

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-423/85-30

Docket No. 50-423

License No. CPPR-113

Licensee: Northeast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06141-0270

Facility Name: Millstone Nuclear Power Station, Unit 3

Inspection At: Waterford, Connecticut

Date of Last Physical Protection Inspection: February 11-15, 1985

Inspection Conducted: June 17-21, 1985

Type of Inspection: Preoperational Security Program Review

Inspector: *William J. Madden*
William J. Madden, Physical Security
Inspector

10-9-85
date

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

10/10/85
date

Inspection Summary: Preoperational Security Program Review on June 17-21, 1985 (Inspection Report No. 50-423/85-30).

Areas Reviewed: Progress in the development of the Site Physical Security Program to meet the requirements of 10 CFR 73.55 and 10 CFR 73.67, including a review of the proposed, consolidated site Physical Security Plan and implementation of the NRC approved "Plan for Receipt of Special Nuclear Material of Low Strategic Significance" (LESNM plan). The review involved a total of 32 hours onsite by one region-based inspector.

Results: The licensee was found in compliance with the NRC approved LESNM Security Plan. Development of the licensee's site physical security plan is progressing as scheduled.

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DETAILS

1. Persons Contacted

*W. Romberg, Station Superintendent *R. Herbert, Station Services Superintendent
F. Rothem, Senior Construction Representative, (NUSCO) *N. Tasker, Director, Systems Security (NUSCO) *M. Griffin, Security Agent (NUSCO)
P. Weekley, Security Supervisor
M. Clarke, Project Engineer, Security Systems
D. Nordquist, Manager, Quality Assurance (NUSCO)
J. Clark, Staff Engineer (NUSCO)

*Present at the Exit Interview.

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

2. 30703 - Exit Interview

The inspector met with the licensee representatives (listed in paragraph 1) at the conclusion of the review on June 21, 1985. At that time, the purpose and scope of the review and the progress of security related matters were discussed.

At no time during this review was written material provided to the licensee by the inspector.

3. MC 92701 - Followup on Inspector Items (IFI's)

- a. (CLOSED) IFI (50-423/85-09-03) - finalization and submittal to NRC of a proposed, consolidated Millstone Station Physical Security Plan for Unit Nos. 1, 2 and 3. The inspector confirmed by review of correspondence that Revision "0" of the consolidated plan was submitted by the licensee to the NRC by letter of May 30, 1985, under the provisions of 10 CFR 50.54(p). Although not yet approved, the inspector reviewed portions of the plan, and found that, in general, it met the spirit and intent of the performance requirements of 10 CFR 73.55. The plan is scheduled to supersede Revision 19 of the current Millstone Modified Amended Security Plan on October 18, 1985.
- b. (CLOSED) IFI (50-423/85-09-02) - finalization and submittal to NRC of a Low Enriched SNM Protection Plan required by 10 CFR 73.67. The inspector confirmed that the licensee's "Plan for Receipt of Special Nuclear Material of Low Strategic Significance for Millstone Power Station, Unit No. 3" was submitted to the NRC in March, 1985 and was approved by the NRC on April 2, 1985. The inspector confirmed the effectiveness of the plan and adequacy of implementing procedures by observing the protection of fuel in storage and by inspecting receipt of a fuel shipment at the site on June 19, 1985.

- c. (OPEN) IFI (50-423/85-09-03) - development of Security Organization and Plant Administrative Security Procedures. Of the current total of 39 security organization procedures and 12 plant administrative procedures affecting security, the licensee has identified at least one organization procedure and eight administrative procedures which will require changes/modification to accommodate the inclusion of Unit No. 3. This work was in progress. This item will be reviewed in future inspections.
- d. (OPEN) IFI (50-423/85-09-04) - organization expansion/restructuring and hiring of supervisors. The licensee is continuing its evaluation of security organization management needs. Some restructuring is planned but not finalized. A total of 38 lieutenants/sergeants have been identified for contract management positions. The organization of the security management staff will be reviewed during a subsequent inspection.
- e. (OPEN) IFI (50-423/85-09-05) - staffing of Security Organization. Current security staffing is 16 proprietary personnel (shift supervisors and overhead staffing), 109 contract guards and 100 contract watchpersons. The total projected staff, to be in place on September 1, 1985, will be 16 proprietary personnel, 215 contract guards and 80 contract watchpersons. Hiring has been completed. The training and qualification program is on schedule. Training and qualification of the security force will be reviewed during a subsequent inspection.
- f. (OPEN) IFI (50-423/85-09-06) - LLEA. A special orientation will be conducted to familiarize local law enforcement authorities (LLEA) with the Unit 3 facility and response procedures. The licensee has scheduled the LLEA for orientation during August, 1985. Results of this orientation will be discussed with the licensee by the inspector during a subsequent inspection.
- g. (OPEN) IFI (50-423/85-09-07) - audit of the "Plan for Receipt of Special Nuclear Material of Low Strategic Significance for Millstone Power Station, Unit 3" and the Site Security Plan. The inspector reviewed the licensee audit of the SNM plan conducted by the Corporate Security Department during the period April 26, 1985 through May 3, 1985. The attributes of the plan and implementing procedures audited were comprehensive and utilized a 15 page checklist. Audit findings were promptly addressed by the licensee.

The annual site security audit of the proposed consolidated Millstone Units 1, 2 and 3 Security Plan is scheduled to be completed in October, 1985. Special emphasis will be placed on the incorporation of Unit No. 3. The annual site audit will be reviewed by the inspector when it is completed.

- h. (OPEN) IFI (50-423/85-09-08) - records and reports modifications. The licensee has concluded that most forms and reports required by the current site plan and procedures will prove compatible when Unit 3 is included. Some minor modifications may be necessary. The modification of forms and reports will be accomplished coincidental with procedure revisions and should be available for use by the security organization on September 1, 1985. These will be inspected during a subsequent inspection.
- i. (OPEN) IFI (50-423/85-09-09) - development of testing and maintenance procedures for new systems and equipment. Testing of new equipment and systems was in progress by I and C personnel. Acceptance testing is being documented and surveillance procedures are being developed consistent with test results and manufacturers' specifications. Surveillance procedures should be available by October 1, 1985 and will be reviewed during a future inspection.
- j. (OPEN) IFI's (50-423/85-09-10 through 85-09-24) - The status of these IFI's are on schedule as documented in Region I Inspection Report No. 50-423/85-09. These items will be reviewed by the inspector and reported as commitments are fulfilled and projects are completed. There were no items noted by the inspector that would impact on the current NTOL schedule.

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Personnel/Systems Interface Plan

- July 1, 1985 - Initiate use of new North Access Facility for personnel access to Unit 3
- July 10, 1985 - Initiate the issuance and collecting of badges upon Unit 3 entry and exit
- July 20, 1985 - Re-program key card readers for acceptance of new key cards
- July 20, 1985 - Initiate package searches at North Access Facility
- Sept. 7, 1985 - Initiate use of search equipment at North Access Facility
- Sept. 7, 1985 - Initiate phase-in of other Revision 0, Site Security Plan commitments

4. MC 81018 - Security Plan and Implementing Procedures

The inspector identified an inconsistency in paragraph 3.1.2 of the proposed Revision 0 of the Site Security Plan concerning armed response. The wording of the licensee's commitment was not clear. A corrected page will be submitted to NMSS to clarify the licensee's intent. This is an inspector followup item (IFI 85-30-02).

5. MC 81501 - Personnel Training and Qualification - General Requirements

The inspector reviewed Revision 3 to the Millstone Nuclear Power Station, Units No. 1 and 2, Suitability, Training and Qualification Plan (ST&Q). Revision 3 was submitted to NRC on May 22, 1985, under the provisions of 10 CFR 50.90. The revision incorporates commitments to: train and qualify contingency force personnel in those critical tasks associated with the individual's assignment within the security organization before utilization and in accordance with the ST&Q Plan crucial tasks outlined for the position(s) and, re-define the scope of critical task(s) responsibilities for proprietary Security Shift Supervisors to be more consistent with their command positions. The licensee inadvertently omitted from the revision, the crucial tasks 2-1B and 3-1B affecting the requirements to demonstrate qualification firing of weapons for the Security Shift Supervisors. The licensee advised the inspector that these two tasks will be included in the ST&Q Plan and a corrected page will be submitted to NRC by July 31, 1985. The licensee will also change the title of the plan to include Unit 3 and will submit this plan change to NRC in accordance with the provisions of 10 CFR 50.54 by September 1, 1985. This is an inspector followup item (IFI 85-30-01).

6. MC 81601 - Safeguards Contingency Plan

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