

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/89019(DRSS)

Docket No. 50-461

License No. NPF-62

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

Facility Name: Clinton Power Station, Clinton, Illinois

Inspection At: Clinton Power Station

Inspection Conducted: February 6, 1989 onsite
May 22 - June 2, 1989 onsite
June 7, 1989 in NRC Region III Office

Type of Inspection: Unannounced Physical Security Inspection

Date of Previous Security Inspection: July 25-29, 1988

Inspectors: G. S. Pirtle
G. L. Pirtle
Physical Security Inspector
G. S. Pirtle
for J. L. Belanger
Physical Security Inspector

6/23/89
Date

6/23/89
Date

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

6/23/89
Date

Inspection Summary

Inspection Between February 6 and June 7, 1989 (Report No. 50-461/89019(DRSS))

Areas Inspected: Included Management Support; Protected and Vital Area Barriers; Access Control - Personnel, Packages, and Vehicles; Alarm Stations and Communications; Testing, Maintenance and Compensatory Measures; Training and Qualification; Licensee's Planning and Implementation of Strike Plans; Licensee's Actions for Previous Inspection Findings; and Review of Licensee's Actions Pertaining to an Allegation.

Results: The licensee was in compliance with NRC requirements in the areas inspected, except as noted below:

- Training and Qualification: Six newly hired security officers did not receive all of the training required by the Security Force Training and Qualification Plan prior to being assigned security shift duties in February 1989.

Enclosure Contains
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One of two previous inspection findings were closed. The remaining inspection finding was being adequately addressed by the licensee and it pertained to a modification for permanent heating, ventilation, and air conditioning capability for the security computer room. The need for revised compensatory measures to cope with a multiple security component failure contingency was identified. One segment of an alarm system experienced excessive out-of-service time. The interior alarm point false alarm rate requires further reduction. Strike contingency security operations appeared effective and well managed. Several additional positive observations were noted pertaining to security force facilities, generally excellent procedural guidance, and conservative approach in implementation of compensatory measures and logging of security events.

(Details - UNCLASSIFIED SAFEGUARDS INFORMATION)

ATTACHMENT - ALLEGATION REVIEW

(Closed) Allegation RIII-89-A-0037 (IP 99014): This Allegation was sent to Illinois Power Company on March 30, 1989, for investigation and resolution. The allegation consisted of three parts and pertained to: (1) some newly hired security force members at the time of the security force strike did not receive all training required by the Security Force Training and Qualification Plan (SFT & QP); (2) non-task related training subjects were not completed by the newly hired personnel as required by the SFT & QP; and (3) requalification task certification was being performed on-the-job and not within a classroom environment as required by the SFT & QP. The above training deficiencies were allegedly caused by licensee management's decision to use the newly hired security officers as soon as possible as contingency members to cope with the security force strike.

NRC Review: The licensee's investigation results and conclusions were provided to NRC Region III by letter dated May 1, 1989. The licensee concluded, and the NRC Region III staff agreed, that non-task related training subjects were not specifically required by the SFT & QP to be completed prior to assignment to security shift duties. The NRC Region III staff review also agreed with the licensee's conclusion that the SFT & QP allowed requalification task certification to be completed on-the-job as well as in the classroom.

As a result of an inspection conducted between May 22 - June 7, 1989, the NRC Region III staff did not agree with the licensee's conclusion that the newly hired personnel received all of the training required by the SFT & QP.

Section 2.2.3 of the SFT & QP requires all security force personnel assigned to security-related duties to successfully demonstrate the capability to perform all crucial security tasks under the conditions and to the standards specified on the applicable Job Analysis Worksheets prior to assignment to the specific shift involved.

Section 2.2.4 of the SFT & QP requires that prior to fulfilling a security force position, an individual will be qualified and certified in that position.

The Individual Responsibility Matrix and the Position Description within the SFT & QP for Unarmed Security Force Members identifies 35 crucial tasks that such personnel must be trained for and/or demonstrate the capability to perform.

Contrary to the above, six security force members assigned to security shift duties in February 1989 were not trained or had not demonstrated the capability to perform 18 of the 35 crucial tasks identified in the SFT & QP for unarmed personnel. Specifically, tasks pertaining to security contingency events and alarm assessment were not evaluated to confirm demonstrated capabilities for these tasks (461/89010-04).

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Of the six personnel, four were no longer performing security duties as of May 22, 1989 (start of onsite inspection). The two remaining personnel were trained and certified as qualified in the Armed Security Force Member position in May 1989. This certification process required training and evaluation on the 18 crucial tasks which were not evaluated when the personnel were initially assigned to security shift duties.

A major contributing factor to the violation was that the SFT & QP does not address in specific detail variations in training and qualification certification for security officers hired or deployed to function as contingency force members. The licensee agreed to revise the SFT & QP to identify specifically what training, qualification, certification, and documentation requirements will apply for security contingency force personnel. The revised SFT & QP change would be completed within two months after receipt of this inspection report as required by 10 CFR 50.54(p) and will be reviewed by NRC Region III (461/89019-05).

Another contributing factor was the security staff's incorrect understanding that personnel required training only in tasks assigned or performed. The SFT & QP identifies training required by "position" regardless of the tasks the person may or may not perform. Additionally, some of the six officers were used for compensatory posts that would require knowledge of some of the crucial tasks they had not been evaluated or certified as proficient to perform.

Conclusion:

The allegation that some newly hired security officers were not trained in all crucial tasks required by the SFT & QP was substantiated. The other two allegations were not substantiated. The causes of the training deficiency were lack of complete understanding of SFT & QP requirements by security force managers, and lack of specific guidance in the SFT & QP pertaining to contingency force training, certification, qualification, and documentation requirements. The licensee's agreement to revise the SFT & QP and submit the revision for NRC Region III review should resolve the issue and prevent recurrence. Therefore, a written response to the violation will not be requested.