

December 18, 2001

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT

**PALISADES NUCLEAR PLANT SUITABILITY, TRAINING AND QUALIFICATION
PLAN, REVISION 19**

Enclosed are two attachments which comprise Revision 19 of the Palisades Nuclear Plant Suitability, Training and Qualification Plan. Attachment 1 contains a description of and justification for the changes included in Revision 19. Attachment 2 contains one original and three copies of the revised Plan.

Nuclear Management Company has determined that the changes contained in Revision 19 do not decrease the safeguards effectiveness of the Palisades Suitability, Training and Qualification Plan. Accordingly, this revision is submitted under the provisions of 10 CFR 50.54(p)(2).

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

Laurie Lahti

Laurie Lahti
Manager, Licensing

CC: Regional Administrator, USNRC, Region III
Project Manager, USNRC, NRR (w/o att)
NRC Resident Inspector - Palisades (w/o att)

Attachments

JE53 1/4
Public per
Bob Skelton



No. 022

TRANSMITTAL AND ACKNOWLEDGEMENT

Nuclear Regulatory Commission

Document Control Desk

To Washington, DC 20555 Date 12/18/01
(Name/Location)

Document Description _____

Palisades Suitability, Training and Qualification Plan, Revision 19

Return Signed Transmittal Within Two Weeks To:

James J Warner, 27780 Blue Star Memorial Highway, Covert, MI 49043
(Name/Location)

- Review and Comment
- Information Only
- Revision and/or Additions No. 19
- Other _____

GENERAL INSTRUCTIONS: _____

SPECIAL INSTRUCTIONS: _____

ACKNOWLEDGEMENT

I have received the document(s) forwarded to me and have taken the following action:

- _____ Reviewed, retained and assumed control of document.
- _____ Reviewed and returned document
- _____ Other _____

COMMENTS:

Signed _____ Date _____
(Name/Location)

ATTACHMENT 1

**NUCLEAR MANAGEMENT COMPANY
PALISADES PLANT
DOCKET 50-255**

**DESCRIPTION OF AND JUSTIFICATION FOR
SUITABILITY, TRAINING, AND QUALIFICATION PLAN CHANGES
REVISION 19**

**Nuclear Management Company
Palisades Nuclear Plant**

**Description Of And Justification For Revision 19 To The Palisades Suitability, Training
And Qualification Plan**

This document provides description of and justification for changes to Nuclear Management Company's Palisades Nuclear Plant Suitability, Training and Qualification Plan, Revision 19. Nuclear Management Company has determined that this revision does not decrease the safeguards effectiveness of the Plan. As such, it is submitted under the provisions of 10 CFR 50.54(p)(2).

Attachment 2 of this submittal document contains the revised Suitability, Training and Qualification Plan. A vertical line in the Plan margins denotes revised Plan text.

DESCRIPTION OF AND JUSTIFICATION FOR PLAN CHANGES

1. Section 4, Pages 12, 13 and 15 of 15, Steps 4.2, 5.1, 5.2.1b and 5.3; Appendix B Pages 7 and 13 of 20, Steps 5.2, 5.5; Appendix C, Page 5 of 8, Step 5.2:

These steps have been revised to eliminate references to shotguns and add references to .223 caliber rifles. Palisades is replacing the shotguns with .223 caliber rifles based on the following information:

- a. The .223 caliber rifle provides more ammunition capacity and a more rapid reloading capability than the shotgun.
- b. The .223 caliber rifle is lighter in weight and more maneuverable than the shotgun thereby providing improved ease of use over the shotgun.
- c. The .223 caliber ammunition is able to penetrate most ballistic body armor.
- d. The shotgun required two types of ammunition to be effective in the varied shooting conditions required at Palisades. The .223 rifle ammunition in use at Palisades is effective in all those varied shooting conditions.
- e. Analysis of the Palisades Plant's protective strategy determined that the shotguns were at the limits of their effective range in certain defensive positions. The .223 caliber rifles offer the necessary range for all defensive positions.

Based on the above information the rifle is superior to the shotgun in terms of response capability and provides security responders with a more effective weapon. As such, this change from shotguns to rifles, as Palisades Security's response weapon, does not decrease the safeguards effectiveness of the Security Plan or the Security organization and meets the provisions of 10 CFR 50.54(p)(2).

**Nuclear Management Company
Palisades Nuclear Plant**

**Instructions For Adding Revision 19 To The Palisades Suitability, Training, and
Qualification Plan**

Remove Following Pages:

- Suitability, Training and Qualification Plan Revision 18 Signature/Approval Page
- List of Effective Pages, Revision 18
- Table of Contents, Revision 18
- Sections 1 through 5, pages 1 through 13, Revision 18
- Appendix B, pages 7 and 13, Revision 18
- Appendix C, page 5, Revision 18

Add Following Pages:

- Suitability, Training and Qualification Plan Revision 19 Signature/Approval Page
- List of Effective Pages, Revision 19
- Table of Contents, Revision 19
- Sections 1 through 5, pages 1 through 13, Revision 19
- Appendix B, pages 7 and 13, Revision 19
- Appendix C, page 5 , Revision 19

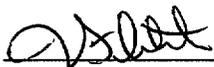
ATTACHMENT 2

**NUCLEAR MANAGEMENT COMPANY
PALISADES PLANT
DOCKET 50-255**

**PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING, AND QUALIFICATION PLAN
REVISION 19**

**Palisades Nuclear Plant
Suitability, Training and Qualification Plan
Revision 19**

The Palisades Suitability, Training and Qualification Plan, Revision 19, has been reviewed and is approved for issue.



JFFletcher
Palisades Security Manager

12-17-01

Date

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

List of Effective Pages

Revision 19

Section	Page	Rev	Section	Page	Rev
List of Eff Pages	1 of 1	19			
Table of Contents	1 of 2	19			
	2 of 2	19			
Scope	1 of 14	19			
Section 1	2 of 14	19			
	3 of 14	19			
	4 of 14	19			
	5 of 14	19			
	6 of 14	19			
Section 2	7 of 14	19			
	8 of 14	19			
	9 of 14	19			
Section 3	10 of 14	19			
Section 4	11 of 14	19			
	12 of 14	19			
	13 of 14	19			
Section 5	14 of 14	19			
Appendix B	7 of 20	19			
	13 of 20	19			
Appendix C	5 of 8	19			

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Table of Contents

Revision 19

Page

SCOPE OF SUITABILITY TRAINING AND QUALIFICATION PLAN

	SCOPE	1
SECTION 1 - EMPLOYMENT SUITABILITY AND QUALIFICATION		
1.0	<u>EMPLOYMENT SUITABILITY AND QUALIFICATION</u>	2
1.1	SUITABILITY	2
1.1.1	<u>Education Development</u>	2
1.1.2	<u>Felony Conviction</u>	2
1.1.3	<u>Age</u>	2
1.2	PHYSICAL AND MENTAL QUALIFICATIONS	2
1.2.1	<u>Physical Qualifications</u>	2
1.2.2	<u>Mental Qualifications</u>	4
1.3	PHYSICAL FITNESS QUALIFICATIONS	5
1.4	CONTRACT SECURITY PERSONNEL	5
1.5	PHYSICAL AND MENTAL ANNUAL REQUALIFICATION	5
1.6	DOCUMENTATION	6
1.7	RECORDS RETENTION	6
1.8	CONSTRAINTS	6
SECTION 2 - TRAINING AND QUALIFICATIONS		
2.0	<u>TRAINING AND QUALIFICATIONS</u>	7
2.1	TRAINING REQUIREMENTS	7
2.2	QUALIFICATION REQUIREMENTS	8
2.2.1	<u>Individual Responsibility Matrix</u>	8
2.2.2	<u>Job Analysis</u>	8
2.2.3	<u>Duty Qualification</u>	8

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Table of Contents

Revision 19

		<u>Page</u>
2.2.4	<u>Individual Qualification Record (IQR)</u>	8
2.2.5	<u>Test Materials</u>	9
2.3	CONTRACT PERSONNEL	9
2.4	REQUALIFICATION	9
 SECTION 3 - WEAPONS TRAINING		
3.0	<u>WEAPONS TRAINING</u>	10
 SECTION 4 - WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM		
4.0	<u>WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM</u>	11
4.1	HANDGUN	11
4.2	RIFLE	12
4.3	REQUALIFICATION	13
 SECTION 5 - GUARD, ARMED RESPONSE AND ARMED ESCORT EQUIPMENT		
5.0	<u>GUARD, ARMED RESPONSE AND ARMED ESCORT EQUIPMENT</u>	14
5.1	FIREARMS	14
5.2	AMMUNITION	14
5.3	CONTINGENCY EQUIPMENT	14

APPENDICES

Appendix A, "Company Training Program"

Appendix B, "Job Analysis"

Appendix C, "Individual Responsibility Matrix"

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Scope
Revision 19
Page 1 of 14

TITLE: Scope

This is the Suitability, Training and Qualification Plan (STQP) for the Nuclear Management Company's Palisades Nuclear Plant. This plan establishes the program for selecting, training, equipping, testing, and qualifying individuals assigned the responsibility of protecting nuclear material at the plant from theft or sabotage.

The STQP is drafted, approved, and revised by the Security Manager (SM). No changes to the STQP are made without prior review of the Nuclear Management Company (NMC) Director, Security or designate.

Revisions which do not decrease the safeguards effectiveness of the STQP may be made without prior approval of the Nuclear Regulatory Commission but must be reported to the Commission within two months after the change is made in accordance with 10 CFR 50.54(p).

Revisions which decrease the safeguards effectiveness of the STQP shall be subject to prior approval by the Nuclear Regulatory Commission pursuant to 10 CFR 50.90.

In addition to this plan, a Suitability, Training and Qualification Plan Implementing Procedure is maintained by the plant. This procedure shall be considered the implementation document for the STQP.

TITLE: Employment Suitability and Qualification

1.0 EMPLOYMENT SUITABILITY AND QUALIFICATION

1.1 SUITABILITY

Prior to employment or assignment to the security organization, an individual shall meet the following criteria.

1.1.1 Educational Development (Fulfill one of the following)

Provide evidence of completion of at least a high school education or equivalency (ie, high school or college diploma; certificate of completion from a high school or college, certificate of successful passing of a high school level General Education Development examination). In cases where individuals were educated in foreign countries, documentation supporting the equivalent of a high school education shall be available.

1.1.2 Felony Conviction

An individual may not be assigned to the security force if convicted of a felony. Every individual must sign a statement indicating whether or not he or she has ever been convicted of a felony; if yes, no further consideration for assignment as a member of the security force shall be given; if no, the background investigation should be conducted in a manner to determine the truthfulness of this matter.

1.1.3 Age

Provide evidence that he or she is at least 21 years of age, ie, birth certificate, baptismal certificate, DD Form 214, driver's license, etc, if seeking qualification as an armed officer status; 18 years of age if seeking qualification as an unarmed officer status.

1.2 PHYSICAL AND MENTAL QUALIFICATIONS

1.2.1 Physical Qualifications

a. General Physical Qualifications

Each individual whose primary responsibility involves the effective implementation of the security program shall not have any physical weakness or abnormalities that would adversely affect his or her performance of assigned security duties. Supervisors are responsible for the prompt reporting of any such weakness and/or abnormality noted during the continued observation program of assigned security personnel.

TITLE: Employment Suitability and Qualification

b. Physical Examination

In addition to the above, armed personnel and central alarm station operators shall successfully pass a physical examination designed to measure the individual's physical ability to perform security job duties. The examination will be conducted by a licensed physician who has been provided appropriate information as to the physical requirements of the security program and criteria outlined in 10 CFR 73, Appendix B. Upon completion of each examination, the physician will provide a statement attesting to the individual's successful passing of the required examination and that there is no medical contraindication to participate in the stated physical fitness qualification test.

c. Armed Personnel Requirements

Armed personnel shall be required to meet the following additional requirements concerning vision, hearing, epilepsy, diabetes, drug or alcohol addiction:

1. Vision: For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye. Field of vision must be at least 70° horizontal meridian in each eye. The ability to distinguish red, green and yellow colors is required. Loss of vision in one eye is disqualifying. Glaucoma shall be disqualifying unless controlled by acceptable medical or surgical means, provided such medications as may be used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security duties, and provided the visual acuity and field of vision requirements stated above are met.

The ability of armed security personnel to perform their assigned crucial tasks while wearing corrective lenses or afflicted with mild color vision defects will be demonstrated prior to assignment.

If corrective lenses are required to meet vision requirements of 1.2.1.c.1, a second set of corrective lenses shall be maintained on site for each affected officer. Prompt action shall be initiated to replace lost or damaged corrective lenses.

2. Hearing: Each individual shall have no hearing loss in the better ear greater than 30 decibels average at 500 Hz, 1,000 Hz and 2,000 Hz, with no level greater than 40 decibels at any one frequency (by ISO 1964 or ANSI 1969 audiometry).

TITLE: Employment Suitability and Qualification

A hearing aid is acceptable provided it demonstrates auditory acuity equivalent to the above-stated requirement, under suitable testing procedures. The tests will be completed prior to the individual being assigned to duties involving crucial security tasks.

3. Diseases: Armed security personnel shall have no established medical history or medical diagnosis of epilepsy or diabetes or, where such a condition exists, the individual shall provide medical evidence that the condition can be controlled with proper medication so that the individual will not lapse into a coma or unconscious state while performing assigned security duties.
4. Addiction: Armed security personnel shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction or, where such a condition has existed, the individual shall provide certified documentation of having completed a rehabilitation program which could give a reasonable degree of confidence that the individual would be capable of performing assigned security duties.

d. Other Physical Requirements

1. An individual who has been incapacitated due to serious illness, injury, disease or operation which could interfere with the effective performance of assigned security job duties shall, prior to resumption of such duties, provide a statement signed by a licensed physician indicating adequate recovery and physical ability to perform such security job duties.
2. Security supervisors will, as part of their normal duties, observe their personnel to detect any indication that they cannot meet the physical demands of their assigned duties. In the event a deficiency is detected, the situation will be reported to the Security Force Leader for appropriate resolution (ie, referral to a physician).

1.2.2 **Mental Qualifications**

a. General Mental Qualifications

Supervisory and training personnel will, as part of their normal duties, observe their personnel to detect any indication that they cannot provide the required mental and communicative skills demanded by their duty assignments. The ability of an individual to meet these requirements will be demonstrated during the testing by meeting performance objectives of necessary tasks.

TITLE: Employment Suitability and Qualification

b. Professional Mental Evaluation

Security personnel will be evaluated by a licensed psychologist or psychiatrist, or physician or other person professionally trained to identify emotional instability. The professional must attest that his or her evaluation detected no mental condition that would interfere with the individual's ability to perform the crucial tasks associated with his or her assigned security duties.

c. Continued Observation

Supervisors will be constantly alert to detect any indications of emotional instability on the part of their shift personnel. Any individual demonstrating an apparent lack of mental ability or emotional stability will be promptly referred to the licensed health professional for evaluation. The person concerned will not be reassigned to security duty until a statement is received from the professional attesting that the individual is mentally fit to perform the crucial tasks associated with his or her assigned security duties.

1.3 PHYSICAL FITNESS QUALIFICATIONS

All armed members of the Security Force, excluding Central/Secondary Alarm Station (CAS/SAS) operators, will comply with the physical fitness requirements by successfully demonstrating the performance objectives for Task 5.5 as outlined in Appendix B, Vehicle Escort Officer. The results of the physical fitness testing will be recorded as prescribed in Section 2, Step 2.2.4, "Individual Qualification Record (IQR)" and Section 2, Step 2.3, "Contract Personnel."

1.4 CONTRACT SECURITY PERSONNEL

In accordance with the terms of the contract between this Company and the contract security service, all contract security personnel shall meet the suitability, physical and mental requirements outlined in this Plan.

1.5 PHYSICAL AND MENTAL ANNUAL REQUALIFICATION

Every 12 months armed personnel and CAS Supervisors will be required to pass a physical examination in accordance with Paragraph 1.2.1b. Armed personnel will meet the additional requirements outlined in Paragraphs 1.2.1.c, 1.2.2.b, and 1.3.

This 12 month requalification requirement may be extended with the following stipulations:

- a. the maximum allowable extension shall not exceed 25% (three months) of the 12 month requalification period and

TITLE: Employment Suitability and Qualification

- b. the combined time extension for any three consecutive training intervals shall not exceed 3.25 times the 12 month training interval. (12 months x 3.25 = 39 months in any three consecutive years)

Verification of requalification will be as specified in Paragraphs 1.2.1.b and 1.2.2.b.

1.6 DOCUMENTATION

The designated contractor representative(s) is required to document and attest to the fulfilling of each requirement outlined in this plan. The Nuclear Oversight Department will conduct periodic audits and surveillances to ensure compliance with this program.

These documents will be available for inspection by an authorized representative of the US Nuclear Regulatory Commission.

1.7 RECORDS RETENTION

Records documenting physical and mental qualifications and requalifications required by Sections 1.2.1.b, 1.2.2.b, and 1.5 of this plan shall be retained for a period of three years from the date results are obtained. These records may be maintained by the company or the contract security agency.

All test and written evaluation materials utilized to demonstrate adequate job performance of required tasks shall be on file onsite for a minimum of three years. Each individual's initial Individual Qualification Record shall be retained on file onsite for the lifetime of the plant and three years thereafter.

1.8 CONSTRAINTS

Nothing herein authorizes or requires any Company or contractor supervisor to investigate into or judge the reading habits, political or religious beliefs, or attitudes on social, economic or political issues of any person. The provisions of Company and Federal Equal Employment Opportunity programs will be strictly adhered to.

TITLE: Training and Qualifications

2.0 TRAINING AND QUALIFICATIONS

2.1 TRAINING REQUIREMENTS

Objectives of this training program are to produce security personnel fully qualified and capable of performing crucial tasks associated with their assigned security duties and to insure they maintain proficiency by detecting any deficiencies in performance. The manner in which individuals are qualified and proficiency is maintained includes formal, on-the-job training and/or, at the time of hiring, determines the individual possesses the necessary knowledge and skills by testing of required performance objectives. As determined by the licensee, initial task evaluations of security personnel will be by practical demonstration when feasible. Proficiency is maintained by ongoing training and performance evaluation. Individual and force effectiveness to meet contingency response tasks will be demonstrated by an officer participating in at least one drill per year and successfully passing a written examination on contingency response procedures. To qualify, the individual must receive a minimum passing score of 70 percent correct answers on written tests and/or demonstrate the correct technique for each action element indicated on the supervisor's checklists as required for any critical task associated with his/her shift assignment. In the event an individual, at any time, fails to demonstrate the required degree of proficiency, he or she will receive retraining until satisfactory performance is demonstrated by retesting of the required performance objective or a decision is made to permanently disqualify the individual.

- 2.1.1 The training/evaluation program begins as a portion of the hiring process. During the initial interview, it is determined if the individual has had any previous training and/or experience with similar security programs. If experience is indicated, the person will be evaluated to determine his or her specific training needs. The Company training program is designed to initially qualify an individual in the position requiring proficiency in the least number of tasks; ie, Personnel Search Officer (PSO). When an individual qualifies as a PSO, he or she then receives the additional training necessary to qualify in the position requiring the next least number of tasks; ie, Vehicle Search Officer (VSO). The training needs to progress from one position to another have been determined and are outlined in Appendix B.

Thus, an individual will eventually progress, through a combination of training techniques and job experience, from the position requiring the least degree of knowledge and skill to the most challenging position. This program is outlined in Appendix A.

Weapons qualification may be performed prior to initiation of training in any other tasks to ensure newly hired armed officer candidates or unarmed officers seeking armed officer qualification can successfully qualify with required weapons.

TITLE: Training and Qualifications

2.2 QUALIFICATION REQUIREMENTS

2.2.1 Individual Responsibility Matrix

A detailed review has been made of the site physical security and safeguards contingency plans and procedures. Based upon the identified tasks the responsibilities of the contract security personnel were established. The established responsibilities, by job position, are outlined in the Individual Responsibility Matrix, Appendix C. These tasks were used in conducting the job analysis as outlined in Section 2.2.2, "Job Analysis."

2.2.2 Job Analysis

Utilizing the Individual Responsibility Matrix (Appendix C), a specific job analysis was accomplished for each shift assignment indicated. The purpose of the analysis (Appendix B) was to authenticate and identify crucial tasks required for the successful implementation of the plant security and safeguards contingency plans which are of sufficient difficulty to require evaluation. The identified crucial tasks along with established standards and conditions will be used for the qualification evaluation of individuals assigned to the specific shift assignments.

2.2.3 Duty Qualification

All personnel assigned to security-related duties are required to successfully demonstrate the capability to perform all crucial security tasks, under the conditions and to the standards specified on the applicable Job Analysis Sheet(s) prior to assignment to the specific shift assignment involved. The demonstration must be performed to the satisfaction of an appropriate Plant or Security Supervisor. The individual will receive retraining in the event the demonstration is unsatisfactory. The routine performance of a task meets this objective provided it is accomplished in accordance with the specifications outlined in the appropriate Job Analysis Sheet (Appendix B).

2.2.4 Individual Qualification Record (IQR)

An IQR is maintained for each individual assigned to security-related duties. The IQR outlines each specific task required for a given shift assignment function, the date that the successful performance for each task was completed, the initials of the evaluating supervisor and examinee certifying completion. Upon initiation of requalification, a new IQR will be utilized to record the evaluation. The IQR(s) for each individual assigned to security-related duties will be available for inspection by an authorized representative of the US Nuclear Regulatory Commission.

TITLE: Training and Qualifications

2.2.5 Test Materials

All test and evaluation materials, to include individual qualification records, utilized to demonstrate adequate performance of required tasks will be retained on the plant site for a minimum of 3 years for inspection by an authorized representative of the NRC.

2.3 CONTRACT PERSONNEL

All contract personnel assigned to security-related duties will meet the training and qualification requirements outlined in this plan. The Security Training Manager or designated contract agency representative will, prior to assigning any contract Security Force member to security-related duties, certify that he has reviewed the individual's IQR and that the person has demonstrated adequate performance for all tasks required of the shift assignment position(s) indicated. Training records will be audited on a periodic basis by the Nuclear Oversight Department.

2.4 REQUALIFICATION

2.4.1 All personnel assigned to security related duties shall, once every 12 months, successfully demonstrate the capability to perform all tasks outlined in the applicable Job Analysis Work Sheet(s). This 12 month requalification period may be extended under the following conditions:

- a. the maximum allowable extension shall not exceed 25% (three months) of the 12 month requalification period and
- b. the combined time extension for any three consecutive 12 month requalification periods shall not exceed 3.25 times the 12 month requalification period. (12 months x 3.25 = 39 months in any three consecutive years.)

The results of the requalifications will be documented and attested to as outlined in Paragraphs 2.2.4 and 2.3 above.

2.4.2 Personnel holding training positions shall be exempt from requirements in Paragraph 2.2.4 with the exception of weapons qualifications, physical examination and physical agility. Qualification in the remaining tasks, as indicated in the Job Analysis Sheet, shall be evaluated by the individual's supervisor, based on observed duty performance.

TITLE: Weapons Training

3.0 **WEAPONS TRAINING**

- 3.1 All personnel required to be armed in the performance of their duties shall receive weapons training in accordance with the provisions of this plan. The training will ensure each individual is knowledgeable in the safe use of his or her assigned weapons and shall include the material concerning: Weapons clearing, loading, unloading, reloading and storage, combat firing day and night for the handgun, rapid firing for the weapons, close quarters firing, stress firing, and target recognition. Each individual must complete the initial training prior to being armed and at 12 month intervals thereafter. Requalification training may be extended beyond the 12 month training interval under the following conditions:
- a. the maximum allowable extension shall not exceed 25% (three months) of the 12 month requalification training interval and
 - b. the combined time extension for any three consecutive training intervals shall not exceed 3.25 times the 12 month training interval. (12 months x 3.25 = 39 months in any three consecutive years.)
- 3.2 Documentation of training provided will be in accordance with Section 2, Step 2.2.4, "Individual Qualification Record (IQR)" and Section 2, Step 2.3, "Contract Personnel". The specific material covered by the training program is available for inspection by authorized representatives of the NRC.

TITLE: Weapons Qualification and Requalification Program

4.0 WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM

Each individual required to be armed in the performance of his or her security-related duties shall qualify in the use of assigned weapon(s) as indicated below. The individual must qualify with the weapon prior to being armed on duty and documentation of the qualification be accomplished as indicated in Section 2, Step 2.2.4, "Individual Qualification Record (IQR)", and Section 2, Step 2.3, "Contract Personnel".

4.1 HANDGUN

To qualify in use of the handgun, the individual must successfully complete the following course with a 70% minimum score, ie, 200 of a possible 285 points:

Stage and Points	Range Distance	No of Rounds	Time	Position
1 45 Points Possible	4 yards	3 Rounds	4 Seconds	Weaver
	4 yards	3 Rounds	4 Seconds	Weaver
	4 yards	3 Rounds	4 Seconds	Weaver
2 40 Points Possible	7 yards	Fire 2, Reload, Fire 2	8 Seconds	Weaver
	7 yards	Fire 2, Reload, Fire 2	8 Seconds	Weaver
3 40 Points Possible	7 yards	Fire 1, Reload, Fire 3	10 Seconds	Weaver
	7 yards	Fire 1, Reload, Fire 3	10 Seconds	Weaver
4 40 Points Possible	10 yards	2 Rounds	4 Seconds	Left Side Barricade
	10 yards	2 Rounds	4 Seconds	Left Side Barricade
	10 yards	2 Rounds	4 Seconds	Right Side Barricade
	10 yards	2 Rounds	4 Seconds	Right Side Barricade
5 20 Points Possible	10 yards	2 Rounds	4 Seconds	Kneeling
	10 yards	2 Rounds	4 Seconds	Kneeling
6 40 Points Possible	15 yards	8 Rounds	1 Minute	Standing, Kneeling or Prone
7 60 Points Possible	7 yards	Fire 3 at left target, Fire 3 at right target	8 Seconds	Weaver
	7 yards	Fire 3 at left target Fire 3 at right target	8 Seconds	Weaver

Michigan State Police course target shall be used.

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Section 4
Revision 19
Page 12 of 14

TITLE: Weapons Qualification and Requalification Program

4.2 RIFLE

To qualify in use of the rifle, the individual must successfully complete the following course with a minimum score of 80% (i.e., 39 hits out of a possible 48 within the shaded area):

STAGE	RANGE DISTANCE	NUMBER OF ROUNDS	TIME	POSITION
1	50 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
2	50 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
3	50 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
4	50 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
5	25 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
6	25 YARDS	2	5 SECONDS	STRONG SIDE KNEELING BARRICADE
7	25 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
8	25 YARDS	2	5 SECONDS	STRONG SIDE KNEELING BARRICADE
9	25 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
10	25 YARDS	2	5 SECONDS	STRONG SIDE KNEELING BARRICADE
11	25 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
12	25 YARDS	2	5 SECONDS	STRONG SIDE KNEELING BARRICADE
13	25 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
14	25 YARDS	2	5 SECONDS	REACTION SIDE KNEELING BARRICADE
15	25 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
16	25 YARDS	2	5 SECONDS	REACTION SIDE KNEELING BARRICADE
17	25 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
18	25 YARDS	2	5 SECONDS	REACTION SIDE KNEELING BARRICADE
19	25 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
20	25 YARDS	2	5 SECONDS	REACTION SIDE KNEELING BARRICADE
21	25 YARDS	2	5 SECONDS	STRONG SIDE STANDING BARRICADE
22	25 YARDS	2	5 SECONDS	STRONG SIDE KNEELING BARRICADE

TITLE: Weapons Qualification and Requalification Program

STAGE	RANGE DISTANCE	NUMBER OF ROUNDS	TIME	POSITION
23	25 YARDS	2	5 SECONDS	REACTION SIDE STANDING BARRICADE
24	25 YARDS	2	5 SECONDS	REACTION SIDE KNEELING BARRICADE

4.3 REQUALIFICATION

Individuals required to be armed in the performance of their security related duties shall be requalified in the use of their assigned weapons once every 12 months. This 12 month requalification period may be extended under the following conditions:

- a. the maximum allowable extension shall not exceed 25% (three months) of the 12 month requalification period and
- b. the combined time extension for any three consecutive 12 month requalification periods shall not exceed 3.25 times the 12 month requalification period. (12 months x 3.25 = 39 months in any three consecutive years).

The requalification will be in accordance with the provisions of Paragraphs 4.0 and 4.2 above the documented in accordance with Section 2, Step 2.2.4, "Individual Qualification (IQR)", and Section 2, Step 2.3, "Contract Personnel".

TITLE: Weapons Qualification and Requalification Program

5.0 **GUARD, ARMED RESPONSE AND ARMED ESCORT EQUIPMENT**

5.1 **FIREARMS**

An adequate number of handguns and rifles are maintained at the plant to arm all security personnel required of the security manpower requirements as outlined in the Plant Security and Contingency Plans. All weapons meet, as a minimum, specifications outlined in 10 CFR 73.55, Appendix B, Section V.

5.2 **AMMUNITION**

5.2.1 For each assigned weapon as appropriate to the individual's assigned contingency security job duties and as readily available as the weapon:

- a. 18 rounds per handgun.
- b. 100 rounds per rifle .

5.2.2 Ammunition available onsite is two (2) times the amount stated in 5.2.1 above for each weapon.

5.3 **CONTINGENCY EQUIPMENT**

The following personnel equipment is readily available for issue to individuals assigned tasks in accordance with the plant Contingency Plan:

- a. Riot Helmets
- b. Flexible Restraints
- c. Rifles

NUCLEAR MANAGEMENT COMPANY
 PALISADES NUCLEAR PLANT
 SUITABILITY, TRAINING AND QUALIFICATION PLAN

Appendix B
 Revision 19
 Page 7 of 20

Job Analysis

SHIFT ASSIGNMENT:

Vehicle Escort Officer

Number	Duties and Tasks (Actions)	Conditions	Standards (Measurable and Observable)
<i>All crucial tasks required by the shift assignments of Personnel and Vehicle Search Officers</i>			
5.5	Demonstrate Required Physical Fitness	Doctor's Statement of Satisfactory Physical Condition	Demonstrate ability to complete following physical agility course within 2 minutes 45 seconds while wearing a handgun (may be simulated) and weapons belt: <ul style="list-style-type: none"> • Run 100 yards to building, pick up rifle and load 1 magazine of ammunition (may be dummy rounds); • Run 50 yards and ascend stairway to lower shooting platform; • Perform tactical maneuver using handgun; • Descend stairway from lower shooting platform; • Run 50 yards to building, perform tactical maneuver using handgun or rifle; • Run 50 yards to course end.

NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN

Appendix B
 Revision 19
 Page 13 of 20

Job Analysis

SHIFT ASSIGNMENT:

Response Force Member

Number	Duties and Tasks (Actions)	Conditions	Standards (Measurable and Observable)
<i>All crucial tasks required by shift assignments of Personnel and Vehicle Search, Vehicle Escort and Patrol Officers:</i>			
5.2	Demonstrate Qualification in Use of rifle	Classroom, rifle, ammunition, Suitable Range	Must demonstrate, with appropriate weapon, ability to (1) use safely (2) properly clear (3) load, unload, correctly store (4) combat fire, day/night (5) rapid fire as appropriate, (6) close firing, (7) stress firing, target recognition, and (8) achieve qualifying score on established firing course.
7.1.11	Respond to Confirmed Protected Area Intrusion	Simulated Protected Area Intrusion	Demonstrate ability to (1) obtain contingency equipment and take security emergency station (2) demonstrate ability to systematically and effectively search area for an intruder (3) demonstrate ability to deploy as directed and (4) demonstrate ability to follow order, as directed.
7.1.20	Internal Disturbance, Respond to Terminate or Other Actions, As Directed.	Simulated Internal Disturbance	Demonstrate ability to obtain contingency equipment and take appropriate action as directed to terminate appropriate action as directed to terminate condition.

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Individual Responsibility Matrix

	Per Sch Off	Veh Sch Off	Veh Esc Off	Ptl Off	Res For Mbr	ID Stat Supv	Res For Ldr	CAS/SAS	Sec Sft Ldr	Sec For Ldr
5.1 Demonstrate Qualification in Use of Handguns			X	*	*		*			
5.2 Demonstrate Qualification in Use of rifle					X		*			
5.3 Use of Radio Communications	X	*	*	*	*	*	*	*	*	
5.4 Use of Offsite Communications								X		
5.5 Demonstrate Required Physical Fitness			X	*	*		*			
6.0 Monitors Alarms										
6.1 Monitors Alarm Displays and Sensors						X				
7.0 Detection and Assessment										
7.1 Directs Contingency Event Response									X	
7.1.1 Directs Security Force Contingency Event Response								X		
7.1.2 Direct/Search for Bomb	X	*	*	*	*	*	*	*	*	

* Tasks required for shift assignment in the event of security related emergency conditions as outlined in paragraph 1.4.3 of the Security Plan.