

DISTRIBUTION:
 AEC PDR
 Local PDR
 Docket File
 DRL Reading
 PWR-2 File
 R.C.DeYoung, DRL
 Licensing Assistant (2)
 Project Leader

APR 11 1972

Docket No. 50-305

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

Gentlemen:

The regulatory staff has prepared the attached draft criteria regarding industrial security. This draft material reflects preliminary thinking by the staff on this subject. It is furnished to applicants for the purposes of illustrating the scope of security planning that is considered appropriate and identifying specific aspects of security planning that should be addressed in security plans. Applicants are encouraged to use the draft criteria as a "checklist" in the preparation of security plans.

These criteria are not and should not be regarded as firm requirements of the regulatory staff; conformance with every criterion is not essential.

Sincerely,

R. C. DeYoung, Assistant Director
 for Pressurized Water Reactors
 Division of Reactor Licensing

Enclosure:
 Draft Criteria on
 Industrial Security

cc: Steven E. Keane, Esquire
 Foley, Samson, & Lardner
 735 North Water Street
 Milwaukee, Wisconsin

Mr. Gerald Charnoff
 Shaw, Pittman, Potts, Trowbridge & Madden
 910 17th Street, N. W.
 Washington, D. C. 20006

CRESS:tlc	DRL:PWR-2	DRL:PWR-2	DRL/AD:PWRs		
OFFICE ▶	<i>Mc</i>	<i>K</i>	<i>RCDeYoung</i>		
SURNAME ▶	LCrocker:tlc	KKniel	RCDeYoung		<i>clb</i>
DATE ▶	4/10/72	4/10/72	4/10/72		

DRAFT CRITERIA ON
INDUSTRIAL SECURITY

The Draft criteria reflects preliminary thinking by the staff on this subject. These criteria are not and should not be regarded as firm requirements of the regulatory staff. Conformance with every criteria is not essential.

I - APPROACH:

Criterion 1 - General Guidelines

Physical protection shall be based on controlling access to the facility and obtaining assistance from local law enforcement authorities. As a minimum the plan shall combine at least the following elements: (i) employee investigation; (ii) a security force; (iii) a lighted fence or other lighted physical barrier which surrounds the facility; (iv) a lock and key system; (v) a system of intrusion alarms to protect each door or other opening in vital buildings; (vi) liaison with local law enforcement authorities; (vii) redundant tamper-resistant communication links with local law enforcement authorities.

Criterion 2 - Employee Intent on Sabotage

This class of opponent is considered to be neutralized by pre-employment investigation, by restrictions on package and vehicle access to the facility, and by procedures which minimize access to vital rooms, buildings, and structures.

Criterion 3 - Non-employee Intent on Sabotage

The fence surrounding the facility shall be considered as preventing irresolute opponents from gaining access to the outside of facility buildings. To the resolute opponent the fence shall be considered as offering only a brief

time delay. Upon breaching the fence the opponent is considered to proceed to a vital building and attempt to gain access. The triggering of any portal or interior alarm shall be considered as announcing a sabotage threat until proven otherwise. Triggering of an alarm shall be sufficient cause to immediately alert local law enforcement authorities, who will respond with a force unless the alert is subsequently cancelled in accordance with a preagreed arrangement.

Criterion 4 - Physical Protection Program

A physical protection program shall be established at the earliest practicable time. Physical protection requirements shall be considered during each new facility design. The program shall be documented by written policies, procedures, and instructions.

Criterion 5 - Separate Document

The physical protection plan shall be an individual document physically separate and distant from other elements of the applications.

Criterion 6 - Compatibility With Emergency Plan

The physical protection plan and related procedures shall be compatible with the emergency plan and related procedures.

II. PERSONNEL SCREENING:

Criterion 7 - Investigation

A background investigation shall be conducted to support the belief that each employee who has access to the protected area is trustworthy.

III. SECURITY FORCE:

Criterion 8 - Requirement For The Force

A force of guards and watchmen shall be established, organized, and trained to carry out actions specified in this Appendix and to act as a deterrent to those intent on industrial sabotage.

Criterion 9 - Response Time

Deployment of the security force shall permit one or more watchmen to arrive at any portal protected by an intrusion alarm within four (4) minutes.

IV. PHYSICAL BARRIERS:

Criterion 10 - Requirement For the Barrier

Vital buildings and structures shall be encompassed by a physical barrier which forms a protected area.

Criterion 11 - Location

A design aim shall be to install the physical barrier at least 50 feet from vital buildings and structures.

Criterion 12 - Buildings and Structures as Part of the Physical Barrier

Buildings or structures which are not vital and which offer intrusion protection equal to or better than the main segment of the physical barrier may be incorporated into and form a segment of the physical barrier. In such buildings or structures, each exterior door, window, or other portal shall be (i) protected by a watchman or (ii) locked and protected by an intrusion alarm.

Criterion 13 - Entrances

Each gate, door, or other intended entrance to the protected area shall be (i) under the control of a watchman, or (ii) locked and protected by an intrusion alarm.

Criterion 14 - Clear Area

The area from at least 25 feet inside to at least 25 outside of the protected area shall at all times be clear and free of objects that would aid in concealing a person.

Criterion 15 - Lighting

The physical barrier shall be lighted between sunset and sunrise so that the illumination (i) at any point 3 feet above the ground and 5 feet from the physical barrier exceed 0.2 foot candles, and (ii) at the ground level from at least 10 feet inside to at least 25 feet outside the barrier permits ready detection of persons.

V. ACCESS CONTROL:

Criterion 16 - Personnel Access to the Protected Area

Personnel access through gates, doors, and other entrances to the protected area shall be controlled by one or more watchmen.

Criterion 17 - Personnel Access to Vital Buildings, Rooms and Structures

Personnel requirements for each vital building, vital room, or vital structure shall be considered individually. Written procedures shall be prepared and implemented to minimize the number of persons who may enter or otherwise have access to each vital building, vital room, or vital structure.

Criterion 18 - Personal Vehicles

No personal vehicle shall be permitted inside the protected area.

Criterion 19 - Essential Vehicles

Vehicles and vehicular equipment essential to the operation, maintenance, and safety of the facility together with their cargoes shall be subject to search before entering the protected area. The physical protection plan shall define essential vehicles.

Criterion 20 - Package Search

Packages shall be subject to search before being permitted into the protected area.

VI. VITAL BUILDINGS AND STRUCTURES:

Criterion 21 - Portal Protection

In vital buildings and structures each door, window, or other portal which is accessible from the ground or any part of which is within 15 feet of the ground shall be (i) under the control of a watchman, or (ii) locked and protected by an intrusion alarm.

VII. INTRUSION ALARMS:

Criterion 22 - Interior Alarms

Interior intrusion alarms and associated components shall satisfy the requirements of Interim Federal Specification W-A-0054A (GSA-FSS) Alarm Systems, Interior, Security, Components for.

Criterion 23 - Exterior Alarms

The selection and installation of exterior intrusion alarms shall be guided by considerations similar to those set forth in Interim-Federal Specification W-A-00450A (GSA-FSS) Alarm Systems, Interior, Security, Components for. Additional considerations shall include (i) the local environmental conditions and (ii) the resistance offered by candidate alarms to tampering.

Criterion 24 - Alarm Termination

Each intrusion alarm shall terminate in central panels located in the control room and in at least one other place within the protected area. Each central panel shall provide for (i) an indication of which individual alarm is triggered, and (ii) a single master alarm which is triggered whenever one or more of the individual alarms is triggered.

VIII. LIAISON WITH LOCAL LAW ENFORCEMENT AUTHORITIES

Criterion 25 - Planning

Liaison with local law enforcement authorities (LLEA) shall be established with the aim of devising a comprehensive cooperative protection plan for the facility. This plan shall incorporate and develop the following features as a minimum: (i) facility personnel shall without delay or investigation alert the LLEA when any intrusion alarm activates; (ii) a prescribed delay period shall follow during which facility personnel shall investigate the cause for the alarm; (iii) a prearranged cancel

arrangement for use only during the delay period shall be devised to avoid full LLEA response to postulated false alarms; and (iv) in the event the prearranged cancel is not received within the prescribed delay period, the LLEA shall respond by dispatching an armed force to the facility to investigate.

Criterion 26 - Communication Links

At least two independent communication links with the LLEA shall be established. At least one of these links shall utilize electromagnetic waves (e.g. radio, microwave link, or LASER) in a design which does not depend primarily on wire or cable transmission lines outside the protected area; this link is referred to as the "primary link." The links shall be accessible from each intrusion alarm central panel.

Criterion 27 - Protection of Communication Links

At least one control panel together with all other onsite components essential to the proper functioning of the primary link shall be protected as a vital structure.

Criterion 28 - Training

The security force and other appropriate employees shall be trained to operate communication links and to implement the plan required in

Criterion 25 - Planning.

IX. TESTING AND MAINTENANCE:

Criterion 29 - Testing and Maintenance

Intrusion alarms, protected areas, and communications links utilized pursuant to the requirements of this part shall be tested and maintained as follows:

- (a) Intrusion alarms, physical barriers, and communications links shall be maintained in operable and effective condition.
- (b) Intrusion alarms and communications links shall be inspected and tested for operability and required functional performance daily.
- (c) Physical barriers shall be inspected at intervals not exceeding four (4) hours.

X. OVERT THREATS:

Criterion 30 - Overt Threats

The plan shall develop measures for dealing with potential dangers such as bomb threats and civil disturbances.

XI. WRITTEN PROCEDURES:

Criterion 31 - Written Procedures

Written procedures shall be prepared and kept readily available for the use of guards, watchmen, and other employees in implementing the following criteria set forth in this Appendix:

- (a) Criterion 9 - Response time
- (b) Criterion 12 - Buildings and structures as part of the physical barrier
- (c) Criterion 13 - Entrances
- (d) Criterion 14 - Clear area
- (e) All criteria under Section V - ACCESS CONTROL
- (f) Criterion 21 - Portal protection
- (g) Criterion 27 - Protection of communication links
- (h) Criterion 28 - Training
- (i) All criteria under Section IX - TESTING AND MAINTENANCE
- (j) Criterion 30 - Overt threats

XII. RECORDS AND REPORTS:

Criterion 32 - Records

Pursuant to the requirements of this Appendix the following records shall be maintained at each facility:

- (a) Except for regular employees, the name, address, and purpose of visit for each individual who enters the protected area.
- (b) Results of all tests, inspections, and maintenance which have been performed on physical barriers, intrusion alarms, and communication links,
- (c) Chronological list of false alarms from intrusion detectors identifying the circuit, area or portal protected, and action taken.

XIII. QUALITY ASSURANCE:

Criterion 33 - Quality Assurance

A separate section of the physical protection plan shall describe tests and inspections designed to demonstrate and confirm the intended performance of each commitment made in the physical protection plan.