

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-305
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Report No. 50-305/98015(DRS)

Licensee: Wisconsin Public Service Corporation

Facility: Kewaunee Nuclear Power Plant

Location: RR #1, Box 99
Kewaunee, WI 4216

Dates: August 31 - September 4, 1998

Inspector: J. Belanger, Senior Physical Security Inspector

Approved by: James R. Creed, Chief, Plant Support Branch 1
Division of Reactor Safety

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EXECUTIVE SUMMARY

Kewaunee Nuclear Plant
NRC Inspection Report 50-305/98015

This routine inspection included a review of the security procedures and documentation, security and safeguards staff knowledge and performance, security and safeguards staff training and qualification, security organization and administration and quality assurance in security and safeguards activities. The inspection also included a review of corrective actions on a violation involving the protection of safeguards information and two open items from the previous security inspection. The report covers a five day inspection by one regional inspector. No violations of the NRC-approved security plan were identified.

- The NRC identified a potential concern regarding the large number of hand-wand searches required of those individuals processing through the metal detectors in the gatehouse. The high number of personnel searches increased the possibility of an individual not being searched. Corrective action was taken. (Section S1.1)
- Management supported the security computer replacement project. (Section S2.1)
- The NRC identified a lack of process to document corrective actions taken to resolve weaknesses identified during tactical force-on-force drills. (Section S4.1)
- Training records reviewed for newly hired security personnel were complete and accurate and personnel were critical task-certified prior to assuming job positions. Response to QA audit findings and resolution of identified deficiencies in the administration of the training program was aggressive and effective. (Section S5.1)
- The quality assurance staff effectively evaluated the training and qualification program (T&Q), and identified problems relating to the administration of the T&Q program. (Section S5.1)

Report Details

IV. Plant Support

S1 Conduct of Security and Safeguards Activities

S1.1 Protected Area Access Control of Personnel

a. Inspection Scope (IP 81700)

The inspector observed personnel search activities on September 1-3, 1998, to verify that the licensee had positive controls in place to assure that only authorized individuals were granted access to the protected area; that personnel and hand-carried items entering the protected area were properly searched; and that the last person controlling access to the protected area was in a position to implement this function effectively.

b. Observations and Findings

The inspector observed a large number of hand-wand searches that were required because of metal detector alarms. Security officers performed an average of twenty hand-wand searches between the hours of 6:30 a.m. and 7:00 a.m. these three days because of alarms caused by the wearing of safety shoes. Discussions with licensee management indicated that they had instituted a safety shoe policy in certain areas of the plant on August 1, 1998. The number of hand wand searches had been about an average of sixty per day and after adjustments to the equipment had been made were reduced to the twenty observed by the inspector. The inspector observed up to three people at any one time waiting to be searched. Licensee management indicated that they encouraged the staff to leave their safety shoes onsite or carry them to work. The inspector noted that the high number of searches occurring at the same time in the limited search area had the potential to create confusion and the possibility of an individual not getting searched, especially during outages. The inspector observed that the same individuals alarmed the metal detectors each day. Subsequent to the inspection the licensee prohibited persons wearing safety shoes from entering the plant during rush periods. The number of required wand searches was reduced to about two per day.

c. Conclusions

The high number of personnel searches increased the possibility of an individual not being searched. The licensee took effective corrective action.

S2 Status of Security System and Facilities

S2.1 Security System Upgrade Project

a. Inspection Scope (IP 81700)

The inspector discussed the licensee's on-going project to replace the existing security computer system.

b. Observations and Findings

Discussions with the Security Director showed that the licensee developed and issued specifications for a new security computer system. The licensee selected a vendor and issued a purchase order. The Security Director indicated that installation is scheduled for Spring 1999 prior to the commencement of their steam generator replacement project. The inspector's review of the schedule, which detailed tasks and milestones, showed that the project was on schedule. The inspector's review of correspondence associated with the project showed close cooperation and communication between the licensee and the vendor.

c. Conclusions

The inspector concluded that management supported the security computer replacement project, and the project was on schedule.

S4 Security and Safeguards Staff Knowledge and Performance

S4.1 Weakness in Documenting Corrective Actions to Identified Drill Deficiencies

a. Inspection Scope (81700)

The inspector reviewed the critiques from the tactical response drills conducted since the last inspection. (Note: No drills were conducted during this inspection)

b. Observations and Findings

Tactical response force-on-force drills were normally conducted quarterly. The inspector's review of a sample of the previous drill documentation showed that the critiques well documented the description of the results and actions of the responders and adversaries and identified areas of concern. However, the corrective actions taken to address identified weaknesses and areas of concern were not documented. Consequently, the inspector found it difficult to assess the corrective actions taken or planned. Additionally, the licensee was not able to track or trend corrective actions.

The inspector's discussions with the Security Director showed that corrective actions were taken to address specific areas of concern but that these actions were not documented. The Security Director acknowledged the importance of documenting

corrective actions and indicated that they would add these areas of concern to the security organizations tracking and trending of open items program.

c. Conclusions

Drill critiques were effective in identifying weaknesses. Assessment of the effectiveness of corrective actions by the licensee to address identified issues developed during tactical response drills was difficult because such actions were not documented. Trends could not be tracked. The licensee agreed to document corrective actions identified during future drills.

S5 Security and Safeguards Staff Training and Qualification

S5.1 Security Training Program was Effectively Implemented

a. Inspection Scope (IP 81700)

Initial qualification files for four newly-hired security personnel and requalification files for nine randomly selected veteran members were reviewed. The inspector toured various security posts, conducted post interviews, and observed performance of duties. Security event logs and other records pertaining to security force performance were also reviewed.

b. Observations and Findings

Significant effort had been expended within the past six months to strengthen the administrative aspect of the training program. The effort was in response to Quality Assurance audit findings that there was no guidance for developing and maintaining training materials, and the condition of the lesson plans was poor. QA identified that in all but a handful of cases, the documents lacked an effective date, an indication of who authored the documents, and signatures of review and approval. Additionally, a number of lesson plans had not been word-processed and consisted of only handwritten notes, copies of unidentified documents and photocopies of magazine articles. Changes to lesson plans were made without an author's or reviewer's signature or a date to indicate when the changes were made.

The training staff, assisted by members of the security organization, developed/revised policies which documented the security training program. These policies adequately documented the implementation of the training program. The staff also revised the lesson plans to address the QA findings.

No deficiencies were noted during the review of security force training and qualification records. The inspector confirmed that the personnel were qualified in the appropriate job related critical tasks prior to being formally assigned to shift assignment positions. Personnel fulfilling job positions requiring physical examinations, physical fitness testing and the use of firearms had completed the necessary requirements prior to assignment to these positions. Requalifications were accomplished on a timely basis.

c. Conclusions

Training records reviewed for newly hired security personnel were complete and accurate and personnel were critical task certified prior to assuming shift job positions. Response to QA audit findings and resolution of identified deficiencies in the administration of the training program was aggressive.

S7 Quality Assurance in Security and Safeguards Activities

S7.1 Security Program Reviews

a. Inspection Scope (IP 81700)

The inspector reviewed the licensee's audits and reviews performed of the physical security program to verify compliance with the requirement in the security plan for a review of the security program every twelve months. The inspector also reviewed the self-initiated performance evaluations conducted by the security staff.

b. Observations and Findings

The inspector reviewed Quality Assurance Audit Report 97-003 dated February 24, 1998, which was conducted January through December 1997. The audit adequately addressed security plan implementation. The inspector also reviewed Quality Assurance Audit Report 97-005 dated March 30, 1998, performed between October 30, 1997 and December 1, 1997, which addressed the training and qualification program. As previously noted in Section S5.1, the audit of the training and qualification program was effective in identifying weaknesses in the administration of the training program. Specifically, weaknesses were identified in the guidance documents governing training department policies and lesson plans. The inspector considered the audit conducted of the lesson plans to be particularly aggressive and professional. A member of the licensee's training department assisted in the QA effort.

The Security Department recently initiated a self-assessment program which was described in General Security Department Policy SDP-31 dated June 12, 1998. Three self-assessments had been conducted to date. The topics included duress alarms and gatehouse lockout. The topics were limited in scope and designed to give the participants some experience in the self-assessment and in the documentation process. The inspector's review of the reports showed that the topics were thoroughly analyzed and well documented.

c. Conclusions

The QA program was effective in identifying significant administrative issues relating to the administration of the training department's implementation of the training and qualification program. Assessment of the security program improved with the initiation of a self-assessment program within the security department.

S8 Miscellaneous Security and Safeguards Issues

- S8.1 (Closed) Follow-Up Item 50-305/97014-01: The licensee's drill program to evaluate the effectiveness of required package searches did not include the searches conducted at the warehouse location. Discussions with the security director and a review of documentation showed that the licensee revised their drill program to include the warehouse facility on a quarterly basis. The licensee initiated the program in the second quarter of 1998. This weakness in the licensee's self-assessment program has been corrected and is closed.
- S8.2 (Closed) Follow-Up Item 50-305/97014-02: This item was opened to track the licensee's submission of a security plan change to allow for slight variations in the nominal height of the protected area barrier fence. Inspection showed that Revision 11, submitted by the licensee on August 8, 1998, addressed this issue. The item is closed.
- S8.3 (Closed) Violation 50-305/98003-01: This item related to failure to properly secure safeguards information stored in a security container located outside the protected area. The Security Director or his administrative assistant reviewed the safeguards information program requirements with all personnel allowed access to or have the potential for generating safeguards information. The review included control of cabinets and combinations, the proper handling of material, the generation of potential safeguards information, and what steps to take if questions arise. The completion of this corrective action was documented in a letter to file dated February 6, 1998. The Security Director also counseled the two employees involved in the event. This violation is closed.
- S8.4 (Closed) Security Event Report 1998-SO2-00: Safeguards Material Control Compromised: Safeguards Information was stored in an unqualified cabinet outside the protected area. The event was caused by a misunderstanding of the classification of the material in that the personnel in control of the cabinet thought that the material was security sensitive but not safeguards. The event did not result in a compromise of the security plan. Upon identification, the material was immediately controlled in accordance with established procedures. The event constituted a violation of 10 CFR 73.21. The violation and corrective actions are described in Section S8.3.

X1 Exit Meeting Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on September 4, 1998. The licensee acknowledged the findings presented. The licensee did not identify any information discussed as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

R. Falvey, Training Director
J. Fletcher, Security Director
B. Presl, Project Manager, The Wackenhut Corporation
K. Weinbauer, Manager, Kewaunee Plant

NRC

J. Lara, Senior Resident Inspector
P. Simpson, Resident Inspector, Point Beach Nuclear Plant

INSPECTION PROCEDURES USED

IP 81700 Physical Security Program for Power Reactors

LIST OF ITEMS OPENED, CLOSED, OR DISCUSSED

Opened

None

Closed

50-305/97014-01	IFI	Lack of method to assess effectiveness of warehouse searches
50-305/97014-02	IFI	Security Plan change needed to address minor variations of PA barrier height
50-305/98003-01	VIO	Failure to properly secure safeguards information

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
DRS	Division of Reactor Safety
IFI	Inspection Follow Up Item
IP	Inspection Procedure
QA	Quality Assurance

LIST OF DOCUMENTS REVIEWED

Quality Assurance Audit Report No. 97-003 dated February 24, 1998

Quality Assurance Audit Report No. 97005 dated March 30, 1998

Security Training Department Policy, "Security Training Program", STDP-01 dated July 15, 1998

Security Training Policy, "Security Qualification Program" dated July 15, 1998

General Security Department Policy, SDP-31, "Self-Assessment Program" dated June 12, 1998

Security Event Logs, September 1997 through August 1998