

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-483/84-05(DRMSP)

License No. CPPR-139

Docket No. 50-483

Licensee: Union Electric Company
Post Office Box 149 - Mail Code 400
St. Louis, MO 63166

Facility Name: Callaway County Nuclear Power Station, Unit 1

Inspection At: Callaway County, MO

Inspection Conducted: January 30-February 3, 1984

Type of Inspection: Pre-Operational Physical Protection Inspection

Date of Previous Physical Protection Inspection: November 28-December 2, 1983

Inspector: D.R. Kneisley for
G. L. Pirtle
Physical Protection Specialist

2/22/84
Date

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

2/22/84
Date

Inspection on January 30-February 3, 1984 (Report No. 50-483/84-05(DRMSP))

Areas Inspected: Included a review of the status of implementation, installation, and operability of the security program and acceptance testing for security-related equipment. Specifically, the inspection addressed: Security Plan and Implementing Procedures; Security Organization-Management-Personnel-Response; Security Program Audit; Records and Reports; Locks, Keys, and Combinations; Physical Barriers-Protected and Vital Areas; Security System Power Supply; Lighting; Assessment Aids; Access Control-Personnel-Packages-Vehicles; Alarm Stations; Communications; Training and Qualification Plan Requirements; Safeguards Contingency Plan; and Licensee's Actions on Previous Inspection Findings. The inspection involved 48 inspector-hours onsite by one NRC inspector. Eight of the 48 inspector-hours were conducted during off-shift periods.

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Results: Two of the three areas of concern identified in Paragraph 2 of Inspection Report No. 50-483/83-24(DRMSP) remain open. These areas pertain to the personnel screening program and acceptance testing of security-related equipment. Progress in both areas has been noted since the previous inspection. Twenty-four additional findings were identified during this inspection. The concerns and findings do not represent noncompliance with NRC requirements due to the pre-operational status of the plant. However, the items must be corrected and/or resolved prior to fuel load. Eight of 17 findings identified in previous inspection reports were closed. Extensive discussions were held with the Superintendent of Security pertaining to security/plant safety issues.

(Details - UNCLASSIFIED SAFEGUARDS INFORMATION)

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- (2) Implementation of the Personnel Screening and Badging Program for unescorted access to the site was also identified as a major area of concern in both previous inspection reports. It continues to be a major concern.

Screening contractors have been identified and screening and badge issue is progressing, although in a fragmented manner. All personnel will not complete badging requirements by March 1, 1984. However, there may be sufficient personnel badged to allow unbadged personnel to be escorted. Required badging of all personnel by April 1, 1984 appears feasible if contractor personnel cooperate with the initial application paperwork.

This program still warrants senior management oversight, particularly as it pertains to contractor personnel.

- (3) Adherence to the Security System Implementation Schedule continues to be "the" critical issue for the security program, particularly the equipment acceptance test portion and integration/operation of the security computer system on a day-to-day basis. This may constitute the major determination if the security system can perform as required by the Security plan. The planned implementation of the entire security program by March 2, 1984 will demonstrate that capability and allow time to resolve technical problems and let personnel become familiar with the security system requirements. The inspector noted that acceptance testing for the perimeter alarm system, CCTV camera system, some VA doors, and the computer consoles still had to be completed.
- c. The inspector also advised the personnel present that another concern had been developed during this inspection. The concern pertained to the reliability of the security computer system. During this inspection, the computers had been out of service at least on two occasions. The inspector requested that a log be maintained on planned/unplanned computer outages (refer to paragraph 19g for further information).
- d. The licensee representatives were advised that the following findings must be corrected or resolved prior to issuance of an operating license. Although each finding was not discussed at the formal exit meeting, they were discussed with the Superintendent of Security or identified by the licensee's staff during the course of the inspection.
- ✓(1) Test sources for explosive detectors are required.
- ✓(2) Metal detectors require modification to compensate for lack of detection capability due to installed metal toe-guards.
- ✓(3) Five openings in the protected area fence need to be closed.
- ✓(4) All duress alarms need to be verified as functional.

- (23) Psychological evaluation determinations for security force members need to be signed.
- (24) The proposed number and location of VA keys within the plant warrant reconsideration by site management personnel.

Additional information pertaining to the above findings is contained in the below report details.

4. Security Plan and Implementing Procedures (MC 81118B) (483/83-24-01):

- a. The licensee formally submitted revision 3 to the Physical Security Plan to NRC, HQ on February 1, 1984. The revision appeared to address deficiencies in the plan which were noted in previous inspection reports.

During this inspection, the inspector noted that the Security Plan did not contain provisions for testing of duress alarms or tamper alarms. The licensee did not want to include these provisions in the Security Plan prior to fuel load because the inclusion may delay formal approval of the plan beyond the scheduled fuel load date. The licensee agreed to commit to testing of tamper alarms on an annual basis and testing of duress alarms on a daily basis when the facilities equipped with such alarms are occupied. The licensee further agreed to include the above testing criteria in a 10 CFR 50.54(p) change to the security plan within two months after issuance of an operating license.

The following administrative changes to the Security Plan were also identified as required to be included in the 10 CFR 50.54(p) change to the Security Plan:

- (1) Figure 5.1-2 needs to be corrected to show the Refueling Water Storage Tank (RWST) and valve house as vital areas.
 - (2) Figure 5.1-4 needs to be corrected to show the roof level of the diesel generator intake and exhaust areas (penthouse) as a Vital Area.
 - (3) The legend on figures 5.1-1 through 5.1-5 need to be corrected to eliminate Type II vital area designations.
- b. Most security procedures required to effectively implement provisions of the Security Plan had been published. However, the following security procedures require formal approval and implementation prior to fuel load:
 - (1) Revision 1 to SDP-ZZ-PP004, "Security Screening Program."
 - (2) SDP-ZZ-P005, "Protected and Vital Area Entry/Exit."
 - (3) Revision 1 to SDP-ZZ-PP005, "Lock and Key Control Procedures."

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a. Some progress in access control has been noted since the previous inspection. However, the bulk of the training, screening, and badging of personnel for unescorted access to the plant still needs to be implemented. Screening contractors have been selected by the licensee and screening of licensee personnel has been initiated. Processing of contractor personnel to be screened by the licensee was also initiated. The access control program is being implemented in a fragmented manner. Personnel photographed for a security badge may or may not have completed training and screening required by the security plan. This process of implementation is contrary to earlier scheduled sequences for badging and will require verification of screening and training requirements prior to fuel load and withdrawal of security badges for those personnel who have not completed the required screening and training. Delays in meeting previous scheduled goals in selecting contractors for screening have contributed to the situation. All personnel will not be screened for unescorted access to the plant by the planned security program implementation date of March 2, 1984. They may be screened by the planned fuel load date of April 2, 1984 if senior management personnel adequately support the screening program, particularly as it applies to contractor personnel. Discussions with the Assistant Superintendent of Security indicated that approximately [redacted] craft personnel and [redacted] licensee personnel may require unescorted access to the plant after fuel load. These figures were estimates and may be lower, depending on construction activities required after fuel load. The screening program remains a major segment of the security program which has not been fully implemented and warrants continued senior management support and oversight.

b.

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Callaway County Sheriff's Office. Each on-duty armed security officer was equipped with portable radio communication equipment. During a test of the portable communication equipment on February 1, 1984, all equipment functioned as designed.

- b. The following communication deficiencies were noted during this inspection:
- (1) The public address system (Gaitronics) installed in the Central Alarm Station (CAS) was inoperative.
 - (2) The "hot line" direct line between the CAS and SAS, required by Section 7.1.2 of the Security Plan, had not been installed.
 - (3) The radio consoles described in Section 7.3.1.1 of the Security Plan were installed in the CAS and SAS during this inspection period. However, the 125V battery system and two battery chargers were not installed. An alternate source of power was being used.

Interviews with the Superintendent of Security indicated that the above deficiencies would be corrected prior to the planned implementation of the security program. Twenty additional portable radios have been ordered by the licensee.

21. General Requirements - Training and Qualification Plan (MC 81501B)
(483/83-29-04):

- a. The licensee formally submitted revision 3 to the Security Force Training and Qualification Plan to NRC, HQ on February 1, 1984. Lesson plans or training material for the critical tasks identified in the Training and Qualification (T&Q) have been prepared and certification of security force personnel is progressing. All armed security force personnel are required to be certified in accordance with T and Q criteria by fuel load. The contract security force supervisor has scheduled required training to complete certification by March 1, 1984.
- b. The inspector reviewed approximately 40 security force screening records. Deficiencies noted in paragraph 8b of Inspection Report 50-483/83-29(DRMSP) had been corrected. During this inspection, the inspector noted that psychological qualification documentation provided to the licensee consisted of an unsigned form letter with the individual's name and social security number entered on the letter. After discussions with the licensee, they agreed to include psychological evaluation certifications signed by the psychologist that determined that the psychological evaluations were satisfactory for unescorted access to the site.
- c. The inspector also reviewed approximately 23 security force training records. Deficiencies noted in paragraph 11.b of Inspection Report 50-483/23-29(DRMSP) had been corrected. Documentation within the training records included certifications of some completed critical tasks identified in the T and Q Plan.

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MAR 28 1984

Docket No. 50-483

Union Electric Company
ATTN: Mr. Donald F. Schnell
Vice President - Nuclear
Post Office Box 149 - Mail Code 400
St. Louis, MO 63166

Gentlemen:

This refers to the pre-operational physical protection inspection conducted by Mr. G. L. Pirtle of this office on March 5-6, 1984, of activities at the Callaway County Nuclear Station, Unit 1, authorized by NRC Construction Permit No. CPPR-139, and to the discussion of our findings with Mr. P. T. Appleby, Assistant Manager, Support Services and other members of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

Adherence to your security system implementation schedule continues to be a concern. If our understanding of the implementation schedule, described in Paragraph 4.b. of the report details is incorrect, please advise us immediately by telephone and in writing within five days after telephone notification.

Areas examined during this inspection concern a subject matter which is exempt from disclosure according to Section 73.21(c)(2) of the NRC's "Rules of Practice," Part 73, Title 10, Code of Federal Regulations. This information must be handled and protected in accordance with the provisions of 10 CFR 73.21. Consequently, our report of this inspection will not be placed in the Public Document Room.

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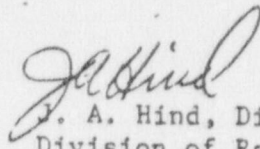
Union Electric Company

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,



J. A. Hind, Director
Division of Radiological and
Materials Safety Program

Enclosure: Inspection Report
No. 50-483/84-07 (DRMSP)
(UNCLASSIFIED SAFEGUARDS INFORMATION)

cc w/encl:
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Construction
S. E. Miltenberger, Plant Manager
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NMSS/SGPL
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