

Indiana Michigan
Power Company
Cook Nuclear Plant
One Cook Place
Bridgman, MI 49106
616 465 5901



AEP:NRC:0995C

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DRP-58 and DRP-74

Allegation RIII-89-A-0058

Mr. A. B. Davis, Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 61037

Attn: Mr. John W. N. Hickey, Director
Division of Radiation Safety and Safeguards

Dear Mr. Davis:

This letter is in response to your request of May 17, 1989, to investigate allegation RIII-89-A-0058 which involves lost keys. The written response is contained in the attachment to this letter. The response contains no personal privacy, proprietary or safeguards information and can be released to the public and placed in the NRC Public Document Room.

This document has been prepared following Corporate and Plant Procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

A handwritten signature in cursive script that reads 'W. G. Smith, Jr.'.

W. G. Smith, Jr.
Plant Manager

Attachment

cc: D. H. Williams, Jr. .
M. P. Alexich
R. C. Callen, Lansing
G. Charnoff
NFEM Section Chief, Lansing
NRC Resident Inspector

JUN 21 1989

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PDC

Following is the response to NRC Allegation RIII-89-A-0058:

ALLEGATION RIII-89-A-0058

A young lady lost her keys for about three months, and it was never reported by Bernie Hall, working at the plant.

1. Describe incidents in which females lost security related keys including types of keys, duration of loss and final disposition of the keys.

Response

Interviews of plant security personnel and a review of plant key control records and Security Incident Reports for the past two years revealed no incidents of lost security related keys (vital and protected area keys) by females.

2. Describe how any losses of security related keys were reported to the security organization.

Response

A review of records for the past two years revealed that one incident of a lost vital area door key controlled by Radiation Protection was reported to the Shift Security Supervisor verbally by a male employee and documented on a plant Condition Report. At the time the key was lost, the two vital area doors associated with the lost key were being manned by security personnel for purposes not related to the lost key. Locks on the doors were changed by security prior to security officers leaving the doors.

The lost key was found in the pocket of anti-contamination clothing by contractor personnel the day following the lock change and returned immediately to security.

3. Provide analysis of the handling of incidents of lost keys by females, including NRC reporting requirements.

Response

As indicated in the response to item number 1, an investigation revealed no incidents of lost or misplaced vital or protected area keys by females. It was noted, however, that one incident of a lost key by a female occurred on September 1, 1987. The

lost key was associated with the fire protection cardox system and had no security related significance. There is no recorded indication that the key was ever found and returned.

4. Provide a description and analysis of any deficiencies you may have identified in your program or performance and corrective actions taken or planned.

Response

No deficiencies in the existing key control program were identified as a result of this investigation. A review of existing administrative controls determined that current key control practices provide high assurance that an attempt to conceal the loss of vital or protected area keys would be detected by security and/or plant personnel and reported to security.

SUMMARY

An extensive investigation involving numerous manhours was conducted to determine if there was any substance to this allegation. The investigation involved a review of all security incident reports from January, 1987, to present; a review of vital and protected area key records from June, 1986, to present; a review of the current revision of Plant Procedure 12 PMP 2060 SEC. 001, "Lock, Key and Magnetic Key Card Control"; interviews with licensee security staff personnel and briefings of all security shift personnel to explain the allegation and request any officer with knowledge of lost keys regardless of the key's security significance to contact the contract security supervisor. No new information from security personnel regarding lost keys has been forthcoming as a result of that request.

12