

# WOLF CREEK NUCLEAR OPERATING CORPORATION

Karl A. (Tony) Hams  
Manager Regulatory Affairs

**MAR 21 2003**

RA 03-0034

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

- Reference: 1) Letter WO 02-0043, dated August 2, 2002, from B. T. McKinney, WCNOC, to USNRC  
2) Letter WO 02-0058, dated November 21, 2002, from B. T. McKinney, WCNOC, to USNRC  
3) Letter WO 03-0004, dated February 10, 2003, from B. T. McKinney, WCNOC, to USNRC

Subject: Docket No. 50-482: Revision 34 to the Wolf Creek Generating Station Physical Security Plan, Safeguards Contingency Plan, and Security Training and Qualification Plan

Gentlemen:

Pursuant to 10 CFR 50.54(p), the Enclosures to this letter provides one original and three copies of Revision 34 to the Wolf Creek Generating Station (WCGS) Physical Security Plan, Safeguards Contingency Plan, and Security Training and Qualification Plan. The documents are provided in their entirety. There are no new commitments as a result of this correspondence.

The Attachment provides reasons and justifications for changes incorporated by this revision. Changes 1, 2, 3, and 4 described in the Attachment, were previously discussed by the References. In addition, changes are incorporated regarding the key issue log and reformatting of the Plans.

The Enclosures contain Safeguards Information. In accordance with 10 CFR 73.21, information contained in the Enclosures should be withheld from public disclosure.

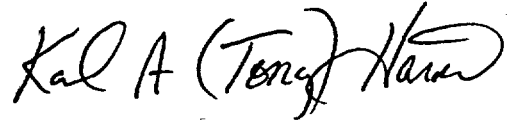
***Safeguards Information Contained in the Enclosures***  
When Separated From Enclosures, This Document is NOT Safeguards Information

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If you have any questions concerning this matter, please contact me at (620) 364-4038, or Ms. Jennifer Yunk at (620) 364-4272.

Very truly yours,



Karl A. (Tony) Harris

KAH/rlg

Attachment

Enclosure I: WCGS Physical Security Plan  
II: WCGS Safeguards Contingency Plan  
III: WCGS Security Training and Qualification Plan

cc: J. N. Donohew (NRC), w/a  
D. N. Graves (NRC), w/a  
E. W. Merschoff (NRC), w/a, w/e  
G. A. Pick (NRC), w/a, w/e  
Senior Resident Inspector (NRC), w/a

**Revision 34 to Wolf Creek Generating Station (WCGS) Physical Security Plan,  
Safeguards Contingency Plan, and Security Training and Qualification Plan**

**Reasons and Justifications**

**Change 1**

Pages Affected: Pages throughout the Physical Security Plan, Training and Qualification Plan, and the Contingency Plan.

Change: The title of Superintendent Security has been changed to Manager Security. The Manager Security reports directly to the Site Vice President.

Reason for Change: Organizational changes within Wolf Creek Nuclear Operating Corporation (WCNOC) have eliminated the position of Manager Resource Protection and implemented the title change from Superintendent Security to Manager Security.

Justification: No responsibilities have changed; only the titles discussed above and reporting relationship have changed. This change has been evaluated in accordance with 10 CFR 50.54(p) and does not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan.

**Change 2:**

Pages Affected: Physical Security Plan page 1-9

Change: This change provides for expediting verification of military service in accordance with the requirements of the Order for Compensatory Measures Related to Access Authorization dated January 7, 2003.

In addition, provisions have been added to reflect that WCNOC is in the process of implementing the Order in accordance with WCNOC letter WM 03-0005 dated January 27, 2003. As the Order is implemented, elements of Regulatory Guide 5.66 and NUMARC 91-03 will be superceded by the Order as applicable.

Reason for Change: Regulatory Order on Access Screening dated January 7, 2003.

Justification: Subsequent to the notification provided by Reference 2, the NRC issued an Order for Compensatory Measures Related to Access Authorization dated January 7, 2003. The Order reflects the guidance provided by RIS 2002-17. Therefore, the WCGS Physical Security Plan is revised to reflect the requirements of the Order dated January 7, 2003. These changes have been evaluated in accordance with 10 CFR 50.54(p) and do not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan

**Revision 34 to Wolf Creek Generating Station (WCGS) Physical Security Plan,  
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**Reasons and Justifications**

**Change 3:**

**Pages Affected:** Pages throughout the Physical Security Plan, Training and Qualification Plan, and the Safeguards Contingency Plan.

**Change:** The Vice President Operations title has been changed to Site Vice President.

**Reason for Change:** Wolf Creek Nuclear Operating Corporation has reorganized upper management positions.

**Justification:** The change from Vice President Operations to Site Vice President is a title change only as far as Security is concerned. No responsibilities related to Security have changed. This change has been evaluated in accordance with 10 CFR 50.54(p) and does not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan.

**Change 4:**

**Pages Affected:** Physical Security Plan, Figure 3.1-4.

**Change:** This figure is a drawing of the Personnel Entrance Search Station (PESS). The layout of PESS equipment (explosive detectors/metal detectors) has been rearranged.

**Reason for Change:** During an NRC inspection in June 2001 a weakness was identified with Security's capability to observe personnel as they passed through the metal detectors. A modification has been implemented that rearranged the PESS area allowing Security personnel to easily see personnel passing through the PESS equipment. In addition, new metal detectors were installed.

**Justification:** The figure is being revised to show the location of the equipment and the path that is utilized for personnel ingress to the protected area. All the required equipment continues to exist and search criteria remains the same. This change has been evaluated in accordance with 10 CFR 50.54(p) and does not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan.

**Revision 34 to Wolf Creek Generating Station (WCGS) Physical Security Plan, Safeguards Contingency Plan, and Security Training and Qualification Plan**

**Reasons and Justifications**

**Change 5:**

Pages Affected: Physical Security Plan, Page 3-33.

Change: This change provides for maintaining the key issue log by the Plant Security Computer System (PSCS).

Reason for Change: In August 1999 Wolf Creek installed a new Security Computer system that is capable of maintaining an electronic log of the mechanical key system. The paper log is no longer maintained. Records of key issue and return are retained by the PSCS.

Justification: An electronic key log is maintained and reviewed daily and reports can be generated from the PSCS system for review and inventory of keys. This change has been evaluated in accordance with 10 CFR 50.54(p) and does not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan.

**Change 6:**

Pages Affected: Pages throughout the Physical Security Plan, Training and Qualification Plan, and the Safeguards Contingency Plan.

Change: All three plans were reformatted into Microsoft Word 2000. This reformatting moved some paragraphs to the previous or next page.

Reason for Change: WCNOC has upgraded to Microsoft Office 2000.

Justification: Reformatting the plans has changed the appearance of the documents only. All information continues to be contained in the three plans. This change has been evaluated in accordance with 10 CFR 50.54(p) and does not reduce the effectiveness of the Physical Security Plan, the Safeguards Contingency Plan, or the Security Training and Qualification Plan.