



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 15 1985

MEMORANDUM FOR: Thomas E. Murley  
Regional Administrator  
Region I

FROM: Robert F. Burnett, Director  
Division of Safeguards, NMSS

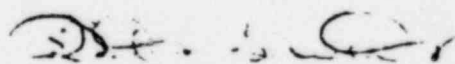
SUBJECT: REGULATORY EFFECTIVENESS REVIEW PROGRAM

A Regulatory Effectiveness Review (RER) for Indian Points Units 2 and 3 has been scheduled for May 14 - 22, 1985. Enclosed are draft letters to Consolidated Edison Company of New York, Inc., and Power Authority of the State of New York which explain the purpose and schedule of the review. Your assistance in forwarding these letters is appreciated.

In addition, the RER team reviews the possible impact of security on plant safety. In view of this responsibility, our team needs the full time support of an individual from your regional office with technical power reactor safety expertise, who will be a member of the RER team. The enclosed "Guidelines for the Safety/Safeguards Interface Member of a Regulatory Effectiveness Review" provides information on the duties of this individual. Your support in this regard is important to this aspect of the program.

A list of logistical matters is also enclosed, which we would very much appreciate the assistance of your staff in resolving.

Many thanks for your cooperation and assistance.

  
Robert F. Burnett, Director  
Division of Safeguards, NMSS

Enclosures: As stated

cc: D. Eisenhower, NRR

8508160140 850703  
PDR FOIA  
CORRIGAS-401 PDR

Dear

The NRC is in the process of conducting safeguards regulatory effectiveness reviews at nuclear power reactors. I wish to inform you that the Indian Point 2 facility has been chosen for such a review scheduled for May 14-22, 1985.

The prime purpose of the review program is to evaluate the overall effectiveness of the Indian Point 2 safeguards program and to determine whether existing safeguards regulations yield the level of protection intended by NRC. The team performing the review supports NRC's quality assurance program for safeguards, both as it applies to the Indian Point 2 security system and to NRC's regulations. The review will complement, but be independent of, the licensing and inspection functions.

The review at Indian Point 2 will be conducted coincident with Indian Point 3 by a team with representatives from the Division of Safeguards, Region I, and U.S. Army Special Forces personnel from Fort Bragg, NC. The review team will be comprised of two groups. One group will look at the facility's safeguards from the perspective of an insider, while the other will view safeguards from an external adversary's perspective.

The review will initiate with a single entrance briefing for both Units. You may wish to have a representative of your corporate staff present during this briefing, as it will provide an overview of the team's objectives and anticipated activities for the duration of the visit. Any questions that may arise concerning the team's review technique or other matters, will be addressed at

that time. For the remainder of the first day, the team would like to have a plant orientation tour with emphasis on safeguards areas and systems, and begin the examination of plant vital areas. During the remainder of the on-site assessment, the team will continue reviewing vital areas and components, and the entire safeguards program. The last day is reserved for any activities the team has been unable to accomplish and for a separate briefing of plant and corporate personnel for each unit on the preliminary results of the review.

Please provide appropriate plant personnel support for both groups of the team during the scheduled review. The external group will require an escort from the security department who can communicate with alarm stations. The internal group will need escorts from both security and plant operations. The latter should be individuals familiar with the locations and detailed operation of the engineered safety feature systems and components. The team will make every effort to schedule its activities so as to minimize disruption of normal plant operations. The time that various team members will spend on-site will vary, but generally will range from four to seven hours per day.

Listed below are the names of the participants, badge number and level of clearance.

<u>Name</u>	<u>Organization</u>	<u>Social Security #</u>	<u>Badge #</u>	<u>Clearance</u>
Elizabeth Ten Eyck	NRC/HQ	217-42-0025	A-3230	Q
David H. Urrik	NRC/HQ	026-26-0360	B-3174	L
John E. Johnson	US Army	557-04-4015	ASF	L
Richard L. Maywald	US Army	449-92-1399	ASF	L
Jack D. Pope	US Army	241-88-5042	ASF	L

<u>Name</u>	<u>Organization</u>	<u>Social Security #</u>	<u>Badge #</u>	<u>Clearance</u>
Zan-Shing R. Hsu	NRC/HQ	265-59-1792	C-1440	145B-Waiver
Kathleen McConnell	NRC/HQ	213-66-2285	A-3010	Q
Douglas Pickett	NRC/HQ	266-66-0134	B-0545	L

If you have any questions regarding the conduct of these regulatory effectiveness reviews, which you wish to have answered prior to the team's visit, please contact Elizabeth Ten Eyck, Safeguards Special Projects Branch, at (301) 427-4723 or  
of the Region staff.

Sincerely,

cc: R. F. Burnett, NMSS  
C. O. Thomas, NRR  
D. Neighbors, NRR  
M. Slosson, NRR

Guidelines for a Safety/Safeguards Interface Member  
of a Regulatory Effectiveness Review

One of the purposes of the RER program is to ensure that plant security and safety assets cooperate, to maximum extent practicable, in achieving the dual goals of prevention of radiological sabotage and safe operation of the plant. This is done by investigating the interaction between operational safety and security. You will do this initially through occasional discussions during the facility tour with plant personnel, asking similar questions of several operational and security personnel to get a variety of perspectives. This should be supplemented with a review of these issues in an office setting before leaving the site. Concerns identified will be discussed with the team at synthesis meetings usually held at the end of each day, discussed with plant management at the exit briefing, and incorporated into the formal RER report.

Issues you should address include:

1. The manner in which security procedures and safety procedures provide an integrated response to indications of unusual plant conditions.
  - ° control room procedures for responding to malfunctions or alarms
  - ° allowable times for correcting malfunctions
  - ° operational personnel consideration of security assets to assist in investigating the cause of an unusual condition
  - ° use of access control computer and security officers for personnel accountability
  - ° use of security officers for fire brigade



2. Identification of any security procedures that may interfere with plant safety during routine or emergency conditions and the extent of that interface.
  - operator actions when normal access to vital areas is prevented
  - procedures for access to key cards for vital areas
  - procedures for access to keys for administrative locks
  - security procedures normally implemented when access computer is not operational.
  - anti-passback features and capability for over-ride in emergencies
  - time delays caused by security access controls for on-site and off-site response of licensee personnel
  - procedures so that off-site emergency response (non-licensee) personnel are not delayed -- badging, escorts
  - familiarization of licensee personnel relative to site manager's ultimate authority in emergency situations
  - procedures to accommodate expanded work force during outages
3. General interaction of security and operational personnel
  - rapport and appreciation of the needs for safety and security procedures
  - program for review of safeguards procedures by operational departments affected and/or by safety committee
  - security participation in review of operational procedures and system changes
  - attitudes of site personnel towards level of security at site
  - attitudes of site personnel regarding removing access controls from vital equipment

- ° attitudes of site personnel regarding wider availability of key cards for operational staff for access to vital areas
- ° attitudes towards benefits of screening programs in general and in particular in lieu of access controls
- ° attitudes towards fitness for duty programs - benefits, objections

4. Equipment Concerns

- ° adverse impact of security equipment on safety (e.g., EMI from security radios effecting safety systems)
- ° adverse impact of plant equipment on security systems (e.g., EMI from pump start-up tripping the security access computer)
- ° any safety problems caused by patrols of armed security officers in vital areas
- ° would radiological habitability requirements for Central Alarm Station permit smoother handling of safety-related emergency situations?
- ° means for unimpeded egress from vital areas even during security systems failures
- ° positive/negative safety aspects of hardened chains and padlocks for protection of Engineered Safety Feature valves and motor controls

Regulatory Effectiveness Review Administrative Concerns

1. Dispatch letter to licensees confirming visit and identifying team members.
2. Arrange for bringing cameras on-site.
3. Inform licensees that aerial photographs will be taken.
4. Inform licensees that the external group will want to make an appointment to meet with a senior representative of the primary local law enforcement authority at their office.
5. Confirm that licensees will provide at least two security escorts, one for the internal group and one for the external group.
6. Confirm that the licensees will provide an additional internal group escort who is familiar with the location and detailed operation of each unit's engineered safety feature systems and components.
7. Inform the licensees that the team will be on-site one evening during the second shift, probably Wednesday, and will need a knowledgeable security escort.
8. Determine what, if any, health physics documents, training, whole body counts, etc. will be needed for escorted access to these equipment areas.
9. Determine for which equipment, if any, respirator protection would be required for access.
10. After consultation with the RER team leader, schedule any health physics appointments with the licensees that might be necessary.
11. Determine what personnel information the licensees will need to facilitate access control requirements for team members.
12. Ask the licensees to select a time and place for a single entrance briefing in the early morning of the first day on-site (8:30 AM - 9:30 AM). The location should be suitable for showing a slide-sound presentation (the RER team will provide the projector).



3/11/85

NRC FORM 255  
(10 76)

File

DIVISION OF CONTRACTS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

NOTIFICATION OF CONTRACT EXECUTION

TO: John Davis, Director  
(Title)

Office of Nuclear Material Safety & Safeguards  
(Organization)

FROM: Marie Page 3/11/85  
Marie Page  
Contract Administrator  
(Date)

Technical Contracts Branch  
DIVISION OF CONTRACTS, ADM

CONTRACTOR (Name & Location)

Army - John F. Kennedy Center  
Fort Bragg, NC

CONTRACT NUMBER

NRC-02-76-311

MODIFICATION NUMBER

15

☐ NEW

☒ MODIFICATION

OTHER (Specify)

CONTRACT BASED ON:

AUTHORIZATION NUMBER

IMS-76-311

DATE

8/7/84

CONTRACT CHANGES PER THIS ACTION

period of performance is  
extended

EXECUTION DATE

February 14, 1985

TYPE OF CONTRACT

PROJECT TITLE

Transport/Fixed Site Vulnerability Analysis

PERIOD OF PERFORMANCE

7/2/76 - 12/31/85

PRINCIPAL INVESTIGATOR

NRC AUTHORIZED REPRESENTATIVE

Nicholas Paradiso

FUNDING

B&R NUMBER

N/A

FIN NUMBER

N/A

AMOUNT

NEW NRC FUNDS

\$ 72,965.00

TOTAL FY — FUNDING (prior)

\$297,790.64

TOTAL NRC OBLIGATIONS

\$ 370,755.64

GOVERNMENT PROPERTY

ATTACHMENT(S):

CONTRACT DOCUMENT I

PROJECT DESCRIPTIVE SUMMARY

OFFICE: NMSS NUMBER:  
PROJECT TITLE: > TRANSPORTATION/FIXED SITE VULNERABILITY APPRAISALS  
FIN NO: R 1536  
TYPE OF CONTRACT: Interagency Agreement  
CONTRACTOR: U.S. Army 1st Special Operations Command  
FY BUDGET(\$K):

	<u>FY84</u>	<u>FY85</u>	<u>FY86</u>	<u>FY87</u>	<u>FY88</u>
<u>PRIOR:</u>	0	73			
<u>OPERATING:</u>			89		
<u>FOLLOW-ON:</u>				88	88

SCOPE OF WORK: The U.S. Army 1st Special Operations Command (U.S. Army Special Forces) will continue to assist NRC in evaluating safeguards, as implemented, at licensed power reactors, fuel cycle facilities, and during transportation. It is anticipated that approximately 18 facility evaluations will be performed during fiscal year 1986.

USER NEED: The Energy Reorganization Act of 1974 requires the Office of Nuclear Material Safety and Safeguards to review the safeguards of the facilities and materials licensed under the Atomic Energy Act of 1954. This program provides vital input to the review process.

PRODUCTS: Resources from this program are used to assist in evaluating the effectiveness of implemented safeguards systems during Regulatory Effectiveness Reviews.

CONTINUATION OF PROJECTS:

Resources from this program have been used to support NRC safeguards on-site since 1977. These resources have been used to assist in Regulatory Effectiveness Reviews for nuclear power reactors and at CAT 1 fuel cycle facilities since 1982. It is anticipated that this program will continue to provide support to Regulatory Effectiveness Reviews of licensed nuclear power reactors, fuel cycle facilities and licensed transport of special nuclear material, as required.

#### JUSTIFICATION FOR SOURCE SELECTED AND DISCUSSION OF ALTERNATIVES

There are several reasons for using interagency tasking to perform this effort. These include:

1. Continuity - This is a continuation of an existing evaluation program. It is more efficient to continue to use the same performing organization that is aware of NRC's mission and evaluation requirements.
2. Unique Capability - While capabilities comparable to those of the U.S. Army Special Forces may exist elsewhere within the Government (e.g., U.S. Navy seals), the U.S. Army Special Forces have, by virtue of their experience in conducting analogous military operations, a capability, not found in commercial contractors, to identify and assess the significance of safeguards vulnerabilities.
3. Financial Advantage - Under the terms of the interagency agreement, NRC is billed only for travel expenses, per diem, and special equipment required incidental to the evaluations. NRC is not charged for personnel salaries, overhead or administrative expenses.

This program enables NRC to use the tactical planning skills of the U.S. Army Special Forces to provide support for safeguards facility evaluations. Members of the U.S. Army Special Forces teams which participate in these evaluations are experienced in both the evaluation of sensitive Department of Defense installations and the planning and execution of tactical missions and have attended the current NRC Reactors Courses on BWR and PWRs. If this program is not undertaken, NRC's capability to evaluate licensee safeguards will be significantly impaired.