

WISCONSIN PUBLIC SERVICE CORPORATION



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

February 2, 1979

Mr. J. A. Hind, Chief
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Hind:

Docket 50-305
Operating License DPR-43
IE Inspection Report 50-305/78-23

Enclosed please find the response to the referenced inspection report conducted by Messrs Creed and Howell of your office. The areas examined during this inspection concern a subject matter which is exempt from disclosure according to Section 2.790 of Title 10, Code of Federal Regulations, and, therefore, our response contained in the enclosure to this letter should not be placed in the Public Document Room.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. W. James".

E. W. James
Senior Vice President
Power Supply & Engineering

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Enc.

ATTACHMENT CONTAINS
10 CFR 2.790 (c) INFORMATION

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Part 2.790 (d) Information

ENCLOSURE

Response to Deficiencies

Deficiency (1) The approved "Industrial Security Manual" (Revision 5, dated August 27, 1975) at Section 3.2.6, states, in part: "Entrances to all buildings within the plant security area with the following exceptions shall be locked: 4. Doors designated to be used by the Shift Supervisor to perform an operational activity"

The approved "Industrial Security Manual" (Revision 5, dated August 27, 1975) at Section 3.2.6.1, states, in part: "A record of normally locked and alarmed doors designated to be in use shall be made in the Shift Supervisor's log at initiation of use and termination of use."

Contrary to the above, a selective review and comparison of the log used by the Shift Supervisor to record the initiation of use and termination of use for doors (Control Room Intrusion Alarm and By-Pass Log) and the form used by Guards to record the observed status of each door (Security Guard and Patrol Log), showed that between August 2, 1978, and November 15, 1978, the guards observed 18 instances of doors being open and no record of that was maintained on the "Control Room Log." Additionally, on 5 occasions, guards observed doors open at times other than those listed on the "Control Room Log."

Response:

The existing alarm system on plant entrance doors monitors only that a door is closed, not latched or physically locked. The Shift Supervisor has many duties and responsibilities and the guard force duties concerning door checks supplement the entire level of security at the plant. We recognize a problem exists and that there will always be discrepancies when two individual logs of separate checks are kept. We have taken steps to correct this situation by the installation of a computerized security access control system. The system will be operational by February 24, 1979.

Deficiency (2) The approved "Industrial Security Manual" at Section 4.0 states, in part: "Written procedures have been prepared which conform with the requirements of ANSI N18.17 . . ." Section 3.4.2 also states in part: "Written instructions, in the form of general orders, have been issued to the guard force by the Security Director. . ."

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Copy 3 of 4 copies
Pages.

Administrative Control Directive (procedure), ACD 11.1 (dated March 30, 1978) at Section 5.9 states, in part: "Security Guard Force - Consists of . . . officers . . . physically equipped as follows: (e) A (2) channel portable transceiver maintaining continuous communications with the Control Room and Gatehouse."

General Order No. 15 (dated November 27, 1977) states, in part: "Whenever a Security Officer leaves the Gatehouse, he shall carry a radio with him to enable contact with the Gatehouse or Control Room."

Contrary to the above, the inspectors observed on November 27, 1978, that a guard who did not have a radio responded to an alarm outside the gatehouse (NOTE: An additional guard responded with a radio). Additionally, the inspectors observed on November 28 and 29, that the guards who were escorting personnel and vehicles outside the gatehouse did not have radios.

Response: *A memorandum has been issued to the guard force reminding them of the requirement to carry a radio whenever they leave the gatehouse area.*

Deficiency (3) 10 CFR 73.70(f) requires that each licensee subject to the provisions of 10 CFR 73.55 keep the following records: "A record . . . of each alarm . . . and . . . details of response by facility guards and watchmen to each alarm, intrusion, or other security incident shall be recorded."

The approved "Industrial Security Manual" at Section 4.0 states, in part: "Written procedures have been prepared which conform with the requirements of ANSI N18.17"

Administrative Control Directives (procedure) ACD 11.9 at Section 6.4 states, in part: "The Shift Supervisor shall respond to all intrusion alarms (NOTE: The Shift Supervisor can send anyone from the Control Room to investigate the alarm.)"

Administrative Control Directive, ACD 11.9 at Section 6.5 states, in part: "A Security Guard shall respond to all intrusion alarms. . . ."

Contrary to the above, a selective review of the "Control Room Intrusion Alarm and By-Pass Log" showed that between August 11, 1978, and November 27, 1978, the records of 37 alarms did not detail the response by both a guard and someone from the Control Room. On some occasions records indicated response by only Control Room personnel or only by guards. During that period, 5 alarms were recorded properly. Interviews with personnel showed that responses were adequate but not recorded correctly.

Response:

The computerized security access control system will assure completion of record entries for all alarms. This system will be installed and operational by February 24, 1979.