

JUN 28 1982

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MEMORANDUM FOR: Darrell G. Eisenhut, Director
Division of Licensing, NRR

FROM: Robert F. Burnett, Director
Division of Safeguards, NMSS

SUBJECT: SAFEGUARDS REGULATORY EFFECTIVENESS REVIEW OF KEWAUNEE
NUCLEAR POWER STATION

Pursuant to its FY82 PPG commitment for Regulatory Effectiveness Reviews (RER), the Division of Safeguards will conduct an RER at Kewaunee Nuclear Power Station during the last week of July.

The purpose of the Commission-approved RER program is to assure that power reactor safeguards programs, as implemented in accordance with NRC-approved plans and regulations, actually provide the level of protection intended. The staff has completed its field tests of the RER methodology and is now ready to formally initiate the program.

Kewaunee was selected as our first operational site because: (1) it is ready for review in terms of meeting licensing and inspection prerequisites; (2) its vital area analysis, which is the starting point for our review, has been completed and documented by LANL; and (3) the safeguards staff has completed the pre-assessment requirements for a review of this site.

In order to meet our commitment of two RER's by the end of the FY82 and to accommodate scheduling constraints that affect our review team, arrangements for the Kewaunee RER in late July must be expedited. We therefore request that you promptly notify the licensee of our impending visit. A suggested letter is enclosed. Consistent with current staff practice, any recommendations arising from this review will be coordinated with NRR and Region III before being proposed as license amendments or rules.

[Handwritten signature of Robert F. Burnett]

Robert F. Burnett, Director
Division of Safeguards, NMSS

Enclosure:
As stated

cc: J. Miller, Region III

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| DATE | 6/25/82 | 6/25/82 | 6/25/82 | 6/25/82 | | |

Docket No. 50-305

Mr. Eugene R. Matthews, Vice President
Power Supply and Engineering
Wisconsin Public Service Corporation
P. O. Box 1200
Green Bay, Wisconsin 54305

Dear Mr. Matthews:

The NRC has begun a program to conduct safeguards regulatory effectiveness reviews at nuclear power reactor facilities. I wish to notify you that a review team plans to visit Kewaunee Nuclear Power Station during the week of July 26-30, 1982. An NRC Safeguards Division representative will contact Mr. Dave Sauer of your staff to ascertain whether the plant is scheduled to be operational that week and to provide more detailed information concerning team composition.

The purpose of the review program is to evaluate NRC's safeguards requirements for sabotage protection and the degree of protection they actually provide once implemented by the licensee. The review is independent of NRC's licensing and inspection functions, although a regional representative may participate as an observer.

The makeup of the review team and its overall plan of action is as follows. The six-person team consists of two groups: one looking at Kewaunee's safeguards from the perspective of a single insider and the other looking at them through the eyes of an external adversary group of several persons. Prior to arriving onsite, the team will have participated in a preliminary review focusing on the Los Alamos National Scientific Laboratory vital area analysis of Kewaunee, plant drawings, vital component locations, and the security plan.

The first day onsite begins with an entrance briefing, which includes the showing of an audio-visual on the regulatory effectiveness review program to appropriate station personnel. A representative from your corporate staff might be interested in attending this session as it will provide, in a

capsulized form, insight into the overall program and our activities at Kewaunee. Any questions that may arise concerning our review technique or other matters will be addressed at this time. For the remainder of the first day, we would like to undertake a plant orientation tour with emphasis on safeguards areas and systems and begin our examination of plant vital areas.

Days two through four will be dedicated to completing the review of vital areas and components, and reviewing the security force, access control system, and physical security system. The last day will be reserved for any activities the team has been unable to accomplish earlier in the week and for a briefing of station and corporate personnel on the preliminary results of the review.

Station personnel whose support the team would like to have during its visit include a reactor operator, an instrument technician, an electrician, and a security officer. We realize, of course, that operational requirements will dictate the availability of such personnel. The team will make every effort to schedule its activities so as to minimize the operational impact of its visit. The time the teams will spend onsite will vary each day, but, generally, will range from four to seven hours including a lunch break.

If you have any questions concerning the conduct of these regulatory effectiveness reviews, please contact Mr. George McCorkle, Chief, Power Reactor Safeguards Licensing Branch, Division of Safeguards, (301) 427-4018.

Sincerely,