



WISCONSIN PUBLIC SERVICE CORPORATION

800 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

November 21, 1991

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Response to Security Concern AMS No. RIII-91-A-0056

Reference: 1) Letter from C.E. Norelius to K.H.Evers dated September 17, 1991

In AMS No. RIII-91-A-0056 the U.S. Nuclear Regulatory Commission (NRC) received information concerning activities at the Kewaunee Nuclear Power Plant (KNPP). In reference 1, Wisconsin Public Service Corporation (WPSC) was requested to review and disposition this matter and submit the results within 60 days. Enclosed in attachment 1 are the results of our investigation into these concerns. As a result of our investigation WPSC has concluded that the concerns identified in reference 1 are unfounded.

Sincerely,

A handwritten signature in cursive script that reads "C. A. Schrock".

C. A. Schrock
Manager - Nuclear Engineering

DJM/jms

Attach.

cc - US NRC - Region III

Mr. Patrick Castleman, US NRC

5003
11

ATTACHMENT

To

Letter from C. A. Schrock (WPSC) to Document Control Desk (NRC)

Dated

November 21, 1991

NRC COMMENTS

AMS No. RIII-91-A-0056

Region III recently received concerns regarding the security program at the Kewaunee Nuclear Station. The concerns are:

1. Security Officers are frequently required to work double shifts, without cause, and at times have felt they were unfit for duty due to fatigue.
2. The Supervisor's fitness-for-duty evaluation checks of officers held over are insufficient and have not been thorough enough to adequately determine if an officer was fit-for-duty. Officers have been required to work when they were tired and may not have been attentive to duty.

WPSC RESPONSE

WPSC initiated an investigation of these concerns to determine their validity. In order to ensure a complete review, the scope of this investigation was expanded to include all security force personnel overtime hours and not only security officer overtime. Additionally, the investigation included a review for both 16 consecutive hours of work within a 24 hour work period and 16 non-consecutive hours of work within a 24 hour work period. Furthermore, if the concern was valid the investigation was to determine the bases or cause for the overtime, whether the overtime was mandatory, and finally what guidance exists to govern overtime and was this guidance followed.

Response to Concern 1

The investigation which was conducted included a records review for the period of January 1, 1991 through July 31, 1991. The applicable records reviewed were:

1. Payroll records.
2. Daily shift status reports compiled by the Operation Shift Captain their respective line supervisors, or both
3. Time card cross reference for clarification of those times when 16 hours may have been recorded within a 24 hour work period and the payroll report or shift status report did not clearly indicate if the 16 hours were consecutive or otherwise.
4. Burns Security Consolidated and Revised Fitness For Duty Policy.
5. Security Force Collective Bargaining agreement.

The results of the investigation revealed that for the period of January 1, 1991 through July 31, 1991 there was only one occasion, (July 20, 1991) in which any member of the security force worked 16 consecutive hours. The reasons associated with this event include:

1. The individual worked a normal eight hour shift.
2. There was a sick leave call-off from the oncoming shift.
3. There were no volunteers on shift to cover the call-off.
4. The individual was the lowest person on-shift in equalized overtime.
5. In accordance with the bargaining unit agreement the individual was mandatorily held over an additional 4 hours.
6. On-shift supervision attempted to contact additional security force personnel for early relief of the individual. All attempted contacts were unsuccessful.
7. In accordance with the bargaining unit agreement, the individual was unable to be relieved and therefore was required to remain another 4 hours.
8. The on-shift Operations Captain performed a fitness-for-duty evaluation of the individual within the thirteenth hour of work, in accordance with the Burns Security Consolidated and Revised Fitness-For-Duty Policy.
9. The individual was determined to be fit to continue his duties and the evaluation and determination were documented on a Burns Security Routine Report Form.
10. After the twelfth hour the individual was assigned to posts and activities, (over 3 hours in the Security Building), in which other members of the Security Force were capable of observing him.

The evaluation period of January 1, 1991 through July 31, 1991 consists of 212 working days for security and is equivalent to a time frame of greater than 71,000 man hours.

The second part of the investigation was to determine whether security officers were required to work 16 non-consecutive hours within a 24 hour work period. The investigation determined that in addition to the one occasion on July 20, 1991, there were 14 additional occasions in which security force personnel worked 16 non-consecutive hours within a 24 hour work period. However, on all 14 occasions the individual volunteered for the overtime. On each of these occasions the individual had 8 hours off after working a maximum of 12 consecutive hours and prior to accumulating the 16 hours. The reasons for the overtime on these 14 occasions included refueling outage support, training needs, vacations by other security officers, and the creation of two new positions and subsequent promotion of personnel into these positions.

WPSC has reviewed the guidance used by the Security Contractor to govern overtime of Security Officers. The guidance is the Burns Security Consolidated and Revised Fitness

For Duty Policy which states:

No employee shall work more than 16 continuous hours in a 24 hour period of time, nor more than 24 hours in a 48 hour period of time, nor more than 72 hours in a 7 day work period.

This Policy dictates the maximum overtime allowable (excluding emergency or major maintenance situations), for security personnel at the Kewaunee site. In addition, more restrictive guidance is found within the Security Force Collective Bargaining Agreement (Article XXVI) which sets the 7 day maximum at 64 hours. For consistency and uniformity the bargaining unit agreement of 64 hours is used to the greatest extent practical in governing overtime hours for the entire security force.

Finally, the investigation into whether the guidance was followed for the July 20, 1991 event will be included in response to concern 2.

In conclusion, this investigation determined that no violation of the Burns Fitness For Duty Program occurred and that the Burns program does meet the NRC guidance on overtime. The investigation also confirmed that a security officer was required to work 16 consecutive hours on only one occasion. The reasons associated with this occurrence were previously provided. On 14 different occasions security officers worked 16 non-consecutive hours within 24 hours. However, on all 14 occasions the individual voluntarily requested the overtime, and had 8 hours off after working a maximum of 12 consecutive hours and prior to accumulating the 16 hours. Since the individuals involved on all 14 occasions did not exceed 12 consecutive hours of work, a documented Fitness For Duty evaluation was not performed. However, the continuous supervisory evaluation was in effect. The documentation resulting from this investigation is on file at the KNPP.

Response to Concern 2

The investigation into this concern included a review of the Fitness For Duty Training provided to Security Officers and Security Supervisors, documentation indicating Security Officer's have requested relief or reassignment of duties due to fatigue, and finally the adequacy of the evaluation performed on the Security Officer who worked 16 consecutive hours on July 20, 1991.

In accordance with the requirements of 10 CFR Part 26, the KNPP developed a continuous behavior observation program (CBOP)/fitness for duty program. This program established that all individuals badged for access to the KNPP should be trained and knowledgeable to the supervisory level and ability. The CBO program (as emphasized in training), specifically identifies the employee's responsibility to report any actual Fitness For Duty concern they may be experiencing or observe in others.

As part of initial indoctrination training, all security force personnel are provided a copy of the Burns Security Consolidated and Revised Fitness For Duty Policy. All security force personnel also receive revisions to this policy as they are implemented. This policy identifies the responsibility for each member of the security force on criteria and issues associated with Fitness For Duty, and the ten primary factors which form the minimum bases for a Fitness For Duty Evaluation. Through observations, questions and answers, relevant to these ten factors a supervisor is capable of making a reasonable determination of an individual's Fitness For Duty.

As part of the investigation an evaluation was made of the security force indoctrination and CBO training programs provided during the investigation period. It was verified that these programs provide training to specifically address individual fatigue and stress. The training also addresses the responsibility of all badged personnel at the Kewaunee site to report any situations they observe or are personally involved in which may have an impact on Fitness For Duty. It was determined that sufficient training is incorporated into these programs.

Since all security force personnel are trained and provided with written guidance on behavioral observation, a records review was performed to determine the number of reports submitted relative to security force personnel being fatigued. There was no documentation found which indicated a security force personnel reported being fatigued or that any fatigue was observed in others.

Finally, a review of the available information was performed to determine whether an adequate evaluation was performed of the July 20, 1991 event involving the individual who worked 16 consecutive hours. This review included conducting interviews with

management and supervisory personnel, and reviewing the Fitness For Duty evaluation performed for the individual and documented on a Burns Security Routine Report Form. This review concluded that no evidence could be found to substantiate that the July 20, 1991 Fitness For Duty evaluation was inadequate. However, during the interviews which were conducted as part of this review a potential weakness was identified involving inconsistent and non-uniform applications of the listed factors between supervisors required to evaluate future Fitness For Duty events.

Based upon the potential for future non-uniformity or inconsistent applications of Fitness For Duty evaluations, it was decided to formalize the evaluation process into a separate procedure. This new procedure will require documentation of the evaluation factors utilized, a review and acknowledgment by the evaluated individual, a review of the past and projected work schedules for the individual including the posting from the current shift, and lastly will provide a summary report of the evaluation.

In summary, this investigation has determined that sufficient training is being provided to the security force personnel on the criteria and issues associated with Fitness For Duty. In addition, the training specifically addresses concerns involving individual fatigue and stress. A review of the information concerning the July 20, 1991 event involving the individual who worked 16 consecutive hours was determined to be adequate. A potential weakness involving non-uniform or inconsistent applications of Fitness For Duty evaluations was identified and is being addressed with appropriate procedure changes. This procedure should be issued prior to the end of December, 1991.

Finally, a program has been developed which will provide a mechanism in which employees can express their concerns about any issue. This program is intended to open avenues for quick reviews by personnel empowered to create changes. It is hoped that these type of issues can be resolved through the use of this program.