



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

PROPRIETARY INFORMATION

June 17, 2004

Gregory M. Rueger, Senior Vice
President, Generation and
Chief Nuclear Officer
Pacific Gas and Electric Company
Diablo Canyon Power Plant
P.O. Box 3
Avila Beach, CA 93424

**SUBJECT: DIABLO CANYON - NRC PHYSICAL SECURITY LIMITED BASELINE
INSPECTION REPORT 05000275/2004007 and 05000323/2004007**

Dear Mr. Rueger:

This refers to the inspection conducted from May 17 through 20, 2004, at Diablo Canyon Power Plant. The enclosed report presents the results of this inspection, which were discussed with Mr. J. Tomkins, Director, Site Services, and other members of your staff.

This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to compliance with the Commission's rules and regulations, orders, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has identified one issue that was evaluated under the risk significance determination process as having very low safety significance (Green). The NRC has also determined that a violation is associated with this issue. This violation is being treated as a non-cited violation, consistent with Section VI.A of the Enforcement Policy. This non-cited violation is described in the subject inspection report. If you contest the violation or significance of the non-cited violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region IV, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001, and the NRC Resident Inspector at the Diablo Canyon Power Plant facility.

Because this issue involves security-related information, your response will not be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. If Safeguards Information is necessary to provide

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an acceptable response, please provide the level of protection described in 10 CFR 73.21. Otherwise, mark your entire response "Proprietary Information in accordance with 10 CFR 2.390(d)(1)," and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

The material enclosed herewith contains Proprietary Information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material will not be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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

Sincerely,

//RA//

Michael P. Shannon, Chief
Plant Support Branch
Division of Reactor Safety

Dockets: 50-275
50-323
Licenses: DPR-80
DPR-82

Enclosure:
NRC Inspection Report 05000275/2004007 and 05000323/2004007
w/attachment: Supplemental Information (**Proprietary information**)

cc: **without enclosure**
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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Dockets: 50-275, 50-323
Licenses: DPR-80, DPR-82
Report: 05000275/2004007 and 05000323/2004007
Licensee: Pacific Gas and Electric Company
Facility: Diablo Canyon Nuclear Power Plant, Units 1 and 2
Location: Avila Beach, CA
Dates: May 17 - 20, 2004
Inspectors: James R. Larsen, Region IV, Physical Security Inspector
Dennis Schaefer, Contractor
Accompanied by: Martin A. Frato, Region IV, Physical Security Inspector
Approved by: Michael P. Shannon, Chief, Plant Support Branch
Division of Reactor Safety

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SUMMARY OF FINDINGS

IR 05000275/2004007, 05000323/2004007; 05/17 - 20/04; Diablo Canyon Power Plant, Units 1 & 2; Security Limited Baseline Inspection

The report covered a 4-day period of on-site and included in-office inspection by two physical security inspectors. One Green non-cited violation was identified. The significance of most findings are indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Findings for which the Significance Determination Process does not apply may be Green or be assigned a severity level after NRC management review.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Physical Protection

- Green. The inspectors identified a non-cited violation of Item B.1.3 (a) of the Order for Compensatory Measures for Access Authorization in Current Threat Environment (Access Authorization Order), dated January 7, 2003. Access Authorization Order, Item B.1.3 (a), specified, in part, that unless certain codes were received as a reason for rejection, fingerprint cards would be re-submitted to obtain individual criminal history records for review and evaluation. Specifically, there were nine instances in which the licensee failed to re-accomplish and re-submit the fingerprint cards to obtain individual criminal history records. The licensee entered the event into their corrective action program and implemented appropriate corrective actions.

The failure to comply with the requirement identified in the Access Authorization Order is a performance deficiency. The issue was more than minor because it related to the Access Authorization attribute and could affect the cornerstone objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in Access Control, there was no malevolent act, and there were no similar findings in the previous 4 quarters (Section 3PP1).

B. Licensee-Identified Violations

None

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REPORT DETAILS

3. SAFEGUARDS

Cornerstone: Physical Protection (PP)

3PP1 Access Authorization (71130.01)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walk downs of the access authorization spaces.

The inspectors verified that the access authorization program: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; (2) provided high assurance that personnel with unescorted access were trustworthy, reliable, and did not constitute an unreasonable risk to public health and safety, including the potential to commit radiological sabotage; and (3) established a behavioral observation program that provided high assurance of continued reliability and trustworthiness of personnel with unescorted access. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between January 2003 and April 2004 (No licensee event reports were documented).
- Verified the licensee implemented: (a) behavioral observation training; (b) procedures related to behavioral observation training; (c) unescorted access program; and (d) procedures related to the personnel information management system.
- Verified the licensee established an effective access authorization program that: (a) included appropriate categories; (b) verified true identities; (c) conducted suitable inquiries; (d) required psychological evaluations; (e) had anomalous results reviewed by a licensed psychologist or psychiatrist; (f) required FBI criminal history record checks; (g) assessed trustworthiness and reliability; (h) reviewed credit history summaries; (i) evaluated for fraud and misuse of financial identifiers; (j) compared the credit history summary with the personal history questionnaire; and (k) implemented best effort evaluations, as appropriate.
- Verified the licensee implemented an update process that: (a) reviewed employment history; (b) reviewed the length and character of employment; (c) required psychological evaluations; (d) conducted clinical reviews by a licensed psychologist or psychiatrist; (e) conducted inquiries for reinstatement, as required;

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(f) reviewed the criminal history, credit history, and drug test results prior to granting access; and (g) audited contractor/vendor programs with a knowledgeable person.

- Verified the licensee utilized a program to effectively manage a common industry database that: (a) established a method to check on personnel from other facilities; (b) identified personnel denied access; (c) had procedures to address personnel denied access; (d) denied access to personnel who violated NRC requirements; (e) identified personnel who are in a follow-up program; and (f) identified personnel potentially affected by any violation of 10 CFR Part 26.
- Verified the licensee: (a) reinvestigated all personnel having unescorted access and (b) developed, implemented, and maintained similar criteria for individuals performing background investigations.
- Verified the licensee established a behavioral observation program that: (a) ensured recognition of behaviors adverse to the safe operation and security of the facility; (b) documented behavioral observation program training and refresher training; (c) established provisions to train offsite personnel; and (d) validated implementation of the behavior observation program for off-site employees.
- Verified the licensee implemented the following to address an insider threat and verify human reliability: (a) re-assessed and re-approved personnel access lists for vital areas; (b) established controls for vital area access upon existence of a specific, credible insider threat; (c) eliminated temporary unescorted access to the facility; (d) established a program to account for the prescribed attributes of an insider; and (e) established a program that included the prescribed human reliability elements to mitigate the potential for an active insider.
- Verified the licensee developed, implemented, and maintained a personnel information management system that: (a) protected personal and confidential information; (b) protected information stored or transmitted in electronic format; and (c) prohibited unauthorized access and modification of the data without proper authorization.

The inspectors completed 42 of the required 44 samples. The following two samples related to the design basis threat were not inspected since the requirements will be effective on October 29, 2004:

- Established a program to account for the prescribed attributes of an insider.
- Established a program that included the prescribed human reliability elements to mitigate the potential for an active insider.

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b. Findings

Failure to submit required information

Introduction. The inspectors identified a non-cited violation of Item B.1.3 a) of the Order for Compensatory Measures for Access Authorization in Current Threat Environment (Access Authorization Order), dated January 7, 2003. Access Authorization Order, Item B.1.3 a), specified, in part, that unless certain codes were received as a reason for rejection, fingerprint cards would be re-submitted to obtain individual criminal history records for review and evaluation. Specifically, there were nine instances in which the licensee failed to re-accomplish and re-submit the fingerprint cards to obtain individual criminal history records. The licensee entered the event into their corrective action program and implemented appropriate corrective actions.

Description. The inspectors requested records of individuals in which information needed to obtain a criminal history check had been submitted to the Federal Bureau of Investigation (FBI) and rejected for the period between August 2003 and April 2004. During this time frame, ten records were rejected by the FBI. In all cases the reports from the FBI contained descriptions why the information was rejected. The licensee was required to re-accomplish and re-submit the fingerprint cards to the FBI for all but one of the records reviewed. The licensee did not re-submit the forms as required for the nine individuals. Instead, the licensee chose an alternate method which was not authorized by the Access Authorization Order, to be used for the rejection codes cited by the FBI. The inspectors determined that the nine individuals accessed the protected area.

Analysis. The failure to comply with the requirement identified in the Access Authorization Order is a performance deficiency. The issue was more than minor because it related to the Access Authorization attribute and could affect the cornerstone objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in Access Control, there was no malevolent act, and there were no similar findings in the previous 4 quarters.

Enforcement. Access Authorization Order, Item B.1.3 a), and Procedure OMD11.DC1, "Process for Unescorted Access Authorization," Section 6.7.7.(a).1, specified certain conditions requiring forms to be re-accomplished and re-submitted. Contrary to these requirements, on nine occasions the licensee failed to re-submit the information specified. The licensee implemented appropriate corrective action and entered this event into their corrective action program (Action Request A0611505). This violation is being treated as a Green non-cited violation, consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000275; 0500323/2004007-01, Failure to re-submit required forms.

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3PP2 Access Control (71130.02)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walk downs of the personnel, package, and vehicle access points into the protected area.

The inspectors verified the access control program: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; (2) established control measures and equipment to detect and prevent the introduction of contraband into the protected area; and (3) ensured that only personnel who were properly screened were granted unescorted access to the protected and vital areas. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between January 2003 and April 2004 (No licensee event reports were documented).
- Verified the licensee: (a) developed procedures to block badges for suspended personnel; (b) ensured security personnel remained familiar with the steps for denying access; (c) did not establish procedures that reduced the effectiveness of the security plans; and (d) established measures to protect badging activities conducted outside the protected area.
- Verified for package, personnel, and vehicle searches that the licensee: (a) established effective implementing procedures; (b) ensured collateral duties did not adversely impact the security officers' ability to perform their primary duties; (c) provided sufficient staffing; and (d) established appropriate processes for items exempted from search.
- Verified the licensee could manually control access to vital areas.
- Verified the licensee properly: (a) controlled and accounted for hard keys; (b) properly maintained the bullet-resistant glazing at access control; (c) positively controlled package, personnel, and vehicle access into the protected area; (d) ensured access control personnel appropriately identified packages; and (e) maintained control of vehicles delivering hazardous material within the protected area.

The inspectors completed 16 of the required 16 samples.

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b. Findings

No findings of significance were identified.

3PP8 Fitness For Duty Program (71130.08)

a. Inspection Scope

The inspectors evaluated the specific area of security force work hour controls by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and reviewing security event reports, corrective action documents and event logs for the previous 12 months.

The inspectors verified the fitness-for-duty program: (1) complied with the NRC-approved security plan, 10 CFR Part 26, "Order for Compensatory Measures Related to Fitness-for-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel" (FFD Order), dated October 23, 2003, and any other applicable Commission requirements; and (2) ensured nuclear facility security force personnel were not assigned to duty while in a fatigued condition. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between January 2003 and April 2004 (No licensee event reports were documented).
- Verified security force working hours required by the Order that the licensee:
(a) ensured individual work hour limits were not exceeded and that management-approved deviations were authorized and documented; (b) ensured group work hour limits have not been exceeded under normal plant conditions, planned plant or planned security system outages, unplanned plant or unplanned security outages, increases in plant threat condition, and during force-on-force exercises; and (c) developed procedures/processes that: (1) controlled the work hours program, (2) provided the ability to self report being unfit for duty, and (3) ensured self-declarations were documented and at least 10 hours passed prior to returning to duty.

The inspectors completed 5 of the required 5 samples.

b. Findings

No findings of significance were identified.

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4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors sampled licensee submittals for the following Physical Protection Cornerstone performance indicators: (1) protected area security equipment, (2) personnel screening program performance, and (3) fitness-for-duty program performance for the period between January 2003 and April 2004. The inspectors verified: (1) the accuracy of the performance indicator data reported during that period and (2) used the performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Indicator Guideline," Revision 2, to verify the basis in reporting for each data element.

The inspectors interviewed licensee personnel that were accountable for collecting and evaluating the performance indicator data and reviewed the process for collecting and submitting the performance indicator data. Specifically, the inspectors randomly selected security event logs and corrective action reports for the 3 months being reviewed.

The inspectors completed 3 of the required 3 samples.

b. Findings

No findings of significance were identified.

4OA2 Problem Identification and Resolution

1. Annual Sample Review

a. Inspection Scope

The inspectors evaluated licensee activities to determine whether the licensee appropriately resolved conditions adverse to quality, which included identifying the root cause, implementing appropriate corrective actions, and trending lower level deficiencies.

b. Findings and Observations

The inspectors reviewed several quality assurance audits and determined the licensee implemented appropriate corrective actions for all identified deficiencies and/or concerns. No findings of significance were identified.

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2. Cross-References to PI&R Findings Documented Elsewhere

Section 3PP1 describes that the licensee had initiated Action Request A0603995, on May 29, 2004, identifying an issue regarding the re-submission of required documents for individual criminal history record information. The issue was evaluated by an Action Request Review Team who determined the issue was not a quality problem and missed the opportunity to have security correct the issue. Security updated Procedure OM11.DC1, Section 6.7.7 to include the codes for document re-submission requirements and trained the access staff on the codes. However, security personnel failed to re-accomplish and re-submit the necessary documents for the nine individuals, to comply with the requirements.

4OA6 Meetings, including Exit

On May 20, 2004, the inspectors presented the preliminary inspection results to Mr. J. Tomkins, Director, Site Services, and other members of licensee management who acknowledged the findings. The inspectors destroyed information provided and examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

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SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

B. Ryan, Security Supervisor
C. Dougherty, Licensing
C. Miller, Security Coordinator
D. Johnson, Security Clerk
J. Tompkins, Director, Site Services
M. Teneau, Security Clerk
R. Todaro, Security Manager
R. Zimkowski, Security Superintendent
T. Garrity, Security Supervisor

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000275; NCV Failure to re-submit required forms (Section 3PP1)
05000323/2004007-01

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Section 3PP1: Access Authorization (71130.01)

Procedures and Instructions

OM11.DC1, Process for Unescorted Access Authorization, Revision 18
OM11.DC1, Unescorted Access Authorization Checklist, Attachment 9.5
OM11.DC3, Psychological Evaluation, Revision 5
OM11.DC5, Access Authorization Records and Protections of Information
OM11.ID1, Site Access Process, Revision 15

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Attachment

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OM11.ID3, Transfer of Access Authorization, Revision 5
OM11.ID5, PADS Data Transfer, Revision 6
OM11.DC2, Background Verification Personal History Questionnaire (PHQ), Revision 12

Security Event Reports

2003-0405, 2003-0448, and 2004-0319

Audits and Assessments

033640088 - Access Authorization & Fitness For Duty Program; Joint Utility Audit of INPO
003680824 - Unescorted Access Authorization & Personnel Access Data System Programs
022330010 - Unescorted Access Authorization & Personnel Access Data System Programs
032520053 - Unescorted Access Authorization Compensatory Measure Implementation
SNA03-081 - PSEG Nuclear LLC Quality Assessment- Background Investigation Program
A-CBC-04-02 - NEI Joint Utility Audit
08.13.DISGA.03.01 - NEI Background Investigation Audit
NE-48-2003 - Exelon Background Screening Program Audit

Other Documents

Safeguards Event Logs from January 2003 through April 2004

Credit History Guidelines

General Employee Training-Student Handout

NEI 03-01, Nuclear Power Plant Access Authorization Program, Revision 1

NEI 03-02, "Access Authorization and Fitness-For-Duty Audit Program, Revision 1

NEI 03-05, Personnel Access Data System Operating Manual, Revision 1

Order EA-02-261, Issuance of Order for Compensatory Measures Related to Access Authorization

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Section 3PP2: Access Control (71130.02)

Procedures and Instructions

SP 401, Security Access Control and Personnel Identification, Revision 24
SP 405, Incoming Package and Material Control, Revision 21
SP 407, Protected Area Vehicle Control, Revision 13
SP 409, Authorization of Status and Shift for Unescorted Access, Revision 30
SP 501, Lock and Key Control, Revision 13
GPAA100TB1 - Tailboard: New Keycard and Hand Readers Training

Security Event Reports

2004-0198, 2004-0044, 2004-0405, 2004-0310, and 2004-0383

Audits and Assessments

EVAL-2004-001, Security Administrative and Access Controls
SA 2003-044, Review of Security Visitor Access Records

Other Documents

SP 306 - Operability Test Form
SP 306 - ITI Model 85 Explosive Detector Performance Test Form
SP 306 - Portable Search Equipment Performance Test Form
SP 306 - Metal Detector Test Form
SP 306 - Performance Testing of Security X-Ray Equipment
SP 306 - Safeguards Event Logs from June 2003 to April 2004

Section 3PP8: Fitness-for-Duty (71130.08)

Procedures

SP 109, Security Services Work Hour Controls, Revision 3

Security Event Reports

2003-0270, 2004-0199, and 2004-0221

Audits and Assessments

033640088 - Access Authorization & Fitness For Duty Program; Joint Utility Audit of INPO
031140008 - 2003 Fitness For Duty Program Audit

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Other Documents

SP 109 - Written Test Document

MS Access Program - Individual/Group Work Hour Control Data Program

Power Point Presentation - Fatigue Presentation

Written Test - Fatigue Test

Order EA-03-038, Order for Compensatory Measures Related to Fitness-For-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel

Reply to Response to Order for Fitness-For-Duty Enhancements For Nuclear Security Force Personnel

NEI Memorandum entitled, Security Officer Work Hours Compensatory Measures, dated November 23, 2003

Individual work hour records for nine individuals

Group work hour records for every 6-week period through April 9, 2004

Safeguards Event Logs from January 2003 through April 2004

Section 4OA1: Performance Indicator Verification (71151)

Action Requests for the period of May 2003 through April 2004

Master Log for Security Incident Report Numbers

Safeguards Event Log January 2003 through April 2004

Protected Area Security Performance Index

Selected intrusion detection system out of service hours from November 2003 to April 2004

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