

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/85-34

Docket No. 50-352

License No. NPF-27

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pennsylvania 19101

Facility Name: Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: August 7, 1985

Date of Last Physical Security Inspection: July 8-12, 1985

Type of Inspection: Special Physical Security Inspection

Inspector: W. L. Kushner
W. L. Kushner, Safeguards Scientist

8/26/85
date

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

8/26/85
date

Inspection Summary: Special Physical Security Inspection on August 7, 1985
(Inspection No. 50-352/85-34)

Area Inspected: Special inspection to followup on an allegation regarding the removal of sensitive security drawings from the Limerick Station by a former member of the security force. The inspection involved 4 hours on site by a region-based inspector.

Results: The allegation was not substantiated.

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DETAILS

1. Persons Contacted

J. Basilio, Administrative Engineer
M. Berner, YOH Site Security Captain

The inspector also interviewed other licensee and YOH security personnel.

2. MC30703 - Exit Interview

The inspector met with the Administrative Engineer at the conclusion of the inspection on August 7, 1985 and advised him of the inspection results.

No written material was provided to the licensee during the inspection.

3. MC93700 - Inspector Dispatched to Site

Background

On August 2, 1985, a reporter for a Philadelphia newspaper advised NRC Region I by telephone that she had received copies of eight drawings along with a handwritten note from an individual who purportedly was previously employed as a member of the security force at the Limerick Generating Station. The note alleged that the drawings contained sensitive physical security information which the individual was able to take away from the station. The reporter requested a meeting with Region I personnel to discuss the allegation. On August 6, regional personnel met with the reporter to review the allegation and the eight drawings. The NRC personnel identified the drawings as being of the Limerick Station but could not identify them as drawings from the physical security plan for the station. The drawings had apparently been reduced to about 3" x 5" size and laminated in plastic. The NRC personnel advised the reporter that they would look into the allegation and report the findings to her.

Special Inspection

On August 7, a regional inspector was dispatched to the Limerick Station to investigate the allegation. The inspector studied the eight drawings and determined that none were from the Limerick Physical Security Plan. One was a hand drawn, unscaled, general outline of the station's perimeter boundary which depicted the general location of intrusion detection system zones. According to a licensee representative, this drawing, in similar reduced and laminated format, had been provided in the past to security force personnel as an orientation and familiarization aid. The inspector reviewed this drawing and the other seven with representatives of the

licensee. The inspector determined that the aid was no longer being provided since security force personnel were sufficiently familiar with the station to carry out their tasks without its use. The inspector also determined that the zones depicted on the drawing could not be effectively utilized to compromise the intrusion detection system. Additionally, the inspector determined that the other seven drawings were fire protection drawings which had been overlayed to add specific door identification numbers. (The capability of overlay enhancement of drawing was available in the station's document control center. Plastic lamination and reduction facilities were also available at the station). The licensee's representative stated that he had not authorized and had no knowledge of the reproduction of these drawings. The information depicted on these seven drawings was also determined by the inspector to not compromise the station's physical security program.

Conclusions

Based upon this special inspection, the inspector concluded the following:

- One of the eight, reduced size, laminated drawings had been provided in the past to members of the security force by the licensee;
- The other seven drawings were reproduced without the authorization or consent of the licensee;
- None of the drawings, either alone or together, represented a compromise of the station's physical security program;

Due to the drawing enhancement and reproduction facilities available on the station, the licensee was advised by the inspector that extreme precautions must be exercised over the control of safeguards (sensitive security) information and other information of a proprietary nature. The licensee agreed to review this matter and to take appropriate actions as deemed necessary. (Inspector Follow-up Item 85-34-01)