

U.S. NUCLEAR REGULATORY COMMISSION

REGION 3

Docket Nos: 50-282; 50-306; 72-10
License No: DPR-42; DPR-60; SNM-2506

Reports No: 50-282/96013(DRS); 50-306/96013(DRS);
72-10/96013(DRS)

Licensee: Northern States Power Company

Facility: Prairie Island Nuclear Generating Plant

Location: 1717 Wakonade Drive East
Welch, MN 55089

Dates: October 7-11, 1996

Inspector: G. Pirtle, Physical Security Inspector

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

EXECUTIVE SUMMARY

Prairie Island Nuclear Generation Plant
NRC Inspection Reports No. 50-282/96013; 50-306/96013; 72-10/96013

This inspection included a review of the physical security program. It was an announced inspection conducted by a regional physical security specialist.

A violation was noted for failure to complete a review of security related plans to evaluate their impact on plant and personnel safety (Section S3). Four inspection followup items were noted pertaining to: (1) monitoring correction of self-identified training record deficiencies (Section S5); (2) the Security Force Training and Qualification Plan required Revision (Section S5); (3) the need to audit maintenance support for the security program had not been identified by the Quality Service staff (Section S7); and (4) compensatory measures for lighting were used for more than six months at two locations in the protected area (Section S2). Two of three open inspection findings were closed (Sections S8.1, S8.2 and S8.3). The potential impact that the loss of three onsite contractor support positions would have on the work load of security shift supervisors was a source of concern. (Section S3.1)

The overall self-assessment efforts and the security exercise with local law enforcement agencies were considered strengths (Sections S7 and S5). No deficiencies were noted in reference to the security portion of the updated FSAR (Section S8.4). Training classes attended by the inspector were thorough and well conducted.

Report Details

S2 Status of Security Facilities and Equipment

a. Inspection Scope (81700)

The inspector reviewed the condition of security equipment and facilities required by the security plan. The equipment observed included, but was not limited to, search equipment, intrusion alarm equipment, and equipment within the alarm stations.

b. Observation and Findings

Most security components required only limited compensatory measures. When required, adequate compensatory measures were implemented for inoperable security equipment.

Two locations in the protected area have had temporary lighting for an excessive period of time. These two locations have had temporary lighting for greater than six months. The security plan does not address backup power for temporary lighting used as compensatory measures for illumination levels below .02 footcandle. The temporary lighting in use however does not have the backup power supply required by Section 12.2 of the Security Plan for standard lighting. In these two locations, the compensatory measures have become the practice rather than the exception. This issue will be monitored as an Inspection Followup Item (50-282/96013-01; 50-306/96013-01).

c. Conclusions

Observed security facilities were well maintained and security equipment functioned as designed. Temporary lighting has been used for an excessive period of time in two locations within the protected area.

S3 Security and Safeguards Procedures and Documentation

a. Inspection Scope (81700)

The inspector reviewed selected security procedures pertaining to the areas inspected and also reviewed appropriate logs, records and other documents pertaining to the activities inspected.

b. Observation and Findings

Section 14.2 of the Security Plan requires Security and Operations Department personnel on an annual basis to review the security plans and procedures to assure that no security measures present a potential plant or personnel safety concern. Documentation pertaining to this requirement shows that the last review of this

nature was conducted in 1994. This represents a violation of Section 14.2 of the Security Plan (50-282/96013-02; 50-306/96013-02).

Interviews with the security staff disclosed that they were unfamiliar with the specific review requirement and thought that the Quality Service Department may have completed the review during their audit efforts. It was subsequently confirmed that QS did not complete the review and the security plan specifically tasks security and operations personnel to complete the review. This failure to evaluate the safety impact of the security plans requirements could have allowed potentially unsafe conditions to be undetected.

The security staff committed to have the required review completed within 30 days and to provide a copy of the review results to the NRC. This commitment was confirmed during the exit meeting conducted on October 11, 1996. The review was completed and determined to be acceptable by the NRC staff. To prevent recurrence of the violation, the annual review requirement will be incorporated into the existing scheduling system for staff actions. Based on the immediate corrective actions and actions to prevent recurrence, a written response to the violation will not be requested.

Procedures reviewed during the inspection were current, correct and described observed work practices. Security related logs and documents were accurate except as noted in other sections of this report.

c. Conclusions

Procedures reviewed were of good quality and correctly described the tasks to be performed. Personnel observed and interviewed on post were familiar with procedure requirements applicable to their responsibilities. Other documents and logs reviewed were accurate.

A violation was cited for not completing a required review action.

S4 Security and Safeguards Staff Knowledge and Performance

a. Inspection Scope (81700)

The inspector toured various security posts and observed performance of duties. Interviews with security officers were conducted to determine if the officers were knowledgeable of post requirements. Security event logs and other records pertaining to security force performance were also reviewed.

b. Observation and Findings

No performance deficiencies were noted during visits to the security posts. Personnel interviewed and observed were aware of post responsibilities and procedures. Loggable security incidents caused by security force performance had improved significantly (Refer to Section S8.3 for related information).

c. Conclusions

Security staff and security officers were knowledgeable of their responsibilities and security force performance has been consistently good.

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

a. Inspection Scope (81700)

The inspector reviewed randomly selected training and qualification records for newly hired security force personnel. Additionally, the inspector evaluated several security training classes.

b. Observation and Findings

No deficiencies were noted during the review of randomly selected initial training and qualification records for newly hired security force personnel. The inspector confirmed that the personnel were qualified in the appropriate job related critical tasks prior to being formally assigned to shift assignment positions. Personnel fulfilling job positions requiring physical examination, physical fitness testing, and use of firearms had completed the necessary requirements prior to assignment to these positions.

The licensee's security staff and contract security staff (The Wackenhut Corporation) have conducted very aggressive audits of personnel and training records within the past six months. The audits have identified several deficiencies with training records that have not been completely corrected yet. The aggressive audits is a very positive aspect of the self assessment program. The number and significance of some of the findings will be monitored as an Inspection Followup Item (50-282/96013-03; 50-306/96013-03).

Review of the Security Force Training and Qualification (SFT&Q) Plan showed that the method to be used to determine proficiency in critical task evaluation was not identified for five critical tasks (Section 3.2.1 of the SFT&Q Plan). The security staff will revise the SFT&Q Plan within two months after receipt of the inspection report. This commitment was confirmed during the exit meeting conducted October 11, 1996. This issue will be monitored as an Inspection Followup Item (50-282/96013-04; 50-306/96013-04).

The inspector attended and evaluated the effectiveness of several training classes during this inspection. Lesson plans were thorough and training objectives identified in the lesson plans were addressed well. The training classes attended were well conducted and the instructor was very familiar with the subject matter.

The licensee recently conducted a security exercise involving several local law enforcement agencies with various scenarios to challenge the agencies involved in the exercise. The joint exercise exceeds regulatory requirements. Although the exercise was conducted outside of the protected area, the strengths, weaknesses,

and recommendations identified during the critique of the exercise have a direct bearing on the protection capability for the plant and personnel.

c. Conclusions

Training records reviewed for newly hired security personnel were complete and accurate and personnel were critical task certified prior to assuming shift job positions in a non-training status. Audits of personnel and training records have been aggressive and resolution of deficiencies noted is continuing. A security exercise involving local law enforcement agencies was a strength. Observed training classes were completed in a professional manner. The SFT&Q Plan requires revision.

S7 Quality Assurance in Security and Safeguards Activities

a. Inspection Scope (81700)

The inspector reviewed the most recent audit documents for the security program and other programs used by the Security Department for problem identification and correction.

b. Observation and Findings

The overall self-assessment efforts were very good. The security section self-assessment procedure has recently been revised. Self-assessments are conducted by the Quality Service (QS) staff, security staff, corporate security staff, security shift personnel and contractor security management personnel. The security staff assessments, particularly in the area of training, have been aggressive. Completed QS audits have been thorough and well documented. Routine reports provided by the security contractor identifies trend data in reference to identified goals. Self-assessment efforts within the security section have improved within the past year and are becoming a more important staff function. Additionally, routine performance trending also continues to be effective. Effective monitoring and assessment of findings continues to remain critical.

Section 14.1 of the Security Plan requires the annual audit of the security program to include an audit of the security testing and maintenance program. The inspector's review of the Generation Quality Services Observation Reports for 1996, (which collectively constitute the annual audit effort) and the Audit Report Summary dated October 9, 1996, showed that maintenance support for security equipment had not yet been audited for calendar year 1996.

The term "annual" as defined in the security plan would require an audit of maintenance support to be completed by mid-December, 1996. Additional security audit activity by QS personnel was not scheduled for the remainder of 1996 until this deficiency was noted. Licensee representatives committed to audit the maintenance support provided for security equipment by mid-December, 1996. This commitment was confirmed during the exit meeting on October 11, 1996.

This issue will be monitored as an Inspection Followup Item (50-282/96013-05; 50-306/96013-05).

Additionally, Section 14.1 of the Security Plan also requires that a copy of the "annual" security audit be provided to the Vice President, Nuclear Generation. The Observation Reports and Audit Summary Report do not show distribution to the Vice President, Nuclear Generation. The inspector was advised that the final audit report when prepared would be forwarded to the Vice President, Nuclear Generation to meet the requirements of the security plan.

c. Conclusions

The self-assessment efforts for the security program have been aggressive and varied. Self-assessment efforts are thorough and well documented. Maintenance support for the security program requires further audit effort to comply with security plan requirements. The findings and recommendation of the final audit report will be provided to the Vice President, Nuclear Generation. The positive impact of excellent effort and findings could be limited by weak oversight of some aspects of the security program (i.e. maintenance support and security plans review).

S8 Miscellaneous Security and Safeguards Issues

- S8.1 (Open) Inspection Followup Item 50-282/95003-01; 50-306/95003-01: The potential impact that the loss of three onsite contractor support positions would have on the work load of security shift supervisors was a source of concern. Two of the positions pertained to administrative and training support functions, some of which will have to assumed by security shift supervisors. Two new training programs have already been or will be implemented within the next couple months. The training demand on the shift supervisors is not fully understood yet but could be extensive.

A change in scheduling on how security critical tasks are evaluated could result in additional training demands for the security shift supervisors because of task certification in some cases being required twice within a year, rather than once a year as is the current practice. The full impact of these changes is not fully known yet. However, a recent time-on-task analysis completed by licensee personnel showed that the security shift supervisors spend about 30% of their time on training and administrative tasks and 40% on operations related tasks. This may be a preview of the training demand affecting operational oversight.

This item will remain open pending implementation of the new training programs and task evaluation schedules.

- S8.2 (Closed) Noncited Violation 50-282/96006-13; 50-306/96006-13: The security diesel being out-of-service for an extended period of time was not logged as a security loggable event. During this inspection, review of security incident reports

and the security event log showed that all incidents that warranted logging as security events have been correctly recorded. This item is closed.

- S8.3 (Closed) Inspection Followup Item 50-282/96006-14; 50-306/96006-14: Security force errors resulted in an excessive number of loggable security events. This finding noted a significant increase in the number of loggable security events caused by the security force (11 in a four month period). During this inspection, it was determined that within the past six months only five loggable security events have been caused by security force performance. This item is closed.
- S8.4 A recent discovery of a licensee operating their facility in a manner contrary to the Updated Facility Safety Analysis Report (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 inspections 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 practices, procedures and/or parameters.
- S8.5 The inspector noted during a document review that an individual had attempted to be granted unescorted access authorization based on an assumed name of a relative of the individual. Although the person was initially granted access under a temporary authorization pending completion of the background investigation, the deceit became known and the person's access authorization was terminated. The NRC is reviewing the circumstances involving the issue and the review results will be addressed by separate correspondence.

X1 Exit Meeting Summary

The inspector presented the inspection results to members of the licensee management at the conclusion of the inspection on October 11, 1996. The licensee acknowledged the findings presented. Actions agreed to by the security staff to address the inspection findings were discussed during the exit meeting.

The inspector asked the licensee whether any materials examined or inspection findings discussed during the exit meeting should be considered as proprietary or safeguards information. No proprietary or safeguards information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee:

M. Wadley, Plant Manager
J. Hill, Quality Manager
G. Miserendino, Manager, Corporate Security
D. Axt, Nuclear Security Program Coordinator, Corporate Security
M. Sleigh, Superintendent, Security
D. Hutchison, Nuclear Security Specialist
E. Timmer, Nuclear Security Specialist
J. Eirikis, District Manager, The Wackenhut Corporation (TWC)
L. Mattfield, Operations Manager, TWC
L. Pallansch, Training Coordinator, TWC

INSPECTION PROCEDURE USED

IP 81700 Physical Security Program For Power Reactors

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-282/96013-01	IFI	Excessive Time For Temporary Lighting.
50-306/96013-01	IFI	Excessive Time For Temporary Lighting.
50-282/96013-02	VIO	A Required Review Was Not Completed by The Security and Operations Department Personnel.
50-306/96013-02	VIO	A Required Review Was Not Completed by The Security and Operations Department Personnel.
50-282/96013-03	IFI	Monitoring Correction of Self-Identified Training Record Deficiencies.
50-306/96013-03	IFI	Monitoring Correction of Self-Identified Training Record Deficiencies.
50-282/96013-04	IFI	Revision to the Security Force Training Plan.
50-306/96013-04	IFI	Revision to the Security Force Training Plan.
50-282/96013-05	IFI	Auditing Maintenance Support For Security.
50-306/96013-05	IFI	Auditing Maintenance Support For Security.

Closed

50-282/96006-13	NCV	An Incident Warranting Entry in the Security Event Log Was Not Entered.
50-306/96006-13	NCV	An Incident Warranting Entry in the Security Event Log Was Not Entered.
50-282/96006-14	IFI	Security Force Performance Errors Were Causing an Excessive Number of Loggable Security Incidents.
50-282/96006-14	IFI	Security Force Performance Errors Were Causing an Excessive Number of Loggable Security Incidents.

Discussed

50-282/95003-01	IFI	Loss of Three Onsite Contractor Support Positions Could Affect Security Shift Supervisor's Workload.
50-306/95003-01	IFI	Loss of Three Onsite Contractor Support Positions Could Affect Security Shift Supervisor's Workload.

LIST OF ACRONYMS USED

IFI	Inspection Followup Item
NCV	Non-cited Violation
QS	Quality Services
SFT&Q	Security Force Training and Qualification
UFSAR	Updated Facility Safety Analysis Report
URI	Unresolved Item
VIO	Violation