



November 15, 2001

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

Operating Licenses DPR-58 and DPR-74  
Docket Nos. 50-315 and 50-316

Document Control Manager:

In accordance with the criteria established by 10 CFR 50.73 entitled Licensee Event Report System, the following report is being submitted:

LER 315/2001-SO1-01: "Unauthorized Individual in Plant Protected Area"

The following commitments were identified in this submittal:

- Site procedure requirements for out-processing will be incorporated into SPS security contractor procedures, to include immediate notifications to licensee SPS management personnel for terminations.
- Change management training classes will be conducted with SPS management personnel.
- Lessons learned will be issued to other site contractor administrators.
- Two self-assessments will be scheduled at 6-month intervals to verify that security's corrective actions are effective.

Should you have any questions regarding this correspondence, please contact Mr. Ronald W. Gaston, Manager, Regulatory Affairs, at 616/697-5020.

Sincerely,

A handwritten signature in black ink that reads "Joseph E. Pollock".

Joseph E. Pollock  
Plant Manager

DB/pae

Attachment

FE74

c: J. E. Dyer, Region III  
A. C. Bakken  
L. Brandon  
S. A. Greenlee  
T. P. Noonan  
R. P. Powers  
M. W. Rencheck  
R. Whale  
NRC Resident Inspector  
Records Center, INPO

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of  
digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

1. FACILITY NAME Donald C. Cook Nuclear Plant Unit 1						2. DOCKET NUMBER 05000-315			3. PAGE 1 of 3		
4. TITLE Unauthorized Individual In Plant Protected Area.											
5. EVENT DATE			6. LER NUMBER				7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME D. C. Cook Unit 2	DOCKET NUMBER 05000-316	
08	27	2001	2001	--	S01 --	11	14	2001	FACILITY NAME	DOCKET NUMBER	
9. OPERATING MODE			11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
1											
10. POWER LEVEL			82								
			20.2201(b)								
			20.2201(d)								
			20.2203(a)(1)								
			20.2203(a)(2)(i)								
			20.2203(a)(2)(ii)								
			20.2203(a)(2)(iii)								
			20.2203(a)(2)(iv)								
			20.2203(a)(2)(v)								
			20.2203(a)(2)(vi)								
			20.2203(a)(3)(i)								
			20.2203(a)(3)(ii)								
			20.2203(a)(3)(iii)								
			20.2203(a)(3)(iv)								
			20.2203(a)(3)(v)								
			20.2203(a)(3)(vi)								
			20.2203(a)(3)(vii)								
			20.2203(a)(3)(viii)								
			20.2203(a)(3)(ix)								
			20.2203(a)(3)(x)								
			20.2203(a)(3)(xi)								
			20.2203(a)(3)(xii)								
			20.2203(a)(3)(xiii)								
			20.2203(a)(3)(xiv)								
			20.2203(a)(3)(xv)								
			20.2203(a)(3)(xvi)								
			20.2203(a)(3)(xvii)								
			20.2203(a)(3)(xviii)								
			20.2203(a)(3)(xix)								
			20.2203(a)(3)(xx)								
			20.2203(a)(3)(xxi)								
			20.2203(a)(3)(xxii)								
			20.2203(a)(3)(xxiii)								
			20.2203(a)(3)(xxiv)								
			20.2203(a)(3)(xxv)								
			20.2203(a)(3)(xxvi)								
			20.2203(a)(3)(xxvii)								
			20.2203(a)(3)(xxviii)								
			20.2203(a)(3)(xxix)								
			20.2203(a)(3)(xxx)								
			20.2203(a)(3)(xxxi)								
			20.2203(a)(3)(xxxii)								
			20.2203(a)(3)(xxxiii)								
			20.2203(a)(3)(xxxiv)								
			20.2203(a)(3)(xxxv)								
			20.2203(a)(3)(xxxvi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203(a)(3)(xxxxix)								
			20.2203(a)(3)(xxxxx)								
			20.2203(a)(3)(xxxxxi)								
			20.2203(a)(3)(xxxvii)								
			20.2203(a)(3)(xxxviii)								
			20.2203(a)(3)(xxxix)								
			20.2203(a)(3)(xxxx)								
			20.2203(a)(3)(xxxxi)								
			20.2203(a)(3)(xxxxii)								
			20.2203(a)(3)(xxxxiii)								
			20.2203(a)(3)(xxxxiv)								
			20.2203(a)(3)(xxxxv)								
			20.2203(a)(3)(xxxxvi)								
			20.2203(a)(3)(xxxxvii)								
			20.2203(a)(3)(xxxxviii)								
			20.2203								

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

1. FACILITY NAME	2. DOCKET NUMBER	6. LER NUMBER				3. PAGE
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	2 of 3
		2001	--	S01	--	
Donald C. Cook Nuclear Plant Unit 1	05000-315					

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

**Conditions Prior to Event**

Unit 1 was in Mode 1, Power Operation, at 82 percent Rated Thermal Power.

Unit 2 was in Mode 1, Power Operation, at 100 percent Rated Thermal Power.

**Description of Event**

On August 27, 2001, at 1031 hours, a former site security officer entered the plant protected area unescorted using his active security badge. This was later determined to be an unauthorized entry into the protected area because the individual had voluntarily terminated employment with Site Protective Services (SPS) on August 22, 2001. The individual's security badge had not been deactivated following his last working shift.

At approximately 1330 hours on August 27, 2001, the Shift Security Supervisor and the Security Project Manager identified that an individual who had terminated his employment on August 22, 2001, had entered the protected area to return his assigned Thermoluminescent Dosimeter (TLD) to the Radiation Protection department. After accessing the protected area, the individual remained within the north security access building for approximately ten minutes while meeting with the on-duty Shift Security Supervisor. The individual then proceeded directly to the Radiation Protection Access Control facility, approximately 400 yards from the security access building. The individual turned in his TLD, then promptly left the protected area at 1053 hours depositing his badge in the security access building's badge return box. The duration of the plant entry was approximately 22 minutes. The individual's badge was subsequently deactivated by SPS supervision.

This event was reported to the U. S. Nuclear Regulatory Commission on August 27, 2001, at 1453 hours in accordance with 10 CFR 73.71(b)(1) and 10 CFR 73.71, Appendix G, I(3)(b), "Reportable Safeguards Events." Due to internal delays in communicating the violation, the required 1 hour notification was not made in a timely manner.

This report does not contain Safeguards Information.

This supplemental LER is being submitted to describe additional corrective actions. It replaces the original LER in its entirety.

**Cause of Event**

The cause of this event was a failure of security personnel to use a plant procedure containing an out-processing checklist. The checklist requires SPS personnel to inactivate a badge, and provides a reminder to ensure the badge is returned. The oversight of the SPS security contractor failed to detect the procedural deficiency and did not monitor the termination process.

A failure to exercise adequate change management controls was a contributing factor. Specifically, SPS management personnel failed to ensure interim managers had adequate familiarity with CNP's out-processing requirements.

**Analysis of Event**

SPS personnel had not incorporated the site procedure's out-processing checklist requirements into their departmental processes. This procedural deficiency was highlighted due to change management issues surrounding the event and a lack of oversight in the SPS security contractor termination process.

Prior to the event, SPS had replaced two key management personnel with interim managers. These management positions were responsible for processing SPS contractor terminations. The interim managers were experienced in nuclear security, but had little Donald C. Cook Nuclear Plant (CNP) experience. They were not familiar with, and received no specific training on, the plant procedure containing the out-processing checklist. This situation resulted in confusion as to who was actually responsible for assuring the badge was deactivated.

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

1. FACILITY NAME	2. DOCKET NUMBER	6. LER NUMBER				3. PAGE
		YEAR	SEQUENTIAL NUMBER		REVISION NUMBER	3 of 3
		2001	--	S01	--	
Donald C. Cook Nuclear Plant Unit 1	05000-315					

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

Another contributing factor was the manner in which the exit interview was conducted. An exit interview is normally completed following an individual's last working shift. The exit interview for the subject employee was performed at approximately 2100 hours on August 21, 2001, only three hours into his twelve hour shift. The exit interview was conducted by an interim manager and the on-duty Shift Security Supervisor. The interim manager was assisting and providing coaching to the Shift Security Supervisor during the exit interview. This was the first exit interview being performed by the Shift Security Supervisor. There was no discussion of deactivating, or collecting, the employee's security badge during, or after, the exit interview. An exit interview form was used; however, its content was directed toward employer-employee relationships, and did not contain the reminders present in the plant procedure checklist related to security badge inactivation.

Additionally, although not required, it was normal practice to announce security employee terminations during pre-shift briefings. The termination of this employee was not announced; therefore, on-duty personnel were unaware of the actual employment status of the individual when he entered the protected area on August 27, 2001.

There is no actual safety significance associated with this event. This event did not involve, or affect, any plant equipment, safety system, structure, or component. The individual was properly searched prior to entering the protected area. The badge was not used to enter any plant vital areas, nor was there an attempt to access the protected area at any other time since terminating employment.

A review of CNP's LERs spanning the previous four years did not identify any previous events of this nature. Prior to that time, hand-geometry cardreaders were not in place and employees did not take their badges home. In addition, a review of 35 recent employee terminations showed no evidence of additional failures to engage the proper termination process. Therefore, this is considered to be an isolated event.

**Corrective Actions**

As an immediate corrective action, SPS department supervisory personnel were required to review the current plant procedure containing the out-processing checklist. In addition, specific instructions were issued to these same personnel regarding security badge controls as they relate to implementing the existing plant procedural guidance, conduct of exit interviews, and announcement of terminations in pre-shift briefings.

Scheduled preventive actions include:

- 1) Site procedure requirements for out-processing will be incorporated into SPS security procedures, to include immediate notifications to licensee SPS management personnel for terminations.
- 2) Change management training classes will be conducted with SPS management personnel.
- 3) Lessons learned will be issued to other site contractor administrators.
- 4) Two self-assessments will be scheduled at six-month intervals to verify the corrective actions are effective.

**Previous Similar Events**

None.