

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/87024

Docket No. 50-461

License No. NPF-55

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Power Station, Unit 1

Inspection Conducted: July 7-8, 1987 Onsite;
July 9-22, 1987 in Region III

Date of Previous Security Inspection: February 27 through April 29, 1987

Type of Inspection: Special Security Inspection

Inspector: James R. Creed
Bryan Drouin
Security Inspector

8/2/87
Date

Approved By: James R. Creed
James R. Creed, Chief
Safeguards Section

8/21/87
Date

Inspection Summary

Inspection on July 7-22, 1987 (Report No. 50-461/87024(DRSS))

Area Reviewed: Applicable portions of the Illinois Power (IP) Company's Fitness For Duty program (NP&S 1.16), Fitness For Duty training for IP personnel and contractors, and interviews of personnel having knowledge of the incident.

Result: One unresolved item, which involved security supervisors ensuring that security officers are fit for duty, was identified.

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DETAILS

1. Key Persons Contacted

The following key members of the licensee staff were contacted during the review of the relief from duty event. The asterisk (*) denotes those present at the exit interview conducted on July 8, 1987.

- *F. Timmons, Supervisor, Plant Security, Illinois Power (IP)
- *J. Brownell, Licensing/NRC Interface, IP
- *G. Baker, Quality Assurance Supervisor, IP
- Z. Hoffman, Site Manager, Pinkerton Inc.
- F. Coffman, Fitness For Duty Clerk, Medical Programs, IP
- J. Holloway, Site Training Coordinator, Pinkerton Inc.
- S. Ray, Resident Inspector, US NRC, Region III
- L. Bush, Reactor Safeguards Branch, USNRC, NRR

2. Exit Interview (IP 30703)

- a. At the beginning of the inspection, the Plant Security Supervisor was informed of the purpose of the special inspection.
- b. The inspector met with the licensee representatives denoted in Section 1 at the conclusion of the onsite inspection on July 8, 1987. 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 referenced as noted in this report. Included below is a statement provided by or describing licensee management's response to each finding.

The inspector determined that the security officer was legally intoxicated when he assumed his security duties at 10:45 p.m. (CST), May 1, 1987 with an estimated Blood Alcohol Content (BAC) of .168% to .237%. The officer initially exhibited no obvious sign of intoxication (slurred speech, unsteady walk, odor of alcoholic beverage) other than bloodshot eyes. The licensee suspected the officer's impaired condition at approximately 1:45 a.m., May 2. The Shift Captain met with the officer at 2:10 a.m. and relieved him of duty at 2:25 a.m. The licensee's identification of the officer's impaired condition was made within a reasonable time period although the condition could have been identified sooner, had the security supervisors been aware of earlier isolated unusual behavior exhibited by the officer (refer to Section 3 for details).

The licensee's long term corrective action was appropriate and prompt.

The licensee was informed that a violation of the security plan may have occurred because the individual performed armed security officer duties for more than three hours while in an intoxicated state before being detected by supervisors.

The Plant Security Supervisor stated that security supervisors detected Individual A's atypical behavior when exhibited in the lunchroom (1:45 a.m.) and took appropriate actions 25 minutes later (2:10 a.m.).

On July 23, 1987, we notified the IP Licensing/NRC Interface representative that the incident was being referred to HQ, NRC for review. The FFD issue identified in this inspection would be considered an unresolved item pending completion of HQ's review.

3. Security Organization (IP 81022)

One unresolved item was identified and is described below:

Section 1.5.3.3 (Continued Observation) of the approved physical security plan requires that supervisors be constantly alert to detect any indications of emotional instability on the part of their shift personnel. Any individual demonstrating an apparent lack of mental ability or emotional stability will have his/her situation evaluated and if appropriate be promptly referred to a licensed health professional for evaluation.

Contrary to the above, supervisory personnel did not adequately observe an individual to detect indication that he could not provide the required mental and communicative skills demanded by his duty assignment. On May 1, 1987, an individual performed duties as an armed security officer which included patrols of vital areas and responses to alarms. After more than three hours of performing those duties a Blood Alcohol test administered by a physician showed the individual to be legally intoxicated (Blood Alcohol Content - .122%). (461/87024-01)

At approximately 10:45 p.m. (CST), May 1, 1987 Individual A reported for the guard force pre-shift briefing at Trailer B-3 in the owner controlled area. He sat in the rear of the room, as he usually did, and said nothing at the briefing. Other security personnel present at the briefing noticed nothing unusual about his behavior. (References to unusual/atypical behavior include: slurred, confused speech; unsteady walk; poor performance; mood changes; etc.)

After the briefing, another security officer requested that Individual A switch security duties (Badge Issue vs Vital Area Patrol). Individual A agreed. The other security officer did not notice any indications of unusual behavior from Individual A.

At 11:00 p.m., the Security Operations Lieutenant entered into a discussion with Individual A while the security officers were being issued their weapons in the Craft Security Portal (CSP) Building. The Operations Lieutenant noted several shaving cuts on the neck and face of Individual A and asked Individual A if he had been in a fight. Individual A mumbled a reply.

At the time, the Lieutenant did not consider Individual A's actions unusual nor did he detect any aberrant behavior. However, he did mention Individual A's physical appearance (facial cuts) to the shift captain who did not consider the information significant. The security officer in line directly behind Individual A at the CSP and the Security Administrative Lieutenant, who was issuing weapons, did not notice anything unusual about Individual A's behavior.

At 11:59 p.m., Individual A reported to CAS/SAS via portable radio that a Vital Area (VA) Door was secure in response to a door alarm, however, CAS/SAS had not received an alarm at the VA door nor had they dispatched Individual A to the non-existent alarm. The CAS/SAS operators were initially concerned about the "no alarm" VA door response by Individual A because they thought the VA door alarm indication may have dropped off their computer monitor. Once they determined that "no alarm" was in fact received, they considered Individual A's activity unusual; furthermore, Individual A was one floor above his assigned patrol area. Supervisory personnel who were present in the SAS at the time of Individual A's VA Door response focused on the fact that he was outside of his assigned VA patrol area. The IP Security Shift Liaison (SSL) indicated that it was not a procedural violation to respond to a VA door alarm outside of an assigned patrol area. Although the CAS/SAS operators deemed Individual A's "no alarm" response unusual activity, they did not pursue the matter because they knew that security supervisory personnel were aware of the incident. The SSL dismissed the incident because he was only aware of Individual A's response to an alarm outside his assigned patrol area and the SSL did not realize that an actual alarm had not occurred.

At 12:30 a.m., May 2, 1987, Individual A requested via radio that the SSL meet with him in the plant to discuss security door problems. The SSL discussed security door problems with Individual A for 30 minutes. During that time the SSL observed that Individual A did not exhibit any unusual behavior. The SSL did not detect the odor of alcoholic beverages on Individual A's breath but the SSL had a cold which affected his olfactory senses.

At 1:10 a.m., Individual A went to the Service Building lunchroom for his lunch break. During the lunch break, he began exhibiting aberrant behavior. He spoke loudly, used profane language in the presence of a female and his speech was confused. All these actions were indicative of atypical behavior for Individual A. His lunchroom behavior was observed at different intervals by the Operations Lieutenant, CAS/SAS operators, and several security officers. In spite of that, the individual was allowed to return to his duties. The CAS/SAS Lead Operator notified the Shift Captain of Individual A's behavior at 1:45 a.m. after departing the lunchroom. The Operations Lieutenant discussed his lunchroom observations of Individual A with the CAS/SAS Lead Operator and then met with the Captain at 2:10 a.m. The Captain was already enroute to the Gatehouse based on the 1:45 a.m. notification from the CAS/SAS Lead Operator.

At 2:10 a.m., Individual A was contacted by radio and instructed to meet with the Captain and the Lieutenant. At 2:20 a.m., Individual A was escorted from the plant to the Gatehouse where his weapon was taken and he was relieved from duty. The Captain detected the odor of alcoholic beverage on Individual A's breath as he passed by the Captain, who was standing in the Armory doorway at 2:25 a.m.

Individual A stated that he had one drink from a 12 ounce can of beer when questioned about his May 1, 1987, consumption of alcohol by the Captain.

Individual A was transported to the John Warner Hospital in Clinton, Illinois by the Administration Lieutenant for a Fitness for Duty examination at 3 a.m. At 3:22 a.m., Individual A signed a consent document for Fitness for Duty (FFD) testing. The attending physician administered an Alco-meter test which provided negative results for the presence of alcohol. (The Alco-meter test is not reliable and is discussed later in this report.) The physician, who was not aware of the specific reasons for the FFD test, suggested that Individual A was exhibiting signs of fatigue. After being apprised of Individual A's behavior, a blood specimen was taken by the physician.

At 3:45 a.m., the Pinkerton Site Manager, who had reported to the hospital, transported Individual A to his home. During the 35 minute trip, the site manager observed Individual A to be acting normally and did not detect the odor of alcoholic beverage.

On May 5, 1987, the Site Manager received the results of Individual A's BAC test (.122%) from the Medical Programs Department. (A .1% BAC or greater is considered intoxicated in the State of Illinois). Individual A was terminated from employment with Pinkerton, Inc. at 1:50 p.m. on May 5, 1987.

On May 12, 1987, the Plant Security Supervisor completed his investigation of the incident. He concluded that:

- a. Individual A was most likely under the influence of alcohol when he reported for duty and there was no evidence that he was consuming alcohol while on duty.
- b. The security duties, Vital Area patrol, performed by Individual A which resulted in his isolation from other security personnel, hindered the early detection of his unfit condition.
- c. Supervisors responded correctly upon suspecting abnormal behavior on the part of Individual A in the lunchroom.

On June 18, 1987, the licensee forwarded their investigative results to the Region III Office for review. After reviewing the licensee's investigation, conclusions and corrective actions, Region III dispatched a security inspector to the site on July 7, 1987, to determine why a security officer, who was performing duties in an intoxicated state, went undetected for three hours.

Utilizing accepted law enforcement rate of alcohol elimination calculations, Individual A's BAC was calculated in the .168% to .237% range when he reported for duty. (Elimination rate of alcohol from the body varies from 0.1% to 0.25% per hour. Individual A was tested 4.5 hours after reporting for duty. His BAC range at 10:45 p.m. was $(4.5 \times 0.1\% + .122\% = .168\%)$ to $(4.5 \times .025\% + .122\% = .237\%)$).

On July 7, 1987, the inspector interviewed all personnel who had an opportunity to talk with Individual A on May 1 and 2. None of the personnel interviewed had detected the odor of alcoholic beverage on Individual A's breath, except the Shift Captain. The discussion between the Operations Lieutenant and Individual A at the Craft Security Postal (CSP) occurred in a large open area which could explain why no odor was detected on Individual A's breath. The IP Security Shift Liaison, who had the most contact with Individual A had a cold, and therefore did not detect any alcoholic beverage odor. Individual A was also a heavy smoker and was consuming food in the lunchroom which could explain why no odor of alcoholic beverage was detected. The only person who did detect the odor of alcoholic beverage was the Shift Security Captain at 2:25 a.m. which was after other officers had told the Captain that Individual A had exhibited aberrant behavior.

The failure of the Alco-meter test to detect the presence of alcohol on Individual A's breath is not particularly significant since the test tends to be inaccurate. The test results, however, do seem to highlight the difficulty in detecting the odor of alcoholic beverage on Individual A's breath. Every individual interviewed stated they knew that reporting to work in an intoxicated state was wrong and that intoxication was grounds for employment termination. None of the individuals had reason to protect Individual A and stated that they would have reported Individual A had they detected the odor of alcoholic beverages or suspected that he was unfit for duty. No interviewed personnel were aware of previous on duty intoxication incidents by Individual A or any other security personnel.

On July 27, 1987, the Chief, Safeguards Section, Region III and the inspector contacted Individual A. He stated that he had several cans of beer on May 1, but did not consume any alcoholic beverages onsite. He also stated that he had never before reported for duty in an intoxicated state. He further stated that his performance was not initially affected by his consumption of alcohol, in explanation of why his condition was not detected earlier by supervisors.

None of our interviews or the licensee's investigation indicated that Individual A had consumed alcohol onsite.

All security personnel are trained that the use of alcohol onsite or reporting for duty in an intoxicated state are dischargable offenses and there has been a test question in security officer initial and annual training on the FFD issue since January 1986. Past practice has demonstrated that security officers can observe and have detected aberrant behavior/impaired condition on the part of plant personnel and have reacted appropriately.

Only ten of 16 Pinkerton Inc. supervisory personnel had received IP supervisor's behavioral observation training. One of the ten personnel was on shift (CAS/SAS Lead) and initiated the first report to the Captain at 1:45 a.m. Observation Training was not required for Pinkerton or IP shift liaison personnel.

The licensee took the following corrective actions in response to their own conclusions and later this inspection:

- a. All IP shift liaison and Pinkerton, Inc. supervisory personnel will receive annual IP Supervisors' Fitness For Duty Training. All shift captains and IP shift liaisons received FFD training by June 3, 1987. All other supervisors are scheduled for the next class in September 1987. The training is based on Edison Electric Institute FFD guidelines and IP FFD Procedure NP&S 1.16. The training discusses the changes in work performance, social interactions and personal health characteristics that could indicate aberrant behavior and the procedures to be followed once a supervisor suspects an employee's behavior to be aberrant.
- b. Procedures for guardmount have been revised so that each individual security officer is observed by the shift Captain and Administrative Lieutenant to detect signs of an impaired condition.
- c. All security officers have been informed that any unusual behavior on the part of plant personnel, particularly security personnel, should be reported to the shift Captain immediately. The Captain must then investigate the report immediately.
- d. Both b. and c. above have been incorporated into initial and annual security officer training.
- e. Coordination has been effected with John Warner Hospital to insure that the Alco-meter test is no longer employed in FFD evaluations. The definitive FFD test for suspected alcohol involvement will be a blood test; an urinalysis test will be administered for suspected drug involvement. These test are specified in IP NP&S 1.16 (Fitness For Duty) procedure.

Our inspection resulted in the following determinations:

- a. Individual A was legally intoxicated at the time he reported for duty as an armed security officer and remained in that condition until his relief from duty, more than three hours later.
- b. There is no evidence that Individual A consumed alcoholic beverages while on-site.
- c. Security supervisors acted appropriately when notified of Individual A's atypical behavior in the lunchroom.

- d. Increased security force sensitivity to the identification of aberrant behavior could have led the Captain to suspect Individual A's inadequate fitness for duty as early as 11:59 p.m., May 1, (report of non-existent VA door alarm) had the Captain been informed.
- e. There is no explanation for the failure to detect the odor of alcoholic beverage on Individual A's breath prior to 2:25 a.m.
- f. The licensee took appropriate, prompt and thorough long term corrective action to insure security officer fitness for duty.

Due to the sensitive nature (armed, intoxicated security officer within vital areas) of this event, any enforcement action will be postponed until the Commission can review the incident in its entirety. This issue will therefore be considered an unresolved item.