

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-373; 50-374

Licenses No: NPF-11; NPF-18

Reports No: 50-373/97002(DRS); 50-374/97002(DRS)

Licensee: Commonwealth Edison Company

Facility: LaSalle County Station, Units 1 and 2

Location: 2601 N. 21st Road  
Marseilles, IL 61341

Dates: January 13-17, 1997

Inspector: J. Belanger, Senior Physical Security Inspector

Approved by: J. R. Creed, Chief, Plant Support Branch 1  
Division of Reactor Safety

## EXECUTIVE SUMMARY

LaSalle County Station, Units 1 and 2  
NRC Inspection Reports 50-373/97002; 50-374/97002

This inspection of the licensee's physical security program included an evaluation of the audit program; corrective action system; management support; controls for identifying, resolving and preventing problems; and interior protected area detection systems.

- In general, the conduct of the security activities was professional with marked improvements in: (a) communications among all levels of the security organization; (b) the definition of roles and responsibilities of staff members; (c) reduction of administrative and other duties that distracted from the primary function of supervisors; and (d) procedure development. Senior site security management involvement was good. (Section S6.1)
- Security staff identified an increase in the number of security doors left unsecured after use and responded promptly and effectively in conducting a root cause analysis of these events. (Section S1.1)
- A security force member identified a visitor within the protected area without an escort due to inappropriate transfer of escort responsibilities. Adequate corrective action was taken. (Section S8.1)
- Self assessment activities were effective. (Section S7)
- Security staffing was adequate. Key personnel changes were made in top management positions since the previous security inspection. (Sections S6.1 and S6.2)

#### IV. Plant Support

##### **S1 Conduct of Security and Safeguards**

##### **S1.1 Corrective Action System**

##### **a. Inspection Scope (81700)**

The inspector reviewed safeguards event logs for a randomly selected two month period (July through August 1996) to determine if appropriate analyses were performed and corrective actions taken.

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

In April 1996, the licensee initiated a Root Cause Investigation in response to several events involving security doors used by personnel and left unsecured after use (PIF 96-1063 dated April 11, 1996). These were high traffic, Auxiliary to Turbine Building double doors. In calendar year 1995, there were sixteen unsecured door events. In the first quarter of 1996, there were twenty-five such event. The security plan required security doors to be secured after use or be compensated. (Unsecured doors are loggable safeguards events.) The licensee's analysis included reviews of human performance factors, door hardware suitability, design applications and door maintenance effectiveness.

The investigation identified that, in the human performance element, individuals failed to assure security doors were closed behind them due to a lack of individual accountability. This was determined to be the primary cause for the increase in the number of unsecured doors. However, other important contributing factors included: (a) lack of training for maintenance personnel on the mechanics of how to use construction documents, door problem assessment and resolution, hardware application, and adjustments; (b) long term formal records of door maintenance or hardware replacement were not available to determine the effectiveness of maintenance and door life expectancy; (c) a high differential pressure; and (d) obsolete door hardware.

Corrective actions taken by the licensee included:

- The security staff interviewed and counseled each door violator and their supervisor.
- Senior management's expectations were verbally promulgated, stressing the importance of individual accountability.
- Publications to station personnel periodically stressed the importance of individual accountability.
- Maintenance staff was trained in closer attention to door hardware replacement records.

- Obsolete door hardware was replaced.
- Ventilation modifications were in progress to properly control differential pressure between the turbine and auxiliary building.
- Task training for dedicated maintenance personnel on door repairs was being developed.
- One damaged door was replaced. Actions were in progress to replace several others.

On January 16, 1997, the inspector frequently observed many individuals entering and exiting through the high traffic turbine and auxiliary building security doors. Personnel observed properly assured that the door was secured after exiting.

c. Conclusions

The inspector concluded that the security staff appropriately analyzed the increase in unsecured doors and that corrective actions taken or in progress were technically adequate.

**S6 Security Organization and Administration**

**S6.1 Security Organization Management Changes and Reassignment of Job Duties**

a. Inspection Scope (81700)

The inspector reviewed the current security organizational structure, position descriptions, and responsibilities. New managers were also interviewed.

b. Observations and Findings

The licensee made personnel changes in the following key management positions within the security organization: Station Services Director; Station Security Administrator; and Fitness for Duty Coordinator. The security contractor made a personnel change in the Security Force Manager position and established two new positions, a Shift Specialist and a Procedure Writer. Several personnel reassignments were also made by the contractor within the staff organization.

The new management staff continued to improve performance as a result of weaknesses identified during a root cause investigation of events involving contractor security force human performance deficiencies (See Section S8.2). Specific changes were initiated to: (a) improve communications among the levels of the security organization and improve supervisory oversight; (b) better define personnel roles and responsibilities and eliminate redundant and overlapping duties; and (c) improve employee morale.

A morning meeting was re-established similar in form to the Station's "Plan of the Day." A new "LaSalle Security Newsletter" was initiated. The security contractor developed an employee recognition and miscellaneous incentives policy to recognize the efforts of the security force as a team, along with incentives for excellence in individual performance. Effective June 3, 1996, the training lieutenants were assigned to specific shifts to provide an overview of operations and to identify training needs. Beginning June 28, 1996, the Operations Coordinator was available on backshifts a minimum of once per month on each shift.

The security management team established a Shift Specialist Position to handle many of the administrative tasks that prevented shift leaders from overseeing shift operations. Most of the administrative roles and responsibilities previously performed by supervision were eliminated or reassigned to staff positions. The contractor also established a "Management By Walking Around Program," the focus of which was to get supervisors out of the office and into the field.

Security force members interviewed were positive in their comments regarding the actions taken, but indicated that a spirit of teamwork continued to be lacking. The Station Security Administrator acknowledged that developing such a spirit was his major challenge.

c. Conclusions

Security management appeared aggressive in addressing self-identified weaknesses relating to performance. Changes and improvements continue.

S6.2 Security Staffing

a. Inspection Scope (81700)

The inspector reviewed contractor status reports and overtime statistics. The Station Security Administrator and the Security Force Manager were interviewed.

b. Observations and Findings

The inspector's review of the licensee's base hours, required of their security force contractor to meet security commitments and categories of security staffing (i.e. majors, lieutenants, sergeants, nuclear security officers, watchpersons and clerical staff), showed that overall staffing was adequate. The watchperson category was overstaffed by seven, four of whom were waiting for weapons handling authorization cards from the State of Illinois. Upon receipt of these cards, the four individuals could be upgraded to nuclear security officer (NSO) status. The NSO category was understaffed by one individual.

Slightly more than half of the security organization possessed more than ten years experience. Approximately one quarter more had five to ten years experience. Less than ten percent of the force had less than one year experience.

Despite adequate staffing, security force overtime was required because of unscheduled employee absences (call-offs) each month by security force members, and temporary compensatory measure posts needed to support the plant outage. Call-offs for the month of December 1996 totaled 56, which represented approximately fifty percent of the total contract security organization. Call-offs occasionally resulted in mandatory overtime. The inspector's review of overtime hours worked showed that NRC guidelines were met.

c. Conclusions

Staffing was adequate to meet security commitments. Unscheduled employee absences and compensatory measures necessitated some overtime which met NRC guidelines for hours worked. Security force experience was considered good.

**S7 Quality Assurance in Security and Safeguards Activities**

a. Inspection Scope (81700)

The inspector examined audit reports of the licensee's security program conducted since the previous security inspection. Attention was given to negative findings, suggestions for improvement, trends, and actual or programmatic weaknesses. The inspector interviewed the lead auditor involved in the Station Quality Verification (SQV) audit and reviewed the audit checklist.

b. Observation and Findings

Two audits of the security program were conducted since the last security inspection. One of the audits was performed by the licensee's SQV staff. This audit met the annual audit requirement in the approved security plan. The second audit was sponsored by the security contractor, using auditors from other nuclear stations.

The audit performed in September 1996 by security contractor staff, addressed compliance with security commitments and performance. The three auditors were supervisors with operational experience in security from three different nuclear sites. The audit identified the need for re-writing and/or consolidating written procedures, which the auditors felt were in some cases too detailed, contradictory, and inaccurate. This finding was similar to a weakness identified during the root cause investigation of security force human performance errors reported to management in May 1996 (See Section S8.2).

The contractor security audit concluded that the security department staff provided "good service in general" and that, with recent management changes, special attention should be given to daily operations to preclude unnecessary human errors.

The audit performed by SQV staff in November 1996 (QAA 01-96-12) reviewed maintenance and testing of equipment, searching implementation, security barrier intrusion detection, security force training, response to drills, conduct of patrols,



interface with local law enforcement, control of safeguards information, Personnel Access Data System (PADS) program implementation and Fitness For Duty (FFD) program implementation. Three findings relating to the implementation of the FFD and PADS program had minimal or no impact on safety. Performance in the areas reviewed was acceptable. The inspector found the audit checklist to be detailed and comprehensive. The SQV audit team included a member with extensive experience auditing nuclear security.

c. Conclusions

Audit requirements of the security plan were met. The audits were effective in assessing and evaluating security program effectiveness.

**S8 Miscellaneous Security and Safeguards Issues**

- S8.1 (Closed) SER 96-SQ1-00: An unescorted visitor was found in the protected area due to inadequate turnover of escort responsibilities. On Thursday, August 8, 1996, while performing rounds, a security force member discovered a visitor within the protected area without escort. The visitor was without an escort for approximately 60 minutes. The licensee's staff determined that the root cause of the event was human performance failure involving inadequate transfer of escort responsibilities.

The licensee's staff promptly corrected this human performance inadequacy. In addition, the licensee's security staff reviewed this event thoroughly and identified contributing factors of less than adequate attention to detail and a less than adequate questioning attitude. By directly observing visitors in protected and vital areas, the inspector verified that escort responsibilities were properly executed.

The inspector determined that the safety significance of the event was minimal. The visitor did not enter vital areas. The visitor was screened for unescorted access and did have unescorted access at the station from January 10, 1996 through July 19, 1996. The event occurred less than 30 days after unescorted access had been terminated.

The inspector determined that this event constituted a violation of Section 7.1.2 of the station security plan. This licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with NUREG-1600 of the NRC Enforcement Policy. (NCV 50-373(374/97002-01)

- S8.2 (Open) Follow-Up Item 50-373/96005-11; 50-374/96005-11: Root cause investigation of security force performance events from January 1, 1995 through March 9, 1997 identified four significant weaknesses: (1) unclear roles and responsibilities for supervisors, coupled with too many administrative and other duties that distracted from primary functions; (2) weak supervisory techniques and methods were used to monitor, direct, and control the work force; (3) training methods were not always effective; and (4) procedure development was not

effective. Interviews conducted by the investigation team identified poor security communications, lack of teamwork, and a less than adequate questioning attitude.

Regarding Item (1), licensee management defined personnel roles and responsibilities and eliminated redundant and overlapping duties. Roles and responsibilities relating to administration, previously performed by supervisors, were eliminated or reassigned to staff positions. Regarding Item (2), licensee management established a new Shift Specialist position to relieve shift supervision from the administrative aspects of the job and allow them to better supervise their shift. A "Management by Walking Around" process was implemented. Regarding Item (3), a Training Lieutenant was assigned to a specific shift to provide an overview of operations and identify any needs for training. Regarding Item (4), the licensee established a full-time procedure writer position to take ownership of the procedure development process.

The progress of upgrading procedures, (i.e. elimination of inconsistencies, consolidation of similar information and use of consistent format) was limited to seven of forty post orders. This item will remain open pending completion of corrective actions.

- S8.3 Updated Final Safety Analysis Report (UFSAR) Review:** A 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 descriptions. While performing the inspection discussed in this report, the inspector reviewed the applicable portions of the UFSAR, Volume VIII, Chapter 13.0, Section 13.7 that related to the areas inspected. The inspector verified that the UFSAR's wording was consistent with observed plant practices, procedures and/or parameters.

## **V. Management Meetings**

### **X1 Exit Meeting Summary**

The inspector presented the results of this inspection to licensee management, listed on Page 9, at an exit meeting on January 17, 1997. The licensee acknowledged the findings presented.



## PARTIAL LIST OF PERSONS CONTACTED

### Licensee

W. Subalusky, Jr., Site Vice President  
D. Ray, Station Manager  
B. Finlay, Station Security Administrator  
R. Robey, Services Director  
W. Bartlett, Security Staff Assistant  
R. Morley, Nuclear Security Administrator, Corporate Security  
D. Combs, Assistant Station Security Administrator  
P. Barnes, Regulatory Assurance Supervisor  
M. Embree, Burns Security District Manager  
B. Askren, Security Force Manager  
J. Drago, NRC Coordinator  
W. Washkowiak, Burns Training Coordinator  
L. Hunter, Procedure Writer

### NRC

M. Huber, Senior Resident Inspector  
K. Ihnen, Resident Inspector

## INSPECTION PROCEDURES USED

IP 81700: Physical Security Program for Power Reactors

## LIST OF ACRONYMS USED

DRS Division of Reactor Safety  
FFD Fitness for Duty  
IR Inspection Report  
NRC Nuclear Regulatory Commission  
PADS Personnel Access Data System  
PIF Problem Identification Form  
SER Security Event Report