

U.S NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-373/86039(DRSS); 50-374/86039(DRSS)

Docket Nos. 50-373; 50-374

Licenses No. NPF-11; NPF-18
Safeguards Group IV

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: LaSalle County Station, Units 1 and 2

Inspection At: LaSalle County, IL and NRC Region III office

Type of Inspection: Review of Allegations

Date of Inspection: July 23 through October 31, 1986

Inspector: *J. L. Pirtle*
Gary L. Pirtle
Physical Security Inspector

11/18/86
Date

Reviewed By: *James R. Creed*
James R. Creed
Safeguards Section

11/18/86
Date

Approved By: *W. L. Axelson*
W. L. Axelson, Chief
Nuclear Material Safety and
Safeguards Branch

11/19/86
Date

Inspection Summary:

Inspection Between July 23 through October 31, 1986 (Reports
No. 50-373/86039(DRSS); No. 50-374/86039(DRSS))

Areas Inspected: Included investigation of an allegation pertaining to security officers being required to work long hours (sometimes as much as 16 consecutive hours) and that this situation may cause security officers to lose their effectiveness.

Results: The licensee was found to be in compliance with NRC requirements within the areas examined. The allegation was partially substantiated in that security officers, at times, have worked as much as 16 consecutive hours. However, no specific evidence of reduced effectiveness which resulted in a violation of the security plan was determined as attributable to excessive working hours. Adequate evaluation procedures for personnel who work in excess of 12 consecutive hours has been developed and implemented as of September 10, 1986, by the licensee's security staff. The investigation involved one NRC inspector and was initiated during the day shift.

DETAILS

1. Key Persons Contacted

- *G. Diederich, LaSalle, Station Manager, Commonwealth Edison Company (CECo)
- *R. Bishop, Services Superintendent, (CECo)
- *B. Saunders, Nuclear Security Administrator, Corporate, (CECo)
 - T. Borzum, Station Security Administrator, (CECo)
- *D. Hamilton, Assistant Security Administrator, (CECo)
 - G. Hacke, Staff Assistant, Security, (CECo)
- *J. Brusse, Site Manager, Burnes International Security Services, Inc.
- *M. Jordan, Senior Resident Inspector, NRC Region III

*Denotes appropriate security licensee and contractor personnel and NRC representatives present at the exit meeting conducted on October 31, 1986.

2. Exit Meeting (IP 30703):

The inspector met with the licensee representatives denoted in Section 1 at the conclusion of the inspection on October 3, 1986. No written material pertaining to the inspection was left with the licensee or contractor representatives. A general description of the scope of the inspection was provided. Briefly listed below are the findings discussed during the exit interview. The details of these findings are in this report. Included below is a statement provided by or describing licensee management's response to the findings.

The licensee representatives were advised that the investigation of the allegation pertaining to decreased security force effectiveness because of excessive working hours had been completed. No violations of security plan criteria were noted as a result of the investigation, and the licensee's recently implemented procedure for evaluating fitness for duty of security force personnel who work more than 12 consecutive hours within a 24-hour period appeared adequate (refer to Paragraph 3 for details).

The Services Superintendent stated that, in his judgment, the allegation was not substantiated and that the security organization had developed a very effective method of evaluating a security officer's fitness for duty for extended time on post.

The licensee representatives were advised that the investigation results would be subject to NRC Region III management review and the final inspection report would identify the formal perspective of the findings.

3. Independent Inspection - Allegation Review (IP 92706):

The following information, provided in the form of an allegation, was reviewed by the inspector as specifically noted below:

Background: (Closed) Allegation No. RIII-86-A-0134. The NRC Senior Resident Inspector (SRI) received the allegation on July 23, 1986 in the form of an "Employee Concern Form." The form was signed by the individual and left at the SRI's office. The individual did not discuss the allegation/concern with the SRI. The allegation was subsequently responded to by a member of the NRC Region III staff. The individual alleged that the security force's effectiveness was hampered because of excessive hours of work. The individual was contacted on August 6, 1986 by NRC Region III in order to obtain a mailing address. He stated at that time that he had no other concerns or information to provide.

Allegation: The individual alleged that one individual (name provided) had been forced to work overtime after already working 16 consecutive hours. The person that submitted the concern also stated that "The effectiveness of personnel to do their jobs is greatly hampered after 16-hours."

Review: During a reactive inspection on July 22-23, 1986, the NRC Inspector independently identified a concern that security management does not routinely monitor excessive hours on post by the contract security force, except for payroll purposes. In that report (Inspection Reports No. 50-373/86031; No. 50-374/86032), the licensee monitoring of excessive time on post appeared minimal, and such monitoring was delegated to the contract security supervisor. The Station Manager was requested to have his security staff review the situation to determine if more licensee awareness of working conditions was warranted.

During a management meeting at NRC Region III, on August 14, 1986, the concern pertaining to licensee security management monitoring of excessive time on post, and other issues, were discussed. The Station Security Supervisor stated that the contract security force supervisors have been advised that personnel who work in excess of 16 hours a day will be identified to the Station Security Administrator. He further stated that such incidents are rare and they had to impose the restriction to control voluntary excessive overtime. The security management representatives provided Time Sheet Activity computer listings for the period of April 24, 1986 to July 24, 1986, for NRC Region III review to support their position that on-post time in excess of 12 hours seldom occurs and they are advised of those incidents on a weekly basis when payroll data is reviewed. Unit outages and plant modifications requiring compensatory measures were cited as factors that required overtime for the security force.

Subsequent to the August 14, 1986 management meeting, the inspector's in-office review of randomly selected Time Sheet Activity listings confirmed that there were occasions whereby security officers worked 16 hours or more a day; however, such occurrences were not frequent, and the number of hours worked each day usually ranged from 8 to 12 hours. Total hours worked each week usually ranged from 40 to 50 hours. Generally, the overtime for the security organization was declining.

The licensee's security management voluntarily implemented a procedure on September 10, 1986, whereby the contract security force supervisor would be required to advise the Station Security Administrator (SSA) of any occasion whereby a security officer was required to work in excess of 12 consecutive hours a day. The advisement to the SSA was to be completed no later than the working day after the occurrence. Additionally, any security officer required to work in excess of 12 consecutive hours a day would be required to be contacted by two security supervisors and evaluated to ascertain if the officer was fit for duty for the period of time in excess of 12-hours. This evaluation is required to be documented (refer to attachment for evaluation guidelines revised on October 28, 1986).

The inspector reviewed the "Time Sheet Activity Listing" for the officer named in the allegation as working over 16 consecutive hours on July 12, 1986. The inspector also interviewed, by telephone, the security staff assistant (responsible for monitoring security contractor forces working hours) in reference to the hours worked by the individual on the date indicated. The record review and interview results indicated the individual worked 13-hours on July 12, 1986. However, the inspector's follow-up actions included a review of the working hours for the entire security force, rather than one individual's working hours.

During the October 27-31, 1986 onsite visit, the inspector confirmed that the fitness for duty evaluation program for security officers working in excess of 12 consecutive hours had been implemented as of September 10, 1986. However, the review also showed that on one occasion (September 13, 1986), four security officers had worked 16 hours, but the documentation of the fitness for duty evaluation had not been prepared. Interview results with the contract security site manager indicated that the evaluations had been performed but not documented. The Management Information for Morning Meeting form (MDF-11) dated September 14, 1986 showed that the licensee's security management had been advised of the personnel who had to work 16-hours. Interview results indicated there was only one other occasion between September 13, and October 15, 1986, whereby a security officer was required to remain on post in excess of 12 consecutive hours. The documentation required by the newly implemented policy had been completed.

The inspector's review of Security Event Reports since January 1986 and a selective review of Security Incident Reports since May 1986 did not disclose any incidents whereby excessive hours on post were determined or appeared to be a causative factor for the incident or event. During the October 1986 inspection, the inspector also reviewed the Time Sheet Activity computer listings for the security force for the period between July 24 and mid-September 1986. Overtime appeared to be continuing to decline and was not considered a regulatory concern. There are no NRC regulatory requirements addressing excessive working hours for security force members. This issue is an area requiring managerial judgment based on the knowledge that a person's effectiveness generally deteriorates after working over 12 consecutive hours.

Conclusion

This allegation was partially substantiated. The inspector concluded that there have been cases in the past of security officers working 16 or more consecutive hours, but these occurrences have not been frequent. A review of security event reports and incident reports indicated that excessive hours on post did not appear to have a direct adverse impact on the performance of the security program as it relates to compliance with the licensee's security plan. The licensee's current procedure for monitoring excessive on-post time for security personnel appears to be adequate. Security force overtime was not considered a regulatory concern as of the close of this inspection.

SHIFT SUPERVISORS GUIDELINES FOR FITNESS FOR DUTY EVALUATIONS

Fitness for duty evaluations may be conducted at any time by the security shift supervisor. Normally these evaluations will be conducted in a response to information received.

Fitness for duty evaluations will always be conducted on individuals (guard or supervisor) who work more than twelve (12) consecutive hours within a twenty-four (24) hour period.

The shift supervisor may delegate another supervisor to conduct the fitness for duty evaluation.

A fitness for duty evaluation must be conducted by a minimum of two (2) supervisory personnel. It is recommended that when possible the evaluation be conducted off post. This evaluation will be done prior to the thirteen hour posting.

Some things to consider while doing an evaluation:

- a. Is the individual attentive
- b. Is the individual displaying indications that could question the individuals ability to continue security duties as assigned
- c. Does the individual appear to be a threat to themselves or others
- d. Does the individual respond to questions in an alert manner
- e. Is the individual displaying any difficulties in verbal communication
- f. Does the individual display any difficulties maintaining balance whether sitting or standing
- g. If an evaluator is familiar with the individual, does the evaluator detect any deviation from normal behavior
- h. The supervisor should inquire of the individual of any mitigating conditions that could potentially affect continues fitness for duty; ie: medication, illness. If mitigating conditions exist, the supervisor will consider this, if continued service is required

The evaluation of the individual will be documented on a to-from memo and attached to MDF 11, management information for morning meeting form, for the shift. The documentation will be kept a minimum of six (6) months.

The evaluator will take whatever corrective actions he deems necessary. This could be as simple as assigning the individual a different post in a higher traffic area or getting the person relieved and sending the individual home.