



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

May 14, 1999

C. Randy Hutchinson, Vice President
Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, Arkansas 72801-0967

SUBJECT: NRC INSPECTION REPORT NO. 50-313/99-07; 50-368/99-07

Dear Mr. Hutchinson:

This refers to the inspection conducted on April 26-31, 1999, at the Arkansas Nuclear One, Units 1 and 2 facilities. The enclosed report presents the results of this inspection.

Areas examined during this inspection included portions of your physical security program. We determined that your physical security program was properly implemented.

During the inspection, we determined that your staffing of armed response personnel inside the protected area was in accordance with the minimum requirements of the physical security plan. During the October 31 - November 3, 1994, Operational Safeguards Response Evaluation (OSRE), you exceeded the minimum requirements of the physical security plan and elected to utilize four additional armed response personnel to successfully demonstrate your ability to defend against the design basis threat. The requirement to defend against the design basis threat is addressed in 10 CFR 73.55(a). The results of your OSRE were documented in an NRC report dated December 6, 1994.

Subsequent to your 1994 OSRE, you have maintained an appropriate number of on-duty armed security personnel inside the protected area. However, as discussed during the exit meeting on April 30, 1999, there remains a difference between the number of armed responders described in the industrial security plan and the additional number of armed response personnel used during the 1994 OSRE to demonstrate your ability to defend against the design basis threat, as discussed in Section S6.2 of this report.

We request that you provide us, within 30 days of the report date, an evaluation of your provisions to maintain an adequate level of response force personnel on-site. Your evaluation should not include safeguards information if possible.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Entergy Operations, Inc.

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

original signed by

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos.: 50-313, 50-368
License Nos.: DPR-51, NPF-6

Enclosure:
NRC Inspection Report No.
50-313/99-07; 50-368/99-07

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Entergy Operations, Inc.

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket Nos.: 50-313
50-368

License Nos.: DPR-51
NPF-6

Report No.: 50-313/99-07
50-368/99-07

Licensee: Entergy Operations, Inc.

Facility: Arkansas Nuclear One, Units 1 and 2

Location: Junction of Hwy. 64W and Hwy. 333 South
Russellville, Arkansas

Dates: April 26-30, 1999

Inspector(s): D. Schaefer, Security Specialist, Plant Support Branch

Approved By: Gail M. Good, Chief, Plant Support Branch
Division of Reactor Safety

Attachment: Supplemental Information

EXECUTIVE SUMMARY

Arkansas Nuclear One, Units 1 and 2
NRC Inspection Report No. 50-313;-368/99-07

This was an announced inspection of the licensee's physical security program. The areas inspected included access authorization; alarm stations; communications; protected area access control of personnel, packages, and vehicles; assessment aids; security program plans and procedures; security event logs; management support; staffing levels; security program audits; and miscellaneous security and safeguards issues.

Plant Support

Performance in the physical security area was very good, and performance in the access authorization area was excellent. An effective access authorization program was established to grant individuals unescorted access to protected and vital areas. The security alarm stations were redundant and well protected. The security radio and telephone communication systems were reliable. An effective program for searching personnel, packages, and vehicles was maintained. Assessment aids provided effective assessment of the perimeter detection zones. Changes to security plans were reported within the required time frame and properly implemented in accordance with 10 CFR 50.54(p). A very good program for reporting security events was in place. Senior management support for the security organization was very good. The audits of the security program, the access authorization program, and the fitness-for-duty program were conducted at the required intervals and were performance based (Sections S1.1, S1.2, S1.3, S1.4, S2.1, S3.1, S3.2, S6.1, S6.2, S7.1).

On-shift staffing of security armed response personnel was in accordance with the minimum requirements of the industrial security plan. However, an inspection followup item was identified involving the difference between the number of armed responders committed to in the industrial security plan and the additional number of armed response personnel used during the 1994 OSRE. During the OSRE, the licensee successfully demonstrated its ability to defend against the design basis threat (Section S6.2).

Report Details

IV. Plant Support

S1 Conduct of Security and Safeguards Activities

SI.1 Access Authorization

a. Inspection Scope (81700)

The Access Authorization Program was inspected to determine compliance with the requirements of 10 CFR 73.56, the security plan, and Regulatory Guide 5.66. The areas inspected included the Review of background investigation files for individuals presently granted unescorted access. The inspector reviewed records and conducted interviews to determine the adequacy of the program. The inspector also reviewed information concerning the licensee's verification of identify, employment history, educational history, credit history, criminal history, military service, and the character and reputation of the applicants before granting individuals unescorted access to protected and vital areas. Seven background investigation files were reviewed.

b. Observations and Findings

Background investigation screening files were complete and thorough. The licensee had accepted the access authorization program of six (self-screening) contractors. The inspector verified through a review of records that each of these self-screening contractors had been audited within the previous 12 months.

c. Conclusions

Performance in the access authorization area was excellent. An effective access authorization program was established to grant individuals unescorted access to protected and vital areas.

S1.2 Alarm Stations

a. Inspection Scope (81700)

The alarm stations were inspected to determine compliance with the requirements of the security plan. The areas inspected included the requirements and capabilities of the alarm stations, redundancy and diversity of stations, protection of the alarm stations, and systems security.

b. Observations and Findings

The inspector verified the redundancy and diversity of the alarm stations. Action by one alarm station operator could not reduce the effectiveness of the security systems without the knowledge of the other alarm station operators. The central alarm station and secondary alarm station were bullet resistant. The inspector questioned the station

operators and determined that they were properly trained and knowledgeable of assigned duties.

c. Conclusions

The security alarm stations were redundant and well protected. Alarm station operators were alert and well trained.

S1.3 Communications

a. Inspection Scope (81700)

The communication capabilities were inspected to determine compliance with the requirements of the security plan. The areas inspected included the operability of radio and telephone systems, and the capability to effectively communicate with the local law enforcement agencies through both of the systems.

b. Observations and Findings

The inspector verified that the licensee had adequate radio and telephone systems capable of meeting all communication requirements of the security organization. The licensee maintained an adequate number of portable radios and batteries for use by members of the security organization.

c. Conclusions

The security radio and telephone communication systems were reliable. An adequate number of portable radios were available for members of the security organization.

S1.4 Protected Area Access Control of Personnel, Packages, and Vehicles

a. Inspection Scope (81700)

The access control program for personnel, packages, and vehicles was inspected to determine compliance with the requirements of the security plan.

b. Observations and Findings

Through observations at the main guard station and the vehicle sallyport, the inspector determined that the licensee properly controlled access of personnel, packages, and vehicles to the protected area. The protected area access control equipment was inspected and found to be functional and well maintained. The inspector also observed use of the X-ray machine and package and material searches. The operators were efficient and well trained. (Note: During the inspection, the secondary guard station was closed.)

c. Conclusions

An effective program for searching personnel, packages, and vehicles was maintained. Equipment operators were efficient and well trained.

S2 Status of Security Facilities and Equipment

S2.1 Assessment Aids

a. Inspection Scope (81700)

The inspector reviewed the assessment aids to determine compliance with the physical security plan. The areas inspected included the closed-circuit television monitors located in the alarm stations.

b. Observations and Findings

Through observation, the inspector determined that the closed-circuit television cameras were positioned to ensure proper coverage of the perimeter alarm zones, and that the overall assessment aids system was effective. The cameras produced a very good resolution. Through interviews, the inspector determined that prompt maintenance support was provided to ensure that system problems were corrected in a timely manner. The licensee has approved the installation of a video capture system. When installed, this system should enhance the licensee's ability to immediately identify the cause of perimeter security alarms.

c. Conclusions

Assessment aids provided effective assessment of the perimeter detection zones.

S3 Security and Safeguards Procedures and Documentation

S3.1 Security Program Plans and Procedures

a. Inspection Scope (81700)

The physical security plan and the implementing procedures were inspected to determine compliance with the requirements of 10 CFR 50.54(p) and the physical security plan. Additionally, the inspector reviewed the Operational Safeguards Response Evaluation (OSRE) report dated December 6, 1994.

b. Observations and Findings

The inspector determined that previous plan changes were submitted to the NRC within the required time frame, and the changes did not reduce the effectiveness of the plan. The inspector reviewed four implementing procedures for adequacy, verified that the licensee maintained an effective management system for the development and

administration of procedures, and verified that changes to the procedures did not reduce the effectiveness of the security program.

c. Conclusions

Changes to security plans were reported within the required time frame and properly implemented in accordance with 10 CFR 50.54(p). Implementing procedures met the performance requirements in the physical security plan.

S3.2 Security Event Logs

a. Inspection Scope (81700)

The inspector reviewed safeguards event logs and security incident reports to determine compliance with the requirements of 10 CFR 73.21(b) and (c), 10 CFR 26.73, and the physical security plan.

b. Observations and Findings

The inspector reviewed the safeguards event logs from August 1, 1998, through April 15, 1999. The records were available for review and maintained for the time required by regulations. The inspector determined that the licensee conformed to the regulatory requirements regarding the reporting of security events. The inspector also reviewed three security incident reports. The logs and supporting reports were accurate and neat. The licensee's records included trending and analysis of events.

c. Conclusions

A very good program for reporting security events was in place. The security staff was correctly reporting security events.

S6 Security Organization and Administration

S6.1 Management Support

a. Inspection Scope (81700)

The effectiveness and adequacy of management support were inspected to determine the degree of management support for the physical security program.

b. Observations and Findings

By discussions with security force personnel, the inspector determined that the security program received very good support from senior management as demonstrated by good morale of the security organization, continued timely repair of security equipment, and scheduled improvements to security equipment. The inspector determined that the security program was implemented by a trained and qualified security staff. All

members of the security organization had a clear understanding of assigned duties and responsibilities.

c. Conclusions

Senior management support for the security organization was very good. The security program was implemented by a well trained and highly qualified staff.

S6.2 Staffing Levels

a. Inspection Scope (81700)

The staffing level of the security organization was evaluated to determine compliance with the requirements of the physical security plan. Additionally, the inspector reviewed the OSRE report dated December 6, 1994.

b. Observations and Findings

Based on discussions with security supervisors and reviews of security shift personnel rosters, the inspector determined that the minimum number of on-duty armed security response personnel met the requirements of the physical security plan. However, a concern was identified regarding the difference between the number of armed responders committed to in the physical security plan and the additional number of armed response personnel used during the 1994 OSRE.

The following regulations apply to this concern:

- 10 CFR 73.55(a) (general performance requirements) requires, in part, that licensee physical protection systems be designed to protect against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a).
- To meet the 10 CFR 73.55 design basis threat, Section 1.4.2 of the licensee's industrial security plan identified, in part, that the security force was comprised of X armed security (response) personnel (specific number is safeguards information) per shift. This number is in addition to the security shift commander, and the personnel manning the central and secondary alarm stations.
- Section 7 of the licensee's industrial security plan, Revision 38, required, in part, that Entergy Operations, Inc., was prepared to meet the Commission's requirements in 10 CFR 73.55(a).
- Section 9 of the licensee's industrial security plan, Revision 38, stated, in part, that the security program met "the general performance requirements stated in 10 CFR 73.55(a)."

From October 31 to November 3, 1994, the NRC's Office of Nuclear Reactor Regulation (NRR) performed an OSRE at the Arkansas Nuclear One, Units 1 and 2 facilities dated December 6, 1994. The primary purpose of the OSRE was to evaluate the licensee's

ability to respond to the external threat portion of the design basis threat as required by 10 CFR 73.55(a). During the OSRE, the NRC observed four licensee contingency exercises. In all four exercises, security personnel, armed with contingency weapons, responded to interdict the adversaries. During the OSRE, the licensee elected to utilize four additional (X+4) armed security response personnel per shift. This was four more armed response personnel than required by the industrial security plan. The licensee's overall protective strategy was based on its total number of armed response personnel (X+4) positioned at specific locations inside the protected area.

During the inspection, the inspector discussed with the licensee, the difference between the number of armed response personnel required by the security plan (X armed personnel) and the number of armed response personnel utilized during the OSRE (X+4 armed personnel). Based on the results of the OSRE, the licensee demonstrated it could respond to a design basis threat with X+4 armed response personnel. However, since the industrial security plan only required X armed response personnel, the licensee could reduce its numbers and still remain in compliance, even though the ability to respond to a design basis threat with only X armed response personnel has not been verified. It is important to note that following the OSRE, the licensee has continued to maintain an on-duty shift strength of X+4 armed response personnel.

During the exit meeting on April 30, 1999, the inspector discussed the difference between the industrial security plan and the number of armed response officers employed during the 1994 OSRE. In response, the licensee's Vice President, Operations, stated that a change to the industrial security plan was not planned because of the upcoming renewal (reorganization) efforts and attendance at an upcoming OSRE public meeting at NRC headquarters in Bethesda, Maryland, on May 5, 1999. This concern will be reviewed during a subsequent security inspection (IFI 50-313; -368/9907-01).

c. Conclusions

On-shift staffing of security armed response personnel was in accordance with the minimum requirements of the industrial security plan. An inspection followup item was identified involving the difference between the number of armed responders committed to in the industrial security plan and the additional number of armed response personnel used during the 1994 OSRE. During the OSRE, the licensee successfully demonstrated its ability to defend against the design basis threat.

S7 Quality Assurance in Security and Safeguards Activities

S7.1 Security Program Audits

a. Inspection Scope (81700)

The audits of the security program were reviewed to determine compliance with the requirements of 10 CFR 50.54(p) and the physical security plan.

b. Observations and Findings

The inspector verified that security program, access authorization, and fitness-for-duty audits were conducted at the required intervals. The inspector reviewed the nine audit and surveillance reports listed in the attachment. The inspector interviewed audit personnel and confirmed that they were independent of plant security management and plant security management supervision.

The inspector determined that the audits of the security plan, contingency plan, access authorization program, and fitness-for-duty program were performance based.

c. Conclusions

The audits of the security program, the access authorization program, and the fitness-for-duty program were conducted at the required intervals and were performance based.

S8 Miscellaneous Security and Safeguards Issues (92700 and 92904)

S8.1 (Closed) Licensee Event Report 98-S02-00: Uncontrolled Weapon Inside the Protected Area

In accordance with 10 CFR 73.71(d) and Paragraph I(a)(3) of Appendix G to 10 CFR Part 73, the licensee reported to the NRC that during the conduct of a security drill, the thumb-snap on the holster of a security officer participating in the drill became unfastened and allowed the handgun to become dislodged and fall to the turbine building floor. An individual from the operations department discovered the weapon and notified security officers in the area. The weapon was immediately retrieved, and the drill was terminated so that accountability of all officers and weapons could be made. The weapon was unattended for approximately 3 minutes. The weapon was found in good condition with all ammunition accounted for.

The licensee's investigation and root cause analysis determined that the holster and snaps were in good condition and that the officer had failed to self-check to insure that the weapon remained secure in the holster. Prior to the drill, the security officer had been sitting in a chair when drill conditions required response to a preassigned position. It was determined the thumb-break snap on the holster became unfastened when it brushed against the arm of the chair.

The licensee's corrective actions included briefing all security officers on the situation and reminding them of weapon retention techniques. Additionally, the licensee's predrill notification sign-off sheet has been revised to add a reminder for all personnel to check weapons and holsters when responding to a drill or an event.

S8.2 (Closed) Licensee Investigation Report: False Negative Blind Amphetamine Specimen

In accordance with 10 CFR Part 26, Appendix A, Subpart B, 2.8(e)(4), the licensee's February 25, 1999, letter reported to the NRC that its HHS-certified laboratory,

Northwest Technologies, Inc., (NWT) had identified a blind "positive" urine specimen as being "negative."

The licensee's investigation determined that on January 20, 1999, as part of its routine blind performance drug testing program, a spiked sample certified as "positive" for amphetamine was introduced into the testing program. The licensee's on-site test determined that the blind specimen was "positive" for amphetamines. On January 22, 1999, NWT notified the licensee that a blind sample from the same certified lot had tested "negative." The licensee requested that NWT investigate its incorrect identification of a blind quality control drug sample.

On January 27, 1999, NWT reported to the licensee that initial (immunoassay) screening for a 5-drug panel determined that the blind specimen was "negative" for all drugs tested. However, NWT had identified the presence of amphetamines just beneath the cutoff level of 1000 ng/ml. In response to its failure to identify the blind sample as "positive," NWT analyzed the specimen by GC/MS (Gas Chromatography/Mass Spectroscopy) and determined that it contained 236 ng/ml of amphetamine and 900 ng/ml of methamphetamine, a sufficient concentration to produce a "positive" screening result.

Additionally, NWT reported that they had previously introduced the substance periodate in their screening reagent in order to minimize the number of false negative results due to the presence of over-the-counter amphetamines-like compounds. NWT rescreened the blind specimen by immunoassay using reagents which did not contain periodate and identified the specimen as "positive" for amphetamines. The screening value was just over the cutoff level.

NWT reported to the licensee that effective February 1, 1999, the amphetamine screening procedure had been changed at the laboratory and that periodate was no longer being used. The licensee's subsequent blind (positive) specimens have confirmed the accuracy of NWT's revised screening procedure.

S8.3 Information Notice 98-35: Threat Assessments and Consideration of Heightened Physical Protection Measures

Information Notice 98-35 dated September 4, 1998, was issued to inform licensees of factors considered by the NRC when assessing threats and disseminating that information to the licensees. Additionally, the Notice advised licensees about additional physical protection measures that should be considered for specific threat conditions. The notice discussed threat levels and appropriate response levels in an effort to avoid any future misunderstandings concerning NRC threat advisories and to facilitate an appropriate and comparable level of physical protection response throughout the nuclear industry.

During this inspection, the licensee stated they had received the Notice and had reviewed it for applicability. The licensee had incorporated this notice into Security Procedure 1043.042, "Response to Contingencies."

S8.4 Information Notice 99-08: Urine Specimen Adulteration

Information Notice 99-08: "Urine Specimen Adulteration," dated March 26, 1999, was issued to remind licensees of a recent attempt by an employee at a nuclear power plant (Arkansas Nuclear One) to circumvent fitness-for-duty (FFD) testing. During preaccess FFD testing, a contract employee unsuccessfully attempted to adulterate a urine specimen with a commercially available substance containing pyridium chlorochromate. This licensee now requires its contracted HHS-certified laboratory to test for adulterants in all specimens that it forwards for confirmation. This information notice also reminded licensees of 10 CFR 26.24 which requires, in part, that chemical testing programs provide a means to deter and detect substance abuse.

During this inspection, the licensee stated it had recently received the Notice and recognized that it discussed corrective action for an event that had occurred at Arkansas Nuclear One. The licensee stated that the corrective actions identified in this Notice remain in effect at Arkansas Nuclear One.

V. Management Meetings

XI Exit Meeting Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on April 30, 1999. The licensee acknowledged the findings presented.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

R. Hutchinson, Vice President, Operations
C. Anderson, General Manager, Plant Operations
G. Ashley, Supervisor, Licensing
R. Bement, Plant Manager, Unit-2
H. Cooper, Manager, Corporate Security
D. Denton, Director, Plant Support
T. Dietrich, Manager, Maintenance
M. Higgins, Supervisor, Security Operations
W. James, Manager, Outages, Planning and Scheduling
D. James, Manager, Nuclear Safety
K. Jeffery, Coordinator, Security Compliance
J. Kowaleski, Acting Plant Manager Unit-1
R. Lane, Director, Design Engineering
T. Morrison, Superintendent, Modifications
S. Pyle, Licensing Specialist
R. Sears, Senior Lead Security Coordinator, Corporate Security
K. Tate, Supervisor, Security Access Authorization
J. Vandergrift, Director, Nuclear Safety
P. Weaver, Auditor, Quality Assurance
H. Williams, Jr., Superintendent, Plant Security

Contractors

E. Gray, Security Shift Commander
K. Hubbard, Project Manager, The Wackenhut Corporation
J. Mills, Director, Nuclear Operations, The Wackenhut Corporation
R. Roach, Security Shift Commander, The Wackenhut Corporation

NRC

K. Weaver, Resident Inspector

INSPECTION PROCEDURES USED

IP 81700	Physical Security Program for Power Reactors
IP 92700	Onsite Followup of Written Reports of Non-Routine Events at Power Reactor Facilities
IP 92904	Follow-up - Plant Support

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Items Opened

50-313;-368/9907-01 IFI Number of Armed Response Officers

Items Closed

50-313;-368/98-S02 LER Uncontrolled Weapon Inside Protected Area

50-313;-368 FFD False Negative Blind Amphetamine Specimen

LIST OF DOCUMENTS REVIEWED

Safeguards Event Log from August 1, 1998, through April 15, 1999, and analysis data

Background investigation records for seven individuals granted unescorted access authorization

Three security incident reports

Licensee Audits and Surveillance Reports

Quality Assurance Surveillance SR 022-99, "Security - Entry Control," dated April 13, 1999

Quality Assurance Surveillance SR 018-99, "Plant Access terminations," dated March 29, 1999

Quality Assurance Audit, QAP-23-99; "ANO Security Program," dated March 2, 1999

Quality Assurance Surveillance, AR 034-98, "Security Safeguards Information/Personnel," dated January 27, 1999

Entergy audit of Career Check dated November 30, 1998

Quality Assurance Audit QAP 7-98, "Fitness for Duty and Access Authorization," dated August 31, 1998

Entergy audit of Choice Point dated August 20, 1998.

Quality Assurance Audit QAP 10-98, "Corrective Action Audit," dated July 13, 1998

Quality Assurance Surveillance SR 017-98, "Badge Terminations," dated July 7, 1998

Industry Audit Reports of Self Screening Contractors

NEI audit report of ABB Engineering dated April 21, 1998

NEI audit report of Framatome dated September 21, 1998

NEI audit report of General Electric dated August 27, 1998

NEI audit report of INPO dated February 1998

NEI audit report of Numanco dated July 1998

NEI audit report of Westinghouse dated August 1998

Security Procedures

Arkansas Nuclear One Procedure 1000.019, "Station Security Requirements," Revision 31

Arkansas Nuclear One Procedure 1043.002, "Access Control," Revision 52

Arkansas Nuclear One Procedure 1043.003, "Guard Screening, Responsibilities and Duties,"
Revision 30

Arkansas Nuclear One Procedure 1043.042, "Response to Contingencies," Revision 1