



WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

May 6, 1991

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentleman:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 50-305/91-04

Reference: 1) Letter to K. H. Evers from C. E. Norelius dated April 4, 1991

The attachment to this letter provides our thirty-day written response to the security-related Notice of Violation identified in reference 1.

Sincerely,

K. H. Evers
Manager - Nuclear Power

DJM/jms

Attach.

cc - US NRC, Region III
Mr. Patrick Castleman, US NRC-w/o attach.

IE01
1/1

ATTACHMENT 1

This attachment provides our response to the notice of violation (NOV) on our failure to conduct an informal behavioral and attitude interview as part of the pre-employment screening process and our failure to process criminal history checks in a timely manner.

- References:
- 1) Letter to Document Control Desk from K.H.Evers dated April 1, 1991.
 - 2) Letter to Document Control Desk from K.H.Evers dated March 1, 1991.
 - 3) Letter to K.H.Evers from C.E.Norelius dated March 7, 1991

NOTICE OF VIOLATION

1. Section 5.1.3 of the approved Kewaunee Security Manual states that a medical examination is part of the pre-employment screening process and as part of the examination, an informal behavioral and attitude interview is conducted by the examining physician.

Contrary to the above, during 1988-1990 approximately 22 individuals did not receive an informal behavioral and attitude interview as a part of the pre-employment screening process.

2. Section 5.3.1 and 5.3.2 of the approved Kewaunee Security Manual allows authorized access before completion of the background investigation or criminal history checks for a period not to exceed 180 days if fingerprints have been taken and submitted and/or verification of previous unescorted access has been submitted to another 10 CFR 50 licensee.

Contrary to the above, a review of criminal history check files for those granted access between April 1987 and January 1991 showed that approximately 17 individuals had been granted unescorted access for more than 180 days for whom criminal history checks had not been completed.

WPSC RESPONSE

In reference 1, Wisconsin Public Service Corporation (WPSC) submitted Security Event Report 91-S01-01. This report was submitted in accordance with the requirements of 10 CFR 73.71(a)(4) "Reporting of Safeguards Events" and provided a description of the security event, cause of event, analysis of event, and corrective actions to be taken. As such, only the immediate and long term corrective actions will be included in this response.

CORRECTIVE ACTIONS

Immediate Corrective Actions

A comprehensive review of all files (in excess of 2100) of personnel with active or inactive badges was completed. Specific corrective actions included:

- 1) Administering psychological screening tests to available WPSC personnel processed for unescorted access during 1988, 1989 and 1990 without a pre-employment medical examination.
- 2) Reprinting a number of individuals and resubmitting their fingerprint cards to the NRC.
- 3) Expediting the processing of outstanding requests for transfer of criminal history information for other licensees or providing followup requests.
- 4) In reference 2, WPSC proposed additional criteria in which the trustworthiness, dependability and reliability of those individuals who did not receive criminal history information from the FBI within 180 days could be evaluated. From this evaluation a determination could be made on whether to reactivate the badge pending receipt of an adequate criminal history check for a period not to exceed 90 days. The NRC accepted this corrective action in reference 3.

With the implementation of these immediate corrective actions WPSC was in compliance with the KNPP Security Manual.

Additional Corrective Actions

Programmatic changes are also being made in the access authorization area:

- 1) The "Kewaunee Nuclear Plant Pre-Employment Screening Documentation" form has been revised to delete the pre-employment physical. The revision now requires that a psychological evaluation (MMPI) has been satisfactorily completed including signature and date. This change has been made pursuant to 10 CFR 50.54(p). The Plant Personnel Supervisor's duties that support implementation of the Security Program will be formalized in a directive or procedure. This document will include the revised form. These actions will be completed by July 1, 1991.
- 2) Administrative responsibility for criminal record history checks has been transferred to the Security Group. The database of pending submittals of fingerprints to the NRC and requests to other licensees are reviewed on a regular basis. Generally, followup is taken on requests to other licensees that have not responded within 30 days of request. Followup is also taken on fingerprint submittals when the response has not been received within 90 days.
- 3) An independent technical review is being conducted to assess the adequacy of controls that support groups (other than the security group) have for implementing provisions of the Security Manual. The report is scheduled for completion by July 1, 1991.

- 4)
 - a) WPSC is currently reviewing any potential legal issues regarding the release of confidential employee information. Except for any restrictions identified by this review, the Quality Assurance auditor will be given full access to the documentation of employee screening for access authorization.
 - b) The annual security program audit will review the followup on criminal history checks.
 - c) The 1991 audit will emphasize review of the access authorization area. The 1991 audit has a tentative completion date of August 1, 1991.
- 5) Section 5 of the Security Manual will be revised to remove inconsistencies. Directives or procedures will be revised as necessary to implement these revisions to the manual. This will be completed by September 1, 1991.