

Indiana Michigan  
Power Company  
Cook Nuclear Plant  
One Cook Plant  
Bridgman, MI 49106  
616 465 5901



December 20, 1999

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Operating License DPR-58  
Docket No. 50-315

Document Control Manager:

In accordance with the criteria established by 10 CFR 73, Appendix G, paragraph I (b) and 10CFR73.71 (d), the following interim report is being submitted:

LER 315/99-S004-00, "Intentionally Falsifying Documentation Results in Unauthorized Unescorted Access".

No new commitments were identified in this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Christopher Bakken, III'. The signature is fluid and cursive.

A. Christopher Bakken, III  
Site Vice President

/mbd  
Attachment

c: J. E. Dyer, Region III  
R. C. Godley  
D. Hahn  
W. J. Kropp  
R. P. Powers  
R. Whale  
Records Center, INPO  
NRC Resident Inspector

IR74

PDR ADDON 05000315

|   |   |
|---|---|
| <b>NRC FORM 366</b> U.S. NUCLEAR REGULATORY COMMISSION<br>(6-1998)<br><br><b>LICENSEE EVENT REPORT (LER)</b><br><br>(See reverse for required number of digits/characters for each block) | <b>APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001</b><br><br><small>Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small> |
|---|---|

|   |   |                               |
|---|---|-------------------------------|
| <b>FACILITY NAME (1)</b><br><br>Cook Nuclear Plant Unit 1 | <b>DOCKET NUMBER (2)</b><br><br>05000-315 | <b>PAGE (3)</b><br><br>1 OF 3 |
|---|---|-------------------------------|

**TITLE (4)**  
 Intentionally Falsifying Documentation Results in Unauthorized Unescorted Access

| EVENT DATE (5) |     |      | LER NUMBER (6) |                   |          | REPORT DATE (7) |     |      | OTHER FACILITIES INVOLVED (8) |               |
|----------------|-----|------|----------------|-------------------|----------|-----------------|-----|------|-------------------------------|---------------|
| MONTH          | DAY | YEAR | YEAR           | SEQUENTIAL NUMBER | REVISION | MONTH           | DAY | YEAR | FACILITY NAME                 | DOCKET NUMBER |
| 11             | 18  | 1999 | 1999           | S004              | 00       | 12              | 20  | 1999 | Cook Nuclear Plant Unit 2     | 05000-316     |
|                |     |      |                |                   |          |                 |     |      | FACILITY NAME                 | DOCKET NUMBER |
|                |     |      |                |                   |          |                 |     |      |                               |               |

|                           |    |  |  |                   |  |                  |  |                   |  |   |
|---------------------------|----|--|--|-------------------|--|------------------|--|-------------------|--|---|
| <b>OPERATING MODE (9)</b> | -  | <b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b> |  |                   |  |                  |  |                   |  |   |
|                           |    | 20.2201(b)   |  | 20.2203(a)(2)(v)  |  | 50.73(a)(2)(i)   |  | 50.73(a)(2)(viii) |  |   |
| <b>POWER LEVEL (10)</b>   | 0% | 20.2203(a)(1)  |  | 20.2203(a)(3)(i)  |  | 50.73(a)(2)(ii)  |  | 50.73(a)(2)(x)    |  |   |
|                           |    | 20.2203(a)(2)(i)   |  | 20.2203(a)(3)(ii) |  | 50.73(a)(2)(iii) |  | X 73.71           |  |   |
|                           |    | 20.2203(a)(2)(ii)  |  | 20.2203(a)(4)     |  | 50.73(a)(2)(iv)  |  |                   |  | OTHER   |
|                           |    | 20.2203(a)(2)(iii)   |  | 50.36(c)(1)       |  | 50.73(a)(2)(v)   |  |                   |  | Specify in Abstract below or in NRC Form 366A |
|                           |    | 20.2203(a)(2)(iv)  |  | 50.36(c)(2)       |  | 50.73(a)(2)(vii) |  |                   |  |   |

**LICENSEE CONTACT FOR THIS LER (12)**

|                                       |   |
|---------------------------------------|---|
| <b>NAME</b>                           | <b>TELEPHONE NUMBER (Include Area Code)</b> |
| Ms. MB Depuydt, Regulatory Compliance | (616) 465-5901 X 1589                       |

**COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)**

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|--------------|--------------------|-------|--------|-----------|--------------|--------------------|
|       |        |           |              |                    |       |        |           |              |                    |
|       |        |           |              |                    |       |        |           |              |                    |

|   |   |    |  |                 |     |      |
|---|---|----|--|-----------------|-----|------|
| <b>SUPPLEMENTAL REPORT EXPECTED (14)</b>  |   |    |  | <b>EXPECTED</b> |     |      |
| <input type="checkbox"/> YES<br><small>(If yes, complete EXPECTED SUBMISSION DATE).</small> | X | NO |  | MONTH           | DAY | YEAR |
|   |   |    |  |                 |     |      |

**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)**

On September 16, 1999, unescorted access was granted to an individual based upon information provided under a temporary background check. On November 18, 1999, fingerprint information was received which led the licensee to the conclusion that the individual would not have been granted unescorted access, due to the falsification of information. This was determined to be reportable as an actual entry of an unauthorized person into a protected area. An Emergency Notification System (ENS) one-hour report under 10CFR73.71 was made at 1222 hours EDT on November 18, 1999.

The cause of this event was personnel error for failing to recognize the disparity between social security numbers (SSN) upon receipt of the individual's credit history check results. The individual's badge was placed on hold upon receipt of the criminal history check and unescorted access was denied on November 18, 1999. Changes were implemented to insure that the Integrated Nuclear Security System (INSS) and PADS are checked for both the claimed SSN and the person's name. SSNs will be verified throughout the background report as well as on the credit report.

The individual had been authorized Protected Area only unescorted access. A review of work showed that badged co-workers and the supervisor monitored the individual's duties, which were non-technical in nature. A report from the security computer system identified the individual accessed the Protected Area on five separated occasions from September 17, 1999 to November 11, 1999. Since the individual did not have access to vital areas, there were minimal implications to the health and safety of the public as a result of this event.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

| FACILITY NAME (1)         | DOCKET (2)<br>NUMBER (2) | LER NUMBER (6) |                      |                    | PAGE (3) |
|---------------------------|--------------------------|----------------|----------------------|--------------------|----------|
| Cook Nuclear Plant Unit 1 | 05000-315                | YEAR           | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER | 2 OF 3   |
|                           |                          | 1999           | S004                 | 00                 |          |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**Conditions Prior To Event**

Unit 1 was Defueled  
Unit 2 was Defueled

**Description Of The Event**

On January 20, 1999, using social security number (SSN) # 1, an individual was denied unescorted access at D. C. Cook (CNP) to work for a CNP contractor. A review of the individual's unescorted access record in the Personnel Access Database System (PADS) revealed the individual had previously been denied unescorted access at another nuclear power plant due to intentional falsification of information.

On September 2, 1999, a different contractor submitted a request to process the same individual for unescorted access to the CNP, providing a different social security number (SSN # 2) for the individual. On September 8, 1999, the individual reported to the site for processing and provided yet another social security number (SSN # 3) and a passport as proof of identification. Access Control personnel noted the difference in SSNs provided by the contractor and the individual and deferred to the number provided by the individual at the time of inprocessing. Access Control reviewed the PADS and noted no record existed for the individual using that SSN. Upon completion of required activities, which included a credit history check, the individual was granted Protected Area only unescorted access to the plant on September 16, 1999. This temporary unescorted access was granted pending completion of a full background investigation, including a criminal history check.

On November 18, 1999, Access Control personnel received the individual's criminal history check, processed using social security number # 3, and discovered the report listed criminal history information not previously disclosed on September 8, 1999. Upon discovering this anomaly, Access Control personnel placed the individual's security badge on administrative hold pending further review.

Further investigation by Access Control personnel determined this was the same individual previously denied unescorted access to CNP on January 20, 1999. The individual had apparently provided different SSNs to Access Authorization personnel in an effort to obtain unescorted access on September 16, 1999. In addition to not disclosing any criminal history information, the individual also failed to disclose prior unescorted access denials of November 4, 1998 at another nuclear facility and January 20, 1999 at CNP.

**Cause Of The Event**

The cause of this event was personnel error. Access Control personnel did not recognize the disparity between social security numbers upon receipt of the individual's credit history check results. The credit report stated that the individual's name and SSN did not match. Had this disparity been recognized, the individual would not have been granted unescorted access on September 16, 1999.

**Analysis Of The Event**

On November 18, 1999, fingerprint information was received which led to the conclusion that the individual would not have been granted unescorted access, due to the falsification of information. This was determined to be reportable as an actual entry of an unauthorized person into a protected area in accordance with Generic Letter 91-03. An ENS one-hour report under 10CFR73.71 was made to NRC at 1222 hours EDT on the same day.

A check of the claimed SSN and person's name in the Integrated Nuclear Security System (INSS) and PADS for all badged individuals at CNP determined that the extent of condition was isolated to the individual identified in this event.

The individual had been authorized Protected Area only unescorted access. A review of work showed that badged co-workers and the supervisor monitored the individual's duties, which were non-technical in nature. A report from the security computer system identified the individual accessed the Protected Area on five separated occasions from September 17, 1999 to November 11, 1999. Since the individual did not have access to vital areas, there were minimal implications to the health and safety of the public as a result of this event.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

| FACILITY NAME (1)         | DOCKET (2)<br>NUMBER (2) | LER NUMBER (6) |                      |                    | PAGE (3) |
|---------------------------|--------------------------|----------------|----------------------|--------------------|----------|
| Cook Nuclear Plant Unit 1 | 05000-315                | YEAR           | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER | 3 OF 3   |
|                           |                          | 1999           | S004                 | 00                 |          |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**Corrective Actions**

The individual's badge was placed on hold upon receipt of the criminal history check on November 18, 1999. At the conclusion of further review by Access Control, the individual's unescorted access was denied on November 18, 1999. An "additional information" entry dated November 18, 1999 for the individual was made in PADS by Access Control personnel to indicate an unfavorable access denial. The individual was terminated by the CNP contractor.

The involved individuals were counseled in accordance with company policies and procedures. Expectations relative to inprocessing attention to detail were immediately reinforced by the responsible supervisor. This was followed by a formal memo outlining those expectations to all inprocessing personnel who perform these types of reviews. Changes were implemented to ensure that the Integrated Nuclear Security System (INSS) and PADS are checked for both the claimed SSN and the person's name. Changes were also implemented to ensure that during review of the background report, the SSNs are verified throughout the report as well as on the credit report.

**Similar Events**

315/94-S001-00