



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 5, 2001

LICENSEE: Nuclear Management Company (NMC), LLC

FACILITY: Point Beach Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY OF DECEMBER 11, 2000, MEETING REGARDING THE POTENTIAL USE OF A COMMON SECURITY PLAN FOR ALL PLANTS OPERATED BY NMC (TAC NO. MB0378)

On December 11, 2000, the Nuclear Regulatory Commission (NRC) staff met with representatives from NMC (the licensee) at the NRC's headquarters in Rockville, Maryland. The purpose of the meeting was to discuss a potential submittal that would contain a revised security plan. Meeting attendees are listed in Enclosure 1. The discussion topics from the meeting are detailed in Enclosure 2.

NMC was formed on February 25, 1999, between Northern States Power Company, Wisconsin Electric Power Company, Wisconsin Public Service Corporation, and Alliant Energy Corporation to operate and manage their nuclear facilities (Monticello, Prairie Island, Point Beach, Kewaunee, and Duane Arnold Nuclear Power Plants). The member utilities executed service agreements with NMC and formed Service Development Teams to define the scope of services to be provided by NMC in such areas as security, procurement, warehousing, fuel services, and oversight. The member utilities applied to the NRC to transfer operating authority of their nuclear facilities to NMC. The NRC approved the transfers of operating authority on May 15, 2000. The operating arrangement is for the purposes of operational efficiency and cost-effectiveness.

During the meeting, the licensee discussed the possibility of submitting a common security plan for all of the nuclear plants operated by NMC. Having a common security plan would provide various efficiencies such as streamlining the process for submitting security plan updates as well as the ease of rotating security personnel throughout the NMC sites because of their familiarization with the common security plan.

The licensee plans to submit a common security plan with addendums for each site containing the site-specific security information. During the meeting it was discussed whether the licensee's new common security plan would be submitted under Title 10 of the *Code of Federal Regulations* (CFR) Part 50.54(p) or 10 CFR 50.90. If any of the changes decrease the

NRC 001

effectiveness of the previous plans, the submittal would be required to be submitted under 10 CFR 50.90. A 10 CFR 50.54(p) submittal is reviewed by the regional office and a 10 CFR 50.90 submittal is reviewed by NRC headquarters office. The licensee stated that they plan to discuss their plans with security personnel in Region III where they will seek feedback on a possible 10 CFR 50.54(p) submittal.



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Docket Nos. 50-266 and 50-301

Enclosures: 1. List of Attendees
2. Discussion Topics

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/RA/

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MEETING ATTENDEES

DECEMBER 11, 2000

<u>NAME</u>	<u>ORGANIZATION</u>	<u>TITLE</u>
B. Wetzel	NRC/NRR	NRC Senior Project Manager
B. Manili	NRC/NRR	NRC Security Specialist
J. McCullum	NMC	Point Beach Security Manager
M. Findlay	NMC	NMC Security Director
D. Gentry	Security Consultant to NMC	

NRR = Office of Nuclear Reactor Regulation

ENCLOSURE 1

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS

BACKGROUND

Elements common to the six plants operated by NMC were identified, reviewed, evaluated and combined into composite NMC Physical Security and Security Training and Qualification Plans. The information specified in 10 CFR 50.34(d) for Safeguards Contingency Plans was integrated in the security plan. The NMC Security Training and Qualification Plan has been developed and submitted to NRC Region III under the provisions of 10 CFR 50.54(p).

The plan will be submitted under the provisions of 10 CFR 50.90 primarily because it constitutes the consolidation of six separate plant security plans and contains changes to 10 CFR 73.55 criteria proposed by the NEI Security Working Group. To provide information that is unique to each plant, a separate appendix is provided for each plant which contains descriptions of structures, systems, components and processes and alternative measures for exceptions to commitments contained in the base plan.

50.90 PLAN CHANGES

1. 73.55(c)(3):

Isolation zones **shall** be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and **shall** be of sufficient size to permit observation of the activities of personnel on either side of the barrier in the event of its penetration. If parking facilities are provided for employees or visitors, then they **shall** be located outside the isolation zone and exterior to the protected area barrier.

Proposed Alternative Commitment:

Paragraph 2.1.4, Isolation Zone:

Isolation zones **shall** be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and **shall** be of sufficient size to permit observation of the activities within each zone of detection. If parking facilities are provided for employees or visitors, then they **shall** be located outside the isolation zone and exterior to the protected area barrier.

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

2. 73.55(c)(5):

Isolation zones and all exterior areas within the protected area **shall** be provided with illumination sufficient for the monitoring and observation requirements of paragraphs (c)(3) (c)(4), and (h)(4) of this section, but not less than 0.2 footcandle measured horizontally at ground level.

Proposed Alternative Commitment:

Section 6.1, Illumination:

Security lighting provides illumination sufficient to support monitoring and observation of the zones of detection located within the isolation zone described in paragraph 2.1.4. The illumination supports the use of the surveillance system described in section 6.2 and facilitates initial response to the detection of an attempted or actual penetration of the protected area. Variations in lighting are described APPENDICES B through G.

3. 73.55(d)(4):

All vehicles, except as indicated in this paragraph, requiring entry into the protected area must be escorted by a member of the security organization while within the protected area and, to the extent practicable, must be off loaded in the protected area at a specific designated materials receiving area that is not adjacent to a vital area. Escort is not required for designated licensee vehicles or licensee-owned or leased vehicles entering the protected area and driven by personnel having unescorted access.

Proposed Alternative Commitment:

Paragraph 4.4.1.B, Other Vehicles:

Any vehicle, other than a designated vehicle, which requires entry to the PA to support plant operations **may** enter and be operated within the PA by either an authorized individual or a visitor who is escorted by an authorized individual. Such vehicles **shall** remain in the PA for the minimum time necessary to deliver materials or perform required support functions. To the maximum extent practicable, delivery vehicles **shall** off-load materials at a designated receiving area that is not located adjacent to a vital area.

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

4. 73.55(d)(7)(i)(D):

Lock and protect by an activated intrusion alarm system all unoccupied vital areas.

Proposed Alternative Commitment:

FIGURE 8-13, Paragraph 5, Intrusion Detection Equipment:

Description	Compensatory Measures
C. Degraded or failed VA door alarm with locking mechanism operational	Use secondary alarm system; <u>OR</u> Verify door is locked at least once every four hours.
D. Degraded or failed VA locking device with alarm operational	Install security padlock; <u>OR</u> Verify door is opened by an authorized individual after each alarm.
E. Degraded or failed VA door alarm and locking mechanism	Post a Security Officer to perform access control and delay functions.

5. 73.55(h)(3):

The total number of guards, and armed, trained personnel immediately available at the facility to fulfill these response requirements shall nominally be **ten**, unless specifically required otherwise on a case-by-case basis by the NRC; however, this number may not be reduced to less than **five** guards.

Proposed Alternative Commitment:

Chapter 1, Paragraph 1.2.10.B:

The minimum number of Security Officers available on each security shift for immediate response to safeguards contingency events is specified in APPENDICES B through G. The on-duty SSS **may** be assigned to perform armed response duties. These Security Officers are trained, qualified, and equipped to perform such duties and **may** assigned other routine duties that can be readily terminated to assure immediate availability for response to a contingency event. Additionally, Security Officers designated to perform armed response duties **may** be assigned to perform compensatory measures specified in FIGURE 8-13 provided that such duties would not impede the officer's ability to immediately respond to a pre-designated position and successfully implement the defensive strategy specified in plant security procedures.

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

6. 73.55(c)(4):

All exterior areas within the protected area **shall** be periodically checked to detect the presence of unauthorized persons, vehicles, or materials.

Proposed Alternative Commitment:

Chapter 6, Section 6.6:

Security Officers conduct patrols of PA barriers, isolation zones and general exterior areas within the PA at random times and using random routes. Patrols are conducted no less frequently than once during each security duty shift, but not less than once every 12 hours. Patrol officers are equipped with a radio capable of communicating with the CAS and SAS. The patrols conduct inspections and activities described in paragraphs 10.3.1 and 10.3.2. The conduct of security patrols is documented as specified in section 11.4.

OTHER DISCUSSION TOPICS AND QUESTIONS

1. In cases where the an existing plan contains exceptions, which were previously approved by the NRC, can these exceptions be included in the applicable plan appendix without additional justification?
Could such an exception be included in the base plan and be applicable to all plants?
2. Will the use of terminology such as "and other armed security personnel" allow the use of personnel other than the number of armed responders provided in the plan text during an OSRE or future SPA drills and exercises?
3. Is it permissible to use the text from 10 CFR 73.55(g)(4) to allow each plant the option to use either:
 - a. Annual (12) month reviews of the security program, or
 - b. Assessments against performance indicators in which case each element of the security program must be reviewed at least every 24 months?
4. Which of 50.90 changes proposed by NEI will be acceptable to the NRC? If the 50.90 changes submitted by NMC are approved, will those changes apply to all six plants or just those plants for which site specific information and exceptions have been provided?
5. The NMC concept proposes to submit the required information for the remaining five plants during 2001. If no changes in the text of the base plan are made, would the entire plan have to be resubmitted for review or only the appendix applicable to plant(s) being integrated into the plan?

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

6. Other than the **testing criteria** listed below which is specified in NUREG 0908, what other testing information is expected? There is a myriad of information contained in regulatory guides, guidelines, and NUREG which refers to operational, performance, and detection rate testing. In many cases, the guidance in one document conflicts with another. Which of the criteria should be used?
 - a. Security Personnel Equipment. Describe how all **security personnel equipment** including weapons, protective clothing and vehicles are maintained in operable condition and **shall** establish and inspection, test and maintenance program for such equipment.
 - b. Physical Barriers. Describe how all PA and VA **physical barriers** are maintained in operable condition through established testing and maintenance programs.
 - c. Paragraph 73.55(g): Describe that **intrusion alarms, emergency alarms, communications equipment, physical barriers and other security related devices or equipment** used pursuant to 73.55 are tested and maintained.
 - d. Paragraph 73.55(g)(2): Describe that each **intrusion alarm** is tested for performance at the beginning and end of any period that it is used for security. If the period of continuous use is longer than seven days, the intrusion alarm should be tested at least once every seven days.
 - e. Paragraph 73.55(g)(3): Describe that:
 - (1) Equipment required for **onsite communication** is performance tested not less frequently than once at the beginning of each security personnel work shift.
 - (2) Equipment required for **offsite communication** is performance tested not less than once a day.

Implied testing and inspection requirements: The following equipment is used to implement the requirements set forth in 73.55(b) through (h):

- a. Vehicle barrier system.
- b. Isolation zones and all exterior areas within the PA are illuminated to not less than 0.2 footcandle measured horizontally at ground level.
- c. PA and VA barriers.
- d. Firearms and explosive detection equipment.
- e. All keys, locks, combinations, and related access control devices.
- f. Tamper indication and self-checking capabilities for alarm devices including transmission lines to annunciators.
- g. CCTV alarm assessment capabilities.

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

7. The NEI proposed 50.90 changes address situations similar to Categories 4 and 6 in the NMC plan. Categories 4, 6 and 7 have been previously approved as exceptions by NRC Region III. Category 7 is currently contained in only one plan. Is it necessary to address these items as 50.90 changes or can they be approved under the provisions of 73.55(d)(3) since they were previously approved?

Extract from PSP, Section 4.2, Searches, Paragraph 4.2.4.B.4, 6 and 7:

In some cases, the searches specified in paragraph 4.2.4.A may not be feasible. When a package or material is identified as one of the following categories, it **may** be delivered to the PA without search provided the requirements specified for the applicable category are met.

Category 4. Packages or material sealed in the manufacturing process. When practicable, such packages and material **should** be stored in designated areas and opened at the final destination under the supervision of persons familiar with the contents. **Examples** include, but are not limited to office supplies, machine sealed or factory assembled materials and equipment or hermetically sealed products.

Category 6: Packages or material being shipped to the plant from another location which are either searched prior to packages and materials departing the shipping location by members of the plant security organization or security personnel from another licensed nuclear facility who are qualified to perform such searches provided:

- a. The material is locked and/or sealed inside a tamper-resistant shipping container or enclosed cargo area of the transport vehicle, and
- b. Security locks and/or tamper-resistant seal(s) that contain a unique mark or serial number are used to secure the shipping container or cargo area of the transport vehicle, and
- c. When shipped from another facility and the material was searched by that facility's security organization, the key(s) and/or a description of the seal(s) and a loading manifest is provided to the plant security organization, and
- d. The shipping container(s) or cargo area, lock(s) and/or seal(s) are verified to be intact on arrival at the plant, or
- e. When a tamper-resistant shipping container(s) secured with security locks and/or seals is not used, the material remained under the observation of a member of the plant security organization while being transported from the PA of the other facility until arrival at the plant.

NMC PHYSICAL SECURITY PLAN DISCUSSION TOPICS (Continued)

Category 7: Material that has been searched and locked and/or sealed as specified in paragraph 4.2.4.B.6 and stored at a location outside of the plant PA, but within the OCA provided the following conditions are met:

- a. The storage period does not exceed 24 months, and
- b. The material remained in locked and/or sealed container(s) and the key(s) and/or description of the seal(s) and a complete loading manifest(s) are positively controlled by the security organization, and
- c. The container(s) is inspected by a Security Force member at least weekly while in storage to ensure integrity of the lock(s) and/or seal(s) and container(s), and
- d.. The lock(s) and/or seal(s) are inspected and verified to be intact by a Security Force member prior to allowing the container(s) to re-enter the PA.