#### September 28, 2000

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE - NRC INSPECTION REPORT 50-373/2000016(DRS);

50-374/2000016(DRS)

Dear Mr. Kingsley:

On September 8, 2000, the NRC completed a routine baseline inspection at your LaSalle County Station. The enclosed report presents the results of that inspection. The results of this inspection were discussed with Mr. J. Meister and other members of your staff on September 8, 2000.

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 programs.

Based on the results of this inspection, it was determined that the programs examined met NRC requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/NRC/ADAMS/index.html">http://www.nrc.gov/NRC/ADAMS/index.html</a> (the Public Electronic Reading Room).

Sincerely,

#### /RA/

James R. Creed Safeguards Program Manager Division of Reactor Safety

Docket Nos. 50-373; 50-374 License Nos. NPF-11; NPF-18

Enclosure: Inspection Report 50-373/2000016(DRS);

50-374/2000016(DRS)

cc w/encl: D. Helwig, Senior Vice President, Nuclear Services

C. Crane, Senior Vice President, Nuclear Operations

H. Stanley, Vice President, Nuclear Operations R. Krich, Vice President, Regulatory Services

DCD - Licensing

C. Pardee, Site Vice President J. Meister, Station Manager

F. Spangenberg, Regulatory Assurance Supervisor

M. Aguilar, Assistant Attorney General

State Liaison Officer

Chairman, Illinois Commerce Commission

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M. Aguilar, Assistant Attorney General

State Liaison Officer

Chairman, Illinois Commerce Commission

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# U.S. NUCLEAR REGULATORY COMMISSION REGION III

Docket Nos: 50-373; 50-374 License Nos: NPF-11; NPF-18

Report No: 50-373/2000016(DRS); 50-374/2000016(DRS)

Licensee: Commonwealth Edison Company

Facility: LaSalle County Station, Units 1 and 2

Location: 2601 N. 21st Road

Marseilles, IL 61341

Dates: September 5 - 8, 2000

Inspector: G. Pirtle, Physical Security Inspector

Approved by: James R. Creed

Safeguards Program Manager Division of Reactor Safety

## 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**

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational
  - Public
- 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. And 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.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

### **SUMMARY OF FINDINGS**

IR 50-373/2000016(DRS), IR 50-374/2000016(DRS), on 09/5-8/2000; Commonwealth Edison Company, LaSalle County Station, Units 1 and 2, Security Specialist Report. This inspection was conducted by a regional security specialist.

**Cornerstone: Physical Protection** 

The Access Authorization and Access Control programs met NRC requirements.

#### Report Details

#### 3. REACTOR SAFETY

Cornerstone: Physical Protection

3PP1 Access Authorization (AA) Program (IP 71130.01)

#### a. <u>Inspection Scope</u>

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

No findings were identified.

3PP2 Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorization) (IP 71130.02)

## a. <u>Inspection Scope</u>

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 detectors, metal detectors, and X-ray machines. The inspector also conducted random observations and interviewed selected security personnel responsible for access control measures for packages, personnel, and vehicles that entered the protected area. The program for controlling and accounting for vital area keys was reviewed. Protection of data entered into security computers used for access authorization was reviewed. The inspector reviewed a sample of licensee self-assessments, audits, maintenance request records, and security logged events for identification and resolution of problems. In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

#### b. <u>Findings</u>

No findings were identified.

#### 4. OTHER ACTIVITIES

# 4OA6 Management Meetings

# **Exit Meeting Summary**

The inspector presented the inspection results to members of licensee management at the conclusion of the onsite inspection on September 8, 2000. The licensee representatives acknowledged the findings presented and did not identify any information discussed as proprietary or safeguards information.

#### PARTIAL LIST OF PERSONS CONTACTED

#### <u>Licensee</u>

- J. Meister, Station Manager
- J. Barichello, Security Analyst
- A. Chinni, Safety
- V. Gengler, Station Security Administrator
- D. Hieggelke, Nuclear Oversight
- B. Saunders, Supervisor, Nuclear Security Operations
- S. Shields, Regulatory Assurance
- F. Spangenberg, Regulatory Assurance Manager
- S. Taylor, Radiation Protection Manager
- C. Wilson, Security Force Manager, TWC

#### **NRC**

E. Duncan, Senior Resident Inspector, NRC Region III

P. Krohn, Resident Inspector, NRC Region III

ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>		
•		
None		
Closed		
None		
Discussed		
None		

# PARTIAL LIST OF DOCUMENTS REVIEWED

- Security Event Logs January August 2000
- Nuclear Oversight Assessment NOA-01-00-PS08, Audit Plan "Security Fitness-For-Duty (FFD)," dated April 14, 2000
- Nuclear Oversight Assessment NOA-01-00-PS08, Report "Security Fitness-For-Duty (FFD)," dated May 17, 2000
- Nuclear Oversight Assessment Report NOA-01-99-033, "Security/Fitness-For-Duty," dated June 7, 1999
- Fitness-For-Duty Performance Data Personnel Subject to 10 CFR 26 for January 1 through June 30, 2000
- Cargo Training Signature Form For Warehouse Personnel, dated September 27, 1999; October 6, 1999; October 12, 1999; October 14, 1999; February 16, 2000; and August 14, 2000
- Test Procedure For Scanex I Walk Through Explosive Detector, dated December 9, 1994
- Semi-Annual Security Key and Lock Inventories, dated October 26, 1999 and April 3, 2000 Card Reader History Reports for Six Randomly Selected Personnel
- Commonwealth Edison Procedure SY-AA-101-110, "Maintaining Search Integrity Between Stations," Revision 1
- Commonwealth Edison Procedure SY-AA-101-117, "Processing Visitors and Vehicles," Revision 1
- Commonwealth Edison Procedure SY-AA-101-120, "Control of Security Keys and Cores," Revision 0
- Commonwealth Edison Procedure SY-AA-101-122, "Testing Security Equipment," Revision 0 Commonwealth Edison Procedure SY-AA-101-123, "Searching Vehicles and Cargo," Revision 3
- Commonwealth Edison Procedure SY-AA-102, "ComEd's Nuclear Fitness For Duty Program," Revision 3
- Commonwealth Edison Procedure SY-AA-102-201, "Call-Outs For Unscheduled Work," Revision 1
- Commonwealth Edison Procedure SY-AA-102-202, "Testing For Cause," Revision 2
- Commonwealth Edison Procedure SY-AA-102-206, "Reporting Use of Prescription Medication," Revision 0
- Commonwealth Edison Procedure SY-AA-103-511, "Request For Unescorted Access," Revision 2
- Commonwealth Edison Procedure SY-AA-103-512, "Continual Behavioral Observation Program," Revision 1
- Commonwealth Edison Procedure SY-AA-103-514, "Fabrication of Security Badges," Revision 3
- Condition Report L2000-01584, "FFD Questions Not Asked," March 27, 2000
- Condition Report L2000-04309, "FFD Questions Not Asked During Unscheduled Call Out," August 1, 2000
- Listing of Security-Related Conditions Reports January 4 to August 25, 2000