

March 10, 2000

Mr. Michael T. Coyle
Vice President
Clinton Power Station
AmerGen Energy Company, LLC
Mail Code V-275
P.O. Box 678
Clinton, Illinois 61727

SUBJECT: NRC INSPECTION REPORT 50-461/2000006(DRS)

Dear Mr. Coyle:

On February 11, 2000, the NRC completed an inspection of your physical protection program at Clinton Power Station. The enclosed report presents the results of that inspection.

Areas examined within your physical protection program are identified in the report. Within those areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress. The objective of the inspection effort was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, no violations of NRC requirements were identified. During this inspection, we determined that the physical security program continued to be effectively implemented. Your staff was prompt and effective in addressing potential vulnerabilities identified during the Operational Safeguards Response Evaluation conducted in November 1999. Security staffing levels, including armed responders, met NRC-approved security plan commitments. Recent changes in the security organization, including the elimination of over-staff positions on shift, forced overtime, payroll problems, and the addition of fire watch responsibilities, affected morale. Despite that, security force performance continued to be effective.

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).

M. Coyle

-2-

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA by John A. Grobe For/

Steven R. Reynolds, Deputy Director
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure: Inspection Report 50-461/2000006(DRS)

cc w/encl: P. Hinnenkamp, Plant Manager
M. Reandeu, Director - Licensing
M. Aguilar, Assistant Attorney General
G. Stramback, Regulatory Licensing
Services Project Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
Chairman, Illinois Commerce Commission

Mr. Michael T. Coyle
Vice President
Clinton Power Station
AmerGen Energy Company, LLC
Mail Code V-275
P.O. Box 678
Clinton, Illinois 61727

SUBJECT: NRC INSPECTION REPORT 50-461/2000006(DRS)

Dear Mr. Coyle:

On February 11, 2000, the NRC completed an inspection of your physical protection program at Clinton Power Station. The enclosed report presents the results of that inspection.

Areas examined within your physical protection program are identified in the report. Within those areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress. The objective of the inspection effort was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, no violations of NRC requirements were identified. During this inspection, we determined that the physical security program continued to be effectively implemented. Your staff was prompt and effective in addressing potential vulnerabilities identified during the Operational Safeguards Response Evaluation conducted in November 1999. Security staffing levels, to include armed response members, met NRC-approved security plan commitments. Recent changes in the security organization, to include the elimination of over-staff positions on shift, forced overtime, payroll problems, and the addition of fire watch responsibilities, affected morale. Despite that, security force performance continued to be effective.

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).

M. Coyle

-2-

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA by John A. Grobe For/

Steven R. Reynolds, Deputy Director
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure: Inspection Report 50-461/2000006(DRS)

cc w/encl: P. Hinnenkamp, Plant Manager
M. Reandeu, Director - Licensing
M. Aguilar, Assistant Attorney General
G. Stramback, Regulatory Licensing
Services Project Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
Chairman, Illinois Commerce Commission

Distribution:

WES (E-Mail)
JBH1 (Project Mgr.) (E-Mail)
J. Caldwell, RIII w/encl
B. Clayton, RIII w/encl
SRI Clinton w/encl
DRP w/encl
DRS w/encl
RIII PRR w/encl
PUBLIC IE-01 w/encl
Docket File w/encl
GREENS
IEO (E-Mail)
DOCDESK (E-Mail)

DOCUMENT NAME: G:DRS\CLI2000006.WPD

***See Previous Concurrence**

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	RIII *	RIII *	RIII *	RIII
NAME	GPirtle for JBelanger:sd	GPirtle for JCreed	TKozak	JGrobe for SReynolds
DATE	03/06/00	03/06/00	0306/00	03/10/00

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-461
License No: NPF-62

Report No: 50-461/2000006(DRS)

Licensee: AmerGen Energy Company, LLC

Facility: Clinton Power Station

Location: Route 54 West
Clinton, IL 61727

Dates: February 7-11, 2000

Inspector: James L. Belanger, Senior Physical Security Inspector

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

EXECUTIVE SUMMARY

Clinton Nuclear Power Station NRC Inspection Report 50-461/2000006(DRS)

This inspection included a review of alarm stations, protected area detection and assessment aids, compensatory measures, security event logs, security program plans, security force training and qualification program, and quality assurance in security. Additionally, the inspector reviewed an access authorization issue pertaining to a recent arrest of an employee who previously was granted unescorted access to Clinton Power Station. The inspector also followed up on a previous inspection finding and two open items identified during the Operational Safeguards Response Evaluation conducted in November 1999. This was an announced inspection conducted by one regional inspector.

- On several occasions, the licensee properly evaluated the trustworthiness and reliability of a contract employee upon notification by local law enforcement that the employee was a suspect in a murder investigation. However, these evaluations were not documented (Section S1.1).
- The perimeter alarm system was effectively maintained. CCTV assessment was good, but continued focus was needed to address open action requests that identified and documented minor problems (Section S2.1).
- The licensee's approved security and contingency plans did not identify the contingency weapon utilized by the armed response force in the implementation of the licensee's protective strategy in protecting Clinton Station against the design basis threat. The licensee acknowledged the discrepancy and agreed to change the security plan (Section S3.1).
- Revision 28 to the NRC-approved security plan, submitted by the licensee under the provisions of 10 CFR 50.54(p), did not decrease the effectiveness of the security program and was therefore determined to be acceptable (Section S3.2).
- Security staffing levels, to include armed response members, met NRC-approved security plan commitments. Recent changes in the security organization, to include the elimination of over-staff positions on shift, forced overtime, payroll problems, and the addition of fire watch responsibilities, affected morale. Despite that, security force performance continued to be effective (Section S6.1).

Report Details

IV. Plant Support

S1 Conduct of Security and Safeguards Activities

S1.1 Access Authorization Program: Licensee Evaluation of Information Affecting Continued Employee Unescorted Access

a. Inspection Scope (81700)

The licensee received significant information from the Local Law Enforcement Authority (LLEA) that could affect the continued trustworthiness and reliability of a contract employee. The inspector reviewed the licensee's evaluation of this information. Interviews were conducted with the Director, Security and Emergency Planning and the Personnel Processing Supervisor. The inspector reviewed the employee's background screening file.

b. Observations and Findings

Subsequent to the discovery of a murder victim in the Decatur, Illinois area in September 1996, the current Director, Security and Emergency Planning (DSEP) learned through local law enforcement that a contract employee working at Clinton Power Station was a suspect in the murder investigation. The DSEP could not specifically recall when he became aware of the ongoing investigation. The Personnel Processing Supervisor (PPS) stated that the employee's access authorization (AA) file information was reviewed and evaluated, with respect to information received by the LLEA, on several occasions by the former and current PPS during the three and a half year police investigation. The PPS stated that based on these file reviews, they determined that the employee had been properly granted access on each occasion and was under a continuous behavioral observation program. The file showed no conclusive factual information indicating an identifiable trustworthy or reliability problem. The licensee concluded that the employee did not represent a threat to the plant as defined in procedures. The DSEP indicated that there was no legal basis for denying the employee unescorted access since the employee was only a suspect and had not been charged with, or convicted of anything. The PPS stated that these evaluations of unescorted access were not documented. Although the reviews were not documented, the DSEP, the former PPS and current PPS provided corroborative testimony that the evaluations were performed. The PPS acknowledged that, in hindsight, they should have documented these reviews and that they have changed their policy to require documentation of these reviews in the future.

The inspector's review of the subject employee's access authorization file record showed that the contract employee had unescorted access to Clinton Power Station on ten occasions, initially granted on October 10, 1986, and terminating on December 30, 1999. At the time of termination, the employee's security badge was removed from service, and he could no longer gain access to the plant. The employee was subsequently arrested on January 28, 2000, for the murder. The PPS stated that the

subject employee's access authorization file folder was "flagged" and that the former employee would be denied unescorted access should the former employee return and request it.

c. Conclusions

On several occasions, the licensee properly evaluated the trustworthiness and reliability of a contract employee upon notification by local law enforcement that the employee was a suspect in a murder investigation. However, these evaluations were not documented.

S2 Status of Security Facilities and Equipment

S2.1 Effectiveness of Protected Area Intrusion Detection System and Assessment Aids

a. Inspection Scope (81700)

The inspector observed licensee tests of the protected area intrusion alarm system and evaluated the licensee's assessment capabilities.

b. Observations and Findings

The inspector requested that the licensee demonstrate the effectiveness of the protected area intrusion alarm system through the conduct of the Monthly Detection Probability Test on a sample of protected area intrusion alarm zones randomly selected by the inspector. The sample was approximately a third of the total number of alarm zones. The testing procedure required ten challenge tests per zone to include running, crawling and rolling. The testing was performed by two members of the security force. Alarms were generated in every test conducted.

The inspector examined the assessment system for the protected area perimeter intrusion alarm system and determined that picture quality was good. However, the inspector's review of the Action Request (AR) Tracking Log showed approximately twelve open requests relating to CCTV problems. Many of these requests were several months old and included heater, wiper, and positioning problems. Discussions with the Security Supervisor indicated that weather conditions, higher priority work by Instrumentation and Control (I&C), and parts not being available contributed to delays in closing these open ARs. The Security Supervisor stated that they would continue to focus on closing out these ARs. The inspector also noted several open ARs relating to pan/tilt/zoom (PTZ) cameras. These ARs related to wiper and movement problems. Although these PTZs are not required by the security plan, these cameras enhance the licensee's assessment capability during an armed response.

c. Conclusions

The perimeter alarm system was effectively maintained. CCTV assessment was good, but continued focus was needed to address open action requests that identified and documented minor problems.

S3 Security and Safeguards Procedures and Documentation

S3.1 Security Program Plans: Contingency Weapon Not Identified in Security Plan

a. Inspection Scope (81700)

The inspector reviewed the weapons provisions specified in the licensee's safeguards contingency plan to determine if these were available.

b. Observations and Findings

The inspector identified that a contingency weapon type utilized by the armed response force in the implementation of the licensee's response strategy was not identified in the approved security and contingency plans. In November 1999, during an Operational Safeguards Response Evaluation (OSRE), the licensee demonstrated a protective strategy that was fundamentally sound and generally effective in protecting Clinton Station against the NRC's design basis threat. During this OSRE, the NRC concluded that the weapons mix was appropriate. During the current security inspection, the inspector identified that this contingency weapon type was not identified in the approved security plan even though the strategy required it. The licensee acknowledged that this weapon should be identified in the plan because of their commitment to the protective strategy demonstrated during the OSRE and agreed to make the change to their security plan in accordance with the provisions of 10 CFR 50.54(p).

c. Conclusions

The licensee's approved security and contingency plans did not correctly identify the contingency weapon utilized by the armed response force in the implementation of the licensee's protective strategy in protecting Clinton Station against the design basis threat. The licensee acknowledged this discrepancy and agreed to change the security plan.

S3.2 Security Plan Changes

a. Inspection Scope (81700)

The inspector reviewed a 10 CFR 50.54(p) security plan change (Revision 28) submitted by the licensee by letter, dated January 4, 2000. The inspector's review was to determine if the submitted changes did not decrease the effectiveness of the security plan. Inspection activities included an interview with the Security Supervisor.

b. Observations and Findings

Region III received Revision 28 to the Clinton Power Station Physical Security Plan from the licensee by letter, dated January 4, 2000. This revision reflected a change in ownership of Clinton Power Station from Illinois Power (IP) to AmerGen Energy Company, LLC (AmerGen). Numerous sections throughout the security plan were

changed. The inspector determined that these changes were administrative in nature and were made in accordance with 10 CFR 50.54(p).

c. Conclusions

The inspector concluded that the security plan change submitted by the licensee had not decreased the effectiveness of the security plan.

S6 Security Organization and Administration

S6.1 Security Staffing

a. Inspection Scope (81700)

The inspector reviewed security staffing to determine if security plan commitments were met. Interviews were conducted with the Security Supervisor and selected members of the security force. The inspector reviewed security procedure CPS 1701.50, "Security Organization," dated July 7, 1998, and security shift schedules for randomly selected days. The inspector also evaluated the impact of recent changes to the security organization, (i.e., personnel staff reductions and the acquisition of fire watch responsibilities).

b. Observations and Findings

The inspector determined through interviews and records that the licensee's security shift manning levels, to include armed response requirements, met with security plan commitments. (The specific numbers are considered safeguards information.)

The Security Supervisor advised the inspector that in late 1999 the licensee eliminated five over-staff positions that were used to provide coverage for short notice call-offs and vacations. Security officers randomly selected for interview by the inspector indicated that the loss of these overstaff positions have resulted in frequent forced overtime and loss of days off. In addition to the security force overstaff positions, the security contractor eliminated centralized payroll functions and the onsite payroll clerk position. Several security officers stated that the transition to a centralized payroll system was poorly handled with the majority of personnel not being paid properly for several pay periods. Many officers stated that the frequent overtime and the payroll problems caused dissatisfaction within the security organization, although most indicated that the payroll issue had recently improved.

The Security Supervisor also advised the inspector that effective January 2, 2000, the security force assumed some fire protection responsibilities including impairment rounds, twenty-four hour door checks of fire doors, fire extinguisher inspections, six month fire door inspections and semi-annual Gaitronics (public address system) testing. He indicated that training in these responsibilities was ongoing and that they expected to train all security force members by the end of February 2000. He also stated that these additional duties have not negatively affected the ability of security force members to perform their principle security related duties. Security officers interviewed by the

inspector stated that they disliked assuming additional duties and expressed concern over the lack of familiarity with the new job responsibilities.

At the conclusion of the inspection during the exit interview, the inspector shared these comments/opinions of security force members with licensee management. The inspector indicated that these comments were provided for their information, and that no regulatory requirements were violated.

c. Conclusions

Security staffing levels met NRC-approved security plan commitments. Staff reductions, forced overtime, and recent payroll issues generated a morale problem but did not affect security force performance.

S8 Miscellaneous Security and Safeguards Issues

- S8.1 (Closed) IFI 50-461/99007-03: Unsolicited door access (Details: Safeguards Information). Licensee determined that the problem was related to security multiplexors. The fix involved the ongoing replacement of modem, fault detect, and common logic boards with vendor refurbished/calibrated boards and the development of a preventive maintenance program for security multiplexors. This item is closed.
- S8.2 (Closed) OSRE IFI 50-461/99-201-01: With no provision for certain contingency equipment, the licensee's protective strategy against the NRC design basis threat was vulnerable. The inspector determined through interviews with the Security Supervisor and observation, the licensee procured the equipment to address the vulnerability and that the equipment is in place and readily available to armed responders. This item is closed.
- S8.2 (Closed) OSRE IFI 50-461/99-201-02: Several internal defensive positions were vulnerable to components of the design basis threat. The inspector determined that the licensee installed ballistic shields at multiple locations in the turbine and fuel handling buildings which addressed this vulnerability. This item is closed.

V. Management Meetings

X1 Exit Meeting Summary

The inspector presented the inspection results to licensee management at the conclusion of the onsite inspection on February 11, 2000. The licensee acknowledged the findings presented. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

G. Baker, Manager, Nuclear Support
D. Basham, Quality Assurance Supervisor
G. Birk, Security Administrator
J. Goldman, Manager, Work Control
H. Hiter, Personnel Processing Supervisor
M. McNamer, Burns Security Site Manager
M. Reandeau, Director, Licensing
S. Smith, Director, Emergency Planning and Security
C. Williamson, Supervisor, Security

NRC

P. Loudon, Senior Resident Inspector
K. Stoedter, Resident Inspector

INSPECTION PROCEDURES USED

IP 81700: Physical Security Program at Power Reactor

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None

Closed

50-461/99007-03	IFI	Unsolicited security door access/multiplexer issues
50-461/99-201-01	IFI	Protective strategy vulnerability
50-461/99-201-02	IFI	Protective strategy vulnerability

Discussed

None

LIST OF ACRONYMS USED

AA	Access Authorization
AR	Action Request
CCTV	Closed Circuit Television
CFR	Code of Federal Regulations
DSEP	Director, Security and Emergency Planning
I&C	Instrumentation and Control
IFI	Inspection Follow Up Item
LLEA	Local Law Enforcement Authority
OSRE	Operational Safeguards Response Evaluation
PPS	Personnel Processing Supervisor
PTZ	Pan/Tilt/Zoom
QA	Quality Assurance

LIST OF DOCUMENTS REVIEWED

Self-Assessment Report on Security Training and Qualification Program (SA #1999-135, dated August 9, 1999)

QA Field Observation Report (Security System Status Meeting/January 12, 2000) RCCL #4E.320

QA Field Observation Report: Security Closed Circuit Television (CCTV) Report #2000-63-001

Letter N95-00(02-03)-L, dated February 3, 2000, Subject: Installation of Security Ballistic Shields Per EWR 00-01-011 & 012

Revision 28 to Clinton Power Station Security Plan submitted by AmerGen Letter, dated January 4, 2000

Security Event Logs: July 1999 - January 2000

Security Shift Schedules: February 7-8, 2000

Fourth Quarter Security Performance Report, dated January 15, 2000

CPS 1701.58, "Key and Core Control," dated September 8, 1998

Detection Probability Log (January 2-15, 2000)

Weekly Operational Test Log (December 1999, January 2000)

Fire Protection Transition Plan, dated October 28, 1999