

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-416
License No.: NPF-29
Report No.: 50-416/96-16
Licensee: Entergy Operations, Inc.
Facility: Grand Gulf Nuclear Station
Location: Waterloo Road
Port Gibson, Mississippi
Dates: September 23-26 and October 1-4, 1996
Inspector: Thomas W. Dexter. Senior Physical Security Specialist
Approved By: Blaine Murray, Chief, Plant Support Branch
Attachment: Partial List of Persons Contacted
Inspection Procedures Used
List of Licensee Documents Reviewed
List of Items Closed

EXECUTIVE SUMMARY

Grand Gulf Nuclear Station NRC Inspection Report 50-416/96-16

This was a special, announced inspection of the licensee's access authorization program utilizing Temporary Instruction 2515/127, "Access Authorization," dated January 17, 1995.

Engineering

- The Updated Final Safety Analysis Report wording was consistent with the observed plant access authorization practice and procedures (Section E2).

Plant Support

- Implementation of the access authorization program was excellent. Management support for the program was excellent (Section S1).
- Background investigations were completed in a comprehensive and thorough manner in accordance with regulations, the physical security plan, and procedural requirements (Section S1.1).
- An excellent psychological evaluation program had been established. Effective procedures were in place regarding the granting of unescorted access into the protected area (Section S1.2).
- Implementation of the behavioral observation program was very good. Supervisors and managers had been properly trained concerning the behavioral observation program requirements. Individuals had been informed of their responsibility to report arrests that could affect their trustworthiness (Section S1.3).
- The grandfathering, reinstatement, updating, transfer, and temporary access program elements were properly administered (Section S1.4).
- An excellent program for denying or revoking unescorted access was in place. The licensee had an effective appeal process. Personnel denied access were advised of their right to appeal that denial (Section S1.5).
- An excellent program was in place to protect personal information from unauthorized disclosure. Effective procedures were in place to ensure that information was only released to those staff members with a need for access (Section S1.6).

- Audits of the access authorization program were excellent. Audits were completed in a timely manner. The licensee had conducted thorough reviews of audits conducted by other licensees (Section S1.7).
- Excellent records retention system and supporting procedures were in place to insure that the specified records were retained for the required period of time (Section S1.8).

Report Details

III. Engineering

E2 REVIEW OF COMMITMENTS IN THE UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR)

A recent discovery of a licensee operating their facility in a manner contrary to the UFSAR description highlighted the need for a special focused review that compares plant practices, procedures and/or parameters to the UFSAR descriptions. While performing the inspection discussed in this report, the inspector reviewed the applicable portions of the UFSAR that related to the areas inspected. The inspector verified that the UFSAR wording was consistent with the observed plant practices, procedures and/or parameters.

IV. Plant Support

ACCESS AUTHORIZATION (TEMPORARY INSTRUCTION 2515/127)

On April 25, 1991, the Commission published the "Personnel Access Authorization Requirements for Nuclear Power Plants," 10 CFR 73.56, requiring power reactor licensee to implement an access authorization program by April 27, 1992, and to incorporate this program into the licensee's physical security plan. The objective of the rule was to provide high assurance that individuals granted unescorted access were trustworthy and reliable, and did not constitute risk to health and safety of the public, including a potential to commit radiological sabotage.

This inspection, conducted in accordance with NRC Inspection Manual, Temporary Instruction 2515/127, "Access Authorization," dated January 17, 1995, assessed the implementation of the licensee's access authorization program.

S1 Conduct of Access Authorization Program Activities

a. Inspection Scope (TI 2515/127)

The inspector evaluated the access authorization program administration and implementation through the assessment of management involvement, oversight and support of the program, structure and interfaces of the organization, the authorities and responsibilities assigned, and the specialized training and work experience of key program personnel. The licensee's program to determine if a single insider could grant and allow unescorted access into the protected and vital areas was also reviewed.

b. Observations and Findings

Responsibility for overall management of the Access Authorization Program was assigned to the Security Supervisor, Access Authorization/Fitness-For-Duty. The supervisor (or designee) was responsible for making a final determination whether unescorted access would be granted.

The inspector interviewed program administrators and site representatives and determined that they were very knowledgeable of program responsibilities and performed their duties in an excellent manner. The inspector reviewed the utility's access authorization program procedures and noted that they were concise and contained the guidance necessary to implement the program.

The inspector determined by a review of the procedures and interviewing access personnel that a system was in place that prevented a single insider from allowing an unauthorized person unescorted access into the protected and vital areas.

The inspector conducted interviews with access authorization program staff and determined there was excellent management support for the program.

c. Conclusions

Implementation of the access authorization program was excellent. The staff were knowledgeable and performed their duties in an excellent manner. Management support for the program was excellent.

S1.1 Background Investigations Elements

a. Inspection Scope (TI2515/127)

The inspector randomly selected and reviewed 90 access authorization files to ensure the licensee was verifying the true identity of applicants for unescorted access and developed information concerning employment, education, credit and criminal history, military service, and the character and reputation of applicants prior to granting them unescorted access to protected and vital areas. Of the reviewed files, 20 were transferred files of personnel cleared under another licensee's program, 9 were personnel reinstated after an absence from a program for less than one year, 20 were update files after personnel were absent from a licensee program in excess of one year, 21 were full background investigation files completed by the licensee, and 20 were files resulting from the licensee denying or revoking unescorted access. The licensee did not have any employees who were grandfathered into the program. When the program was implemented the licensee choose not to grandfather employees already employed into the program but conducted full background investigations on them also. The inspector also reviewed the background screening records on 43 recently screened potential security officers. Those 43 personnel were screened to replace security personnel

who had gone on strike against the security contractor. The records on the 43 potential security officers were completed in the same thorough manner as the other records on file. Individuals who were denied access were informed in person or by letter of their right to appeal the denial. Only those who met the established access screening standards in all areas required of security officers were granted unescorted access to the facility.

b. Observations and Findings

The inspector reviewed 21 background files and determined that all elements of a successful background investigation were completed in accordance with the physical security plan and regulatory requirements. The inspector verified that when the licensee reviewed periods of employment and unemployment, they also specifically verified employee activities during periods of unemployment. There were no problems discovered in the background investigation program.

c. Conclusions

Background investigations were completed in a comprehensive and thorough manner in accordance with regulations, the physical security plan, and procedural requirements.

S1.2 Psychological Evaluations

a. Inspection Scope (TI 2515/127)

The inspector reviewed the licensee's program for administering psychological tests and the methodology for evaluating the results. Regulatory Guide 5.66 requires that the test results must be evaluated by qualified and, if applicable, licensed psychologists or psychiatrists.

b. Observations and Findings

The licensee administered psychological tests to all individuals requesting unescorted access into the protected area. The inspector confirmed by observation and interviews that personnel taking the test were positively identified and that the test was proctored to prevent compromise. The licensee had contracted for evaluation of the tests and a psychologist was at the site during testing to conduct oral interviews when necessary. The inspector determined that the psychologist had developed proper standards for use in reviewing test results.

The licensee was aware of NRC information notices addressing access authorization concerns in the area of psychological testing.

c. Conclusions

The licensee's psychological evaluation program was excellent. Effective implementing procedures had been developed for the psychological evaluation program.

S1.3 Behavioral Observation Program

a. Inspection Scope (TI 2515/127)

The licensee's behavioral observation program was inspected to determine whether supervisors and managers were trained to detect and report changes in behavior that could adversely affect trustworthiness and reliability.

b. Observations and Findings

The inspector reviewed the continual observation program procedures and the associated training lesson plans. The procedures covered all of the program elements in a clear and effective manner. In addition, the inspector interviewed six licensee supervisory and management level personnel, three contractor supervisors, and a training instructor. All the supervisory and management personnel interviewed had been trained in behavioral observation. From the interviews, it was apparent that a very good behavioral observation program had been implemented and that training and annual retraining were on-going.

Paragraph 9.0 of the appendix to Regulatory Guide 5.66 (NUMARC 89-01) states, in part, individuals with unescorted access authorization must be notified of his/her responsibility to report any arrest that may impact upon his/her trustworthiness. The inspector determined by interviewing approximately 12 individuals with unescorted access into the protected area that the licensee had notified individuals of their responsibility to report all arrests that could affect their trustworthiness.

c. Conclusions

The licensee's behavioral observation program insured that all applicable supervisors and managers had been trained and retrained as appropriate. Individuals had been informed of their responsibility to report arrests that could affect their trustworthiness. Implementation of the behavioral observation program was very good.

Sl.4 Grandfathering, Reinstatement, Updating, Transfer and Temporary Unescorted Access Authorization

a. Inspection Scope (TI 2515/127)

As part of the review activities for the files discussed in section S1.1 above, the inspector determined that 20 were for personnel cleared under another licensee's program, nine were for personnel reinstated after an absence from a program for less than 1 year and 20 were update files of individuals whose access had lapsed for a period exceeding one year. All of the files were reviewed to determine compliance with the requirements of 10 CFR 73.56 and the physical security plan.

b. Observations and Findings

The inspector reviewed 20 transferred access authorization files of individuals whose original access authorization background investigations were either completed by another licensee or a self-screening contractor accepted by another licensee. The files were complete and provided all information needed to extend unescorted access to the licensee's facility.

The inspector reviewed nine files that contained reinstatements of access after unescorted access had been terminated for less than 1 year. The licensee conducted employment and "suitable inquiry" inquiries for all periods of time where the individuals did not have unescorted access under an approved access authorization and fitness for duty program.

The inspector reviewed 20 update files of individuals whose access had lapsed for a period exceeding 1 year. Over half of the files contained a temporary unescorted access authorization. Overall, the updates were effectively completed with complete background investigations for whatever period of time the employee's access had lapsed.

c. Conclusions

The licensee's reinstatement, updating, transfer, and temporary access program elements were administered in accordance with rule requirements.

SI.5 Denial or Revocation of Unescorted Access

a. Inspection Scope TI 2515/127)

The inspector reviewed 20 files in which fingerprint submittals had been returned with a criminal record or other derogatory information had been developed during the investigation.

b. Observations and Findings

The inspector verified that the licensee had implemented a proper procedure for the review, at the request of the affected individual, of a denial or revocation by the licensee of unescorted access of an employee of the licensee, contractor or vendor. The inspector verified that the rationale used by the licensee in its decision for denial was appropriate. The persons denied access were notified of the denial of access and of their right to review and reply to information in the records used as a reason for the access denial. These persons were also provided with information on the appeal process that was available to them. The inspector reviewed three appeals on file and determined that the process was consistent and conducted in accordance with established procedures.

c. Conclusions

An excellent program for denying or revoking unescorted access was in place. The criteria used by the licensee was appropriate. The licensee had implemented an appeal process and personnel denied access were advised of their right to appeal that denial.

SI.6 Protection of Personal Information

a. Inspection Scope TI 2515/127)

The inspector interviewed licensee personnel and reviewed the file system and procedures to determine whether personal information was disclosed to unauthorized persons. File maintenance and access control was also reviewed.

b. Observations and Findings

The inspector interviewed licensee personnel to determine that personal information was protected from disclosure to anyone without a need to know and the authority to have access to that information. The background information files were kept in locked containers in a secure area with access limited to only those staff members with a need for access. Procedures were in place to ensure that information was only released to those staff members with a need for access.

c. Conclusions

An excellent program to protect personal information from unauthorized disclosure was identified. Procedures were in place to ensure that information was released only to those staff members with a need for access.

S1.7 Audits

a. Inspection Scope TI 2515/127

The licensee's audit program was reviewed to determine if audits of the licensee and contractors' access authorization programs were of sufficient depth to detect problems.

b. Observations and Findings

The inspector reviewed 12 audits of the licensee's access authorization program to determine if proper audits were conducted. The licensee's records included copies of several audits of contractor programs. Some of the audits were performed by other licensees and, according to the regulations, were accepted by the licensee to satisfy their own audit requirements. The licensee retained responsibility for the effectiveness of the contractors' programs and for the implementation of appropriate corrective actions by the contractors.

The inspector determined that the licensee had conducted a thorough review of the audits they had accepted that were completed by other licensees. The inspector also reviewed the licensee audits of the licensee's access authorization program and those of the screening contractors. The audits of the site access authorization program were excellent and completed in a timely manner.

c. Conclusions

The licensee's auditing of the site access authorization program was excellent. Audits were completed in a timely manner and thorough reviews were completed of audits conducted by other licensees.

S1.8 Records

a. Inspection Scope TI 2515/127

The inspector reviewed the licensee's records retention activities in order to insure that the access authorization records were retained for the appropriate time.

b. Observations and Findings

The inspector determined that the licensee's procedure for records retention correctly identified the required records and retention times for the records. All required documents supporting the final granting of unescorted access to an individual were in the file.

c. Conclusions

An excellent records retention system and supporting procedures were in place to insure that the specified records are retained for the correct period of time.

S8 Miscellaneous Security and Safeguards Issues (92904)

S8.1 (Closed) Unresolved Item 416/94-22-01: Falsification of Access Authorization Records

The licensee identified 13 individuals who had falsified information on their personal history questionnaires. An enforcement panel was conducted in NRC Region II, on June 7, 1995, to discuss the specifics related to this issue. As a result of the discussions, it was determined that the licensee did not violate regulatory requirements; therefore, this issue is closed.

S8.2 (Closed) Inspection Followup Item 416/95-20-01: Failure to Properly Log Three Security Events

The licensee failed to properly record three security safeguards events in the quarterly events log. During this inspection the inspector reviewed the licensee's corrective actions. The licensee changed Security Section Procedure 11-S-01-8, Reportable Security Safeguards Events Safety Related, Revision 11, dated August 20, 1996. The revision now requires logging of events involving alarms at vital area doors and perimeter intrusion alarms. The inspector interviewed the individual responsible for maintaining the logs and determined that he was aware of the procedure change.

S8.3 (Closed) Inspection Followup Item 416/95-20-02: Poor Picture Quality on Video Monitors

During the previous inspection the inspector noted the poor picture quality on the video monitors in the alarm stations. The picture quality had deteriorated with the age of the monitors. During this inspection the inspector observed that the licensee had replaced the deficient monitors with new monitors that had significantly improved the picture quality.

V. Management Meetings

X1 Exit Summary

The inspector presented the inspection results to members of the licensee management at the conclusion of the inspection on October 4, 1996. The licensee acknowledged the findings presented. No proprietary information was identified.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Licensee

C. Abbott, Quality Supervisor, Quality Programs
C. Bottemiller, Superintendent, Nuclear Safety and Regulatory Affairs
S. Buford, Specialist III, Investigations
J. Christian, Security Operations Supervisor
H. Cooper, Manager, Security, Corporate
J. Czaika, Nuclear Specialist
L. Daughtery, Technical Coordinator, Nuclear Safety and Regulatory Affairs
W. Deck, Superintendent, Security
J. Graise, Security Coordinator, Security
C. Holifield, Licensing Engineer, Nuclear Safety and Regulatory Affairs
R. Jackson, Licensing Specialist, Nuclear Safety and Regulatory Affairs
B. Jones, Auditor, Quality Programs
S. Kinne, Security Coordinator
M. Meisner, Manager, Nuclear Safety and Regulatory Affairs
B. Middleton, Security Coordinator
R. Moomaw, Manager, Maintenance Manager
B. Pierce, Access Specialist, Investigations
H. Reed, Security Supervisor, Fitness-for-Duty
R. Sears, Senior Lead Security Coordinator, Corporate Security
T. Tankersley, Technical Coordinator, Maintenance
J. Venable, Manager, Operations

NRC

K. Weaver, Resident Inspector

INSPECTION PROCEDURES USED

TI 2515/127: Access Authorization
IP 92904: Followup - Plant Support

LIST OF LICENSEE DOCUMENTS REVIEWED

Procedure OM-106, Revision 2, dated April 28, 1995, Unescorted Access Authorization Program

Procedure 5.1, Revision 11, dated August 22, 1996, Nuclear Security Clearance Program

Procedure 5.12, Revision 5, dated May 13, 1996, Access Determination/Key Card Control Facility

Procedure OM 110, Revision O, dated March 31, 1995, Continual Behavioral Observation Program

Entergy Plant Access Training Lesson Plan EOI-S-LP-GET-FAT01.01, dated June 10, 1996

Security Section Procedure 11-S-01-8, Revision 11, dated August 20, 1996, Reportable Security Safeguards Events Safety Related

Updated Final Safety Analysis Report, Section 13.6, Industrial Security

LIST OF ITEMS CLOSED

Closed

50-416/9422-01 Unresolved Item, Falsification of Access Authorization Records

50-416/9520-01 Inspection Followup Item, Logging of Security Events

50-416/9520-02 Inspection Followup Item, Poor picture quality on video monitors