

U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 50-443  
License No: NPF-86

Report No: 50-443/96-12

Licensee: North Atlantic Energy Service Corporation

Facility: Seabrook Station

Location: Seabrook, New Hampshire

Dates: October 21-25, 1996

Inspectors: Gregory C. Smith, Senior Security Specialist  
Edward B. King, Physical Security Inspector

Approved by: Richard R. Keimig, Chief  
Emergency Preparedness and Safeguards Branch  
Division of Reactor Safety

## EXECUTIVE SUMMARY

Seabrook Station  
NRC Inspection Report No. 50-443/96-12

On April 25, 1991, the Commission published the Personnel Access Authorization Requirements for nuclear power plants, 10 CFR 73.56 (the rule), requiring power reactor licensees to implement an Access Authorization Program (AAP) by April 27, 1992, and to incorporate the AAP into the licensee's physical security plan. The objective of the rule is to provide high assurance that individuals granted unescorted access are trustworthy and reliable, and do not constitute an unreasonable risk to the health and safety of the public, including a potential to commit radiological sabotage.

The licensee's Access Authorization Program was inspected during the period October 21-25, 1996. It was found to meet the above stated objective.

## Report Details

### **P8 Miscellaneous Security and Safeguards Issues**

#### **P8.1 General**

On April 25, 1991, the Commission published the Personnel Access Authorization Requirements for nuclear power plants, 10 CFR 73.56 (the rule), requiring power reactor licensees to implement an Access Authorization Program (AAP) by April 27, 1992, and to incorporate the AAP into the licensee's physical security plan. The objective of the rule is to provide high assurance that individuals granted unescorted access are trustworthy and reliable, and do not constitute an unreasonable risk to the health and safety of the public, including a potential to commit radiological sabotage.

A May 22, 1992, letter from the licensee to the NRC forwarded Revision 15 to its physical security plan which stated, in part, that all elements of Regulatory Guide 5.66, "Access Authorization Program for Nuclear Power Plants," have been implemented to satisfy the requirements of 10 CFR Part 73.56. By letter, dated July 9, 1992, the NRC informed the licensee that the changes submitted had been reviewed and were determined to be consistent with the provisions of 10 CFR 50.54(p) and that the revision would be acceptable for inclusion in the NRC-approved security plan.

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 AAP to determine if it was commensurate with regulatory requirements and the licensee's physical security plan.

#### **P8.2 Access Authorization Program and Administration Organization**

##### **a. Inspection Scope**

The inspectors reviewed organizational charts, applicable procedures and conducted interviews to assess the licensee's access authorization program and administrative organization.

##### **b. Observations and Findings**

The North Atlantic Energy Service Corporation (NAESCO) AAP requirements are contained in the Seabrook Station Security Manual (SSSM), Revision 19, dated October 7, 1996. This manual defines the requirements for the AAP, including the fitness-for-duty and behavioral observation portions of the AAP.

The responsibility for implementation of the AAP is vested in the Security and Safety Manager. The access screening and fitness-for-duty personnel report to the Security and Safety Manager. All access authorization functions are performed in the plant access processing center.

c. Conclusions

The inspectors' review of the Security Manual disclosed that the manual was comprehensive and contained sufficient details in the guidance to implement the AAP in accordance with regulatory requirements.

**P8.3 Background Investigations (BI) Elements**

a. Inspection Scope

The inspectors reviewed records and conducted interviews to determine the adequacy of the program to verify the true identity of an applicant and to develop information concerning employment history, educational history, credit history, criminal history, military service, and character and reputation of the applicant prior to granting unescorted access to protected and vital areas.

b. Observations, Findings and Conclusions

The inspectors reviewed the results of 50 background investigations (BIs) representing a cross-section of licensee and contractor employees. The licensee employs a contractor to conduct the BIs. The scope and depth of these investigations are prescribed in NAESCO's Purchase Order 02000327, dated September 17, 1996.

The 50 BI reports also contained the information on which temporary access was granted or denied. The records of those abbreviated scope and depth investigations permitted by the rule contained information on which to base a determination regarding temporary access pending completion of the full BI, and fulfilled the program requirements to which the licensee had committed. The inspectors noted that any matter of questionable or suspect information was thoroughly evaluated and documented prior to granting or denying temporary access.

In accordance with 10 CFR 73.57, the licensee is responsible for initiating criminal history checks on individuals applying for unescorted access authorization, and for considering all information received from the U.S. Attorney General. Among the records reviewed by the inspectors were those of eight individuals whose fingerprint records had been returned with derogatory information. The inspectors determined that the information had been properly evaluated and appropriate action had been implemented as a result of the derogatory information.

**P8.4 Psychological Evaluations**

a. Inspection Scope

The inspectors reviewed the licensee's psychological testing program procedures and interviewed the individuals who administer and proctor the psychological tests.

b. Observations and Findings

The licensee has contracted with a licensed psychologist to provide oversight of the psychological testing program and to perform the requisite evaluations. All individuals seeking unescorted access to the site are required to complete the psychological questionnaire administered by licensee personnel that have been trained and qualified as examination proctors. The answer sheets for the psychological questionnaire are forwarded to the psychologist for evaluation and, if the need for a clinical interview is indicated, the psychologist conducts the interview and recommends either access or denial to the licensee. In all cases reviewed, the licensee took the psychologist's recommendation.

The inspectors found that procedures were clear and that the proctors demonstrated a sound knowledge of their duties.

Conclusion

The inspectors concluded that the licensee's psychological evaluation program was being effectively administered.

**P8.5 Behavioral Observation Program (BOP)**

a. Inspection Scope

The inspectors reviewed the Behavioral Observation Program (BOP) training procedures and lesson plans. Observed a BOP training session and conducted interviews to ensure that supervisors have and maintain awareness and sensitivity to detect behavior changes in employees that could adversely affect their trustworthiness and reliability, and to report such changes to appropriate management for further evaluation and action, if deemed necessary.

b. Observations and Findings

The program was instituted as part of, and is an element in common with, the licensee's Fitness-for-Duty (FFD) Program. Interviews conducted throughout the inspection with various individuals, representative of a cross-section of both supervisory and non-supervisory employees, indicated a knowledge of program requirements. The supervisors interviewed also demonstrated an awareness and sensitivity to detect and report adverse changes in behavior. The effectiveness of the BOP training was further evidenced by employees who had been referred to the employee assistance program and had been FFD for-cause tested as a result of changes in behavior that were identified through the BOP.

c. Conclusion

The inspectors concluded that the training program and lessons plans were adequate to support the program. The inspectors also concluded that the BOP training and retraining were effective and that the BOP was being effectively implemented.

**P8.6 Grandfathering, Reinstatement and Transfer of Access Authorization**

a. Inspection Scope

The inspectors reviewed a cross-section of records to evaluate the licensee's application of the provisions for Grandfathering, Reinstatement and Transfers of Access Authorizations.

b. Observations and Findings

- "Grandfathering"

Included in the records selected at random by the inspectors were records of personnel who did not meet the criteria for "grandfathering," i.e., those who did not have uninterrupted, unescorted access authorization for at least 180 days on April 25, 1991, the date of publication of the NRC's access authorization rule.

- Reinstatement

The licensee's criteria for reinstatement of access authorization was reviewed. The criteria provided for reinstatement of unescorted access authorization if one had been previously granted, that authorization was terminated under favorable conditions no more than 365 days prior to the reinstatement request, and FFD program requirements were met.

- Transfer of Access Authorization

The licensee incorporated the provision for the transfer of access authorization, both receipts in and transfers out, into its program. The records selected at random for review by the inspectors included several examples of each.

c. Conclusions

The inspectors concluded that the requirements for grandfathering, reinstatement and transfers of access authorizations were being met and that these portions of the AAP were being implemented satisfactorily. No discrepancies were noted.

**P8.7 Temporary Access Authorization****a. Inspection Scope**

The inspectors reviewed records that included the results of abbreviated scope investigations, which are used as the basis for granting temporary unescorted access authorization, as permitted by the rule.

**b. Observations, Findings and Conclusions**

The records of the abbreviated scope investigations were determined to contain adequate information (character and reputation from a developed reference, past year's employment history, and a credit check) on which to base temporary access authorization. The inspectors noted that, in those records of abbreviated scope investigation, there were no instances in which rescission of access authorization was necessitated following receipt of the full 5-year investigation.

**P8.8 Denial/Revocation of Unescorted Access****a. Inspection Scope**

The inspectors reviewed the licensee's provisions for the review of appeals of denial or termination of access authorization.

**b. Observations and Findings**

The inspectors determined that an individual is informed of the basis for denial or revocation of access authorization, is provided the opportunity to provide additional information for consideration and can have the decision, and any additional information, reviewed by the Appeal Committee, which consists of three representatives assigned by the Station Director. After that review, the decision on the appeal is final. The inspectors noted that the licensee has a provision to temporarily suspend permanent access based on information that could adversely reflect on the reliability and trustworthiness of an individual. The suspension of access is used during the period information is being developed and reviewed on which to base the decision to terminate or reinstate access. The Appeal provision applies only to denied or terminated access authorizations, per NRC regulations, not to the period during which access is suspended pending the decision to terminate access authorization.

**c. Conclusion**

The inspectors concluded that this aspect of the program was in accordance with the rule and was being adequately implemented.

**P8.9 Audits****a. Inspection Scope**

The inspectors reviewed the most recent combined nuclear safety assessment audit of the security, access authorization, and fitness-for-duty programs conducted April 8-24, 1996, (Audit No. 96-A04-01).

**b. Observations and Findings**

The inspectors' review of the audit report disclosed that the audit identified no findings and one observation associated with the AAP. The observation, involving the requirement to list foreign military service when completing site access documentation, was not indicative of a programmatic weakness but, if corrected, would enhance program effectiveness. Audit results were disseminated to the appropriate levels of management. The inspectors determined, based on discussions with security management and a review of the responses to the observation, that corrective actions were effective and were completed prior to the issuance of the audit report.

**c. Conclusion**

The review concluded that the audit was comprehensive in scope and depth, that the observation was appropriately distributed and that the audit program was being properly administered.

**P8.10 Record Retention****a. Inspection Scope**

The inspectors reviewed the onsite record retention program for the AAP records.

**b. Observations and Findings**

Records are stored in locked file cabinets, accessible only to authorized personnel. The inspectors noted that the records were very well organized and complete.

**c. Conclusions**

The inspectors concluded that the storage facilities provided adequate security, and that access to those records was adequately controlled to protect personal information from unauthorized personnel.

**X1 Exit Interview**

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on October 25, 1996. At that time, the purpose and scope of the inspection were reviewed and the preliminary findings were presented. The licensee acknowledged the preliminary inspection findings.

**X2 Updated Final Safety Analysis Report (UFSAR) Review**

A recent discovery of a licensee operating its facility in a manner contrary to the UFSAR description highlighted the need for a special focused review that compares plant practices, procedures, and parameters to the UFSAR description. Since the UFSAR does not specifically include security program requirements, the inspectors compared licensee activities to the NRC-approved physical security plan, which is the applicable document. While performing the inspection discussed in this report, the inspectors reviewed Section 4.2.6 of the Plan, Revision 19, dated April 24, 1995, titled, "Former Unit II Connections." Based on discussions with security supervision, procedural reviews, and observations, the inspectors determined that the former Unit II connections were being maintained as described in the security plan.

## PARTIAL LIST OF PERSONS CONTACTED

North Atlantic Energy Service Corporation

R. Cooney, Assistant Station Director  
J. Sobotka, NRC Coordinator  
A. Callendrello, Licensing Manager  
G. Gram, Director Support  
B. Drawbridge, Executive Director-Services  
M. Lewis, Maintenance Services  
B. Seymour, Security and Safety Manager  
R. Sherwin, Planning, Scheduling, and Outage Manager  
J. Grillo, Operations Manager  
R. White, Engineering Manager  
V. Pascucci, Quality Assurance Department Supervisor  
S. Kulback, Security Supervisor-Operations  
R. Messina, Security Supervisor  
G. House, Processing Supervisor

Nuclear Regulatory Commission

J. Macdonald, Sr. Resident Inspector