

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket No.: 50-382  
License No.: NPF-38  
Report No.: 50-382/96-25  
Licensee: Entergy Operations, Inc.  
Facility: Waterford Steam Electric Station, Unit 3  
Location: Hwy. 18  
Killona, Louisiana  
Dates: October 28 through November 1, 1996  
Inspector: Thomas W. Dexter, Senior Physical Security Specialist  
Approved By: Blaine Murray, Chief, Plant Support Branch  
Division of Reactor Safety  
Attachment: Supplemental Information

## EXECUTIVE SUMMARY

Waterford Steam Electric Station, Unit 3  
NRC Inspection Report 50-382/96-25

This routine, announced inspection focused upon specific areas of the licensee's physical security program. These areas included review of commitments in the updated final safety analysis report, records and reports, testing and maintenance, security plans and procedures, compensatory measures, access control of personnel and packages, management support, training and qualification, lighting, assessment aids, alarms stations, and review of previous inspection findings.

### Plant Support

- There was a very good records and reports program in place. The security staff was correctly reporting security events. A noncited violation was identified for failure to verify activities of an individual who was unemployed in excess of 30 days (Section S1.1).
- Security systems were repaired in a timely manner. An excellent testing and maintenance program was being conducted and was properly documented. (Section S2.1).
- Assessment aids were excellent and alarm station operators implemented compensatory measures for degraded conditions (Section S2.2).
- The protected area intrusion detection system was functional, effective, and operated (Section S2.3).
- Alarm stations were redundant and alarm station operators were knowledgeable of the duties (Section S2.4).
- Security lighting within the protected area was good (Section S2.5).
- Security plan changes were generally submitted in accordance with NRC requirements and the changes did not decrease the effectiveness of the plans. Security procedures were consistent with the security plans (Section S3.1).
- The compensatory measures program was effectively implemented. The security personnel were well trained on the program requirements (Section 4.1).
- An effective program for searching personnel, packages, and material was maintained. Security personnel operating the equipment were well trained (Section 4.2).

- An effective security training program had been implemented (Section 5.1).
- Licensee management support for the security program was very good (Section 6.1).

Report Details

III. Engineering

**E2 Review of Commitments in the Updated Final Safety Analysis Report (UFSAR)**

A recent discovery of a licensee operating their facility in a manner contrary to the UFSAR description highlighted the need for a special focused review that compares plant practices, procedures and/or parameters to the UFSAR description. While performing the inspection discussed in this report, the inspector reviewed the applicable portions of the UFSAR that related to the areas inspected. The inspector verified that the UFSAR wording was consistent with the observed plant practice, procedures and/or parameters.

IV. Plant Support

**S1 Conduct of Security and Safeguards Activities**

**S1.1 Records and Reports (81700-02.01)**

**a. Inspection Scope**

The inspector reviewed safeguards event logs and security incident reports to determine compliance with the requirements of 10 CFR 73.21(b) and (c), 10 CFR 26.73, and the physical security plan.

**b. Observations and Findings**

The inspector determined that the licensee conformed to the regulatory requirements regarding the reporting of security events. The records were available for review and maintained for the time required by regulations. The inspector specifically reviewed the security event logs from July 1 through October 31, 1996. The reports were accurate and contained sufficient information for the reviewer to determine reportability and corrective action taken.

During the review the inspector noted that the licensee had logged an access authorization event involving the erroneous granting of unescorted access to an individual.

License Condition 2.E of the Waterford Steam Electric Station, Unit 3, Operating License NPF-38, dated March 16, 1985, requires that the licensee fully implement and maintain in effect the Commission approved physical security plan, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Waterford 3 Physical Security Plan, "Personnel Screening and Access Authorization," Revision 16, paragraph 2.4.1, states, in part, "Entergy Operations, Inc., Waterford 3, commits to Regulatory Guide 5.66, Access Authorization Program for Nuclear Power Plant dated June 1991. All regulatory elements have been implemented to satisfy to the requirements of 10 CFR 73.56."

Procedure OM-106, "Unescorted Access Authorization Program," Revision 2, paragraph 6.7.1.f. requires the licensee to verify activities of the individual during interruptions of employment in excess of 30 days.

On July 10, 1996, the licensee granted unescorted access to an individual without verifying what activities the individual engaged in during the period of May 3, 1996, when the individual terminated work at Indian Point 3 Nuclear Power Plant and July 10, 1996, when the individual began work at the Waterford 3 plant.

The licensee discovered the error on July 11, 1996, and immediately began corrective actions. The licensee's root cause analysis determined that this event was caused by an administrative error. During this inspection, the inspector verified that the licensee had completed the following corrective actions:

- (1) Two new checklists specific to the Waterford 3 process, as opposed to four checklists previously used, were developed and being used.
- (2) Desk Top Instruction 18 was revised and specifically addressed when to initiate a suitable inquiry and what type of background packets were available to use by the screening staff.
- (3) On July 11, 1996, the licensee suspended the individual's unescorted access pending completion of a suitable inquiry. A review of plant security records was also conducted to determine the access activities of the individual from July 10-11, 1996. The records indicated the individual had not entered the protected area during that time.

The licensee's failure to verify activities of an individual during interruptions of employment in excess of 30 days prior to granting unescorted access to an individual is a violation of Section 2.4.1 of the physical security plan. This licensee-identified and corrected violation is being treated as a noncited violation consistent with Section VII.B.1 of the NRC Enforcement Policy (382/9625-01).

c. Conclusions

There was a very good records and reports program in place. The security staff was correctly reporting security events. A noncited violation was identified for failure to verify activities of an individual during interruptions of employment in excess of 30 days.

## **S2 Status of Security Facilities and Equipment**

### **S2.1 Testing and Maintenance (81700-02.07)**

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

The inspector reviewed the testing and maintenance program to determine compliance with the requirements of the security plan.

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

The inspector determined through interviews with security officers and supervisors and a review of records that repairs to security equipment were generally completed in a timely manner. The timely response to repair detection aids, access control equipment, and vital area door locks and closures was instrumental in the low number of compensatory posting hours and overtime required of security officers.

On October 30, 1996, the inspector requested and observed a security officer perform functional testing of the portal metal and explosive detectors. The officer performed the tests in accordance with applicable security procedures. All equipment performed as designed.

A security officer also conducted functional testing of the perimeter intrusion detection system at the request of the inspector. The system was tested at 17 randomly selected locations. The system detected all attempts by the officer to penetrate the zones either by crawling, running, or walking.

#### **c. Conclusions**

Security systems were repaired in a timely manner. An excellent testing and maintenance program was being conducted and was properly documented.

### **S2.2 Assessment Aids (81700-02.06)**

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

The assessment aids program was inspected to determine compliance with 10 CFR 73.55(a), (h)(4), and (6), and the physical security plan.

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

The inspector observed the assessment aids during the hours of daylight on October 30, 1996, and determined that they were installed, maintained, and operated as required in the physical security plan. The overall picture quality of the cameras was excellent. The licensee used two monitors for the alarm station



operator to monitor alarms. Alarm station operators monitored the video reception quality and, when necessary, compensatory measures were employed to ensure compliance with the physical security plan.

c. Conclusions

Assessment aids were excellent and alarm station operators correctly implemented compensatory measures for degraded conditions.

S2.3 Detection Aids - Protected Areas (81700-02.04)

a. Inspection Scope

The licensee's intrusion detection systems were inspected to verify that they were functional, effective, and met the licensee's commitments in accordance with 10 CFR 73.55(d)(7) and (8) and (e)(2) and the physical security plan.

b. Observations and Findings

The inspector requested and observed testing of the perimeter intrusion detection system on October 31, 1996. Approximately 17 locations on the protected area perimeter were tested. The two individuals conducting the testing were knowledgeable of the testing procedures and conducted the tests in a manner that was performance based and challenged the system. The inspector determined that the intrusion detection system was installed and operated as required by the plan.

c. Conclusions

The protected area intrusion detection system was functional, effective, and operated as required by the licensee's physical security plan.

S2.4 Alarm Stations and Communications (81700-02.06)

a. Inspection Scope

The inspector verified that the licensee's central and secondary alarms stations were maintained to meet the requirements of 10 CFR 73.55(e)(1) and (f)(1), (2), and (3) and the physical security plan.

b. Observations and Findings

The inspector confirmed the redundancy and diversity of the alarm stations. Action by one alarm station operator could not reduce the effectiveness of the security systems without the knowledge of the other alarm station operators. The central and secondary alarm stations were bullet resistant. The inspector determined that the alarm station operators were knowledgeable of their duties.

The communications capabilities were also inspected to determine compliance with the requirements of the security plan. The areas inspected included the operability of both radio and telephone systems and the capability to effectively communicate both telephonically and by radio with the local law enforcement agencies. The inspector monitored radio communications with security officers inside the plant protected and vital areas.

c. Conclusions

Alarm stations were redundant and alarm station operators were knowledgeable of their duties. Communications capabilities were in accordance with security plan requirements.

S2.5 Lighting (71750)

a. Inspection Scope

The protected area and isolation zone lighting system was inspected to determine compliance with the requirements of the security plan.

b. Observations and Findings

On the evening of October 30, 1996, the inspector determined, by observation, that security lighting within the protected area, all buildings in the protected area of less than 18 feet in height, all buildings with ready access to the roof, and the isolation zones measured at least 0.2 footcandles, or had compensatory measures in place for those areas that were below 0.2 footcandles.

c. Conclusions

Security lighting within the protected area was good.



### **S3 Security and Safeguards Procedures and Documentation**

#### **S3.1 Security Program Plans and Procedures (81700-02.03)**

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

The licensee's physical security plan and several implementing procedures were reviewed to determine compliance with the requirements of 10 CFR 50.54(p), 10 CFR 50.90, and 10 CFR 73.55(b)(3).

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

The inspector verified, from a review of security plans and procedures and interviews with licensee security personnel, that changes to the licensee's NRC-approved Security, Contingency, and Training and Qualification Plans, as implemented, did not decrease the effectiveness of the respective plans. Plan changes submitted were generally in accordance with NRC requirements. A recent change had to be resubmitted to clarify some of the changes. The inspector also verified that the licensee had established a system to ensure that revisions to the plans were incorporated into procedures. Procedure changes were in agreement with the security plan requirements. An effective management review process for procedure changes was in place.

The inspector reviewed some of the licensee's security procedures and found them consistent with the security plans.

##### **c. Conclusions**

Security plan changes generally were submitted in accordance with NRC requirements and the changes did not decrease the effectiveness of the plans. Security procedures were consistent with the security plans.

### **S4 Security and Safeguards Staff Knowledge and Performance**

#### **S4.1 Compensatory Measures (81700-02.07)**

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

The compensatory measures program was inspected to determine compliance with the requirements of the physical security plan. The areas inspected included deployment of compensatory measures and the effectiveness of those measures.

b. Observations and Findings

The inspector confirmed that the licensee deploys compensatory measures in a manner consistent with the requirements in the security plan. The inspector determined through observation and interview of security personnel that the security personnel assigned to compensatory posts were properly trained for those duties.

c. Conclusion

The compensatory measures program was effectively implemented. The security personnel were well trained on the program requirements.

S4.2 Access Control of Personnel and Packages (81700-02.05)

a. Inspection Scope

The access control program for personnel and packages was inspected to determine compliance with the requirements of the security plan.

b. Observations and Findings

The inspector determined through observations that the licensee properly controlled personnel access to the protected area. The protected area access control equipment was inspected and found to be functional and well maintained. The inspector observed the x-ray machine search of hand carried packages at the primary access point and determined that operators were efficient and well trained. The inspector also observed personnel processing through the metal and explosive detectors and determined that most plant employees were familiar with the proper procedures for passing through the detectors.

c. Conclusions

An effective program for searching personnel, packages, and material was maintained. Security personnel operating the equipment were well trained.

**S5 Security and Safeguards Staff Training and Qualification**

S5.1 Personnel Training and Qualification (81700-02.01)

a. Inspection Scope

The security training program was inspected to determine adequacy and compliance with the requirements of Appendix B of 10 CFR Part 73.55(b)(4), (h)(5), and the NRC-approved Training and Qualification Plan.

b. Observations and Findings

The security organization was conducting all required training in accordance with their approved security training and contingency plans. The inspector confirmed that the training was being conducted every twelve months by security shift supervisors and security trainers assigned to the shifts.

c. Conclusions

An effective security training program had been implemented.

**S6 Security Organization and Administration**

**S6.1 Management Support (81700-02.01)**

a. Inspection Scope

Management support for the physical security program was evaluated.

b. Observation and Findings

Management support for the security program was very good. The inspector interviewed security officers on two of the four shifts and determined from their comments that licensee management of the security organization had improved.

c. Conclusions

Licensee management support for the security program was very good.

**S8 Miscellaneous Security and Safeguards Issues (92904)**

**S8.1 (Closed) Violation 382/9509-02: Failure to Maintain Positive Access Control to a Vital Area**

The licensee failed to provide positive access control to a vital area in that three individuals gained access to a vital area without their access authorization being verified by the licensee. During this inspection, the inspector reviewed the licensee's corrective actions. The inspector reviewed documentation that proper access control requirements were reviewed with all security personnel on shift. The inspector also reviewed Security Procedure PS-015-107, "Duties of Personnel at the Primary Access Point," Revision 12 and the letters from the security operations supervisor to all security personnel on the violation.

S8.2 (Closed) Violation 382/9522-05: Failure to Properly Compensate for Degraded Protected Area Lighting

The licensee failed to properly compensate for a trench within the protected area that did not meet the physical security plan requirements of having 0.2 footcandles of lighting in all areas. The licensee's corrective actions were to brief all security officers on the procedure and inform them of the requirement by letter. However the corrective actions were not adequate and a repeat violation (382/9605-09) was identified by the NRC resident inspector.

S8.3 (Closed) Violation 382/9605-09: Failure to Properly Compensate for Degraded Protected Area Lighting

On May 18, 1996, the licensee failed to ensure that the lighting in the protected area was at least 0.2 footcandles under construction trailers and the space between storage trailers in the gas yard. The inspector conducted an inspection of the security lighting on the evening of October 30, 1996, and observed adequate lighting within the protected area. The individual conducting the protected area lighting check and the security supervisor on duty were knowledgeable of the procedural requirements and compensatory action requirements. The inspector also verified the licensee had changed Security Procedure PS-012-102, "Protective Lighting," and had trained all security officers on the changes.

S8.4 (Closed) Violation 382/9601-03: Security Supervisor Failed to Log a Security Safeguards Event

During this inspection the inspector reviewed the licensee's actions to close this violation. A complete investigation of the supervisor's actions for not logging the event was conducted by the licensee and the supervisor was subsequently terminated. In addition, the licensee conducted 4 hours of documented training for all security personnel on security event logging.

S8.5 (Closed) Inspection Followup Item 382/9518-01: Utilization of Local Unions To Obtain a "Developed" Character Reference

During NRC Inspection 50-382/95-18, the inspector noted that Equifax, a background investigative service provider to Entergy, in one instance, telephoned a local union to obtain a "developed" character reference without providing any notation in the investigative report as to why one of the four listed references was not used. During this inspection, the inspector reviewed the licensee's actions to address this concern. The licensee had detailed discussions internally and with Equifax regarding the NRC concern. The licensee determined that Equifax only uses local unions to develop other character references when those listed by the applicant can not be contacted and the applicant can not provide any other references. The local union is then contacted to identify other personnel who may have worked at a job site with the applicant. Equifax is now providing more information on why a local

union was contacted for a developed reference. The inspector verified this by reviewing a background record on one individual who Equifax used the local union to develop a character reference.

#### V. Management Meetings

##### **X1 Exit Meeting Summary**

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on November 1, 1996. The licensee acknowledged the findings presented. No proprietary information was identified by the licensee.

## ATTACHMENT

### PARTIAL LIST OF PERSONS CONTACTED

#### Licensee

R. Azzarello, Maintenance Manager  
E. Beckendorf, Superintendent, Plant Security  
G. Bourgeois, Quality Assurance Specialist  
E. Brumfield, Contract Security Project Manager  
C. Coleman, Licensee Security  
B. Collura, Lead Trainer/Key Control Coordinator  
H. Cooper, Manager, Corporate Security  
F. Drummond, Director, Site Support  
G. Davie, Quality Assurance Manager  
G. Desoto, Specialist  
J. Fisicaro, Director, Nuclear Safety  
J. Kieff, Coordinator, Security  
A. Lambert, Training Clerk  
J. Lewis, Emergency Planning Manager  
J. Maikell, Contract Operation Coordinator  
M. Rodriguez, Security Equipment Testing Specialist  
G. Scott, Licensing Engineer  
R. Sears, Senior Lead Security Coordinator  
H. Shrum, Shift Supervisor, Operations  
M. Sosa, Training Specialist, Security  
C. Thomas, Licensing Supervisor  
L. Unger, Specialist

#### NRC

T. Pruett, Resident Inspector  
B. Murray, Chief, Plant Support Branch RIV

### INSPECTION PROCEDURES USED

IP 81700     Physical Security Program for Power Reactors  
IP 92904     Followup - Plant Support



PARTIAL LIST OF LICENSEE DOCUMENTS REVIEWED

Entergy Company Procedure OM-106, Unescorted Access Authorization Program, Revision 2, dated April 28, 1995.

Waterford 3 Investigation Desk Top Instruction No. 18, Revision 2, dated August 28, 1996.

Station Security Procedure PS-012-102, Protective Lighting, Revision 6, dated July 16, 1996.

Waterford 3 Physical Security Plan, Revision 16, dated December 29, 1996.

Security Event logs covering the period from July 1 through October 31, 1996 and Licensee Condition Reports and Security Incident Reports associated with the logs.

Training records on four contract security personnel.

ITEMS OPENED

Opened

50-382/9625-01	NCV	Failure to verify activities of an individual during interruptions of employment in excess of 30 days.
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ITEMS CLOSED

Closed

50-382/9509-02	VIO	Failure to maintain positive access control to a vital area
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50-382/9522-05	VIO	Failure to properly compensate for degraded protected area lighting.
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50-382/9605-09	VIO	Failure to properly compensate for degraded protected area lighting.
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50-382/9601-03	VIO	Failure by security supervisor to log a safeguards event.
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50-382/9518-01	IFI	Utilization of local unions to obtain "developed" character references.
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50-382/9625-01	NCV	Failure to verify activities of an individual during interruptions of employment in excess of 30 days.
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