

Detroit Edison



September 5, 2003
NRC-03-0071

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Submittal of Fermi 2 Security Personnel Training
and Qualification Plan, Revision 21

The purpose of this letter is to submit the Fermi 2 Security Personnel Training and Qualification Plan (SPT&QP), Revision 21, in accordance with 10CFR50.54(p)(2).

Chapter 3, Appendices E and H, the Table of Contents and the List of Figures/Appendices are being submitted. A summary of the changes made in the SPT&QP Revision 21 is also provided. Additionally, changes to the text are highlighted (shaded). Deleted text is not identified with markings. The changes made under this revision do not decrease the overall effectiveness of the SPT&QP.

If there are questions regarding this submittal, please contact Mr. Joseph H. Korte, Manager – Nuclear Security at (734) 586-1095.

Sincerely,

Norman K. Peterson
Manager - Nuclear Licensing

Enclosures

| | |
|------------------------------------|-------------------------|
| cc: H. K. Chernoff | (w/o Enclosures) |
| J. R. Creed | (2 copies w/Enclosures) |
| NRC Resident Office | (w/o Enclosures) |
| Regional Administrator, Region III | (w/o Enclosures) |
| USNRC Document Control Desk | (3 copies w/original) |

IE53

**Fermi 2 Security Personnel Training and Qualification Plan
Summary of Revision 21
Page 1**

The changed text within the SPT&QP has been **shaded**. Deleted text is not marked.

Chapter 3 – Revision 21:

1. Deleted “9mm” from the description of the semi-automatic handgun course in 3.4.2, page 3-8.
2. Deleted 9mm Carbine Course reference from 3.4.2, page 3-8.
3. Changed reference to Appendicies E through H to E through G in 3.4.2, page 3-8.

Appendix E – Revision 21:

1. Deleted unnecessary detail from course and deleted all references to decocking in Appendix E, pages E-1 through E-3.

Appendix H – Revision 21:

1. Deleted 9mm carbine course.

END

FERMI 2 SECURITY PERSONNEL TRAINING AND QUALIFICATION PLAN
TABLE OF CONTENTS
July 29, 2003

| | | |
|------------|--|------------|
| 1.0 | CHAPTER 1: INTRODUCTION Revision 17 | 1-1 |
| 2.0 | CHAPTER 2: DEFINITIONS AND ACRONYMS Revision 19..... | 2-1 |
| 3.0 | CHAPTER 3: EMPLOYMENT CRITERIA Revision 21 | 3-1 |
| 3.1 | <u>Suitability and Qualification</u> | 3-1 |
| | 3.1.1 Suitability | 3-1 |
| | 3.1.2 Physical Qualifications | 3-1 |
| | 3.1.3 Mental Qualifications | 3-2 |
| | 3.1.4 Physical Fitness Qualifications..... | 3-3 |
| | 3.1.5 Contract Security Personnel | 3-3 |
| | 3.1.6 Material Search Personnel..... | 3-3 |
| | 3.1.7 Documentation | 3-4 |
| 3.2 | <u>Training and Qualification Plan Requirements</u> | 3-4 |
| | 3.2.1 Training Objective..... | 3-4 |
| | 3.2.2 Scope of Training | 3-4 |
| | 3.2.3 Site Specific Training Requirements..... | 3-5 |
| 3.3 | <u>Qualification Requirements</u> | 3-6 |
| | 3.3.1 Critical Task Qualification Matrix | 3-6 |
| | 3.3.2 Conditions and Standards..... | 3-6 |
| | 3.3.3 Duty Qualification | 3-6 |
| | 3.3.4 Critical Task Qualification Records | 3-6 |
| | 3.3.5 Training Materials | 3-7 |
| | 3.3.6 Requalification | 3-7 |
| 3.4 | <u>Weapons Training and Qualification Program</u> | 3-7 |
| | 3.4.1 Weapons Training | 3-7 |
| | 3.4.2 Weapons Qualification | 3-8 |

**FERMI 2 SECURITY PERSONNEL TRAINING AND QUALIFICATION PLAN
LIST OF FIGURES/APPENDICES
July 29, 2003**

| <u>FIGURE</u> | <u>TITLE</u> |
|----------------------|--|
| 3-1 | Critical Task/Written Examination Matrix.....Revision 19 |

| <u>APPENDIX</u> | <u>TITLE</u> |
|------------------------|---|
| A | Physical Fitness Test.....Revision 17 |
| B | Critical Task Qualification Matrix.....Revision 19 |
| C | Conditions and Standards.....Revision 19 |
| D | Records Retention Matrix.....Revision 17 |
| E | Semi-Automatic Handgun Qualification Course.....Revision 21 |
| F | Shotgun Qualification Course.....Revision 17 |
| G | Rifle Qualification Course.....Revision 20 |

3.0 CHAPTER 3: EMPLOYMENT CRITERIA

3.1 Suitability and Qualification

3.1.1 Suitability

All persons hired to or assigned to the Nuclear Security Organization at Fermi 2 shall meet the following requirements:

1. Be mentally and physically qualified for assignment.
2. Be qualified for the position assigned through job-related education and/or experience.
3. Have no record of felony convictions involving the use of weapons and no felony convictions that reflect on the applicant's reliability.
4. Possess a high school education or the equivalent.
5. All Security Officers shall be at least 21 years of age.
6. All Watchpersons shall be at least 18 years of age.
7. A background investigation shall be performed on each individual as outlined in the Physical Security Plan.
8. An interview shall be conducted by a member of the Nuclear Security Staff or contract agency to appraise the candidate's suitability for the position.

3.1.2 Physical Qualifications

Watchpersons are examined to determine whether they meet the requirements of 10CFR73, Appendix B, I.B.1.a. Security Officers and Central Alarm Station operators are examined to determine whether they meet the requirements of 10CFR73, Appendix B, I.B.1.a and b. Security Officers and Central Alarm Station operators are provided a physical examination administered by a licensed physician. (Those individuals wearing corrective lenses, hearing aids, or afflicted with mild color vision defects shall demonstrate that they can

perform required security duties prior to assignment by successful completion of the training program. All armed personnel whose uncorrected distance vision is 20/40 or less in the better eye shall have an extra pair of eyeglasses available within the Protected Area.) Final attestation by the physician is required to certify that the examination has detected no condition that renders the individual incapable of performing assigned security tasks.

All security personnel assigned to the Nuclear Security Organization are observed by their supervisors for physical fitness. Individuals who have been determined to be physically unfit or incapacitated to the extent that they cannot perform their assigned duties shall be relieved and be required to provide medical certification of their capability to perform such duties before reassignment.

3.1.3 Mental Qualifications

Successful performance of the tasks required for their duty assignments, identified in the Qualification section of this plan, requires individuals to possess such things as the acuity of senses and ability of expression necessary to ensure the successful performance of their duties.

All MSF are evaluated by a licensed psychologist, psychiatrist, physician or other person professionally trained to identify emotional instability and determine whether their behavioral reliability is suitable to Nuclear Security Organization assignment. Certification of the results of this evaluation is provided to Nuclear Security Management.

Individuals who have a history of, or demonstrate behavioral characteristics that could adversely affect the proper discharge of their duties are not assigned to the Nuclear Security Organization.

Security supervisors observe their assigned security personnel to detect any indications of changes in behavior. Any individual suspected of being unstable is relieved from duty, counseled, and required to be evaluated by a professionally trained person to determine if sufficient emotional instability exists to warrant continued suspension from security duties.

3.1.4 Physical Fitness Qualifications

Security Officers shall demonstrate physical fitness by successfully performing to the standards of one of the test methods described in Appendix A for initial qualification and annually thereafter.

Prior to participating in either test method described in Appendix A individuals are subject to a medical examination conducted by a licensed physician who shall determine and certify there are no medical contradictions for participation in the program. One of the physical fitness test methods shall be completed within 12 months of medical certification.

Those Security Officers, who by medical examination cannot participate in the physical fitness test or, who fail to satisfy the test requirements are temporarily relieved from response force duty until they meet the physical fitness requirements. Those officers who fail one of the testing methods will be retested in accordance with the testing method that they failed.

3.1.5 Contract Security Personnel

Contract Security personnel are required to meet the suitability requirements and mental qualification standards for their assigned duties in accordance with sections 3.1.1 and 3.1.3 of the SPT&QP. A physical assessment is completed for contract security Watchpersons consisting of completion of a health history questionnaire which is reviewed by a licensed physician who attests to the candidate's suitability to perform assigned duties.

3.1.6 Material Search Personnel

Material Search Personnel are required to meet the suitability requirements, and mental qualification standards for their assigned duties in accordance with sections 3.1.1 and 3.1.3 of the SPT&QP. A physical assessment is completed for material search personnel consisting of completion of a health history questionnaire, which is reviewed by a licensed physician who attests to the candidate's suitability to perform assigned duties.

3.1.7 Documentation

All background investigation documents, and physical and mental examination certifications for all members of the Nuclear Security Organization are retained in accordance with Appendix D.

Initial Physical Fitness test records and requalification physical fitness test records are maintained in accordance with Appendix D.

3.2 Training and Qualification Plan Requirements

3.2.1 Training Objective

The objective of the DECO Nuclear Security Training Program is to train and qualify security personnel to protect Fermi 2 against radiological sabotage, as required by the criteria Of 10CFR73, Appendix B.

Personnel completing the training programs are capable and qualified to execute the duties prescribed in the Physical Security and Safeguards Contingency Plans.

Nuclear Security Management ensures that all MSF are trained and qualified in accordance with Sections II, III, IV, and V of Appendix B, 10CFR73 as described in the SPT&QP.

3.2.2 Scope of Training

The training program presents equipment usage, officer duties and responsibilities, security skills, tactical training, weapons training and qualification, and response to contingency events. Annual refresher training and requalification are provided to maintain a high level of security skills.

Individual and Security force effectiveness for contingency event response is demonstrated utilizing examinations, task evaluation checklists, and periodic drills and exercises.

3.2.3 Site Specific Training Requirements

The Nuclear Security Organization uses formal classroom instruction and on-the-job training to train officers.

All members of the Security Force are required to successfully complete the training program and demonstrate the correct techniques required by the critical task evaluation conditions and standards applicable to their assigned duties.

Instructors document an individual's successful completion of classroom instruction and qualification critical tasks before the MSF is assigned related duties.

In order to train and test security personnel on tasks not normally performed, such as responding to contingency events, periodic exercises shall be conducted by the Security Operations Staff, General Supervisor, Nuclear Security Operations, Security Shift Supervisor, or Response Force Leader. The Lead Controller of the exercise critiques and documents the exercise. The Security Shift Supervisor is responsible for providing remedial instruction for officers to correct any deficient performance observed during the exercise.

The Security Shift Supervisors observe the performance of personnel assigned to their shifts. If an individual fails to demonstrate the required degree of proficiency, the Security Shift Supervisor removes the officer from the related duty assignment until satisfactory performance of the task(s) is demonstrated.

3.3 Qualification Requirements

3.3.1 Critical Task Qualification Matrix

The Critical Task Qualification Matrix references personnel qualifications to the Nuclear Security Organization duty assignments which are evaluated to ensure successful implementation of the Safeguards Contingency and Physical Security Plans. The Matrix is shown in Appendix B.

3.3.2 Conditions and Standards

Conditions and Standards for critical security tasks are provided in Appendix C. The conditions and standards contain specific performance requirements that the examinee must satisfactorily perform to complete each critical task. The conditions and standards are listed for the appropriate duty assignment.

3.3.3 Duty Qualification

The Security Shift Supervisor ensures that all personnel assigned to an operational shift have successfully demonstrated the required standards for their duty assignments in accordance with Appendices B and C.

3.3.4 Critical Task Qualification Records

The Security Shift Supervisor, the Response Force Leader, or members of the GSNSO staff who are qualified as Security Shift Supervisors evaluate personnel in accordance with the Critical Task/Written Examination Matrix (Figure 3-1).

The evaluator documents individual performance of standards associated with critical tasks. For duty qualification, the evaluator records (on the evaluation check sheet) the results of the task which was evaluated.

Initial Qualification examinations and evaluation checklists and requalification examinations and evaluation checklists are maintained in accordance with Appendix D.

3.3.5 Training Materials

Master copies of current training materials are retained onsite.

3.3.6 Requalification

Nuclear Security Organization personnel identified in Section 3.3.4 of this plan, annually evaluate Nuclear Security Organization personnel in accordance with Appendices A-C.

Task requalification consists of written and/or verbal examinations, which have established pass/fail criteria, and practical demonstrations of the critical task. Personnel assigned responsibility to instruct, develop, or revise course material, e.g., lesson plans, written examinations, etc., are exempt from taking written examinations for their own requalification. The practical demonstration consists of the member of the security force actually performing the task described by the critical task matrix in Appendix C.

3.4 Weapons Training and Qualification Program

3.4.1 Weapons Training

All Security officers receive weapons training in accordance with the provisions of this plan. The training ensures that the officers are aware of their responsibilities and the legal ramifications of firing a weapon, and are knowledgeable in the safe use of their assigned weapons. Their instruction includes weapons loading, unloading, reloading, cleaning and storage; combat firing, rapid firing, close quarter firing, stress firing, and target recognition. Each individual must complete the initial training prior to being armed and annually thereafter.

3.4.2 Weapons Qualification

Security Officers are required to fire for initial qualification and annual requalification with assigned weapons. The live fire qualification courses (Semi-Automatic Handgun, Basic Shotgun Course, and Basic Rifle Course) are described in Appendices E through G respectively. Additionally, night firing for familiarization is conducted during initial training and every three years thereafter.

Security personnel loaned to the Fermi 2 Security Force from another licensee shall qualify on assigned weapons using the approved course of fire from their licensee facility. If that licensee does not have an approved course for a specific weapon, the loaned personnel will fire the appropriate Fermi 2 approved course.

Initial weapons qualification records and weapons requalification records are maintained in accordance with Appendix D.

APPENDIX E

SEMI-AUTOMATIC HANDGUN QUALIFICATION COURSE

NOTE: The shooter starts each stage of fire with a loaded, holstered handgun, fires rounds unsupported (except in prone position) and returns the handgun to the holster after firing unless described otherwise.

Stage 1

4 yard line - 3 rounds - 4 seconds

On the command to fire, the shooter draws and fires 3 rounds in 4 seconds. This stage is performed 3 times.

Stage 2

7 yard line - 4 rounds - 8 seconds

On the command to fire, the shooter draws and fires 2 rounds, reloads without command and fires 2 rounds in 8 seconds. This stage is performed 2 times.

Stage 3

7 yard line - 4 rounds - 10 seconds

The shooter starts with a loaded handgun and an empty magazine inserted. On the command to fire, the shooter draws and fires 1 round, executes combat reloading and fires 3 rounds in 10 seconds. This stage is performed 2 times.

Targets are scored for stages one through three. Unfired rounds are scored as misses.

Stage 4

10 yard line - 2 rounds - 4 seconds

The shooter starts behind a barricade from the standing ready position. On the command to fire, the shooter fires 2 rounds from the left side of the barricade in 4 seconds, moves back behind cover, and returns to the standing ready position. This stage is performed 2 times

Stage 5

10 yard line - 2 rounds - 4 seconds

The shooter starts in the standing ready position behind a barricade. On the command to fire, the shooter fires 2 rounds from the right side of the barricade in 4 seconds, moves back behind cover, and returns to the standing ready position. This stage is performed 2 times.

Stage 6

10 yard line - 2 rounds - 4 seconds

The shooter starts behind the barricade in the standing ready position. On command to fire, the shooter takes a speed kneeling position and fires 2 rounds in 4 seconds. The shooter then returns to the standing ready position behind the barricade. This stage is performed 2 times.

Stage 7

15 yard line - 8 rounds - 60 seconds

On command to fire, the shooter draws the handgun and fires using any of the positions taught (speed kneeling, standing, or prone) firing 8 rounds in 60 seconds.

Targets are scored for stages four through seven. Unfired rounds are scored as misses.

Stage 8

7 yard line - 6 rounds - 8 seconds

The shooter faces 2 targets, set about 2 yards apart. On the command to fire, the shooter draws and fires 3 rounds at the left target, and then 3 rounds at the right target in 8 seconds. This stage is performed 2 times. On the second command to fire, the shooter draws and fires 3 rounds at the right target, and 3 rounds at the left target in 8 seconds.

Targets are scored for stage eight. Unfired rounds are scored as misses.

The maximum score obtainable is 285 points. The minimum score allowable is 200 (70%). A maximum of 57 rounds are fired. The target used is the XTC-71 or similar target using an equivalent scoring method.