Consumers Power

Thomas J. Paimisano Plant General Manager

MICHIGAN'S PROGRESS Palieades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

April 3, 1995

Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT PHYSICAL SECURITY CONCERNS AT PALISADES

In a letter dated February 8, 1995, the Nuclear Regulatory Commission (NRC) provided information concerning Palisades security activities and requested that we complete a review of the identified issues in order to determine the facts and to evaluate their safety and security significance.

The NRC also requested that: 1) this review be completed by personnel in an organization independent from the plant contract security organization, 2) the results of the review and disposition of this matter be submitted to Region III within 30 days of the date of the NRC request, and 3) that, if possible, our response contain no personal privacy, proprietary, or safeguards information so that it can be released to the public and placed in the Public Document Room. In a subsequent telephone conversation with Mr. Roy Caniano Chief, Reactor Support Programs Branch, we received an extension to defer our results submittal.

The independent review has been completed. The review team consisted of two Consumers Power personnel, one from the security group and one from Human Resources. The investigation included a review of records and interviews with selected contract security personnel and involved Consumers Power personnel. Of the five allegations, one was found to be of some merit and the other four were found to be without merit. The conclusion of the review are summarized below and contain no personal privacy, proprietary, or safeguards information:

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Security Concern 1:

This concern related to an alleged failure of a Security Shift Supervisor to report an incident between two security force members.

Investigation found evidence of an incident occurring between the two named security force members. Investigation also found the incident was not reported to the Security Shift Supervisor. An earlier investigation concluded that the incident was probably not reported to the Supervisor when it occurred. The earlier investigation report was submitted to the Nuclear Regulatory Commission as an attachment to a letter dated February 15, 1995.

The concern was not validated and no further action was taken.

Security Concern 2:

This concern alleged "atypical" behavior by a Security Supervisor.

Consumers Power was first notified of this concern on January 5, 1995. The earlier investigation also examined the concern about the Security Shift Supervisor in question. The earlier investigation did not verify the concern and no further action was taken. A tape-recorded interview with the Security Shift Supervisor and a transcript of that interview has been prepared and is available in the Consumers Power Legal Department in Jackson. However, this information is of a confidential nature and is not included in this report.

This concern was not validated and no further action was taken.

Security Concern 3:

This concern involves alleged inaction by a Security Shift Supervisor after receiving a written report of "atypical" behavior by another Security Officer.

This concern was validated by the investigation. The written appraisal should have prompted a more thorough evaluation of the Security Officer's behavior. Disciplinary action was taken at the time on one item included in the appraisal. There were no identified actions or occurrences that would have constituted violations of the Plant Security Plan, Suitability, Training and Qualification Plan, Plant Implementing Procedures, or Corporate Controls.

The Security Officer, whose behavior was questioned in the written appraisal, has been terminated. Due to personal privacy concerns a more detailed discussion of the termination is not included in this report.

Consumers Power will assure the contract security force Supervisors undergo Supervisor Skills Training to improve Supervisor's ability to evaluate employee behavior. This training will be completed by June 30, 1995.

Security Concern 4:

This concern involves alleged failure of a Security Shift Supervisor to check a Security Officer on post.

Investigation found that the Security Shift Supervisor does check on the Security Officer when that officer is on post. The conclusion was based upon interviews with the security employees named in the concern and other security employees who work the same shift.

The concern was not validated and no further actions were taken.

Security Concern 5:

The concern involved an allegedly not qualified or proficient Security Officer.

Investigation reviewed the qualifications and proficiency of the Security Officer. The investigation verified the qualifications based upon successful completion of all initial qualification testing and critical task evaluations which were performed during the time the Security Officer worked as an armed officer. The perception was that this officer was not as proficient as other officers but the investigation did not confirm an unacceptable level of proficiency in comparison to other officers. The officer's employment was ended in November 1994 for reasons not related to performance or critical tasks.

This concern was not validated and no further actions were taken.

SUMMARY OF COMMITMENTS

This letter contains one (1) new commitment. That commitment is for the contract security force to conduct Supervisor Skills Training to Security Supervisors. This training will be completed by June 30, 1995.

Thomas J. Palmisano Plant General Manager

CC Administrator, Region III, USNRC NRC Resident Inspector - Palisades