were interviewed on post. The inspectors determined that these personnel were knowledgeable of their assigned duties.

13. MC 81066 - Assessment Aids

Assessment aids utilized by the licensee were observed by the inspectors from the Central Alarm Station during daylight hours. They were found to conform to security plan requirements and were adequate for their intended function.

14. MC 81070 - Access Control (Personnel)

The inspectors observed that personnel access to the protected and vital areas was being controlled in accordance with the security plan. Search equipment at the PA entry appeared adequate and appropriate for detection of firearms and explosives.

15. MC 81072 - Access Control (Packages)

The inspectors observed the processing of packages and material into the protected area and found the procedure to be in conformance with the security plan.

16. MC 81074 - Access Control (Vehicles)

The inspectors observed the control of vehicles entering the protected area and found the procedure to be in accordance with the security plan.

17. MC 81078 - Detection Aids (Protected Area)

The perimeter intrusion detection system (PIDS) in two zones detected inspector requested penetration test of the PIDS in accordance with the physical security plan and security procedures. In another zone, the PIDS failed the test. The licensee implemented compensatory measures in accordance with the security plan. The PIDS in that zone was repaired during the inspection and the zone was satisfactorily retested.

18. Mc 81080 - Detection Aids (Vital Areas)

The intrusion detection systems detected inspector requested penetration tests in accordance with the physical security plan and procedures.

19. MC 81084 - Alarm Stations

The inspectors confirmed through observation of the central alarm station (CAS) that it was in conformance with the physical security plan and was adequate and appropriate for its intended function. CAS operators demonstrated adequate skill and knowledge in the performance of their duties.

20. MC 81501 - Training and Qualification Plan (T&Q)

The security contractor has developed, but not completely implemented, a new procedure for random testing of security personnel on their duties and responsibilities. Random testing will be conducted in addition to the annual training and requalification required by the T&Q Plan.

A special NRC inspection (50-352/85-22) was conducted in April, 1985 to ascertain the ability of the security personnel to carry out their assigned duties and responsibilities. Minor weaknesses in the training and qualifications program were identified.

During the current inspection, the inspectors determined, by reviewing training records, that remedial training and requalification were promptly initiated for the security force members who could not adequately demonstrate their abilities during the April, 1985 inspection. In addition, the inspectors also determined that all security personnel in a specific group, who had a statistically unacceptable failure rate, were retrained and requalified by May 1, 1985.