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SUBJECT: Responds to NRC 880712 ltr re violations noted in Insp Rept
 50-305/88-14.

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

August 11, 1988

10. CFR 73.21

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Inspection Report 50-305/88014

Reference: 1) Letter from R. De Fayette (NRC) to D. C. Hintz (WPSC) dated
July 12, 1988

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

Sincerely,

A handwritten signature in cursive script, appearing to read "C. R. Steinhardt".

C. R. Steinhardt
Manager - Nuclear Power

DJM/jms

Attach.

cc - US NRC, Region III
Mr. Robert Nelson

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PDR ADOCK 05000305
Q PDC

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Attachment to August 11, 1988 Letter

From D. C. Hintz (WPSC) to Document Control Desk (NRC)

NOTICE OF VIOLATION

As a result of the inspection conducted during the period of May 16 through June 30, 1988, and in accordance with the "General Policy and Procedures for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1987), the following violation was identified:

10 CFR, Part 73.46, "Fixed site physical protection systems, subsystems, components, and procedures," subpart (d)(9), states, in part; "The licensee shall control all points of personnel and vehicle access to... controlled access areas. Identification of personnel and vehicles shall be made and authorization checked at such points."

This requirement is implemented by the licensee's Industrial Security Manual, Section 3.2.1, "Personnel Portal."

Contrary to the above, on May 18, 1988, an individual gained entrance to a controlled access area without being properly identified; that is, the individual was issued an identification badge (key card) for another individual.

WPSC ResponseImmediate Corrective Actions Taken:

Upon discovery of the mis-issued identification badge (resulting from the badge rack and log entry form check), the individual was notified and immediately escorted to the security building for the correct identification badge. A roll call and transaction history analysis was performed on the mis-issued identification badge to determine the areas accessed. The transaction history analysis revealed that areas accessed with the mis-issued identification badge were the same areas for which the individual was authorized had he used his own badge. A later review revealed that both badges involved had authorization to exactly the same areas.

Short Term Corrective Actions Taken:

Later that same day discussions were held with the security officers involved to emphasize the importance of issuing the proper identification badge (key card). The next day the Manager-Nuclear Power, KNPP Plant Manager, Security Director and the individual who received the incorrect badge met to discuss the circumstances of the event and how to improve the issuance of badges to preclude another mis-issued badge. During the next day's daily plant status meeting (which most plant supervisors attend) the event was discussed in detail. Results of these and several other meetings led to the issuance of a new badge issuance policy. This badge issuance policy states that (whenever possible) all individuals must recite their badge number to the security officer at the badge desk prior to receiving their badges. The security officer in turn will read off the name on the identification badge and match the picture to the individual prior to issuing the badge, thus ensuring the proper badge has been issued.

Finally, it was further emphasized to plant and contractor personnel that each individual must ensure he/she has been issued the proper badge. This method provides independent ways of verifying the proper badge has been issued. A letter stating this method of badge issuance was made available to individuals entering the plant.

During the July plant safety meetings, the KNPP Plant Manager emphasized the individual's responsibility to obtain the proper badge. During the ensuing discussion, numerous ideas were provided by the plant staff on how to improve badge issuance to prevent a recurrence. Furthermore, a meeting was held by the Plant Manager with plant contractors to emphasize their responsibility to obtain the proper badge. In addition a meeting was held by the Manager-Nuclear Power with the corporate nuclear staff to emphasize their responsibility to obtain the proper badge. A number of the ideas expressed at these meetings are being considered by the Security Director for future implementation.

Long Term Corrective Actions To Be Taken:

The KNPP plant computer group is developing a system to further preclude mis-issued badges in the future. It is anticipated that this system will be operational prior to the end of 1988. However, it will still be emphasized to all individuals that they are responsible to verify that the proper badge has been issued.