

March 9, 2000

Mr. M. Wadley
President, Nuclear Generation
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

SUBJECT: NRC SECURITY INSPECTION REPORT 50-282/2000003(DRS);
50-306/2000003(DRS)

Dear Mr. Wadley:

On February 17, 2000, the NRC completed a routine, pilot program inspection at your Prairie Island Nuclear Generating Plant. The enclosed report presents the results of that inspection. The results of this inspection were discussed with Mr. J. Sorensen and other members of your staff on that date.

The inspection was an examination of activities conducted under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commission's rules and regulations and with the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observation of activities, and interviews with personnel. Specifically, this inspection focused on performance involving your access control and access authorization program.

Based on the results of this inspection, it was determined that the programs examined met NRC requirements. An Unresolved Item pertaining to criteria for granting unescorted access to vital areas was identified. Your security staff has entered the issue into the corrective action program. Resolution of this issue will be addressed by separate correspondence.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Sincerely,

/RA/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

Docket Nos. 50-282; 50-306
License Nos. DPR-42; DPR-60

Enclosure: Inspection Report 50-282/2000003(DRS);
50-306/2000003(DRS)

See Attached Distribution

M. Wadley

-2-

cc w/encl: Site General Manager, Prairie Island
Plant Manager, Prairie Island
S. Minn, Commissioner, Minnesota
Department of Public Service
State Liaison Officer, State of Wisconsin
Tribal Council, Prairie Island Dakota Community

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M. Wadley

-2-

cc w/encl: Site General Manager, Prairie Island
Plant Manager, Prairie Island
S. Minn, Commissioner, Minnesota
Department of Public Service
State Liaison Officer, State of Wisconsin
Tribal Council, Prairie Island Dakota Community

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-282; 50-306
License Nos: DPR-42; DPR-60

Report No: 50-282/2000003(DRS); 50-306/2000003(DRS)

Licensee: Northern States Power Company

Facility: Prairie Island Nuclear Generating Plant

Location: 1717 Wakonade Drive East
Welch, MN 55089

Dates: February 14-17, 2000

Inspector: G. Pirtle, Physical Security Inspector

Approved by: James R. Creed, Safeguards Program Manager
Division of Reactor Safety

SUMMARY OF FINDINGS

Prairie Island Nuclear Generating Plant
NRC Inspection Report 50-282/2000003(DRS); 50-306/2000003(DRS)

The report covers a four day, announced inspection by a regional security specialist. This inspection focused on the Physical Protection Cornerstone, within the Safeguards Strategic Assessment area, and included a review of the access authorization program, access control program, performance indicator verification, security plan revision, and identification and resolution of problems.

An Unresolved Item pertaining to criteria for granting unescorted access to vital areas was identified. Your security staff has entered the issue into the corrective action program (3PH2).

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
<ul style="list-style-type: none">● Initiating Events● Mitigating Systems● Barrier Integrity● Emergency Preparedness	<ul style="list-style-type: none">● Occupational● Public	<ul style="list-style-type: none">● Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

Report Details

1. REACTOR SAFETY

Cornerstone: Physical Protection

1RO2 Change to License Conditions

a. Inspection Scope

The inspector reviewed Revision 39 of the Prairie Island Nuclear Generating Plant which was submitted by licensee letter, dated December 8, 1999, to verify that the change did not decrease the effectiveness of the security plan. The security plan revision was submitted in accordance with 10 CFR 50.54(p).

b. Observations and Findings

There were no findings identified and documented during this inspection.

3. SAFEGUARDS

Cornerstone: Physical Protection

3PH1 Access Control (Identification, Authorization and Search of Personnel, Packages, and Vehicles)

a. Inspection Scope

The inspector reviewed testing and maintenance procedures, observed licensee testing activities, and interviewed and monitored security personnel regarding the staffing and operational requirements for protected area search equipment, to include explosive and metal detectors and X-ray machines.

The inspector also conducted random observations and interviewed selected security personnel responsible for access control measures for packages that entered the protected area.

b. Observations and Findings

There were no findings identified and documented during this inspection.

3PH2 Access Authorization (AA) Program (Behavior Observation)

a. Inspection Scope

The inspector interviewed five supervisors and five non-supervisors (both licensee and contractor employees) to determine their knowledge of behavior observation responsibilities. Procedures pertaining to the Behavior Observation Program and fitness-for-duty semi-annual test result reports were also reviewed.

b. Observations and Findings

10 CFR 73.55(d)(7) and Section 8.1 of the Prairie Island security plan requires the access authorization program to limit unescorted access to vital areas to non-emergency work related needs. In accordance with the inspection procedure, six randomly selected personnel's access authorization to vital areas was compared to actual entry into the vital areas. For two of the six personnel, entry into some vital areas had not occurred within the past six months, or only one entry into the area occurred within the past six months. Licensee staff supervisors generally based requests for unescorted access for their personnel on job descriptions for the personnel involved. Additionally, unescorted access needs were reviewed by the responsible supervisors on a monthly basis. The unresolved item is what constitutes "non-emergency work related needs" for access to vital areas, and if frequency of access to the area(s) is part of the criteria that constitutes work related needs. The issue was entered into the licensee's Corrective Action Program (Issue Tracking Module No. 20000422, dated February 17, 2000). This issue will be forwarded to NRC Headquarters for evaluation and resolution of the issue will be addressed by separate correspondence (URI 50-282/2000003-01; 50-306/2000003-01).

4. OTHER ACTIVITIES

4OA1 Identification and Resolution of Problems

a. Inspection Scope

The inspector reviewed a sample of licensee self-assessments, audits, and security logged events. In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Observations and Findings

There were no findings identified and documented during this inspection.

4CC2 Performance Indicator Verification

a. Inspection Scope

The inspector reviewed the licensee's program for the gathering and submittal of data for the Physical Protection Performance Indicators (PI) pertaining to Fitness-For-Duty Personnel Reliability and Personnel Screening Program for 1999. Specifically, a sample of plant reports related to security events, fitness-for-duty reports, and other applicable security records were reviewed.

b. Observations and Findings

There were no findings identified and documented during this inspection relating to the submitted data for the Fitness-for-Duty Personnel Reliability PI or the Personnel Screening Program PI.

4CC5 Management Meeting

.1 Exit Meeting Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the onsite inspection on February 17, 2000. The meeting attendees were informed that our evaluation of the unresolved item would continue and resolution of the issue would be addressed in separate correspondence. The licensee representatives acknowledged the findings presented and did not identify any information discussed as proprietary or safeguards information.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Sorensen, Site Manager
J. Corwin, Administrative Lieutenant, The Wackenhut Corporation (TWC)
C. Ghlover, D Team 1st Lieutenant, TWC
T. Grosse, 2nd Training Lieutenant, TWC
D. Hutchison, Nuclear Security Consultant
C. Johnson, Security Operations Manager, TWC
J. Kivi, Licensing
H. Nyberg, Self-Assessment Supervisor, TWC
D. Schlitz, Generation Quality Services
M. Sleigh, Superintendent, Security

NRC

S. Ray, NRC Region III Senior Resident Inspector
S. Thomas, NRC Region III Resident Inspector
J. Belanger, NRC Region III Senior Security Inspector (Observer)

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

50-282/2000003-01	URI	Criteria Applicable For Unescorted Access to Vital Areas
50-306/2000003-01	URI	Criteria Applicable For Unescorted Access to Vital Areas

Closed

None

Discussed

None

PARTIAL LIST OF DOCUMENTS REVIEWED

Security Event Logs - January-December 1999
Fitness-For-Duty Training Film For Supervisors
Fitness-For-Duty Initial and Requalification Computerized Training For Supervisors
Vital Area Card Reader History For Six Randomly Selected Personnel For a Six Month Period
Generation Quality Services Internal Audit Report No. AG 1999-S-3, dated November 4, 1999
Corporate Nuclear Administrative Control Directives No. N1ACD 2.12, "Fitness-For-Duty Program," Revision 1, dated November 29, 1999
Security Implementing Procedure 1.1, "Badge Control," Revision 0, Approved June 1, 1999
Security Implementing Procedure 3.3, "Portal Control Room Operations," Revision 1, Approved October 14, 1999
Security Implementing Procedure 4.1, "Testing and Inspection of Systems and Equipment," Revision 1, Approved April 21, 1999
Administrative Work Instruction 5AWI 5.1.0 "Plant Security and Unescorted Access Authorization," Revision 3
Administrative Work Instruction 5AWI 3.18.0, "Fitness-For-Duty Program," Revision 1
Surveillance Procedure 1653, "Quarterly X-Ray Machine Test," Revision 4, Approved March 17, 1999
Surveillance Procedure 1621, "Explosive Vapor Detector Annual Test," Revision 9, Approved April 9, 1999
Surveillance Procedure 1620, "Quarterly Metal Detector Calibration," Revision 8, Approved December 28, 1995
Fitness-For-Duty Program Performance Data Personnel Subject to 10 CFR 26 for Period Between January 1 and December 31, 1999
Security Services-Personnel Security Section Procedure AAP-15, "Continuous Behavior Observation," Revision 4, Approved October 5, 1998
General Training Data Sheet For Seven Newly Assigned Supervisors to Confirm Completion of Behavior Observation Training
Security Self-Assessment Schedule For 1999
Review of Corporate Security Annual Audit Item 5.13, "Results Pertaining to Behavior Observation Program"
Third Quarter 1999 Security Report, dated October 23, 1999
Fourth Quarter 1999 Security Report, dated January 12, 2000
Fitness-For-Duty Personnel Reliability and Personnel Screening Performance Indicator For the Period Between Second Quarter 1997 and Fourth Quarter 1999
Issue Tracking Module No. 20000423 Pertaining to Badging Control, dated February 17, 2000
Issue Tracking Module No. 20000422 Pertaining to Vital Area Unescorted Access, dated February 17, 2000
Security Key Inventory Report, dated June 30, 1999
Summary Report of Work Orders and Preventive Maintenance Completed For Personnel Search Equipment For 1999