

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Report No. 50-309/85-11

Docket No. 50-309

License No. DPR-36

Licensee: Maine Yankee Atomic Power Company

83 Edison Drive

Augusta, Maine 04336

Facility Name: Maine Yankee Atomic Power Station

Inspection At: Wiscasset, Maine

Inspection Conducted: April 28 - May 2, 1985

Date of Last Physical Security Inspection: August 27-31, 1984

Type of Inspection: Routine, Unannounced Physical Security

Inspector: *R. J. Bailey*
R. J. Bailey, Physical Security
Inspector

7-11-85
date

Approved by: *R. B. Keimig*
R. B. Keimig, Chief, Safeguards
Section

7-11-85
date

Inspection Summary: Routine, Unannounced Physical Security Inspection on April 28 - May 2, 1985 (Inspection Report No. 50-309/85-11)

Areas Inspected: Security Plan and Implementing Procedures; Security Organization; Management Effectiveness; Security Program Audits; Records and Reports; Testing and Maintenance; Physical Barriers (Protected Area); Physical Barriers (Vital Areas); Training and Qualification Records; and, follow-up on previously identified violations, inspector follow-up and unresolved items. The inspection involved 34 man-hours onsite by one region-based inspector and began during a Sunday, day shift. Five hours were spent during off-shift periods.

Results: The licensee was found to be in compliance with NRC requirements within the nine areas examined.

DETAILS

1. Key Persons Contacted

J. Garrity - Plant Manager
B. Marshal - Director of Security
H. Tolberg - Site Security Supervisor
R. Crosby - Quality Assurance
S. Nichols - Licensing Department

The inspector also interviewed other licensee employees and members of the Hall contract security organization.

MC 30703 - Exit Interview

The inspector met with the licensee representatives listed in paragraph 1 at the conclusion of the inspection on May 2, 1985. At that time, the purpose, scope and results of the inspection were reviewed. At no time during this inspection was written material provided to the licensee by the inspector. The inspector stated that he had observed test grading disparities in the security training and requalification program. In response, the licensee had regraded all examinations using a more stringent grading criteria. As a result, two individuals, who had previously requalified, scored below the acceptance standard in one portion of a four part examination. Each individual was retested and the tests were graded using the revised criteria. Both passed the examination. The licensee committed to take the following corrective actions by May 17, 1985 as a result of their review of this matter:

- a. Security qualification and requalification tests will be reviewed and revised.
- b. Security qualification and requalification test answer keys will be reviewed and revised to preclude answers that are broadly subjective and, therefore, can lead to grading disparities.
- c. Security training lesson plans will be reviewed and revised where necessary, to conform to existing security procedures.
- d. The security supervisor will review all test material, procedures and training documentation on a quarterly basis and record the results of his review.

The inspector requested that these actions be documented in a letter to NRC Region I by the close of business on May 2, 1985. The licensee agreed and complied with the request. (See also paragraph 13 of this report.)

3. MC 92701 - Follow-up on Inspector Identified and Unresolved Items

The following Inspector Identified (IFI) and Unresolved Item(s) (UI) which contain SGI or COFI, were closed during this inspection: IFI 83-09-04; IFI 83-09-06; IFI 83-09-08; IFI 83-09-09; IFI 84-20-04; and UI 84-20-03.

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(Closed) Inspector Follow-up (50-309/84-20-02): Review of security procedures pertaining to locks used on security containers that protect safeguards information. The inspector verified that the licensee published a written security procedure, No. 15-15, Revision 2, dated April 18, 1985 which, in paragraph 10, outlines the audit and combination change requirements for all account holders maintaining safeguards information.

(Closed) Inspector Follow-up (50-309/84-20-01): Review the scope of independent security program audit. The licensee was advised by the inspector to include other aspects of the security program that were not specifically identified to be audited in the Physical Security Plan; for example, Training and Qualification Plan, Security Contingency Plan, security event reporting and the protection of safeguards information. The inspector reviewed the independent quality assurance audit MY-85-4, dated February 11-15, 1985 and observed that the licensee had included the protection of safeguards information. The licensee stated that other aspects of the program would be included in subsequent audits.

4. MC 92702 - Follow-up on Violations

The following violations, which contain SGI or COFI, were closed during this inspection: 81-02-01; 83-09-01; 83-09-05; and 83-09-07.

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(Closed) Violation (50-309/84-12-02): Improper access control. An NRC inspector had observed an individual who failed to follow proper access control procedures when entering the plant. The inspector verified on April 29, 1985, that the actions enumerated in the licensee's reply to the violation had been taken, and observed that Security Officers were implementing proper access control procedures.

(Closed) Violation (50-309/84-20-05): Failure to qualify all armed security officers in accordance with the physical security plan. The licensee's reply to this violation stated that all officers previously qualified incorrectly were requalified in accordance with the security plan by September 4, 1984 and that future fitness demonstrations would be accomplished accordingly. The inspector verified that this had been accomplished by a records review and personal interviews.

5. MC 81018 - Security Plan and Implementing Procedures

The inspector audited portions of the licensee's security program and found that they conformed to the security plan and implementing procedures. Plant safety was not observed to be adversely affected by security programs, procedures, or equipment.

6. MC 81020 - Management Effectiveness

The licensee's security management staff and contractor management and supervisory staff appeared effective in discharging their responsibilities with respect to the security program. Additionally, in response to several discrepancies identified by the inspector in the qualification and requalification training program, the licensee's security management and security contractor management responded promptly with a technically sound and thorough approach to analyzing and resolving the problem. (See paragraph 13 of this report.)

7. MC 81022 - Security Organization

The licensee's security management structure and chain of command were in conformance with the approved physical security plan, contingency plan, procedures, and applicable regulatory requirements, and were adequate and appropriate for their intended functions. In addition, the licensee has a management system to provide for the development, revision, implementation and enforcement of physical protection procedures.

8. MC 81034 - Security Program Audit

The licensee properly audited the security program with qualified persons who were independent of both security management and supervision. The most recent audit of the program (MY-85-4) was conducted on February 11 - 15, 1985. Reports of audits conducted over the past five years were noted by the inspector to be in the files and were readily accessible.

9. MC 81038 - Records and Reports

The inspector reviewed security logs and records for accuracy, completeness, abnormal conditions, significant changes and trends, required entries, and proper reporting. The following records and logs were reviewed: Training records, training test material, door alarm records, and weekly functional alarm check sheets.

10. MC 81042 - Testing and Maintenance

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11. MC 81052 - Physical Barriers (Protected Area)

The inspector observed that the licensee maintained the physical barriers around the protected areas in conformance with the security plan. During a review of Figure 3.1.1.1 of the approved Physical Security Plan, the inspector observed that a particular exit door is not depicted as part of the protected area barrier but was considered as such. The licensee was advised to correct this in the next revision to the security plan. (Inspector Follow-up Item 50-309/85-11-01.)

12. MC 81054 - Physical Barriers (Vital Areas)

The inspector observed that the licensee maintained the physical barriers surrounding the vital areas in conformance with the security plan.

13. MC 81501 - Training and Qualification (T&Q) Plan

During a review on April 30, 1985, of security training qualification and requalification records maintained by the security force contractor,

the inspector observed that qualification tests previously graded by the security force training officer contained apparent discrepancies. The inspector, using the authorized test answer key determined, with the aid of the site security supervisor, that the scores on several tests graded by the training officer were several percentage points higher than those graded by the inspector. The training officer stated that since many questions on the tests were poorly worded, ambiguous or outdated, he accepted some answers which were different than those on the answer key and, in some cases, assigned partial credit for incomplete or partial answers. However, even given that explanation, the inspector and site security supervisor found it difficult to assess the answers and apply the same the grades as the training officer did. The inspector stated that, because of the highly judgmental nature of the grading process, he could not accept the scores as being valid. Additionally, the inspector could not find prescribed controls for the administration of qualification/requalification testing in the Training and Qualification (T&Q) Plan or in the written security procedures.

In the absence of such administrative control, and because of the judgement used in grading the tests used to qualify the security force, the inspector stated that a more definitive method of scoring the training test results would be necessary in order to determine whether the security force was qualified in accordance with the T&Q Plan. When the licensee was apprised of the inspector's findings, six individuals were selected to comprise a team under the Director of Security to regrade all tests that had been administered to qualify the current security force members. After the licensee developed consistent and accurate answers and grading criteria for each of the four examinations, the examinations were regraded. The regrading process resulted in grades being reduced on an average of 5.6 points. The regrading process established that all security force members were qualified to perform security duties with the exception of two individuals who scored below the 70% acceptance criteria in one of the four tests. One individual was retested on May 1 and the other on May 2, 1985; both passed the test. The licensee committed to implement the following actions by May 17, 1985, to correct the problem: review and revise the security qualification/requalification tests; review and revise the test answer keys; and, ensure that there is compatibility between the lesson plans, security procedures and tests. The inspector requested the licensee to document these commitments in a letter to Region I by the close of business on May 2, 1985; the licensee complied. In addition to the actions mentioned above, the licensee committed to requiring the security supervisor to review all test material, procedures and training documentation on a quarterly basis and formally record the results of that review.

The licensee advised the inspector by telephone on May 8, 1985 that all security qualification/requalification test and test answer keys had been reviewed and revised, as necessary, and they are currently being

used for annual requalification. During this telephone conversation the inspector reminded the licensee of the commitment made during the exit interview concerning the review and revision of lesson plans. This commitment was not included in the licensee's May 2 letter to Region I.

The licensee representative stated that all phases of the contractor's training program would be closely monitored by the site security supervisor. In a telephone conversation on May 13, 1985, the licensee advised the inspector that a procedure to control the integrity of tests, answer keys and test material was being developed.

The licensee was advised during the May 8 and 13 telephone conversations that the commitments made at the exit interview and in writing to Region I will be reviewed along with the effectiveness of the actions at a future inspection of their security program. (Inspector Follow-up Item 50-309/85-11-02.)