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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

December 27, 1985
BECO Ltr. #85-229

Dr. Thomas E. Murley
Regional Administrator
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

License No. DOR-35
Docket No. 50-293

Subject: Plan and Schedule of Security Program Improvements

Dear Sir:

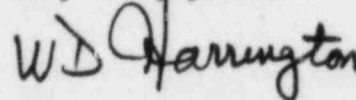
In accordance with our letter to Mr. J. Taylor dated November 27, 1985, attached please find a plan and schedule of Security Program Improvements for Pilgrim Nuclear Power Station. As stated in Attachment 2 of our November 27, 1985 letter, the planned improvements demonstrate a continued commitment for aggressive management of our security program. The plan includes a schedule for program improvements in the areas of management oversight, self audits, corrective actions system, regulatory requirements analysis and training.

A separate schedule for planned corrective action addressing compensatory measures on loss of the security computer is included as Attachment 2 to this letter. This information is also submitted in accordance with our November 27 letter (Attachment 4) and includes a schedule of proposed actions to improve the reliability of the security computer and standardize the reporting of security events.

Progress reports of the security program improvements will be developed on a routine basis. As discussed with Mr. Joyner of your staff, these progress reports will be forwarded to our Senior Resident Inspector, Dr. M. McBride.

Should you have any questions or concerns in regard to this letter, please contact me directly.

Very truly yours,



W. D. Harrington

Attachments

cc: Mr. J. Taylor, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

T. Martin w/a
M. McBride w/a

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ATTACHMENT 1

Plan and Schedule of Security Program Improvements

Increased Management Oversight - Corporate Security

- ° Plan to establish a Corporate Security Representative to strengthen the interface between site and corporate security personnel. This individual will be responsible to perform audits in accordance with a structured audit plan, review program document changes, and maintain state-of-the-art knowledge of security methodologies. This change will be reflected in the Corporate Bulletin Book.

Planned Milestones

Scheduled Completion

- Develop job description and approve. February 1986
- Commence hiring process for corporate security representatives. March 1986
- Corporate Security Representative on board. April 1986
- Revise Corporate Bulletin Book B-6 to reflect increased involvement of site security by corporate. Complete

- ° Plan to hire five (5) Boston Edison security supervisors to provide shift coverage of the contract security force.

Planned Milestones

Scheduled Completion

- Develop job description and approve. January 1986
- Commence hiring process for Boston Edison site security supervisors. February 1986
- First additional Boston Edison site security supervisor on board. April 1986
- Remaining Boston Edison site security supervisors on board. July 1986

Self-Audits

- ° Plan to audit the sections of the security plan on a regular basis such that the entire plan is addressed by corporate security once/year.

Planned Milestones

Scheduled Completion

- Develop corporate level self audit program for the site security plan. February 1986
- Review and approve audit program. April 1986
- Commence first module of audit program. June 1986

- ° Plan to establish procedures for the existing internal surveillance effort and include the scheduling of these surveillances in the Master Surveillance Tracking Program.

Planned Milestones

Scheduled Completion

- | | |
|--|---------------|
| - Develop procedures to formalize existing surveillance programs. | February 1986 |
| - Approve and issue procedures. | March 1986 |
| - Revise Master Surveillance Tracking Program to schedule these surveillances. | March 1986 |

Corrective Actions System

- ° Plan to develop a procedure to standardize the reporting of security deviations and to initiate thorough and effective corrective actions. The procedure will include a form for reporting deviations and will require a trend analysis of deviations to identify recurring problems.

Planned Milestones

Scheduled Completion

- | | |
|--|--------------|
| - Identify and evaluate requirements of the corrective action system. | March 1986 |
| - Develop and approve procedure, including form, for reporting deviations. | June 1986 |
| - Indoctrination and implementation of process. | July 1986 |
| - Perform first trend analysis of deviations to identify recurring problems. | January 1987 |

Regulatory Requirements Analysis

- ° Plan to perform a regulatory requirements analysis of the Modified Amended Security Plan (MASP), Safeguards Contingency Plan, and Training and Qualification (T&Q) Plan vis-a-vis the Code of Federal Regulations. This analysis is to assure that the regulatory requirements are met by existing programs and procedures.

Planned Milestones

Scheduled Completion

- | | |
|---|-----------------------------|
| - Obtain resources to perform analysis. | January 1986 |
| - Determine methodology of performing analysis. | February 1986 |
| - Perform regulatory requirements analysis (interim milestones have been established for this task and are available upon request). | October 1986 |
| - Revise Boston Edison program documents and procedures as required. | Pending results of analysis |

Training

- ° Plan to evaluate the present approach to training such that:
 - (1) Security force personnel have a greater sense of awareness of the bases behind their duties (i.e. why they are here).
 - (2) Security force personnel understand the need to initiate aggressive corrective action and to follow-up thoroughly.

Planned Milestones

Scheduled Completion

- | | |
|--|----------------------------|
| - Determine evaluation method. | January 1986 |
| - Perform evaluation. | February 1986 |
| - Issue report with evaluation results. | March 1986 |
| - Revise present approach to training as required. | Pending evaluation results |

ATTACHMENT 2

Compensatory Measures on Loss of Security Computer

A recent concern was raised by our Senior NRC Resident Inspector, Dr. M. McBride, regarding establishment of compensatory measures within 10 minutes if the security computer becomes inoperable. The concern is that in 1985, six security event reports have been filed because full compensatory limits were not established within 10 minutes after loss of the security computer.

° As stated in our November 27, 1985 letter, Boston Edison has reviewed the situation and implemented the following corrective actions:

- Reviewed and revised the response methodology allowing security personnel to man the required posts within 10 minutes.
- Temporarily increased staffing levels as an interim measure to ensure the 10-minute response time can be met.
- Provided pre-established compensatory zone assignments on each shift in the event the computer becomes inoperable.
- Trained security force on the revised methodology of response.
- Conducted drills and verified that less than 10-minute response is achieved.

° In addition to the completed actions stated above, the following actions are planned;

<u>Planned Milestones</u>	<u>Scheduled Completion</u>
- Evaluate the reliability of the security computer.	Complete
- Develop recommendations for computer improvements.	February 1986
- Decision on optimal recommendation.	March 1986

- ° Plan to proceduralize the process of pre-established compensatory zone assignments.

Planned Milestones

Scheduled Completion

- Revise existing procedure to formalize compensatory zone assignments. February 1986
- Approve and issue procedure. March 1986

- ° Plan to standardize security event reporting.

Planned Milestone

Scheduled Completion

- Revise and approve procedure to standardize requirements of security event reports. February 1986

- ° Determine feasibility of revising the Contingency Plan.

Planned Milestones

Scheduled Completion

- Evaluate existing security systems to determine feasibility of revising the Contingency Plan to include increased response time to computer outages. February 1986
- Submit proposed changes to Contingency Plan for NRC approval. Pending results of above evaluation