

SECURITY TRAINING AND QUALIFICATION MANUAL

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2.0 INTRODUCTION

Appendix B to Part 73, Title 10, Code of Federal Regulations provides general criteria for suitability and qualifications, general training and qualifications requirements to include weapons training for security personnel and qualifications requirements for security personnel who are responsible for the protection of the Kewaunee Nuclear Power Plant (KNPP).

The Security Training and Qualification Manual provides the process by which Security Force Members are selected, trained, tested, qualified, and requalified to perform security related duties identified in the KNPP Security Manual and Security Safeguards Contingency Plan.

Security Force Members who are responsible for the protection of the Kewaunee Nuclear Power Plant (KNPP) are required to meet the requirements of this Manual to assure that they will effectively perform their assigned security related duties. No member of the Security Force shall be assigned to perform security tasks or duties at KNPP until they have successfully completed all training and qualifications specified in this Manual for the specific duty assignment.

For the purpose of this Manual, the term annual is defined as a nominal 12 month period with a maximum allowable extension not to exceed three months. The combined time interval for a three year period shall not exceed three years and three months.

The following areas are addressed in detail in the Security Manual or Security Safeguards Contingency Plan, and/or applicable security procedures and are not addressed in this Manual:

- A. The composition and staffing of the Security organization and Security force and
- B. The types and quantities of Security equipment required by Security Force Members to perform both routine and contingency response duties and tasks.
 - 1. Location, equipment inventories and inspection criteria are provided in applicable security procedures.

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3.0 DEFINITIONS

Alarm Station Operator - Security supervisor personnel or selected Security Force Members who are qualified as a Watchperson or Security Officer and satisfactorily complete the required training and crucial task qualifications for the job designation and duty assignment of Alarm Station Operator in either the CAS or SAS.

Annual - A nominal 12 month period with a maximum allowable extension not to exceed three months. The combined time interval for a three year period shall not exceed three years and three months.

Assigned Job Duties - One or more specific actions performed by an individual or group of individuals in response to situations. Assigned job duties have definite starting and ending points and contain elements that are measurable, observable by a trained observer, and may be evaluated to determine if the overall performance of the task is acceptable.

Certification - Verification of training documentation by a qualified evaluator and, when required, the Security Director or Designee that a Security Force Member has satisfactorily completed the required training and demonstrated their proficiency to perform security-related duties and tasks in a specific job designation or duty assignment.

Condition - Environmental, physical and mental conditions, or equipment that Security Force Members could experience during the performance of assigned security-related duties and tasks.

Crucial Task - An action or series of actions performed by one or more Security Force Members that produce a product or an achievable result that is crucial to the successful implementation of the Security Manual or Security Safeguards Contingency Plan and, if not properly executed, could cause unsatisfactory performance and possible danger to the plant.

Element - An element is an integral part of a task or sub-task which either individually or in conjunction with other elements dictates the outcome of the task or sub-task.

Instructor - An individual who possesses special skills, knowledge, or advanced training in security-related subject areas and is empowered to impart the information to Security personnel during their initial and subsequent annual training and qualification.

Lesson Plan - Either a written manuscript or outline which identifies specific lesson objectives and organizes information pertaining to the performance of duties and tasks associated with a specific duty assignment or other security-related topics for presentation to Security personnel.

Medical Examination - A physical examination administered by a licensed physician. Physical examinations may be conducted by a licensed health professional who is trained to administer physical examinations provided. The final confirmation of an individual's physical condition and ability to perform security related duties and tasks is required to be made by a licensed physician.

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On-The-Job Training (OJT) - The assignment of an unqualified individual to a duty assignment for the purpose of training. Individuals assigned to perform security related tasks and duties in an OJT status shall remain under the continuous observation of an individual who is trained and qualified to perform **all** tasks and duties associated with the duty assignment. The qualified individual shall be responsible for verifying that all tasks and duties performed by an individual in an OJT status are satisfactorily completed.

Qualified Evaluator - An instructor or Security Force supervisor who administers crucial task evaluations, certifies the qualification of Security personnel to perform crucial tasks, and has the authority to disqualify Security personnel to perform security-related duties and tasks.

Security Force Member - Any member of the Security Organization assigned duties associated within the Security Program.

Security Officer - A trained and qualified armed Security Force Member.

Standards - Measurable and observable characteristics of a task which indicate how well the task is or has been performed. Standards may include, but are not limited to time, percentages of correct versus incorrect responses, hits on a target, correct performance of a sequence of actions, or completion of documentation.

Watchperson - An individual trained and qualified in accordance with this Manual to perform security related tasks and duties **not** associated with armed response. A watchperson may or may **not** be in uniform or armed depending on the level of training completed and qualification to perform security related tasks and duties associated with a specific duty assignment.

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4.0 SECURITY FORCE SUITABILITY AND QUALIFICATION CRITERIA

4.1 SUITABILITY

4.1.1 Suitability

- A. Prior to employment or assignment, applicants for Security Force positions shall be processed for unescorted access in accordance with the KNPP Access Authorization Program.

4.1.2 Educational Development

- A. Members of the KNPP Security Force shall possess a high school diploma or pass a state or nationally recognized equivalent performance examination.
- B. In the case of individuals educated in foreign countries, documentation supporting the equivalent of a high school education from the country of origin shall be considered acceptable to meet the educational requirements specified in paragraph 4.1.1 A.

4.1.3 Felony Convictions

- A. Security Force Members shall have no felony convictions involving the use of weapons and have no felony convictions that reflect on the individual's reliability.
- B. The results of a background investigation conducted on each individual prior to assignment to the Security Force may be used to determine and verify this requirement.

4.1.4 Age Requirement

- A. Armed Security Force Members must have attained the age of 21 years prior to assignment.
- B. Unarmed Security Force Members must have attained the age of 18 years prior to assignment.

4.1.5 Suitability Records

- A. A record certifying that each Security Force Member satisfactorily met the requirements for unescorted access and the criteria specified in Subsections 4.1.1, 4.1.2, 4.1.3 and 4.1.4, shall be maintained at KNPP and available for inspection.

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4.2 PHYSICAL AND MENTAL QUALIFICATIONS

4.2.1 General

- A. Individuals assigned to the KNPP Security Force, who perform security related duties and tasks which are directly associated with the implementation of the KNPP Security Manual and Security Safeguards Contingency Plan, shall have no physical weaknesses or abnormalities that would adversely affect the performance of assigned job duties.
- B. Responsible supervisory personnel shall maintain continued observation of Security Force Members for indications of physical weaknesses or abnormalities that would adversely affect the performance of their assigned job duties.

4.2.2 Physical Qualifications

- A. In addition to the criteria specified in Subsection 4.2.1, armed personnel and Alarm Station Operators shall successfully pass an annual physical examination administered by a licensed physician. The physical examination may be administered by a licensed health professional trained to administer physical examinations provided that final confirmation of the individual's physical condition and ability to perform the physical duties and tasks shall be made by a licensed physician.
- B. The examination shall be designed to measure the individual's physical ability to perform their required duty assignments.
- C. Results of the examination shall be provided by the licensed physician by either:
 - 1. A written statement indicating that the individual successfully passed the required examination or
 - 2. A written statement indicating that the individual does not have any physical weaknesses or abnormalities that would adversely affect their performance of assigned job duties or participation in a physical agility test, or
 - 3. If a physical impairment is detected during a medical examination, then a supportive qualifying statement from a licensed physician of the affected individuals ability to perform their assigned required duty assignments shall be sufficient justification to allow the individual to continue their employment within the Security Force.

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D. In addition to the criteria specified in Subsection 4.2.1.A, armed Security Force Members and Alarm Station Operators shall meet the following physical requirements.

1. Vision

- (a) For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye, with eyeglasses or contact lenses. If uncorrected distance vision is **not** at least 20/40 in the better eye, **then** the individual shall have available on site, an extra pair of corrective eyeglasses or contact lenses while on duty.
- (b) Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye.
- (c) Field of vision must be at least 70 degrees horizontal meridian in each eye.
- (d) The ability to distinguish red, green, and yellow colors is required. The affects of mild color vision defects will be evaluated as part of the individual's job duty qualifications to determine if the defect significantly degrades performance of assigned job duties.
- (e) Loss of vision in one eye is disqualifying
- (f) Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means. Controlled glaucoma shall **not** be disqualifying, provided that such medications as may be used for controlling glaucoma do **not** cause the individual to exhibit undesirable side effects which adversely affect the individuals ability to perform assigned job duties.
- (g) Where the use of corrective eyeglasses is required, they shall be of the safety glass type.
- (h) The use of corrective or contact lenses shall **not** interfere with the individual's ability to effectively perform assigned job duties.

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2. Hearing

- (a) Individuals shall have no hearing loss in the better ear greater than 30 decibels average at 500, 1000, and 2000 Hz, with no level greater than 40 decibels at any one frequency by ISO 389, "Standard Reference Zero for the Calibration of Purtone Audiometer," (1975) or ANSI S3.6-1969 (R.1973), "Specification for Audiometers."
- (b) The use of a hearing aid is acceptable provided the auditory acuity requirements stated in paragraph 4.2.2.B.2(a) are met. The affect of the use of such an aid shall be evaluated as part of the individual's job duty qualifications to ensure that its use does not adversely affect the individual's ability to perform assigned job duties.
- (c) Testing may be conducted at ranges above those stated in paragraph 4.2.2.B.2(a), but only to identify the possible reduction of hearing. Losses detected in ranges that are above required testing criteria shall not be disqualifying.

3. Diseases

- (a) Individuals shall have no established medical history or medical diagnosis or epilepsy or diabetes.
- (b) Where such a condition exists, a licensed physician shall provide documented medical evidence or a written statement to the affect that the conditions can be controlled with proper medication such that the individual will not lapse into a coma or unconscious state and that the medication will not adversely affect the individual's ability to perform assigned job duties.

4. Addictions

- (a) Individuals shall have no established medical history or medical diagnosis or habitual alcoholism or drug addiction.
- (b) Where such a condition has existed, the individual shall provide certified documentation of having completed a medically recognized rehabilitation program from a licensed health professional trained in drug and alcohol disorders.

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- (c) The certified documentation shall provide a reasonable degree of confidence that the individual would be capable of performing assigned job duties.

5. Incapacitation

- (a) Watchpersons, armed personnel, and Alarm Station Operators who have been incapacitated by a serious or prolonged illness, injury, disease or operation to the extent that they cannot effectively perform their assigned job duties shall be required to provide, medical evidence of recovery and ability to perform such assigned job duties prior to resumption of their assigned job duties.

4.2.3 Mental Qualifications

- A. Security Force Members whose assigned job duties are directly associated with the implementation of the KNPP Security Manual and Security Safeguards Contingency Plan shall demonstrate mental alertness and the capability to exercise good judgement, implement instructions, assimilate assigned job duties, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, audible, or other signals required by assigned job duties.
- B. The successful completion of verbal or written tests or both associated with the Training and Qualification Program, shall serve to demonstrate that an individual possesses the necessary cognitive and communication skills required by their assigned job duties.
- C. Armed Security Force Members and Alarm Station Operators shall demonstrate no emotional instability that would interfere with the effective performance of assigned job duties. The use of written or other acceptable testing techniques are acceptable, provided the final determination of mental qualification is made by a licensed psychologist, psychiatrist, physician, or other person professionally trained and certified to identify emotional instability.
- D. Responsible Security supervisory personnel shall maintain continued observation of Security Force Members for indications of emotional instability during the performance of assigned job duties.
- E. The identification of potential emotional instability by a responsible supervisor shall be subject to verification by an individual identified in paragraph 4.2.3.C.

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4.3 MEDICAL EXAMINATIONS AND PHYSICAL FITNESS QUALIFICATIONS

4.3.1 Medical Examination

- A. Each armed Security Force Member and Alarm Station Operator shall undergo a medical examination specified in Section 4.2.2 and receive written certification by a licensed physician that there are no medical contraindications that would preclude them from participating in a physical agility performance test.

4.3.2 Physical Fitness Qualification

- A. Subsequent to the medical examination and the written certification specified in Subsection 4.3.1, armed Security Force Members and Alarm Station Operators shall be required to demonstrate their physical fitness to perform required security related tasks and duties.
- B. Prior to their initial assignment to duties associated with armed response and annually thereafter, each Security Force Member shall be required to successfully complete the Physical Agility Performance Test specified in Subsection 4.3.2.C.
- C. Physical Agility Performance Test Requirements
 - 1. Officers shall be equipped with standard issue equipment or facsimiles thereof during conduct of the test, (i.e., duty belt, handcuffs, handgun, and radio).
 - 2. The test should not be conducted outside in conditions of inclement weather, (i.e., snow, rain, freezing, or high temperatures, etc.), or in conditions that would jeopardize the safety of the personnel being tested.
 - 3. Test Description.
 - (a) The test shall be conducted in two phases. Phase 1 is required to be completed first.
 - (b) Phase 1 (40 Yard Dash):
 - (1) The course consists of a start and finish line 40 yards apart on a reasonably flat, straight path.
 - (2) The dash must be completed within 10.5 seconds or less.

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- (3) After completing Phase 1, the Security Force Member may take a rest period that shall not exceed one minute and 30 seconds prior to starting Phase 2.
- (c) Phase 2 (440 Yard Run):
 - (1) The course consists of a start and finish line 440 yards apart on a reasonably flat surface. The course may be conducted on either an oval, straight or angled track.
 - (2) The course must be completed within two minutes and 45 seconds or less.
- (d) Failure to satisfactorily complete either phase shall result in a failure of the physical agility performance test. When a Security Force Member fails to successfully complete the test, both Phases 1 and 2 shall be completed during the retest.

4.4 CONTRACT SECURITY PERSONNEL

4.4.1 Contract Security Requirements

- A. Contract security personnel shall be required to meet the suitability, physical, and mental requirements as appropriate to their assigned duties specified in this Section.

4.5 PHYSICAL REQUALIFICATION

4.5.1 Physical Requalification

- A. Armed Security Force Members and Alarm Station Operators shall be required to meet the physical requirements specified in Subsection 4.2 on an annual basis.

4.5.2 Physical Fitness Requalification

- A. Armed Security Force Members and Alarm Station Operators shall be required to successfully complete the Physical Agility Performance Test in accordance with Section 4.3 on an annual basis.

4.6 DOCUMENTATION

The requirements specified in this Section pertaining to suitability, physical, and mental qualifications, annual physical examinations, and physical fitness qualifications shall be documented in accordance with Section 7.0.

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5.0 TRAINING AND QUALIFICATION

5.1 TRAINING REQUIREMENTS

- 5.1.1 Prior to being assigned to the Security Force, each individual who requires training to perform security-related tasks or duties shall attend and satisfactorily complete the applicable training course specified in Subsection 5.3.5.
- 5.1.2 Personnel shall be trained and qualified to perform the security-related tasks and duties identified in this Manual for one or more of the following duty assignments:
- A. Escort Officer
 - B. Compensatory Officer
 - C. Access Control Officer
 - D. Search Officer
 - E. Patrol Officer
 - F. Response Team Member
 - G. Central and Secondary Alarm Station Operator (as appropriate)
- 5.1.3 Initial and subsequent annual training shall be conducted in accordance with Section 5.3.6 of this Section.

5.2 QUALIFICATION REQUIREMENTS

- 5.2.1 Prior to being assigned to the Security Force, each individual who is required to perform security-related duties and tasks shall satisfactorily complete the applicable training courses specified in Subsection 5.3.5 and demonstrate the performance standards for all crucial tasks required for the duty assignments identified in Figure 5-2.
- 5.2.2 Crucial Tasks
- A. As a result of an evaluation of the Security Manual and Security Safeguards Contingency Plan, certain tasks have been identified as "crucial" to specific duty assignments.
 - B. FIGURE 5-2 provides a matrix which indicates the crucial tasks required to qualify for each duty assignment identified in Subsection 5.1.2.

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- C. FIGURES 5-3 through 5-12 provide a task description and the conditions and performance standards for each crucial task specified for the duty assignments identified in FIGURE 5-2.

5.2.3 Task Qualifications

- A. All Security personnel shall be required to satisfactorily demonstrate the performance of all crucial tasks specified in FIGURE 5-2 for each duty assignment to the satisfaction of a qualified evaluator. Documentation of task qualifications shall be accomplished in accordance with Section 7.
- B. Each task should be performed under the following conditions unless otherwise specified:
 - 1. Weather conditions shall not be extreme (high winds, heavy rain, icy conditions, very high or very low temperatures, etc.). Failure to meet standards affected by such weather conditions shall not be disqualifying.
 - 2. There shall be sufficient lighting to allow the individual to perform the task required in a safe manner.
 - 3. The individual is to be dressed and equipped in a manner similar to that routinely encountered during the duty assignment associated with the crucial task being evaluated. Facsimiles may be substituted for actual personal security equipment normally worn or carried by Security personnel to prevent unnecessary damage or wear.
 - 4. The performance of the task shall be observed and documented by a qualified evaluator.
 - 5. The individual shall have access to all reference materials routinely available, unless specifically prohibited.
 - 6. Plant security devices and equipment designed to provide functional support for completion of the task should be operational and used by the individual being evaluated during performance of the task. When required to facilitate the conduct of the evaluation, the functioning of security devices and equipment associated with the task may be simulated.
- C. The demonstration of the ability to perform assigned job duties may be accomplished using one or more of the following evaluation methods:
 - 1. Hands-on component; or

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2. Written component; or
 3. Verbal component.
- D. Individual tasks may be performed for qualification under actual or simulated situations and conditions.
1. An individual's ability to meet a given standard may be evaluated through the use of one or more of the methods specified in paragraph 5.2.3.C. To qualify, each individual shall demonstrate the required knowledge for each standard specified for a task.
 2. The observation of the routine performance of a task while on-duty by a training instructor or qualified evaluator may meet this requirement provided that the task is performed to the required standards and under the conditions specified in Subsection 5.2.3.B.
 3. Any individual who fails to satisfactorily perform a crucial task during qualification or requalification testing shall be provided remedial instruction prior to being retested.
- E. Certain detailed testing materials or evaluation forms used in the qualification process are not required to be retained after the results of each evaluation have been certified by the Security Director or designee.
- F. Initial qualification of Security personnel shall be documented in accordance with Section 7.
- 5.2.4 When a Security Officer fails to demonstrate the required degree of proficiency for any security-related duty or crucial task associated with their duty assignment, they shall be disqualified from performing the affected duty assignment and shall receive remedial training until satisfactory performance is demonstrated or a decision is made for permanent disqualification.

5.3 TRAINING AND QUALIFICATION PROGRAM

- 5.3.1 The implementation of the Security Manual and Security Safeguards Contingency Plan relies on a Security Force that is trained, qualified, and proficient in the application of procedural requirements during both normal and emergency conditions. The training and qualification program outlined in this Section provides qualified Security personnel needed to meet the requirement. FIGURE 5-1 provides a schedule which indicates the frequency and requirements for the training, qualification, and requalification of Security personnel.
- 5.3.2 Proficiency of Security personnel shall be assured through:

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- A. Observation of Security personnel performing the security related duties and tasks associated with the duty assignments specified in Subsection 5.1.2 by security supervisors and
- B. Annual requalification of Security personnel in accordance with Section 5.5.

5.3.3 The Training and Qualification Program outlined in this Manual is designed for individuals who do not have any educational background or previous experience in the field of security. Individuals who possess a sufficient educational background or previous security experience that provides an equivalent degree of knowledge, skills, and abilities in the field of security may be exempted from attending all or portions of the training courses specified in Subsection 5.3.5 when approved by the Security Director or designee. Such personnel shall be required to satisfactorily complete all examinations and crucial tasks required for the training which was exempted prior to being certified and assigned to perform specific duty assignments.

- A. Newly assigned security personnel may be placed in an unqualified trainee status until such time that they complete the required course. Such personnel shall not be placed in a duty assignment which requires the performance of crucial tasks until they have been trained and qualified in accordance with this Manual.
- B. An unqualified individual may be placed in a duty assignment for the purpose of on-the-job training (OJT). Individuals assigned to perform security related tasks and duties in an OJT status shall remain under the continuous observation of an individual who is trained and qualified to perform all tasks and duties associated with the duty assignment. The qualified individual shall be responsible for verifying that all tasks and duties performed by an individual in an OJT status are satisfactorily completed.
- C. Because of their job assignments, Security personnel above the rank of Shift Captain who are approved by the Security Director, shall not be required to be trained in accordance with the provisions of this plan, with the exception of weapons and physical fitness qualifications, but may be qualified to perform one or more of the crucial tasks identified in this Manual
- D. Plant Protective Services, licensee security staff and contract management personnel are generally familiar with all crucial tasks required of security positions and are not required to demonstrate proficiency (when approved by the Security Director), with the exception of firearms qualifications.
- E. Plant Protective Services licensee personnel and contract management personnel (when approved by the Security Director) are authorized to carry firearms on KNPP property.

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5.3.4 Training should be conducted in the environment most conducive to the subject matter and may range from classroom to lab to on-the-job (OJT) in the field.

5.3.5 Training Courses

A. In order to ensure that only trained and qualified personnel are assigned to the Security Force, the Security Training and Qualification Program provides two training courses for Security Force Members. The training courses are developed to provide individuals with the knowledge, skills, and abilities required to perform the duty assignments identified in Subsection 5.1.2. Each course is comprised of individual topics for which lesson plans are prepared. Because topics are subject to change, specific topics are not provided in this Manual, but are maintained and available for inspection. Course content and lesson plans shall be reviewed and approved by the Security Director or Designee.

1. Initial Training Course:

(a) The course is designed to provide trainees with the knowledge, skills, and ability to qualify as a Watchperson or Security Officer depending upon their successful completion of required training and crucial task qualifications.

(b) The course may be modified to provide the necessary training to qualify personnel to perform one or more of the duty assignments identified in Subsections 5.1.2.A through 5.1.2.F.

2. Alarm Station Operator Training Course: The course is designed to provide Security Force supervisory personnel, selected Security Force Members, or other Security personnel above the rank of Shift Captain the knowledge, skills, and abilities to perform the duties and tasks required for assignment as an Alarm Station Operator in either the CAS or SAS.

B. A minimum score of 70 percent overall is required for written components to satisfactorily complete the training courses specified in Subsections 5.3.5.A.

C. Successful completion of training courses shall be documented in accordance with Section 7.

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5.3.6 Requalification Training

- A. Modifications made to the Training and Qualification Program that affect qualification criteria shall require additional training and qualification necessary to ensure that Security personnel have the knowledge, skills, and abilities to perform the modified task or duty requirements. Methods of providing such training include, but are not limited to supplemental instruction, review of procedure changes or revisions, OJT, drills or demonstrations, and required reading assignments.
- B. Annual requalification training for Security personnel shall be limited to:
 - 1. Requalification of Security personnel in the crucial tasks necessary to perform their required duty assignments.
 - 2. Requalification of Security personnel in duties or tasks that cannot be accomplished through on-the-job observation and evaluation, i.e., weapons requalification, weapons knowledge, response knowledge, physical fitness qualification, etc.
 - 3. Changes or modifications in the performance standards for security-related tasks and duties prior to requalification.
 - 4. Significant changes to the Security Manual, Security Contingency Plan, and Security Training and Qualification Program during the past year.
 - 5. Areas in which repetitive errors have occurred.
- C. A minimum score of 80 percent is required to satisfactorily complete written components administered during requalification training.
- D. Annual requalification training shall be documented in accordance with Section 7.

5.4 CONTRACT SECURITY PERSONNEL

All contract security personnel assigned to the Security Force shall be trained and qualified in accordance with this Manual.

5.5 REQUALIFICATION

- 5.5.1 All assigned personnel are required to requalify on all crucial tasks required by their assigned duties at least annually. The administration of crucial task evaluations required for requalification shall be conducted in accordance with Section 5.2 and attested to by a qualified evaluator.

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5.5.2 Alarm Station Operator Requalification.

- A. The duties of CAS and SAS Operators are normally performed by supervisors. Because these personnel are dedicated to performing the tasks and duties associated with the duty assignment of Alarm Station Operators, annual requalification is not required after initial training and crucial task qualification have been completed. Certified Alarm Station Operators who routinely perform the duty assignment shall maintain their certification through on-the-job evaluations conducted by a qualified evaluator.

- B. Personnel who have completed the required training and qualified as an Alarm Station Operator, but do not routinely perform the tasks and duties required by the duty assignment shall be required to requalify annually in the applicable crucial tasks identified in FIGURE 5-2.

5.5.3 Requalification of Security personnel shall be documented in accordance with Section 7.

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**FIGURE 5-1
TRAINING AND QUALIFICATION SCHEDULE**

QUALIFICATION OR TRAINING PROGRAM ELEMENT	JOB DESIGNATION	FREQUENCY	
		Initial	Annual
Physical Examinations	Alarm Station Operator and Armed Personnel	X	X
Physical Agility Qualification Testing	Armed Personnel/Alarm Station Operator	X	X
Indoctrination Training - General Employee Training	All Personnel	X	X
Crucial Task Qualification/Requalification	According to Assigned Job Duties	X	X
Night Weapons Familiarization	Armed Personnel	X	
Handgun Qualification/Requalification	Armed Personnel	X	X
Shotgun Qualification/Requalification	Armed Personnel	X	X
Contingency Plan	Armed Personnel	X	X

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**FIGURE 5-2
CRUCIAL TASK/DUTY ASSIGNMENT MATRIX**

DUTY ASSIGNMENTS

A. Access Control Officer	E. Patrol Officer
B. Personnel Search Officer	F. Compensatory Officer
C. Vehicle Search Officer	G. Response Team Member
D. Escort Officer	H. Alarm Station Operator

Crucial Task Description	A	B	C	D	E	F	G	H
1. Control Access to the Protected Area	X							
2. Conduct Personnel and Hand-Carried Package Searches		X						
3. Conduct Vehicle Searches			X					
4. Escort Vehicles Within the Protected Area				X				
5. Conduct Patrols of Protected and Vital Areas					X			
6. Perform Compensatory Measures During Security Equipment Outages (Note 1)						X		
7. Respond to Safeguards Contingency Events							X	
8. Monitor and Operate Access Control System								X
9. Monitor and Operate Closed Circuit Television System								X
10. Monitor and Operate Security Communications Equipment								X

NOTE 1: Watchpersons may be qualified to perform dedicated observer responsibilities in the CAS or SAS.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 5-3

CRUCIAL TASK NUMBER 1

TITLE: Control Access to the Protected Area

Duty Assignment: Access Control Officer

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall strictly control the access of all personnel and materials entering the Protected Area through the personnel access points and report all abnormalities in accordance with the Security Manual and Security Implementing Procedures.

1. Prior to entering the Protected Area, all personnel who are authorized unescorted access shall be properly searched for explosives, incendiary devices, firearms, and other items that could be used for radiological sabotage. Identify and issue properly screened personnel their security badge.
2. Process individuals who require escort and ensure that the individuals are properly registered and escorted prior to allowing entry to the Protected Area.
3. Ensure that all security badges are properly controlled at the Protected Area personnel exit point.
4. During security or emergency events, control access to the Protected Area by allowing access only to individuals who have been specifically authorized and emergency response personnel.
5. Verify authorization for materials that are required to be transported by vehicle to a location inside the Protected Area when requested by the Search Officer processing the vehicle for entry.
6. Control access to the vehicle search area during the search of vehicles being processed for entry to the Protected Area.

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FIGURE 5-4

CRUCIAL TASK NUMBER 2

TITLE: Conduct Personnel and Hand-Carried Package Searches

Duty Assignment: Search Officer (Personnel)

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall ensure that all personnel and hand-carried packages and materials are properly searched for firearms, explosives, incendiary devices, or other items that could be used for radiological sabotage prior to entering the Protected Area and report all abnormalities in accordance with Security Implementing Procedures.

1. Monitor and control individuals processing through contraband detection equipment (walk-through equipment cable of detecting firearms and explosives) for entry to the Protected Area.
2. Recognize audible and visual alarms and signals indicating the actual or suspected presence of firearms or explosives or an individual who fails to properly complete the search process and implement appropriate actions to determine the cause, resolve the alarm, and, if appropriate, deny access. Conduct hands-on searches of personnel and hand-carried items when required by Security Implementing Procedures.
3. Operate and monitor x-ray equipment or conduct physical searches of all packages and materials for entry to the Protected Area for firearms, explosives, incendiary devices, or other items that could be used for radiological sabotage.
4. Process bona fide federal, state, and local law enforcement personnel on official duty of entry to the Protected Area.
5. Conduct tests of equipment used in the search process.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 5-5

CRUCIAL TASK NUMBER 3

TITLE: Conduct Vehicle Searches

Duty Assignment: Search Officer (Vehicle)

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall ensure authorization and conduct searches of vehicles and materials, devices, and other items that could be used for radiological sabotage prior to allowing entry to the Protected Area.

1. Verify authorization for entry and search all vehicles for firearms, explosives, incendiary devices, and other items that could be used for radiological sabotage prior to allowing entry to the Protected Area.
2. Implement actions required to deny access when contraband is discovered.
3. Ensure that non-designated vehicles are escorted by a Security Force Member.
4. Process emergency response vehicles for access to the Protected Area during security or site emergency situations.
5. Coordinate the operation of the active vehicle barrier system to allow the entry and exit of vehicles from the Protected Area.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 5-6

CRUCIAL TASK NUMBER 4

TITLE: Escort Vehicles Within the Protected Area

Duty Assignment: Escort Officer

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall escort and control vehicles within the Protected Area and report all abnormalities in accordance with the Security Manual and Security Implementing Procedures.

1. Maintain continuous and effective observation and control of the vehicle and, when required the vehicle operator.
2. Ensure that only materials authorized for delivery within the Protected Area are unloaded from the vehicle in accordance with the SM.
3. Properly immobilize vehicle and control keys when the vehicle is unattended within the Protected Area.

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FIGURE 5-7

CRUCIAL TASK NUMBER 5

TITLE: Conduct Patrols of the Protected and Vital Areas

Duty Assignment: Patrol Officer

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall conduct patrols of the Protected Area and Vital Areas and report all abnormalities in accordance with the Security Manual and Security Implementing Procedures.

1. Demonstrate thorough knowledge of plant physical layout.
2. Conduct a patrol of the Protected Area to detect unauthorized or suspicious activities.
3. Inspect barriers and security doors for deficiencies or indications of tampering.
4. Test or inspect security equipment.
5. Respond to alarms or breached barriers and conduct assessments of perimeter zone, doors, and other security equipment when directed by the CAS or SAS.
6. Implement and perform appropriate compensatory measures until properly relieved when degraded or failed security equipment is discovered.

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FIGURE 5-8

CRUCIAL TASK NUMBER 6: Perform Compensatory Measures During Security Equipment Outages

Duty Assignment: Compensatory Officer

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall demonstrate the knowledge, skills, and ability to perform the following duties and tasks and report all abnormalities in accordance with approved Security Implementing Procedures:

1. Perform access control and surveillance duties at perimeter zones, doors, barriers, or specified security areas during CCTV, intrusion detection, or other security-related equipment outages.
2. Perform CCTV surveillance as a dedicated observer in the CAS or SAS.
3. Demonstrate a thorough knowledge of communications procedures and codes used by Security Force Members to communicate with the CAS and SAS and other Security Force Members during normal, security-related, or emergency operations.

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FIGURE 5-9

CRUCIAL TASK NUMBER 7

TITLE: Respond to Safeguards Contingency Events

Duty Assignment: Response Team Member

Conditions: As specified in Section 5.2.3.C.

Standards: The individual shall demonstrate the knowledge, skills, and ability required to respond to and resolve events identified in the Security Safeguards Contingency Plan and report all abnormalities in accordance with Security Implementing Procedures.

1. Demonstrate a thorough knowledge of the physical layout of the plant.
2. Demonstrate a thorough knowledge of the criteria for using deadly force.
3. Communicate with the CAS, SAS, Response Team Members, and other Security Force Member.
4. Conduct evacuations of areas where plant personnel may be endangered during security and site emergency situations and, when directed or required by the situation, secure and isolate areas located within the Protected Area.
5. Conduct searches of the Protected Area and Vital Areas for unauthorized personnel, vehicles, or materials.
6. Apprehend and detain unauthorized personnel.

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FIGURE 5-10

CRUCIAL TASK NUMBER 8

TITLE: Monitor and Operate Access Control System

Duty Assignment: Central or Secondary Alarm Station Operator

Conditions: As specified in Section 5.2.3.C. Qualified to perform the duty assignments of Access Control Officer, Search Officer (Personnel), Search Officer (Vehicle), Escort Officer, Patrol Officer, Compensatory Officer, and Response Team Member.

Standards: The individual shall demonstrate the knowledge, skills, and ability to perform the following tasks and report all abnormalities to Security supervision in accordance with the Security Manual and Security Implementing Procedures.

1. Monitor, operate, and assess the perimeter intrusion detection system (PIDS) to include:
 - A. Monitoring the PIDS to detect any unauthorized entry attempt.
 - B. Assessing alarms using CCTV.
 - C. Dispatching Security personnel to assess alarms when the cause cannot be satisfactorily determined using the available alarm station assessment aids.
 - D. Documenting alarm response and assessment results.
 - E. Evaluating system output data to recognize equipment malfunctions or failures.
 - F. Implementing compensatory measures for equipment outages.
 - G. Conducting, monitoring, and documenting equipment operability testing.
2. Monitor, operate, and assess the Computer Access Control System (ACS) to include:
 - A. Monitoring card reader operations to detect unauthorized attempts to enter security controlled areas.
 - B. Dispatching Security personnel to assess access-related alarms.
 - C. Documenting alarm response and assessment results.
 - D. Evaluating system output data to recognize equipment malfunctions or failures.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 5-10 CON'T

- E. Evaluating system output data to recognize equipment malfunctions or failures.
 - F. Conducting, monitoring, and documenting equipment operability testing.
 - G. Activating and inactivating security badges.
3. **Monitor Contraband Search Equipment Operation (SAS Operator Only).**
- A. Monitor the operation contraband detection and x-ray equipment used in the access control facility.
 - B. Respond to alarm and duress conditions.
 - C. Demonstrate the ability to lock-out the Security Building portal.
4. **Supervisory Duties**

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 5-11

CRUCIAL TASK NUMBER 9

TITLE: Monitor and Operate Closed Circuit Television System (CCTV)

Duty Assignment: Central or Secondary Alarm Station Operator

Conditions: As specified in Section 5.2.3.C. Qualified to perform the duty assignments of Access Control Officer, Search Officer (Personnel), Search Officer (Vehicle), Escort Officer, Patrol Officer, Compensatory Officer, and Response Team Member.

Standards: The individual shall perform surveillance and alarm assessment functions using CCTV equipment and report all abnormalities to Security supervision in accordance with the Security Manual and Security Implementing Procedures:

1. Monitor the CCTV system to identify possible intrusions into the Protected Area.
2. Operate video capture and CCTV equipment to assess alarms.
3. Test and document CCTV equipment.
4. Recognize equipment malfunctions and failures.
5. Implement required compensatory measures during equipment outages.

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FIGURE 5-12

CRUCIAL TASK NUMBER 10

TITLE: Monitor and Operate Security Communication Equipment

Duty Assignment: Central and Secondary Alarm Station Operator

Conditions: As specified in Section 5.2.3.C. Qualified to perform the duty assignments of Access Control Officer, Search Officer (Personnel), Search Officer (Vehicle), Escort Officer, Patrol Officer, Compensatory Officer, and Response Team Member.

Standards: The individual shall use security communications equipment to communicate with Security Force Members, local law enforcement agencies, and other plant personnel during normal and security or emergency situations and report all abnormalities to security supervision in accordance with the Security Manual and Security Implementing Procedures:

1. Operate all communications equipment identified in the Security Manual and Security Implementing Procedures.
2. Conduct and document on and off-site communications tests.
3. Identify and use communication procedures and codes to communicate directions to Security personnel during normal operations or for response to alarms and safeguards contingency events.
4. Recognize communications equipment failures and implement the applicable compensatory measures during an equipment failure or outage.
5. Contact personnel and make the appropriate notifications.

SECURITY TRAINING AND QUALIFICATION MANUAL

6.0 WEAPONS TRAINING AND QUALIFICATION

6.1 WEAPONS TRAINING

- 6.1.1 Security Force Members assigned to duties which require the use of a weapon shall demonstrate knowledge and proficiency in the use of Security Force weapons prior to assignment to the Security Force.
- 6.1.2 The weapons training program for initial qualification shall provide classroom associated training in the following areas:
- A. Mechanical assembly, disassembly, projectile range, penetration capability of weapon, and target firing.
 - B. Weapons cleaning and storage.
 - C. Handgun combat firing, day and night.
 - D. Safe weapons handling.
 - E. Cleaning, loading, unloading, and reloading.
 - F. When to draw and point a weapon.
 - G. Rapid fire techniques for handgun and shotgun.
 - H. Close quarter firing with handgun and shotgun.
 - I. Stress firing.
- 6.1.3 Night familiarization firing is conducted with both the handgun and shotgun during initial training. The course is fired under actual reduced lighting conditions or under simulated reduced lighting conditions created by dimming the range lights at indoor ranges. Night familiarization firing shall be required only during the individual's initial weapons qualification. Neither qualifying scores or time limitations are required for this course of fire.
- 6.1.4 Proficiency in the weapons knowledge area shall be demonstrated by achieving a minimum score of 70 percent on a written examination covering those areas which are not performance based.

SECURITY TRAINING AND QUALIFICATION MANUAL

6.2 WEAPONS QUALIFICATION

6.2.1 Handgun Qualification

A. The Handgun Comhat Course

1. FIGURE 6-1 provides a description of the Handgun Combat Course which is conducted for initial qualification and requalification of armed Security Force Members.
2. The functions of recovery, holstering, or returning to the ready position are not included in the time constraints specified for various phases of the course.

B. Qualification firing shall consist of 68 rounds fired on command from 3, 5, 7, 12, 15 and 25 yards at a B-27 full size silhouette target or a target of equivalent difficulty. Scoring will be as follows:

1. All rounds placed in the X, 10, 9, and 8-rings shall score as five points.
2. All rounds in the 7-ring shall score as four points.
3. All rounds placed elsewhere within the silhouette target shall score as three points.
4. All rounds placed outside the silhouette target shall score as zero points.

C. The minimum qualifying score shall be 238 points (70 percent) of a total possible score of 340 points for the course of fire.

6.2.2 Shotgun Qualification

A. The Shotgun Course

1. FIGURE 6-2 provides a description of the Shotgun Course which is conducted for initial qualification and requalification of armed Security Force Members.
2. The function of returning to the ready position is not considered to be included in the noted time constraints.

SECURITY TRAINING AND QUALIFICATION MANUAL

- B. Qualification firing shall consist of 8 rounds fired on command from 15 and 25 yards at a B-27 full size silhouette target or a target of equivalent difficulty.
 - 1. Security Force Members shall use a 12-gauge shotgun as described in the Security Manual.
 - 2. Shotgun shell ammunition used is 00-gauge with nine pellets per round.
 - 3. All rounds placed within the silhouette shall score as one point.
- C. The minimum qualifying score shall be 51 of 72 pellets (70 percent) scored within the silhouette portion of the four targets.

6.2.3 WEAPONS QUALIFICATION AND REQUALIFICATION

- A. Initial qualification of armed Security Force Members shall require the successful completion of the criteria specified in Sections 6.1 and 6.2.
- B. Each armed Security Force Member shall be required to requalify annually by successfully completing the criteria specified in Subsections 6.2.1 and 6.2.2.
- C. Initial weapons training and qualification and subsequent annual requalification of Security personnel shall be documented in accordance with Section 7.0.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 6-1 - HANDGUN COMBAT COURSE

PHASE 1 (Target Distance: 3 yards)

Requirements	Rounds	Time	Weaver Position
Stage 1: From a snapped holster, fire 2-rounds.	2	3 sec.	Standing
Stage 2: From the ready position, fire 4-rounds.	4	3 sec.	Standing
Stage 3: From a snapped holster, fire 2-rounds.	2	3 sec.	Standing
Stage 4: From a snapped holster, fire 4-rounds.	4	3 sec.	Standing

PHASE 2 (Target Distance: 5 Yards)

Stage 1: From a snapped holster, fire 2-rounds.	2	3 sec.	Standing
Stage 2: From the ready position, fire 3-rounds, reload, and fire 2-rounds.	5	15 sec.	Standing
Stage 3: From a snapped holster, fire 2-rounds.	2	3 sec.	Standing
Stage 4: From the ready position, fire 4-rounds.	4	3 sec.	Standing

Note: Change target after Phase 2

PHASE 3 (Target Distance: 7 Yards)

Stage 1: From a snapped holster, fire 6-rounds.	6	10 sec.	Standing
Stage 2: From a snapped holster, fire 3-rounds, reload and from a kneeling position, fire 5-rounds.	8	25 sec.	Standing to kneeling

PHASE 4 (Target Distance: 12 Yards)

Stage 1: From a snapped holster, fire 8-rounds.	8	10 sec.	Standing
Stage 2: From a snapped holster, fire 4-rounds, reload, and fire 3-rounds.	7	20 sec.	Standing

Note: Change target after Phase 4

PHASE 5 (Target Distance: 15 Yards)

Stage 1: From a snapped holster, fire 4-rounds.	4	10 sec.	Standing
Stage 2: From a snapped holster, assume kneeling position and fire 4-rounds.	4	10 sec.	Standing to kneeling

PHASE 6 (Target Distance: 25 Yards)

Stage 1: From a snapped holster, fire 2 rounds, and	2	Note 1	Barricade standing (left or right, supported or unsupported)
Stage 2: Assume kneeling position and fire 2 rounds.	2	Note 1	Barricade standing to kneeling (behind barricade)
Stage 3: Assume prone position and fire 2 rounds.	2	Note 1	Kneeling to roll-over prone

NOTE 1: Stages must be fired consecutively and all stages completed within 30 seconds. Rounds may be fired using rapid or slow fire techniques.

NOTE: Instructor or Designee verifies magazine rounds after stages 1 through 5.

SECURITY TRAINING AND QUALIFICATION MANUAL

FIGURE 6-2 -SHOTGUN COURSE

PHASE 1 (Target Distance 15 Yards)

Requirements	Rounds	Time	Position
From the ready position with four rounds loaded, fire one round at each of the four separate targets.	4	10 sec. (Note 1)	Standing shoulder fire

PHASE 2 (Target Distance 25 Yards)

Requirements	Rounds	Time	Position
From the ready position with four rounds loaded, fire one round at each of the four separate targets.	4	10 sec. (Note 1)	Standing shoulder fire

SECURITY TRAINING AND QUALIFICATION MANUAL

7.0 DOCUMENTATION AND RECORDS RETENTION

7.1 DOCUMENTATION

7.1.1 Unless otherwise specified in this Manual or the Security Manual, the documents and records specified in Section 7.2 of this Section shall be:

- A. Attested to by a qualified evaluator and
- B. Reviewed and certified or approved, as appropriate, by the Security Director or designee.

7.1.2 Personnel, initial qualification, and requalification records for Security personnel who have been granted unescorted access shall include documentation of training received during initial and requalification training specified in Sections 4.0, 5.0, and 6.0 of this Manual. These records shall be reviewed and approved by the Security Director or designee.

7.2 RECORDS RETENTION

7.2.1 Suitability

- A. Data which verifies the qualification of Security personnel to meet the suitability criteria specified in Section 4.1 of this Manual shall be documented and retained in accordance with Section 18.3 of the Security Manual.

7.2.2 Physical Qualification and Requalification

- A. Results of initial and subsequent annual physical qualification which certify that Security personnel meet the physical requirements specified in Sections 4.2 and Subsections 4.3.1 and 4.5.1 of this Manual shall be documented and retained in accordance with Section 18.3 of the Security Manual.

7.2.3 Mental Qualifications

- A. Results of initial and any subsequent mental requalification evaluations which certify that Security personnel meet the mental requirements specified in Subsection 4.2.3 of this Manual shall be documented and retained in accordance with Section 18.3 of the Security Manual.

SECURITY TRAINING AND QUALIFICATION MANUAL

7.2.4 Physical Fitness Qualification and Requalification

- A. Successful completion of the initial and subsequent annual physical agility requirements specified in Subsections 4.3.2 and 4.5.2 of this Manual shall be documented for Security personnel and retained for three years from the date of each qualification.

7.2.5 Initial Qualification and Requalification

- A. Successful completion of the requirements for the training specified in Subsection 5.2.1 and crucial task qualification specified in Subsection 5.2.2 shall be documented for each individual qualified under the provisions of this Manual and retained for the length of employment plus three years or the life of the plant plus three years, whichever is shorter.
- B. Successful completion of the requirements for annual requalification training for Security personnel specified in Subsection 5.3.6 and crucial task requalification specified in Section 5.5 shall be documented and retained for three years from the date of each requalification.

7.2.6 Weapons Qualification, Familiarization, and Requalification

- A. Successful completion of the initial weapons training and qualification requirements specified in Subsection 6.2.1 and annual requalification requirements specified in Subsection 6.2.2 shall be documented for Security personnel and retained for three years from the date of the qualification or requalification.

7.2.7 Training and Qualification Manual and Training Materials

- A. Training and Qualification Manual. This Manual shall be retained for the life of the plant plus three years. Superseded portions of the manual shall be retained for a period of three years after the revision was made.
- B. Supporting Documentation and Records. Superseded or discontinued materials used to support the Training and Qualification Program shall be retained for a period of three years.

SECURITY TRAINING AND QUALIFICATION MANUAL

8.0 QUALITY ASSURANCE

8.1 Audits

8.1.1 Audits shall be conducted in accordance with Section 15.0 of the Security Manual.

8.2 Internal Audits

8.1.2 Internal audits are performed by Quality Assurance personnel who are independent of the Security organization.

ATTACHMENT A

to

Letter from M.L. Marchi (WPSC)

to

Document Control Desk (NRC)

dated

February 2, 1999

Description of Revisions to the KNPP Security Training and Manual

ATTACHMENT B

to

Letter from M.L. Marchi (WPSC)

to

Document Control Desk (NRC)

dated

February 2, 1999

KNPP Security Training and Qualification Manual - Revision 1

**KEWAUNEE NUCLEAR PLANT
SCREENING CRITERIA FORM
ASSESSMENT OF ACCEPTABILITY OF 10CFR50.54 PLAN CHANGES**

SECTION/TITLE: General/Glohal changes.

1. Table of Contents. Reformatted and re-numbered.
2. List of Effective Pages
3. 8.0 - Moved Definition section to 3.0
4. Moved section 2.0 named Security Force Suitability and Qualification Requirements to section 4.0 and changed "Requirements" to "Criteria".
5. Introduction - Reworded for grammatical purposes. Words describing actions replaced with words describing non-action requirements. The definition of annual was included in the Introduction section. This definition was approved in revision 0.
6. Under Definitions - Alphabetized list, added definition of "Alarm Station Operator", "On-the-Job Training", Expanded definition of "Watchpersons"
7. 2.1.3 Age Requirement reworded (see below)
8. 2.1.4 Personnel Suitability reworded
9. 2.2.2 Physical Examination
10. 2.2.2 SAS and CAS Operators

PROPOSED ADDITION/COMMENT:

1. See 1 above.
2. Added List of Effective Pages
3. Moved Definition section from 8.0 to section 3
4. See # 4 above
5. Added what is required of personnel in lieu of what actions were not allowed. Added definition of annual from the definition section. This is to ensure understanding of "annual" in the introduction statement.
6. Expanded definition of "watchman" to more closing follow the definition in 73.2
7. 4.1.4 A. Armed members of the Security Force must have attained the age of 21 years prior to assignment.
 B. Unarmed members of the Security Force must have attained the age of 18 years prior to assignment.
8. 4.1.1 A. Prior to employment or assignment, applicants for Security Force positions shall be processed for unescorted access in accordance with the KNPP Access Authorization Program.
 4.1.5 A. A record certifying that each Security Force member satisfactorily met the requirements for unescorted access and the criteria specified in Subsections 4.1.1, 4.1.2, 4.1.3 and 4.1.4, shall be maintained at KNPP and available for inspection.
9. Physical Examination changed to Physical Qualification, to better describe section.
10. Throughout Manual, changed "SAS and CAS Operators" to "Alarm Station Operators" This more efficiently identifies the position.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: These changes are administrative in nature and do not change or delete any regulatory requirements and does this change delete or contradict any regulatory requirements

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: These changes are administrative in nature. Therefore they do not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable

**KEWAUNEE NUCLEAR PLANT
SCREENING CRITERIA FORM
ASSESSMENT OF ACCEPTABILITY OF 10CFR50.54 PLAN CHANGES**

SECTION/TITLE: Introduction

Current: Security Force instructors, management, and supervisory personnel above the rank of Captain, because of their job assignments, will not be required to be trained in accordance with the provisions of this plan, but will be qualified in the crucial tasks.

PROPOSED ADDITION/COMMENT:

This statement was moved to section 5.3.3.

- C. Because of their job assignments, Security personnel above the rank of Shift Captain who are approved by the Security Director, shall not be required to be trained in accordance with the provisions of this plan, with the exception of weapons and physical fitness qualifications, but may be qualified to perform one or more of the crucial tasks identified in this Manual
- D. Plant Protective Services, license security staff and contract management personnel are generally familiar with all crucial tasks required of security positions and are not required to demonstrate proficiency, with the exception of firearms qualifications.
- E. Plant Protective Services license personnel and contract management personnel are authorized to carry firearms on KNPP property.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: The current plan allows for certain contract staff members to be considered qualified as a security officer because of their position and job knowledge. The change recognizes that Licensee staff who are generally familiar with crucial tasks and clarifies who may fall under this provision. It also now requires the approval of the Security Director prior to allowing Staff personnel to act as a Security Force Member to ensure personnel are familiar with requirements..

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: Because of their position Security personnel above the rank of Shift Captain and members of the Licensee and Contract Security staff specifically designated by the

Security Director are knowledgeable of the provisions of the KNPP security plans. The current approved plan recognizes this knowledge and with the additional provision of requiring the Security Director's approval further enhances the program. Therefore this change does not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This better clarifies currently approved commitments and is not an alternative to any requirement, therefore this section is not applicable

**KEWAUNEE NUCLEAR PLANT
SCREENING CRITERIA FORM
ASSESSMENT OF ACCEPTABILITY OF 10CFR50.54 PLAN CHANGES**

SECTION/TITLE: SECURITY FORCE COMPOSITION AND EQUIPMENT

6.1 SECURITY FORCE COMPOSITION AND EQUIPMENT

The composition and staffing of the KNPP Security Force is specified in the approved KNPP Security Manual. The routine and contingency KNPP Security Force equipment is specified in the approved KNPP Security Manual. Quantities, locations, and availability of routine and contingency equipment are provided in applicable security procedures. Security Force equipment inventory and inspection criteria are provided in applicable security procedures. The types and amounts of weapons and ammunition required for use and available to the Security Force is specified in the KNPP Security Manual and appropriate security procedures.

PROPOSED ADDITION/COMMENT:

Section 6.0 "SECURITY FORCE COMPOSITION AND EQUIPMENT", moved to Introduction and changed as follows.

The following areas are addressed in detail in the Security Manual or Security Safeguards Contingency Plan, and/or applicable security procedures and are not addressed in this Manual:

- A. The composition and staffing of the security organization and security force and
- B. The types and quantities of Security equipment required by Security Force personnel to perform both routine and contingency response duties and tasks.
 - 1. Location, availability, equipment inventories and inspection criteria are provided in applicable security procedures.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: This change is administrative in nature and does not delete or contradict any regulatory requirements.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: These changes are administrative in nature and are consistent with currently

approved criteria in the KNPP SM and T&QM. Therefore they do not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable

**KEWAUNEE NUCLEAR PLANT
SCREENING CRITERIA FORM
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SECTION/TITLE: 2.1.2 Felony Convictions

Security Force personnel shall have no felony convictions involving the use of weapons and have no felony convictions that reflect on the individual's reliability. Fingerprint cards are submitted Federal Bureau of Investigation (FBI) via the U. S. Nuclear Regulatory Commission (USNC). A review of the individual's fingerprint cards for potential criminal history information is conducted upon receipt.

PROPOSED ADDITION/COMMENT:

4.1.2 Felony Convictions

- A. Security Force personnel shall have no felony convictions involving the use of weapons and have no felony convictions that reflect on the individual's reliability.
- B. The results of a background investigation conducted on each individual prior to assignment to the Security Force may be used to determine and verify this requirement.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: The requirement to conduct a fingerprint check already exists within the Security Manual.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is a wording change and the review for potential criminal history is still being conducted as required in the Security Manual in section 5.0, Personnel Reliability. Therefore this change does not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable

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SECTION/TITLE: 2.5 Mental Qualification and 2.6 Continual Behavior Observation

- Current:**
1. 2.5 Mental Qualification and 2.6 Continual Behavior Observation were separate sections.
 2. 2.6.2 Annual mental requalification testing is not required as Security Force members are subject to an ongoing Continual Behavior Observation Program.

PROPOSED ADDITION/COMMENT:

1. 2.5 and 2.6 were combined into one section and moved to section 4.2.3 under Mental Qualifications and subsections A through E.
2. Removed statement that "Annual mental requalification testing is not required as Security Force members are subject to an ongoing Continual Behavior Observation Program."

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

- Justification:**
1. These changes are administrative in nature and do not change or delete any regulatory requirements.
 2. Annual mental requalifications remain a requirement of the Security Manual, section 5.0, Personnel Reliability. The statement itself is negative and duplicates requirements of the Security Manual. The requirements of 10CFR73, Appendix B do not include re-evaluation of security personnel's mental capacity. This is accounted for by the CBOP.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

- Justification:** These changes are administrative in nature and therefore do not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable2

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SECTION/TITLE: 2.3.2 Physical Agility Performance Test Requirements

- A. The physical agility performance test shall consist of a forty (40) yard dash and a four hundred forty (440) run, and requires completion within a given time. Officers shall be equipped with standard issue equipment i.e. Duty belt, handgun, handcuffs, and radio.
- B & C These sections were reworded, however the requirements of time, distances and conditions remain unchanged. Section D was deleted and incorporated into B and C

The sections of Course Description and Running the Course were combined into one section. All requirements of the course remain the same.

PROPOSED ADDITION/COMMENT:

4.3.2 C.1 Added "or facsimiles thereof" to the list of equipment that officers must carry.

4.3.2 Physical Fitness Qualification

- A. Subsequent to the medical examination and the written certification specified in Subsection 1.3.1, armed Security Force members shall be required to demonstrate their physical fitness to perform required security related tasks and duties.
- B. Prior to their initial assignment to duties associated with armed response and annually thereafter, each Security Force member shall be required to successfully complete the Physical Agility Performance Test specified in Subsection 4.3.2.C.
- C. Physical Agility Performance Test Requirements
- 1 Officers shall be equipped with standard issue equipment or facsimiles thereof during conduct of the test, (i.e., duty belt, handcuffs, handgun, and radio).
 2. The test should not be conducted outside in conditions of inclement weather, (i.e., snow, rain, freezing, or high temperatures, etc.), or in conditions that would jeopardize the safety of the personnel being tested.
 3. Test Description.
 - (a) The test shall be conducted in two phases. Phase 1 is required to be completed first.
 - (b) Phase 1 (40 Yard Dash):
 - (1) The course consists of a start and finish line 40 yards apart

on a flat, straight path.

- (2) The dash must be completed within 10.5 seconds or less.
- (3) After completing Phase 1, the Security Force member may take a rest period that shall not exceed one minute and 30 seconds prior to starting Phase 2.

(c) Phase 2 (440 Yard Run):

- (1) The course consists of a start and finish line 440 yards apart on a flat surface. The course may be conducted on either an oval or straight track.
- (2) The course must be completed within two minutes and 45 seconds or less.

- (d) Failure to satisfactorily complete either shall result in a failure of the physical agility performance test. When a Security Force member fails to successfully complete the test, both Phases 1 and 2 shall be completed during the retest.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification:

1. This change is administrative in nature and does not change the requirements or the contradict any regulatory requirements.
2. The use of actual duty equipment during the physical fitness test is not a regulatory requirement.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification:

1. This change is administrative in nature.
2. The use of facsimile duty equipment would be similar in shape and weight of the required actual duty equipment and the equipment itself is not an significant part of the testing. Safety to both the officer and bystanders would be increased by the use of facsimiles.

Therefore these changes do not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: These are not an alternative to any requirement, therefore this section is not applicable

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SECTION/TITLE:

Current:

2.3.1 Physical Fitness Qualification

- A. The physical agility of Armed Personnel and CAS/SAS Operators to perform assigned job duties will be identified and tested.
- B. Within 90 days, prior to physical agility performance testing, personnel will successfully pass a physical examination as required within Section 2.2

PROPOSED ADDITION/COMMENT:

Reworded and clarified when physical agility test is conducted. Moved sections C and D under performance requirements. Removed redundancy of 2.3.2 "Physical Agility Performance Test Requirements" sections A, B, and C, and combined into 4.3.2 "Physical Fitness Qualifications".

Removed requirement to conduct physical agility performance test within 90 days after medical examination.

Revised:

4.3.2 Physical Fitness Qualification

- A. Subsequent to the medical examination and the written certification specified in Subsection 4.3.1, armed Security Force members shall be required to demonstrate their physical fitness to perform required security related tasks and duties.
- B. Prior to their initial assignment to duties associated with armed response and annually thereafter, each Security Force member shall be required to successfully complete the Physical Agility Performance Test specified in Subsection 4.3.2.C.
- C. Physical Agility Performance Test Requirements
 - 1. Officers shall be equipped with standard issue equipment or facsimiles thereof during conduct of the test, (i.e., duty belt, handcuffs, handgun, and radio).
 - 2. The test should not be conducted outside in conditions of inclement weather, (i.e., snow, rain, freezing, or high temperatures, etc.), or in conditions that would jeopardize the safety of the personnel being tested.
 - 3. Test Description.

- (a) The test shall be conducted in two phases. Phase 1 is required to be completed first.
- (b) Phase 1 (40 Yard Dash):
 - (1) The course consists of a start and finish line 40 yards apart on a flat, straight path.
 - (2) The dash must be completed within 10.5 seconds or less.
 - (3) After completing Phase 1, the Security Force member may take a rest period that shall not exceed one minute and 30 seconds prior to starting Phase 2.
- (c) Phase 2 (440 Yard Run):
 - (1) The course consists of a start and finish line 440 yards apart on a flat surface. The course may be conducted on either an oval or straight track.
 - (2) The course must be completed within two minutes and 45 seconds or less.
- (d) Failure to satisfactorily complete either phase shall result in a failure of the physical agility performance test. When a Security Force member fails to successfully complete the test, both Phases 1 and 2 shall be completed during the retest.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: There are no requirements within 10 CFR 73 App. B that requires the physical agility run to be conducted within a specific amount of time after the physical examination.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (b) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: Prior to initial assignment, security personnel must continue to demonstrate their ability to complete a physical fitness test. A physical examination should identify conditions that may cause an officer to fail a physical fitness test and running the test within 90 days does not significantly ensure physical fitness. Therefore this change does not decrease the overall level

of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (b): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable

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SECTION/TITLE: 4.0 WEAPONS QUALIFICATION/REQUALIFICATION

1. All current requirements have been maintained. Section was reformatted and courses of fire have been placed into tables.
2. 4.2.1 B Fired from a distance of 3 to 25 Yards and,
3. 4.2.1. C and 4.3.1 C Fired at the B-27 full size silhouette target.
4. 4.2.2 Handgun Comhat Course. The course of fire requires that rounds are to fired in two round bursts.

PROPOSED ADDITION/COMMENT:

6.0 WEAPONS TRAINING AND QUALIFICATION

1. Administrative change
- 2/3. These sections were combined to read:

Qualification firing shall consist of 68 rounds fired on command from 3, 5, 7, 12, 15 and 25 yards at a B-27 full size silhouette target or a target of equivalent difficulty. Scoring will be as follows:
4. Remove requirement for rounds to be fired in two round bursts.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification:

1. Changes are administrative in nature and do not delete or contradict any regulatory requirements.
- 2/3. Sections were combined and the addition to use a target of equivalent difficulty is allowed in App. H, and does not delete or contradict any regulatory requirements.
4. The State of Wisconsin Department of Justice, Training and Standards Bureau, instructs personnel to fire until the threat is stopped. Appendix B does not use the word "bursts" in the manual. Therefore this change does not delete or contradict any regulatory requirements.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: The change described in number 1 above is administrative in nature. The change described in 2 above is allowed and is consistent with 10CFR73, Appendix H, Weapons Qualification Criteria.

The removal of the two round bursts is seen as an enhancement to the program and to officer safety as instructed by the State of Wisconsin Department of Justice, Training and Standards Bureau

Therefore these changes do not decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a).

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (b): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: These are not an alternative to any requirement, therefore this section is not applicable

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SECTION/TITLE: 5.0 DOCUMENTATION AND RETENTION PERIODS

Renamed and reformatted entire section and placed all requirements in subsections.

PROPOSED ADDITION/COMMENT:

7.0 DOCUMENTATION AND RECORDS RETENTION

All requirements currently approved have been maintained. Section reworded and reformatted to reduce repetativeness.

IMPACT ON EFFECTIVENESS KEWAUNEE NUCLEAR PLANTS SECURITY TRAINING AND QUALIFICATION MANUAL:

1. Yes No Does this change delete or contradict any regulatory requirements?

Justification: These changes are administrative in nature and do not change or delete any regulatory requirements.

2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10CFR73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: These changes are administrative in nature. Therefore they do not decrease the overall level of security system performance to protect with the objective of high assurance against the design basis threat of radiological sabotage.

3. Yes No For any NRC-approved Security Manual commitments as alternatives to one or more of the requirements of 10 CFR 73.55 (b) through (h): Does this change decrease the overall level of effectiveness of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1 (a)

Justification: This is not an alternative to any requirement, therefore this section is not applicable