

Docket File

July 17, 1974

Docket No. 50-305

K. Kniel, Chief, LWR 2-2, L

SPECIAL REVIEW ASSIGNMENT, KEWAUNEE, REVIEW OF INDUSTRIAL SECURITY PLAN

Utility: Wisconsin Public Service Corp.

Licensing Stage: Post-OL

Cognizant LPM: L. Crocker

Review Branch: IS&EP

References: (1) Revisions to Kewaunee Industrial Security Manual dated 4/22/74

(2) Letter from W. P. S. Corp. dated 5/28/74

We have reviewed the references noted in conjunction with the Kewaunee Industrial Security Manual (Rev. 1), dated 7/18/72. Our findings are given in the attachment, for transmittal to the licensee. We suggest the licensee be requested to respond in 30 days.

Original Signed by
R. Wayne Houston

R. Wayne Houston, Chief
Industrial Security and
Emergency Planning Branch
Directorate of Licensing

Enclosure:
Attachment titled "Industrial
Security Manual - Kewaunee Plant"

- cc:
- S. Hanauer
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DATE	7/17/74				

Industrial Security Manual

Kewaunee Plant

23-1

23.0
(NONE)INDUSTRIAL SECURITY AND EMERGENCY PLANNING BRANCH

The Regulatory staff has reviewed the Kewaunee Plant Industrial Security Manual, including revisions dated through April 22, 1974. The Manual has been evaluated by comparison with the requirements of 10CFR50.34(c) and the position statements of Regulatory Guide 1.17, June 1973, including the requirements of ANSI N18.17-1973. As a result of this review, we are unable to affirm that the Manual demonstrates acceptable conformance with the provisions of Regulatory Guide 1.17. We request further revisions in the Manual to clarify or amplify its provisions with respect to the following items. (The decimal notation under each item number identifies the relevant section of the Kewaunee Security Manual.)

23.1
(4.3)

Vehicles allowed access to the protected area, i.e., within the security fence, should be restricted to essential vehicles. (Reference Section 3.3.1 of ANSI N18.17-1972.) The staff considers that essential vehicles means vehicles not used primarily for the conveyance of people, except for designated emergency or security vehicles, and that are necessary to serve a required function within the protected area.

23.2
(4.1.2)

Permanent badges assigned to persons authorized access to the protected area without escort should be tamper-resistant photo-identification cards or badges. (Reference Section 3.3.2.2 of ANSI N18.17-1973.)

23.3
(4.2.1)

Security procedures should provide for random unannounced as well as scheduled inspections or searches of individuals, packages, and vehicles before entering the protected area. The staff considers that this applies to employees and non-employees alike. "Questionable packages and briefcases" is not an acceptable basis. (Reference Section 3.3.2.3 of ANSI N18.17-1973.)

23.4
(3.4.2)

Surveillance of the protected area by routine guard patrols should be supplemented, (Reference Section 3.3.3 of ANSI N18.17-1973), preferably by a system which, in principle, provides for continuous monitoring of the entire physical barrier surrounding the protected area.

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23-2

- 23.5
(4.2.3) Access to vital areas should be limited to authorized persons having a need to enter such areas. The staff considers that permitting tour groups to observe control room operations may not be consistent with the provisions of Section 3.4 of ANSI N18.17-1973.
- 23.6
(3.4.1) No information is provided on the size of the guard force. (Reference Section 3.4.4 and 4 of ANSI N18.17-1973.) The staff considers that the onsite guard force should consist of not less than two per shift.
- 23.7
(4.0) Most of the requirements of Section 4.2 (Procedures) of ANSI N18.17-1973 are not addressed in the Manual. A commitment to conform to the requirements of this section would be acceptable to the staff.
- 23.8
(3.2.7) The description of training for members of the Guard Force is inadequate. (Reference Section 4.4.2 of ANSI N18.17-1973.) A more detailed description should be provided or, as an alternative, a commitment to conform to the position set forth in Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen", dated January 1974, would be acceptable to the staff.
- 23.9
(3.4) No criteria for the selection of Guard Force personnel are given. (Reference Section 4.5.1 of ANSI N18.17-1973.) A commitment to conform to the requirements of this section would be acceptable, or the commitment identified in item 8 above would also be acceptable to the staff.
- 23.10
(2.2.2) The provisions of Regulatory Guide 1.17 position statement C.1.b. are incompletely addressed. A more detailed description is necessary, or, as an alternative, a commitment to conform to this statement would be acceptable to the staff.
- 23.11
(3.2.5) The provisions for testing security equipment are not adequately addressed. The staff position is set forth at C.2.a. and C.2.b. in Regulatory Guide 1.17, June 1973. A commitment to conform to these statements would be acceptable to the staff.

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