

November 9, 2000

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: BRAIDWOOD - NRC INSPECTION REPORT 50-456/00-16(DRS);
50-457/00-16(DRS)

Dear Mr. Kingsley:

On October 20, 2000, the NRC completed a routine inspection at your Braidwood Nuclear Power Station. The results were discussed on October 20, 2000, with Mr. Tulon and members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commission's rules and regulations and with the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observation of activities, and interviews with personnel. Specifically, this inspection focused on performance involving physical protection performance indicator verification, implementation of a revision to the security plan, access authorization and behavioral observation and access control.

Based on the results of the inspection, one issue of very low safety significance (Green) was identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. *ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html>* (the Public Electronic Reading Room).

O. Kingsley

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

Sincerely,

/RA/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

Docket Nos. 50-456; 50-457
License Nos. NPF-72; NPF-77

Enclosure: Inspection Report 50-456/00-16(DRS);
50-457/00-16(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President, Nuclear Operations
H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
T. Tulon, Site Vice President
K. Schwartz, Station Manager
T. Simpkin, Regulatory Assurance Supervisor
M. Aguilar, Assistant Attorney General
State Liaison Officer
Chairman, Illinois Commerce Commission

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-456; 50-457
License Nos: NPF-72; NPF-77

Report No: 50-456/00-16(DRS); 50-457/00-16(DRS)

Licensee: Commonwealth Edison Company

Facility: Braidwood Nuclear Plant, Units 1 and 2

Location: 35100 South Route 53
Suite 84
Braceville, IL 60407-9617

Inspection Dates: October 16 - 20, 2000

Inspector: James Belanger, Senior Physical Security Inspector

Observer: Donald Funk, Physical Security Inspector

Approved by: James R. Creed, Safeguards Program Manager
Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas) reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety

- Occupational
- Public

Safeguards

- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR 05000456-00-16(DRS); 05000457-00-16(DRS); on 10/16-20/2000, Commonwealth Edison, Braidwood Nuclear Power Plant, Units 1 and 2; Access Controls and Problem Identification and Resolution.

The inspection was conducted by a regional security specialist. The inspection identified one green issue, which was determined not to be a violation of the security plan. The significance of the issue is indicated by its color (green) and was determined by the Significance Determination Process.

Cornerstone: Physical Protection

Green. The NRC determined that the licensee did not have a drill and exercise program to test certain personnel to provide a high probability of detecting contraband items during searches from being introduced into the protected area via a specific point. The licensee's Appendix B security drill and exercise program applied only to other personnel (Section 3PP2.b.1).

The inspector reviewed the risk significance of this finding and found the risk to be very low since there were no actual intrusions and there have not been greater than two similar findings in four quarters.

Report Details

3. SAFEGUARDS

Cornerstone: Physical Protection

3PP1 Access Authorization (AA) (Behavior Observation)

a. Inspection Scope

The inspector interviewed four supervisors and six non-supervisors (both licensee and contractor employees) to determine their knowledge of fitness-for-duty and behavior observation responsibilities. Procedures pertaining to the Behavior Observation Program and fitness-for-duty semi-annual test result reports were also reviewed.

The inspector reviewed a sample of the licensee's records to verify the implementation of the licensee's identification and resolution of problems program. Specifically, three self-assessments, and three calendar quarters of logged security events were reviewed.

Additionally, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

No findings of significance were identified.

3PP2 Access Control (Identification, Authorization and Search of Personnel, Packages, and Vehicles)

a. Inspection Scope

The inspector reviewed the licensee's protected area access control testing and maintenance procedures. The inspector observed licensee testing of all access control equipment to determine if testing and maintenance practices were performance based. On two occasions during peak ingress periods, the inspector observed in-processing search of personnel, packages, and vehicles to determine that search practices were conducted in accordance with regulatory requirements. Interviews were conducted and records were reviewed to verify that staffing levels were consistently implemented. Also the inspector reviewed the licensee's process for limiting access to only authorized personnel to the protected area or vital equipment by a sample review of quarterly access authorization reviews performed by managers. The inspector reviewed the licensee's program to control hard-keys and computer input of security-related personnel data.

The inspector reviewed a sample of licensee self-assessments, audits and security logged events (see attached list of documents reviewed). In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

a. Findings

- (1) (Green) During the inspector's review of the Appendix B security drill and exercise program, the inspector identified the concern that the drills and exercises did not include several of the Appendix B trained and qualified personnel who perform package searches at a specific control point. The risk significance of this issue is that the licensee's Appendix B drill and exercise program does not test the performance of those personnel and thus does not provide a high probability of detecting contraband items in packages being introduced into the Protected Area. The licensee chose to add this issue to their correction action program (Condition Report No. A2000-03952). The significance of the issue is indicated by its color (green) and was determined by the Significance Determination Process.

3PP4 Security Plan Changes (71130.04)

a. Inspection Scope

The inspector reviewed Revisions 49 and 50 of the Braidwood Station Security Plan which were submitted by licensee letters dated July 27 and October 18, 2000, respectively to verify that the changes did not decrease the effectiveness of the security plan. The security plan revisions were submitted in accordance with 10 CFR 50.54(p).

b. Findings

No findings of significance were identified.

Open Unresolved Item 254/265/00-14-03: Revision 49 contained a clarification to the definition of bullet resistant that included a height limitation. The change was made by the licensee to all of their nuclear stations security plans. During NRC's review of the Quad Cities Security Plan Revision 47, (NRC Inspection Report 50-254/2000014(DRP); 50-265/2000014(DRP)), NRC identified that this new limitation was not included in NRC guidance documents. Discussions among NRC headquarters staff, the licensee's staff, and Region III inspectors resulted in the conclusion that this new limitation was unnecessary. This issue was discussed with the licensee on September 27, 2000, and the licensee agreed to resubmit a plan change that will eliminate the bullet-resisting height limitation for all of their security plans. This issue is being tracked as an unresolved item until the removal of the height limitation from the security plans under the Quad Cities docket numbers 50-254/00-14-03; 50-265/00-14-03.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspector verified the data for the Physical Protection Performance Indicators (PI) pertaining to Fitness-For-Duty Personnel Reliability, Personnel Screening Program, and Protected Area Security Equipment. Specifically, a sample of plant reports related to

security events, fitness-for-duty reports, and other applicable security records were reviewed for the period between September 1999 and September 2000.

b. Findings

No findings of significance were identified.

40A6 Management Meetings

Exit Meeting Summary

The inspector presented the inspection results to Mr. T. Tulon and other members of the licensee staff at the conclusion of the inspection on October 20, 2000. The personnel present acknowledged the findings presented. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

- T. Tulon, Site Vice President
- G. Baker, Security Manager
- R. Davis, Operations Coordinator, The Wackenhut Corporation (TWC)
- T. Hakey, Security Shift Supervisor, TWC
- J. Harvey, Nuclear Oversight
- R. Mau, Security Analyst
- P. O'Brien, Site Security Force Manager, TWC
- D. Pallansch, Manager, Training and Compliance, TWC
- T Saksefski, Nuclear Oversight, TWC
- B. Saunders, Supervisor, Nuclear Security Operations
- T. Simpkin, Regulatory Assurance Manager
- K. Schwartz, Station Manager
- D. Turner, Security Analyst
- H. Walker, Training Coordinator, TWC

NRC

- C. Phillips, NRC Region III Senior Resident Inspector
- N. Shah, NRC Region III Resident Inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

CFR	Code of Federal Regulation
DRP	Division of Reactor Projects
DRS	Division of Reactor Safety
TWC	The Wackenhut Corporation

PARTIAL LIST OF DOCUMENTS REVIEWED

Semi Annual FFD Reports for Periods ending December 31, 1999, June 30, 2000
NGG Training Module FFD(General Employee Training) Revision 5, dated August 2000
ComEd Procedure: "Control of Security Keys and Cores," SY-AA-101-120, Revision 0
ComEd Nuclear General Employee Training Study Guide, Revision 23, June 2000
NGG Security Training Program, Appendix B Drill Program, Training Module APPC, dated
June 30, 1999
Nuclear Oversight Assessment NOA-20-99-017 (Assessment of Security and Fitness-For-Duty)
Braidwood Station Security Focus Area SelfAssessment (Access Authorization, Fitness-for-
Duty, Personnel Access Data System) February 28 2000 - April 14, 2000
Braidwood Station Security Focus Area Self Assessment, "Access Control and Security Plan
Changes," August 21, 2000 - September 1, 2000
Records of Appendix B Drills: Fourth Quarter 1999, First, Second, and Third Quarters of 2000
Safeguards Log: Fourth Quarter 1999, First, Second and Third Quarters of 2000
Procedure SY-AA-103-512, Revision 1, Behavior Observation Program
Procedure SY-AA-103-511, Revision 3, Request for Unescorted Access
Quarterly Unescorted Access List and Authorization Matrix Review, September 2000