

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-320/85-06

Docket No. 50-320

License No. DPR-73

Licensee: GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

Facility Name: Three Mile Island Nuclear Station, Unit 2

Inspection At: Middletown, Pennsylvania

Inspection Conducted: March 4-8, 1985

Date of Last Physical Security Inspection: October 22-26, 1984

Type of Inspection: Routine, Unannounced Physical Security

Inspector: *J. M. Dunlap*
J. M. Dunlap, Physical Security
Inspector

5/06/85
date

Approved by: *W. R. Keimig*
Richard R. Keimig, Chief
Safeguards Section, DRSS

5/20/85
date

Inspection Summary: Unannounced, Physical Security Inspection on March 4-8, 1985
(Report No. 50-320/85-06)

Areas Inspected: Security Plan and Implementing Procedures; Management Effectiveness; Security Organization; Security Program Audit; Locks, Keys, and Combinations; Physical Barriers (Protected/Vital Areas); Assessment Aids; Access Control (Personnel/Packages/Vehicles); Detection Aids (Protected/Vital Areas); Alarm Stations; Communications; and Personnel Training and Qualifications. The inspection involved 18 hours onsite by one NRC region-based inspector, during regular hours.

Results: The licensee was found to be in compliance with NRC requirements in the areas examined, except for: Access Control - Personnel (failure to properly control photo-ID badges) and Personnel Training and Qualification Plan (failure to complete annual physical fitness tests by three protection personnel).

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DETAILS

1. Key Persons Contacted

- *H. D. Hukill, Director, TMI-1
- *C. W. Smyth, Licensing Manager, TMI-1
- *R. B. Swartzwelder, Licensing, TMI-2
- *H. Masini, Security Manager, GPU Nuclear
- *C. L. Incorvati, Audit Supervisor, TMI-1
- *J. F. Marsden, Manager, QA Engineering
- *J. B. Miller, Operations QA Monitor
- *O. Shalikashvili, TMI Training Department
- *D. Lauder Milch, Training
- *R. E. Nieidig, Jr., Communications
- *J. F. Stacey, Security Manager, TMI-1
- *R. D. Stintzcum, Security Manager, TMI-2
- *R. J. Conte, Senior Resident Inspector (TMI-1), USNRC
- *F. I. Young, Resident Inspector, TMI-1, USNRC
- *K. R. Barr, Radiation Specialist, USNRC
- *W. H. Baunack, Project Engineer, USNRC
- R. J. Cook, Senior Resident Inspector (TMI-2), USNRC
- S. M. Otto, Licensing, TMI-1

*Present at the exit interview.

The inspector also interviewed other plant employees and members of the licensee's proprietary security force.

2. 30703 - Exit Interview

The inspector met with licensee representatives at the conclusion of the inspection on March 8, 1985, to review the purpose and scope of the inspection and present the findings. No written material was provided to the licensee by the inspector at any time during the inspection.

3. 92701 - Followup on Inspector Identified Problems

- a. (Closed) Inspector Followup Item (IFI) (84-20-01): Careless personnel searches at the Unit 2 processing center. Personnel conducting the searches were corrected on the spot by the shift sergeant. TMI-2 Site Protection Force Directive No. 48, January 16, 1985, Search Techniques, was issued and describes the search procedure including a diagram showing areas of possible concealment. According to the Security Manager, the directive has been reviewed with all security personnel and the training has placed additional emphasis on body searches during requalification training. Marked improvement in body searches was noted by the inspector.

- b. (Open) Unresolved Item (84-24-02): Uncontrolled Safeguards Information distributed in an Engineering Change Authorization. Manager - Security Directive 85-07, dated February 13, 1985, Subject: Interim Revision 2-00 to 1000-ADM-1510-01, Protection of Safeguards Information, sets forth the changes to the procedure which the licensee committed to at an Enforcement Conference with the NRC on February 8, 1985. The revised procedure was in the process of being finalized, according to the TMI-2 Security Manager. The revised procedure was reviewed by the inspector. The changes incorporated provide additional guidance concerning the handling and protection of Safeguards Information as described in 10 CFR 73.21. This item will be reviewed again after issuance of the revised procedure.

4. 92702 - Followup on Violation

(Open) Violation (84-21-06): Did not secure Safeguards Information (SGI) as required by 10 CFR 73. The licensee interviewed and counseled the person responsible for the violation. The inspector reviewed corporate Safeguards Procedure 1000-ADM-1510-01, Revision 2-00, which was revised to further address the handling and protection of SGI. The revision is currently under review and when approved, the Training Department will provide further guidance to their administrative personnel in the handling of SGI.

5. 81018 - Security Plan and Implementing Procedures

The Modified Amended Physical Security Plan (MASP) for Three Mile Island Nuclear Station, Units 1 and 2, Revision 19, dated February 29, 1984, and implementing procedures were reviewed and found to be adequate to meet the general performance requirements and objectives of 10 CFR 73.55. No unauthorized changes were identified.

6. 81020 - Management Effectiveness

Licensee management appeared to be effective and adequately discharging its responsibilities relative to the security program as evidenced by the findings of this inspection and as observed by the inspector. Improvements to security facilities and the professional appearance and manner in which security personnel accomplished their duties were noted.

7. 81022 - Security Organization

The security management structure and chain of command are in conformance with the approved Physical Security Plan, Contingency Plan, procedures, and applicable regulatory requirements. They are adequate and appropriate for their intended function.

8. 81034 - Security Program Audit

The annual QA Audit was completed on November 2, 1984. The inspector observed that the audit disclosed no deficiencies. The audit appeared to have been comprehensive and well executed.

9. 81038 - Records and Reports

A review of weekly and quarterly security equipment tests by the inspector disclosed no discrepancies. Licensee security event reports to the NRC were timely and complete. A review of thirty percent of the training records revealed a requalification violation which is addressed in Paragraph 20 of this report.

10. 81042 - Testing and Maintenance

The licensee's program for testing and maintenance of security equipment conformed to the requirements of the physical security plan and licensee procedures. Tests observed by the inspector of intrusion detection equipment and access control equipment disclosed that the systems met performance requirements and objectives.

11. 81046 - Locks, Keys and Combinations

Security keys and card keys were controlled and protected in conformance with the security plan and licensee procedures. Tests requested by the inspector of the card key system indicated that it was effective and appropriate for the intended access control function.

12. 81152 - Physical Barriers (Protected Areas)

The inspector verified by observation that the licensee was maintaining the protected area physical barriers in accordance with the physical security plan. The barriers appeared adequate and appropriate for their intended function.

13. 81154 - Physical Barriers (Vital Areas)

A tour of the vital areas verified that the licensee was maintaining the physical barriers surrounding the vital areas in accordance with the physical security plan. No openings larger than 96 square inches were observed in the barriers, and they appeared adequate and appropriate for their intended function.

14. 81070 - Access Control (Personnel)

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15. 81072 - Access Control (Packages)

Observation of search procedures at the entry control points by the inspector verified that the licensee was controlling the entry of packages and material to the protected area (PA) in conformance with the MASP and approved procedures.

16. 81074 - Access Control (Vehicles)

The inspector observed the processing of vehicles into the PA and verified that the licensee was controlling vehicle access in accordance with the MASP and approved procedures.

17. 81078 - Detection Aids - Protected Area

The licensee's intrusion detection system detected NRC inspector requested penetration tests of the protected area in conformance with the security plan and approved procedures.

18. 81080 - Detection Aids - Vital Areas

The licensee's intrusion detection system detected NRC inspector requested penetration tests of the vital areas in conformance with the security plan and approved procedures.

19. 81088 - Communications

The inspector confirmed by observing tests that the internal and external communications established by the licensee conformed to security plan requirements and were adequate and appropriate for their intended functions.

20. 81501 - Personnel Training and Qualification - General Requirements

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One three site protection personnel mentioned above requalified prior to completion of the inspection.