

REVIEWED BY: \_\_\_\_\_

R. R. Keimig

(NAME)

R. Keimig  
(SIGNATURE)

NRC: REGION I

(ORGANIZATION)

4-17-89

(DATE)

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 50-286/89-05

Docket No. 50-286

License No. DPR-64

Licensee: Power Authority of the State of New York  
123 Main Street  
White Plains, New York 10601

Facility Name: Indian Point 3 Nuclear Power Plant

Inspection At: Buchanan, New York

Inspection Conducted: February 27 - March 3, 1989

Type of Inspection: Routine, Unannounced Physical Security

Inspector: \_\_\_\_\_

W. K. Lancaster  
W. K. Lancaster, Physical Security Inspector

4/10/89  
date

Approved by: \_\_\_\_\_

R. R. Keimig  
R. R. Keimig, Chief, Safeguards Section  
Division of Radiation Safety and Safeguards

4-11-89  
date

Inspection Summary: Routine, Unannounced Physical Security Inspection  
(Inspection Report No. 50-286/89-05)

Areas Inspected: Onsite Follow-up of a Non-Routine Event; Management Support, Security Program Plans and Audits; Protected and Vital Area Physical Barriers, Detection and Assessment Aids; Protected and Vital Area Access Control of Personnel, Packages and Vehicles; Alarm Stations and Communications; Power Supply; and Testing, Maintenance and Compensatory Measures.

Results: The licensee was found in noncompliance with the NRC-approved Physical Security Plan in the areas of Physical Barriers - Protected Areas; Access Control - Personnel and Packages; Access Control-Vehicles; Lighting; and Assessment Aids.

8904260366 890414  
PDR ADDCK 05000286  
Q PNU

## DETAILS

### 1.0 Key Personnel Contacted

#### Licensee Personnel

- \*W. Josiger, Resident Manager
- \*M. Peckham, Assistant to the Resident Manager
- \*E. Sackman, Manager of Security Compliance
- \*J. Hahn, Security Manager
- \*W. Heady, Security Supervisor
- \*J. Mosher, Security Coordinator
- M. Leonard, Security Coordinator
- J. Corbett, Security Coordinator
- F. Hugley, Security Coordinator

#### U. S. Nuclear Regulatory Commission (NRC)

- P. Koltay, Senior Resident Inspector
- \*G. Hunegs, Resident Inspector

\*Indicates those present at the exit interview.

### 2. Onsite Follow-up of a Non-Routine Event

#### a. Background

At approximately 4:30 p.m., on February 5, 1989, the licensee notified the NRC Operations Center, via the Emergency Notification System (ENS), that a security gate in the Protected Area (PA) barrier was found unlocked at 6:57 a.m. that morning. During this notification, the licensee informed the NRC that the gate in question had been accessed on February 4, 1989, by maintenance personnel.

#### b. NRC Review

During the week of February 27 - March 3, 1989, the inspector reviewed the circumstances surrounding the event. The inspector reviewed the NRC-approved Indian Point 3 Physical Security Plan (the Plan), plant drawings, security procedures and alarm zone records. The inspector also interviewed security personnel and conducted a physical inspection of the PA barrier and the PA gate that was found unlocked on February 5, 1989.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

**THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.**

Sometime after 7:00 a.m., on February 5, 1989, the Security Coordinator notified the Security Manager of the incident. The Security Manager was, as first, uncertain about the need to notify the NRC Operations Center of the event but, around 10:45 a.m., notified the Plant Shift Supervisor about the need to inform the NRC Operations Center of the event. That call was received at the NRC Operations Center at about 4:30 p.m., that afternoon.

In summary, an SO, posted to compensate for an unlocked PA gate, left that post without locking the gate when he was reassigned at about 4:30 p.m. on February 4. Another SO, on PA patrol at about 6:00 p.m., failed to notice the unlocked gate, even though checking locked PA gates is an inherent duty of a PA patrol. Still another SO on PA patrol found the gate unlocked at about 1:00 a.m. on February 5 and failed to respond. The unlocked gate was detected again and reported to security management at about 7:00 a.m. The NRC was not notified until about 4:30 p.m., even though the event clearly requires notification to the NRC within one hour of discovery.

c. NRC Findings

The inspector reviewed the NRC-approved Indian Point 3 Physical Security Plan (the Plan) and implementing procedures and found the following requirements:

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector determined that the licensee's failure to comply with the above requirements in the NRC-approved Plan, its implementing procedures and in 10 CFR 73.71, Appendix G, I(3)(c), is an apparent violation of NRC requirements (50-286/89-05-01).

3. Management Support, Security Program Plans, and Audits

- a. Management Support - Management support for and attention to the physical security program appeared to have decreased. This is based upon the inspector's review of various aspects of the licensee's program and the number and nature of the potential violations identified during the inspection.

On several occasions during the inspection, members of the security force informed the inspector of their dissatisfaction with various management aspects of the program. Complaints consisted of mandatory overtime; cancellation of vacations; lack of adequate facilities for the security force; poor janitorial service; lack of respect from other plant personnel and labor/management differences. It was apparent to the inspector that the morale of the security force was low, and, while the complaints did not involve any regulatory requirements, the potential for poor personnel performance existed.

The inspector noted that the licensee entered the current steam generator replacement and refueling outage with two fewer than the authorized complement of security force members, and there were no plans to increase the force during the outage period, except for three trainees upon qualification. The inspector found that, due to the additional security posts required because of outage activities, members of the security force are being required to work overtime and that vacations had been cancelled. The work schedule was increased to five twelve-hour days per week; the normal is five eight-hour days per week. A review of security force work records by the inspector indicated that over one-half of the force had been required to work at least one sixteen-hour shift since the outage began, with only eight hours off between that shift and the next.

The inspector discussed this matter with the licensee and expressed the concern that several of the potential violations identified during the inspection reflected poor personnel performance, possibly as a result of fatigue. The licensee agreed and committed to look into the matter.

- b. Security Program Plans - The inspector verified that changes to the licensee's Security, Contingency, and Guard Training and Qualification Plans, as implemented, did not decrease the effectiveness of the respective plans, and had been submitted in accordance with NRC requirements.
- c. Audits - The inspector reviewed the reports of the 1987 and 1988 annual security program audits, conducted by Quality Assurance and by Corporate Security, and verified that the audits had been conducted in accordance with the Plan. The audits appeared to be comprehensive in scope and the results were reported to the appropriate levels of management. The inspector's review included the response of the security organization to the audit findings and the corrective actions taken to remedy any adverse findings. The documented corrective actions appeared appropriate for the findings. However, due to the number and nature of the apparent violations identified during this inspection, the depth and effectiveness of these audits is subject to question. These aspects of the licensee's audit program will be reviewed further during the next inspection.

During the review of the 1987 and 1988 audit reports, the inspector noted that a recurrent weakness had been identified. The weakness concerned the timeliness of repairs to security-related systems and equipment. In response to the 1988 audit finding, the licensee increased the Instrumentation and Control (I&C) support to the security program. The inspector reviewed a sample of security-related work orders and found that the time required for repairs still appeared to be excessive. The licensee's testing, corrective maintenance, and preventive maintenance programs will be reviewed during the next inspection.

4. Protected and Vital Area Physical Barriers, Detection and Assessment Aids

- a. Protected Area Barriers - The inspector conducted a physical inspection of the PA barrier on February 27, 1989. The inspector determined, by observation, that the barriers were generally installed and maintained as described in the Plan.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

This is considered an Unresolved Item (50-286/89-05-01) and will be discussed further with the licensee.

- b. Protected Area Detection Aids - The inspector observed the testing of the PA perimeter detection aids on February 27 and 28, 1989, and determined that they were installed, maintained and operated as committed to in the Plan.
- c. Isolation Zones - The inspector verified that isolation zones were generally maintained to permit observation of activities on both sides of the PA barrier.
- d. Protected Area and Isolation Zone Lighting

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
 INFORMATION AND IS NOT FOR PUBLIC  
 DISCLOSURE, IT IS INTENTIONALLY  
 LEFT BLANK.

The inspector noted that one dark area resulted from on-going outage activities and two resulted from recently completed construction work.

When the inspector returned to the plant on the morning of February 28, 1989, he could find no documented evidence that any compensatory action had been taken after identification of the areas of inadequate lighting. This was discussed with a licensee representative who stated his belief that compensatory measures had been implemented but that they had not been documented. Compensatory measures were implemented on February 28 and were in effect through March 2 while additional lighting was being installed. On February 28, March 1 and March 2, the inspector resurveyed the areas, as the installation of additional lighting was completed, and found them to be satisfactory.

The inspector expressed concern to the licensee regarding the apparent insensitivity of PA patrols to deficient lighting conditions, and the failure of the security force to properly document identified deficiencies and resultant compensatory actions.

The inspector reviewed the NRC-approved Plan and found the following requirements:

THIS PARAGRAPH CONTAINS SAFEGUARDS  
 INFORMATION AND IS NOT FOR PUBLIC  
 DISCLOSURE, IT IS INTENTIONALLY  
 LEFT BLANK.

The licensee's failure to comply with the lighting requirement in the NRC-approved Plan, is an apparent violation of NRC requirements (50-286/89-05-02).

- e. Assessment Aids - The inspector observed the use of assessment aids, and other security equipment in operation at the Central Alarm Station (CAS), between approximately 3:30 p.m. and 5:30 p.m., on February 27, 1989. The inspector found that three portions of the Protected Area barrier and associated isolation zones could not be adequately assessed.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector reviewed the Plan and found the following requirements:

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE. IT IS INTENTIONALLY  
LEFT BLANK.

The inspector determined that the licensee's failure to provide PA perimeter assessment as committed to in the NRC-approved Plan and its implementing procedures is an apparent violation of NRC requirements (50-286/89-05-03).

- f. Vital Area Barriers - The inspector conducted a physical inspection of several Vital Area (VA) barriers on February 28, 1989. The inspector determined, by observation, that the barriers were generally installed and maintained as described in the Plan.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

This item is considered unresolved (50-286/89-05-02) pending further discussion with the licensee.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
 INFORMATION AND IS NOT FOR PUBLIC  
 DISCLOSURE, IT IS INTENTIONALLY  
 LEFT BLANK.

This item is considered unresolved (50-286/89-05-03) pending further discussion with the licensee.

- g. Vital Area Detection Aids - The inspector observed the VA detection aids and determined that they were installed, maintained and operated as committed to in the Plan.

5. Protected and Vital Area Access Control of Personnel, Packages, and Vehicles

- a. The inspector determined that the licensee was generally exercising positive control over personnel access to the PA and VAs, except for personnel searches. This determination was based on the following:
- 1) The inspector verified that personnel are properly identified and authorization is checked prior to issuance of badges and key-cards.
  - 2) The inspector verified that the licensee has a fitness for duty program in place. A drug testing program has been implemented and individuals are tested as follows:
    - All prospective New York Power Authority employees who would be assigned to the plant are tested prior to employment;
    - All security personnel are tested prior to employment, and annually thereafter;
    - All New York Power Authority personnel who require access to radiation areas are tested annually;
    - All contractor personnel who require access to radiation areas are tested prior to assignment to the site, and annually thereafter; and,
    - For cause.

The inspector noted that the testing program does not include annual testing of licensee or contractor employees who have access to sensitive areas which are not radiation areas.

- 3) The inspector verified that the licensee has a search program, as committed to in the Plan, for firearms, explosives, incendiary devices and other unauthorized materials. The inspector observed plant personnel and visitor access processing several times during the inspection and interviewed members of the security force and the licensee's security staff about personnel access procedures. Several problems were identified.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector determined that the NRC-approved Plan and  
implementing procedures contains the following requirements:

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector determined that the licensee's failure to comply with the requirements in the Plan and its implementing procedures, regarding searches of personnel and packages entering the protected area, is an apparent violation of NRC requirements (50-286/89-05-04).

- 4) The inspector determined, by observation, that individuals in the PA and VAs display their access badges as required.
  - 5) The inspector verified that the licensee has escort procedures for visitors to the PA and VAs.
- b. The inspector determined that the licensee has established controls for vehicle access to and within the PA. The inspector verified that, generally, vehicles are properly processed prior to entering the PA, except for searches.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector reviewed the NRC-approved Plan and implementing procedures and found the following requirements:

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

THIS PARAGRAPH CONTAINS SAFEGUARDS  
INFORMATION AND IS NOT FOR PUBLIC  
DISCLOSURE, IT IS INTENTIONALLY  
LEFT BLANK.

The inspector determined that the licensee's failure to comply with the requirements in the Plan and its implementing procedures, regarding vehicle searches, is an apparent violation of NRC requirements (50-286/89-05-05).

6. Alarm Stations and Communications

- a. The inspector observed the operation of the CAS and SAS and determined that they were maintained and operated as committed to in the Plan. CAS and SAS operators were interviewed by the inspector and found to be knowledgeable of their duties and responsibilities. The inspector verified that the CAS and SAS do not contain any operational activities that would interfere with the assessment and response functions.
- b. The inspector observed tests of all communications capabilities in both the CAS and the SAS and reviewed the testing records for the communications channels. All were found to be as committed to in the Plan.

7. Exit Interview

The inspector met with the licensee representatives indicated in paragraph 1 at the conclusion of the inspection on March 3, 1989. At the time, the purpose and scope of the inspection were reviewed and the findings were presented.

At no time during this inspection was written material provided to the licensee by the inspector.