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 SCHROCK, C.A. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 931215 ltr re violations noted in insp rept
 50-305/93-18. Corrective actions: page by page review of
 security manual initiated & conducted review of each file to
 determine if obvious info missing.

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January 14, 1994

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
Reply to Notice of Security Violation

Reference: 1) Letter from J.B. Martin to C.R. Steinhardt dated December 15, 1993

This letter provides the response requested in reference 1 concerning the violation cited in Inspection Report No. 50-305/93018. Wisconsin Public Service Corporation (WPSC) acknowledges the violation regarding an unlocked and unattended security storage cabinet containing safeguards information. The root cause of the violation was an isolated error by a clerk.

On July 6, 1993, immediately following the discovery of the event, an investigation was initiated to gather information on how long the file cabinet was open, the situation surrounding why it was open and to determine the security significance. The results of this investigation led to the following immediate corrective actions.

- 1) Initiated a page by page review of the Security Manual.
- 2) Conducted a review of each file to determine if there was any obvious information missing.
- 3) Completed a review of the microfilm cards to ensure that there were no missing cards.

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- 4) Counseled the affected individual on the importance of ensuring the file is locked when left unattended.

The above mentioned corrective actions resulted in an immediate return to full compliance.

The following subsequent corrective actions have been taken as a result of this event to prevent recurrence:

- 1) On August 3, 1993, at 1000 hours, a training session was presented to the corporate clerical support personnel and drawing control personnel to discuss this event and to emphasize the importance of controlling safeguards information.
- 2) On August 4, 1993 the KNPP security force and operations personnel were informed that they should be on a heightened sense of awareness due to the potential compromise of safeguards information in the corporate office. An announcement was made at the plant morning meeting informing plant personnel of the event and the request that plant personnel also demonstrate the heightened awareness. Security personnel had already been on heightened awareness due to the TMI/World Trade Center events however a re-emphasis was provided specific to the potential compromise of Security Safeguards Information.
- 3) The KNPP Security Group immediately contacted all "owners" of cabinets containing Security Safeguards Information and informed them of the event. As an immediate control measure the Security Group changed the combination on all the safeguards files and required "owners" to contact security if the file needed to be opened. This interim action is providing added assurance that security safeguards information cabinets are being properly controlled pending implementation of further corrective actions.
- 4) An inventory of all documents in the affected corporate file cabinet was performed and a matrix was developed to document the significance of the information available.
- 5) The Security Group contacted each owner of files containing Security Safeguards Information. If it is determined that the cabinet is for convenience only, efforts will be made to combine/eliminate files to reduce the number of cabinets maintained and therefore reduce the possibility of having uncontrolled documentation. This effort has already resulted in the reduction of cabinets.
- 6) The General Employee Training (GET) sessions are conducted initially and annually thereafter for all badged personnel at KNPP. The GET lesson plan will include a discussion emphasizing the need for employees to be more pro-active when observing questionable or unusual conditions even outside their area of expertise. This violation will be discussed during the 1994 GET sessions.

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- 7) The Nuclear Administrative Directive (NAD 15.3) Control of Safeguards Information was revised to better address control of safeguards material and storage containers.

The above mentioned actions have been taken to prevent future occurrence. WPSC recognizes the need to control safeguards material and is taking reasonable actions to ensure that this type of an event does not recur.

Sincerely,



C.A. Schrock
Manager - Nuclear Engineering

DJM

cc - US NRC - Region III
Senior Resident Inspector, US NRC

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