



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

JAN 17 1975 Docket No. 50-305

Wisconsin Public Service Corporation
ATTN: Mr. W. E. James
Senior Vice President
P. O. Box 1200
Green Bay, Wisconsin 54305

Gentlemen:

This acknowledges receipt of your letter dated December 23, 1974, informing us of the corrective actions taken with respect to the apparent violations as stated in the enclosure to our letter dated December 5, 1974.

With respect to the actions taken on the items of noncompliance which are discussed in your letter of December 23, 1974, we have no further questions regarding item No. 3. With respect to the other items, your corrective action is not fully responsive to the violations stated in our letter of December 5, 1974. Our comments on your responses to these items are contained in the enclosure to this letter. Please provide specific comments as to the corrective action taken or planned with respect to these matters within ten days of your receipt of this letter. Your reply should be submitted as a separate enclosure to your transmittal letter.

The topics discussed in the enclosure to this letter concern a subject matter which is exempt from disclosure according to Section 2.790 of the AEC's Rules of Practice, Part 2, Title 10, Code of Federal Regulations. Consequently, the enclosure to this letter and your response to the items listed in the enclosure will not be placed in the Public Document Room.

Should you have any questions concerning these matters, we will be glad to discuss them with you.

Sincerely yours,

Gaston Fiorelli, Chief
Operations Branch

Enclosure:
As stated above
(10 CFR 2.790 Information)

bcc w/ltr dtd 12/23/74
RO Chief, FS&EB
RO Chief, M&PPB
RO:HQ (4)
L:D/D for Reactor Projects
DR Central Files
RO Files
PDR, w/o encl
Local PDR, w/o encl

Handwritten initials and date:
Romo 1/22

ENCLOSURE

Wisconsin Public Service Corporation
Docket No. 50-305

Following are our comments with respect to the actions taken on the apparent violations as stated in our letter dated December 5, 1975:

1. You state that no commitment was made in the Kewaunee Industrial Security Manual to equip the guards in accordance with Regulatory Guide 5.20 but that you would meet the intent of the Regulatory Guide for the selection and training of guards and watchmen. You also state that you cannot instruct the guards to be armed with loaded weapons until you have pursued this matter further.

Consonant with Part 73.2(c) and C.4.b of Regulatory Guide 5.20, guards must be equipped with a sidearm of not less than .38 caliber and the sidearm must be kept loaded while being carried by guards. Please inform us when you expect to have this problem resolved.

2. In your response to item No. 2, you indicated that "Patrols (of the protected area) will be conducted on two hour intervals as stated in the Security Manual." Please inform us when these patrols will commence.
3. No further questions.
4. In your response to item No. 4, you state, "Glass panels in plant outside doors (Numbers 40,46,70,75,76,120) will be replaced with two panels of 3/16" Lexan or a security screen." Please inform us when the glass panels will be replaced.
5. In your response to item No. 5 you state, "Scheduled inspections, as determined by the Security Director, will be conducted and searches of individuals will be conducted as warranted." Please provide information regarding the frequency, extent and number of searches and inspections that will be made.
6. With respect to item No. 6, you maintain that visual surveillance by guards suffices to provide monitoring to Doors 40 and 70 to permit their being unlocked from 0630 to 1830 hours. During these particular hours, the alarms on Doors 40 and 70 are bypassed and unless guards have continuous visual contact of these doors, the degree of monitoring envisioned in Sections 2.2.2 and 3.4.2 of the Kewaunee Industrial Security Plan is not possible. If you seek relief from these commitments made in the Security Plan because of operational needs, the Directorate of Licensing should be contacted.

WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

December 23, 1974

U.S. Atomic Energy Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. James G. Keppler
Regional Director

Dear Mr. Keppler:

Reference: Docket 50-305
Operating License DPR-43
Letter from Mr. J. G. Keppler to Mr. E. W. James
dated December 5, 1974

EXEMPT FROM DISCLOSURE

This response is submitted in answer to the six apparent violations of AEC requirements indicated and identified in Reactor Operations Inspection Report 050-305/74-14.

The activities that appear to be in violation of AEC regulations as identified below are in reference to 10 CFR Part 50.34(c), Part 73 and Regulatory Guide 5.20. The items are identified per report details.

1. 10 CFR Part 50.34(c) requires a licensee to address itself to vital equipment and vital areas within the physical security plan and demonstrate how it plans to comply with the requirements of Part 73 of this chapter, if applicable. Part 73.2(c) states that a guard "means a uniformed individual armed with a firearm whose primary duty is the protection of special nuclear material against theft and/or the protection of a plant against industrial sabotage".

Section 3.4 of the Kewaunee Industrial Security Manual states: "The selection and training of the guard force will conform to the requirements of Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen". Section C.4.b of Regulatory Guide 5.20 states: "On-duty guards should be armed with sidearms of not less than caliber .38. Weapons should be kept loaded at all times while being carried by guards".

Contrary to the above, Kewaunee guards are not armed, as weapons carried by the guards are not loaded.

Response

We agree that our Industrial Security Manual Section 3.4 states: "The selection and training of the guard force will conform to the requirements of Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen". We did not commit to equipping the guards in accordance with the Regulatory Guide. We further point out that this statement was inserted into the manual by direction from the Commission, after we had stated we would "meet the intent" of the requirements of Regulatory Guide 5.20 for the selection and training of guards and watchmen. We therefore, cannot instruct our guards to be armed with loaded weapons until we have pursued this matter with our partners, our insurance carrier and our legal department. When we have satisfactorily resolved this area, we will duly inform the Commission of our action.

2. Section 3.4.2 of the Kewaunee Industrial Security Manual states: "The plant protected area will be patrolled on a two hour interval."

Contrary to the above, patrols are not being conducted from approximately 0500 hours to 1100 hours and from 1300 hours to 1800 hours.

Response

Patrols will be conducted on two hour intervals as stated in the Security Manual.

3. Section 2.2 of the Kewaunee Industrial Security Manual states in part: "An area immediately adjacent to the fence will be kept clear of objects and materials that could offer concealment to an individual."

Contrary to the above, a van utilized for trash disposal, and a wooden platform with staircase, were located adjacent to the perimeter fence on the northwest section.

Response

The van utilized for trash disposal and a wooden platform have been removed from the area adjacent to the fence. Plant and trash disposal personnel have been informed as to the requirements for keeping the area around the fence clear of any objects.

4. 10 CFR Part 50.34(c) requires a licensee to address itself to vital equipment and vital areas within the physical security plan and demonstrate how it plans to comply with the requirements of Part 73

of this chapter, if applicable. Part 73.2(h) states that a vital area, "means any area which contains vital equipment within a structure, the walls, roof, and floor of which constitute physical barriers of construction at least as substantial as walls as described in paragraph (f)(2) of this section". Paragraph (f)(2) states, in part, "Building walls constructed of stone, brick, cinder block, concrete, steel or comparable materials (openings in which are secured by gates, doors, or covers of construction and fastening of sufficient strength such that the integrity of the wall is not lessened by an opening)"

Contrary to the above, windows form the upper portions of personnel doors to the Turbine and Auxiliary Building. (Door Numbers 40, 46, 70, 75, 76, 120)

Response

Glass panels in plant outside doors (Numbers 40, 46, 70, 75, 76, 120) will be replaced with 2 panels of 3/16" Lexan or a security screen.

5. Section 4.2.1 of the Kewaunee Industrial Security Manual states in part that the guard will conduct both scheduled inspections and random unannounced searches of individuals, packages, briefcases and vehicles.

Contrary to the above, scheduled inspections are not being conducted. Random unannounced searches conducted thus far have not included searches of individuals.

Response

Scheduled inspections as determined by the Security Director will be conducted; and searches of individuals will be conducted as warranted.

6. Section 2.2.2 of the Kewaunee Industrial Security Manual states that "detectors are located so that all exterior doors to the plant can be monitored from the gatehouse and control room. Alarms located in the gatehouse and control room will detect and alarm when doors are opened." Section 3.4.2 states that the guards "shall monitor exterior doors leading into the plant with the help of electronic monitoring devices that alarm in the gatehouse."

Contrary to the above, there is no monitoring by electronic monitoring devices of external doors #40 and #70 leading into Turbine Building and Auxiliary Building respectively, because these doors are open and alarms bypassed between the hours of 0630 and 1830 hours.