

U.S. NUCLEAR REGULATORY OPERATIONS
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

RO Inspection Report No. 070-1193/75-07

Licensee: Kerr-McGee Nuclear Corporation
Kerr-McGee Center
Oklahoma City, Oklahoma

License No. SNM-1174
Priority: I

Cimarron Facility, Pu Plant
Crescent, Oklahoma

Type of Licensee: SNM

Type of Inspection: Unannounced Physical Protection

Dates of Inspection: May 20-22, 1975

Lead Inspector: *J. F. Donahue*
J. F. Donahue

6/9/75
(Date)

Accompanying Inspector: *J. W. Devlin*
J. W. Devlin, IE: I

6/9/75
(Date)

Reviewed By: *J. A. Hind*
J. A. Hind, Chief
Materials and Plant
Protection Branch

6/1/75
(Date)

Attachment:
Findings (10 CFR 2.790 Information)

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SUMMARY OF FINDINGS

Enforcement Action

The following items of noncompliance were identified during the inspection:

Violations: None

Infractions

1. Contrary to 10 CFR 70.32(e), a change was made in the approved security plan which would decrease its effectiveness and prior approval for this change was not solicited or received from NRC. ~~X~~ This change related to the replacement of the combination lock on the door of the material storage vault with a key lock ~~X~~ (See Page No. 13, Report Details)
2. Contrary to 10 CFR 73.2(m) and 3.7.1 of the approved security plan, the ~~X~~ lock on the door of the material storage vault is a key-lock mechanism rather than a combination lock as specified in the regulations and as described in the security plan ~~X~~ (See Page No. 34, Report Details)
3. Contrary to Section 5.6 of the approved security plan ~~X~~ Only one formalized drill of the security organization was conducted whereas the plan calls for conducting of quarterly drills including preparation of outline, evaluation of response and management review of written results. Also an annual report of all drills and summarization of results has not been completed and circulated to corporate management for review ~~X~~ (See Page No. 43, Report details)

Deficiencies: None

Licensee Action on previously identified matters:

An IE:III inspection of SNM in Transit conducted during the period of February 18-22, 1975 developed one infraction and six deficiencies. These items of noncompliance were contained in an IE:III letter dated March 19, 1975 which was responded to by Kerr-McGee on April 8, 1975. The items of non-compliance licensee response and current inspection findings on these items are as follows:

IE:III Letter dated March 19, 1975

Infraction:

Contrary to 10 CFR 73.31(b), during a shipment of SNM from Crescent, Oklahoma to Richland, Washington on July 20-24, 1974, the ~~X~~ radiotelephone ~~X~~ in the transport

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IE:III Copy No. ____ of ____

tractor was inoperable for the outbound portion of the round trip. The required communication was met by the ~~radiotelephone~~ in the escort vehicle and/or by pay-telephone calls.

K-M Response dated April 8, 1975

~~Radio telephones~~ in the transport tractor and the escort vehicle shall be operational upon departure from terminal, pick-up points and unloading points. Should failure of equipment occur between any of these points, the back-up system shall be utilized until such time as safety permits the delay for repairs.

This incident has been checked with and was concurred by Tri-State Motor Transit Company. Kerr-McGee was, however, not aware of the situation at the time.

Kerr-McGee shall verify equipment operations prior to departure from Cimarron Facility beginning with the next shipment.

Inspection Findings

The licensee generated procedure K-M-NP-22-13 on April 14, 1975 titled "Security Requirements Prior to Release of Carrier for Delivery and Carrier Performance." This procedure assigns responsibility to the Kerr-McGee Security Officer and/or his designated alternates to use a check list to verify carrier requirements and records covering call-in log, enroute list of telephone numbers, emergency notification numbers, communications operability, scheduled routes, trailer seals and numbers and certification of guard qualifications. Included in this procedure are such items as confirmation of shipment by telephone and TWX to the consignee, carrier logs, performance of quarterly audits of carrier performance, semi-annual reports of shipment interception and inspection and annual summary report to Kerr-McGee management regarding carrier performance.

The security officer produced records showing that for shipments which took place on March 11-13, and April 22-26, 1975 communications equipment was verified as operable before the shipments left the Kerr-Gee site. All other facets of carrier performance and appropriate records were also checked. The checklist was used for the latter shipment. IE:III has no further questions on this item.

IE:III Letter dated March 19, 1975

Deficiencies:

1. Contrary to Licensing's Modification No. 3 to the Tri-State SNM Security Transportation Manual at Page 3, Section V, Paragraph 5, entitled ~~"Firearms Training,"~~ only one of eight driver/guards has requalified within the six month requirements. ~~7~~

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K-M response dated 4/8/75

1. Documentation has been requested from Tri-State Motor Transit Company to assure that each driver/guard used by Tri-State in the transport of our SNM is currently qualified. Each driver/guard shall be queried as to their qualification prior to each departure. Departure shall not be allowed unless qualified. Qualifications were verified by Tri-State on March 7, 1975.

Inspection Findings

Verbal confirmation of the driver/guards qualification with firearms was received and documented by Kerr-McGee on March 7, 1975. Also verbal assurances were received on qualifications prior to the March 11 and April 22, 1975 shipments. It is noted that written verification of driver/guard qualifications for the seven previously nonqualified personnel was provided to J. A. Hind of IE:III By Tri-States letter dated April 3, 1975, copy of which was provided to Kerr-McGee. The Kerr-McGee security officer provided assurances that he will personally review Tri-States qualification records during his next quarterly audit at Tri-States headquarters in Joplin, Missouri.

IE:III has no further questions on this item.

IE:III Letter dated March 19, 1975

2. Contrary to Section 5.5.7 of the Kerr-McGee Transportation Security Plan dated February 22, 1974, and approved by Licensing on March 25, 1974, a quarterly audit at Joplin, Missouri of the Carrier's (Tri-State) performance was not performed until August 7, 1974 although the first audit was due to have been conducted on or before June 25, 1974.

K-M response dated April 8, 1975

2. Quarterly audits have been conducted in a timely manner since August 7, 1974.

Inspection Findings

The last audit performed at Tri-State headquarters by Fred Welch, Kerr-McGee Security Officer was February 19, 1975. Another audit for the next quarter was tentatively scheduled for the week of May 28, 1975.

IE:III has no further questions on this matter.

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[REDACTED]

IE:III Letter dated March 18, 1975

3. Contrary to Section 5.5.7, Paragraph 2, of the Kerr-McGee Transportation Security Plan dated February 22, 1974, and approved by Licensing on March 25, 1974, an in-transit shipment of SNM was not intercepted at a planned stop by Kerr-McGee representatives to examine the drivers procedures and records during the committed-to-six-month interval. No such interceptions have been performed since approval of the Transportation Security Plan.

K-M response dated April 8, 1975

3. The regulation indicates that the truck during a shipment must be intercepted at a planned stop. The stop is, however, not defined. We have in the past, defined this stop as the Cimarron Facility. As in the following two discrepancies, a formal record of the required record check was not made, although this check was completed.

In order that our operation is adequately described in the Transportation Security Plan, without decreasing the security, the plan will be revised to perform a check of the records every three months and audit the calls to Tri-State during the quarterly audit.

Inspection Findings

According to Messrs. [Janka, Adkisson] and [Welch] it is Kerr-McGee's position that audits performed before a shipment is dispatched and at the time a return shipment is received at the Kerr-McGee site suffice to meet the intent of the security plan commitment. On April 25, 1975, [Janka] requested [W. J. Shelley] Director of Regulation and Control for Kerr-McGee, to revise the security plan to clarify the surveillance commitment and submit the revision to Licensing. It was determined that [Shelley] has not submitted any revisions to Licensing to date for the reason that the Kerr-McGee position does not decrease the effectiveness of the security plan. It is planned however, to notify Licensing of the Kerr-McGee position on in-transit audits.

It should be noted that IE:III has not accepted the Kerr-McGee position in this matter and by letter dated April 23, 1975, IE:III advised Kerr-McGee that the matter was being referred to the Office of Nuclear Material Safety and Security for resolution. By memo to H. D. Thornburg dated April 23, 1975, our position was stated and request was made for referral of the matter by Licensing. Such referral was made by IE:HQ on May 27, 1975.

Since a final determination has not been made on this item of noncompliance, it is being held open as an "unresolved item."

IE:III Letter dated March 19, 1975

4. Contrary to 10 CFR 73.70(g) records substantiating the consignee is notified immediately of the time of the departure of shipments were not being maintained.

K-M response dated April 8, 1975

4. Proper notification of shipments to the consignee were made by phone. However, formal records of this notification were not maintained. Beginning with the next shipment, a record will be started as proof of this notification as required by 10 CFR 73.70(g).

Inspection Findings

Facility records on recent shipments were reviewed to assure that proper records are being maintained to establish appropriate notifications.

Shipment of March 11, 1975 - Records reflect that [Welch] notified Milton Rasmussen of ERDA - Richland by telephone at 1530 hours on March 11, 1975 that the shipment consigned to HEDL was departing the Kerr-McGee site at 1535 and an ETA at the Richland site was established. A TWX covering shipment details had been sent to Rasmussen at 1603 hours on March 10, 1975. A shipment checklist form was utilized to record this pertinent information.

Shipment of April 22, 1975 - Records verify that [William DeMerchman] of HEDL-Richland was telephonically notified by [Welch] at 1410 hours on April 22, 1975 that a shipment consigned to HEDL had departed the Kerr-McGee site at 1405 hours and an ETA - Richland was established. Also records show that Kenneth Ridgway of IE:III was telephonically notified of a revised ETD and ETA and a change in driver/guards on April 22, 1974 and a TWX was dispatched to ERDA/HEDL also reporting these changes.

IE:III has no further questions concerning this matter.

IE:III Letter dated March 19, 1975

5. Contrary to 73.70(g) records for return shipments to substantiate the shipper is notified of the arrival of the shipment at its destination were not being maintained.

K-M response dated April 8, 1975

5. Proper notification of receipts to the shipper were made by phone. However, formal records of this notification were not maintained. Beginning with the next shipment, a record will be started as proof of this notification as required by 10 CFR 73.70(g).

Inspection Findings

With respect to the March 11, 1975 shipment of fuel pins to HEDL, this was a one-way shipment with no return shipment of Pu nitrate from ARCHO. All that was brought back to Kerr-McGee was empty birdcages. No notification to ERDA/ARCHO was required in this instance.

Regarding the April 22, 1975 shipment, the Tri-State truck brought back from ARCHO/Richland a shipment of Pu nitrate after having delivered the fuel pins to HEDL. Kerr-McGee records indicate that on April 26, 1975 at 1530 hours, Welch telephonically advised the ARCHO duty officer, M. L. Thornton, that the shipment had arrived at the Kerr-McGee site at 1510 hours that date. This telephone conversation was backed up by a TWX to ERDA/ARCHO on April 28, 1975.

IE:III has no further questions on this item.

IE:III Letter dated March 19, 1975

6. Contrary to 10 CFR 73.70(g), record information pertaining to shipments made during the periods July 2-5, 1974, August 31, to September 3, 1974, September 30 to October 5, 1974, December 17-19, 1974 and January 14-18, 1975 was not maintained at Kerr-McGee.

K-M response dated April 8, 1975

6. Records for the shipment dates indicated were not maintained, but a request was made to Tri-State requesting this information. In the future all such data will be requested and maintained on file.

In order to provide additional assurance that the above items and other requirements for shipping these nuclear materials are completed, a procedure and check list will be prepared. This will be complete by April 15, 1975.

In reference to the specific deviations sent to Tri-State by you, we will request a copy of their response to you and follow-up with them to determine proper compliance in their response.

Inspection Findings

Kerr-McGee records were reviewed to assure that record information on shipments (telephone logs, shipping receipts, emergency instructions, escorts, etc.) had been provided by Tri-States. The Kerr-McGee file has now been documented to cover shipments made on the above dates and an agreement was reached that Kerr-McGee will invariably receive these shipping documents immediately upon completion of each shipment handled by Tri-States.

IE:III has no further questions on this item.

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Previous to the In-Transit inspection which resulted in the aforementioned items of noncompliance, a follow-up physical protection inspection was conducted on September 11, 1974 by J. A. Hind, IE:III. Resulting from this inspection were the following items of noncompliance which were presented to the licensee by IE:III letter dated October 2, 1974 and responded to by Kerr-McGee letter dated October 25, 1974. The actions taken on these items of noncompliance were evaluated during the current inspection.

IE:III Letter dated October 2, 1974

1. License Condition 9.3.4 states, ~~"The licensee shall select metal, explosives and special nuclear material detectors which have the detection capabilities specified in Regulatory Guide 5.7. . ."~~

Part 3.5.1.2 of the Kerr-McGee Security Plan states in part ~~"Explosives"~~ will be detected by ~~an ITI-540~~ detector installed by April 15, 1974.

73.50(f)(1) states, "All alarms, communications equipment, physical barriers, and other security related devices or equipment shall be maintained in operable and effective condition."

~~Contrary to the above, the installed explosive detector is not being maintained in effective condition. Nonexplosive type substances (smoke, perfume, for instance) also activate the alarm. To date, your efforts to correct this situation have not been fully effective.~~

K-M response dated October 25, 1974

1. License Condition 9.3.4, Part 3.5.1.2 of Kerr-McGee Security Plan and Regulation 73.50(f)(1) ~~"Explosive Detector."~~

As described, during the audit by Mr. Hind, it was determined that other types of vapors such as smoke and perfume caused a response in the instrument. It should also be noted, however, that explosives are effectively detected as required by regulations and as indicated by the manufacturer.

Since the instrument was installed in our plutonium plant, we have conducted many tests to determine its reliance and effective operation. We will continue these tests to improve the effective operation of the unit. Some of the tests indicate that modifications can be performed to accomplish this goal. In addition to these tests, the operation of this specific instrument will be reviewed with the manufacturer. Other types of detectors for this application are being investigated.

We expect that these tests and investigations should be completed by January 1, 1975.

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~~CONFIDENTIAL~~

Inspection Findings

Licensee representatives, in concert with the explosive detector manufacturer, conducted numerous tests of the Model ITI-58 explosive detector and found that numerous spurious alarms were caused by cigaret or cigar smoke, perfume, foot powder and hair oil. Adjustments could not effectively be made to eliminate spurious alarms without affecting the equipment's capability to detect the presence of explosives. Therefore, it was decided to discontinue use of the fixed explosives detector in the confining entrance corridor and to conduct the search of personnel for presence of explosives in the main lobby using a hand-held explosives detector, Model ITI-58 manufactured by Ron Track Instrument Corporation. Apparently this instrument, when used as a fixed detector within a confined area was adversely affected by vapors other than caused by explosives. The instrument has demonstrated greater reliability when used in a more open area as a hand-held device.

The inspector observed use of the detector during shift change and during the normal traffic between shifts. All incoming employees and visitors are examined for explosives by the hand-held detector. Sample sources of plastic explosives, TNT and gunpowder are used to assure effectiveness of the instrument and to calibrate its sensitivity during the weekly filter change.

IE:III has no further questions on this item.

IE:III Letter dated October 2, 1974

2. License Condition 9.7 states, "...The licensee shall install balanced magnetic switch type intrusion alarms on all emergency exits and all normally locked points of ingress and egress in accordance with 10 CFR 73.50(d)(1) and (2) and 73.60(c)."

Contrary to the above, you are not in full compliance. The dock air lock door is still equipped with the plunger type alarm. The other ten areas are equipped with balanced magnetic switch type intrusion alarms as required. This is a repeat violation from the May 1974 inspection.

K-M response dated October 25, 1974

2. License Condition 9.7 - Balanced Magnetic Switch

The balanced magnetic switch on the air lock door has now been installed and was operational as of October 15, 1974.

It should be noted that sufficient switches were purchased to cover all required doors although during the installation one of these switches was found to be defective. This was returned to a supplier and a new unit requested. The delay in installation was caused as a result of an excessive delivery time.

Inspection Findings

The portal in question has been fitted with a balanced magnetic alarm switch. We have all emergency portals at the Pu Plant. The licensee showed that an adequate number of alarm switches had been initially ordered but one switch is to be returned to the manufacturer for replacement.

It has no further questions on this item.

Changes

As stated earlier in the Summary of Findings, the licensee, since the last special protection inspection, cut three holes in the steel door of the 7 storage room and has replaced the combination lock of this door with a key-lock. The matter of the holes in the door is pending resolution in licensing; the lock change resulted in a citation for noncompliance. (See Citation No. 2).

To comply with License Condition 3.9.18, the licensee has established new building evacuation routes, has constructed an additional emergency gate in the southwest section of the protected area fence and has erected a six foot high fence extending southward to the Decontamination and First Aid Building to assure control and surveillance of personnel when evacuated from the Pu Building.

Other Significant Findings

Few persons within the Pu Plant were wearing their identification badges in clear view. The badges are normally kept in the breast pocket of company-issued coveralls. Management was asked to consider requiring employees to wear badges in clear sight to facilitate recognition as an authorized area occupant.

Although Regulatory Guide 5.20 specifies annual physicals for guards, there are no commitments made in the security plan to satisfy this standard. Management was asked to consider the possibility of scheduling annual physical examinations and were informed that this matter will be explored further by IE:III with Licensing.

Management Interview

At the conclusion of the inspection, a preliminary close out was held with Mr. Janka, Adkisson and Welch to discuss the inspection findings and items of noncompliance. Representing NRC were J. F. Donahue of IE:III and J. W. Smith of IE:I. A subsequent close out was held with these Kerr-McGee representatives in the presence of Mr. Morgan Moore, Cimarron Facility Manager. Rebuttals were offered to the identified items of noncompliance.

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REPORT DETAILS
INTRODUCTION AND SCOPE

Persons Contacted

Morgan Moore, Cimarron Facility Manger
Raymond Janka, Manger, Administration and Accountability
Ronald Adkisson, Supervisor, Safeguards and Security
Fred Welch, Security Officer
Messrs. McCoy, Selmon, Jeffries, Johnson - Guards

Scope

This inspection covered the Kerr-McGee Security Plan, portions of License Conditions MPP-1, Section 3, all of License Conditions MPP-1, Section 9, and applicable sections of 10 CFR 73. Also covered were licensee actions taken on items of noncompliance identified during a follow-up inspection of September 11, 1974 and an SNM In-Transit inspection conducted on February 18-22, 1975.

Introduction

An unannounced physical protection inspection was conducted during the period of May 20-22, 1975 by J. F. Donahue of IE:III, assisted by J. W. Devlin of IE:I. All facets of the Kerr-McGee security program were inspected. In general, management cooperation was satisfactory and an effective and workable security program is being carried on.

I. SECURITY PLAN

1. [70.22(h)] Does the licensee possess an approved Physical Security Plan (PSP)?

Yes

2. [70.32(e)] Did any change in the PSP decrease its effectiveness?

Yes

If yes, explain: The lock on the Vault door was changed from a combination lock to a six pin tumbler lock without prior notification to Licensing.

(See attached sheet)

- A. Did the licensee secure AEC approval prior to making changes in the PSP which decreased its effectiveness?

No

(1) If yes, were approvals:

(a) Written, and/or

(b) Verbal?

3. [70.32(d)] For changes in the licensee's PSP which decreased its effectiveness, did the licensee submit an application to amend his license or to change the Technical Specifications incorporated in his license?

No

4. [70.32(e)] Were any changes made to the PSP which did not decrease its effectiveness?

Yes

If yes, list changes.

A. Sample window in Pu Building.

B.

C.

D.

5. [70.32(e)] Did the licensee make changes in the PSP which did not decrease its effectiveness without proper notifications?

Item of Noncompliance - Section I.2

During the course of this inspection, it was noted that the licensee modified the door of the material storage vault. In addition to cutting 3 three portholes in the metal door, reported in IE:III letter dated October 2, 1974 to H. D. Thornburg, the locking mechanism - a dial type combination lock, was replaced by a six pin Sargeant and Greenleaf key lock. Since replacement of the lock represented a significant decrease in the protection afforded the vault door and this change was not specifically reported to Licensing for approval as required by 10 CFR 70.32(e), the licensee was found to be in noncompliance.

With respect to the three holes cut in the door, Licensing, by letter dated April 4, 1975, requested K-M to submit revisions of appropriate pages of the PSP for Licensing review and approval. As of the date of this inspection K-M had not submitted the requested revisions. Further, in a telephone conversation held on June 3, 1975 between the inspector and George McCorkle of Licensing, it was developed that Licensing had no knowledge of K-M's action in changing the locking mechanism and no requests for exceptions have been submitted by K-M. (See Infraction No. 1, Summary of Findings)

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II. FACILITY LICENSE CONDITIONS AND EXCEPTIONS

Attach current copy of specific license conditions applicable to the facility and comment on each condition as to compliance or noncompliance.

Amendment MPP-1 to License SNM-1174, Section 9 License Conditions dated March 6, 1974 as subsequently amended, were reviewed. All Conditions, 9.1 through 9.18.6, were covered with no items of noncompliance being disclosed. Certain of the license conditions in Section 9 are no longer relevant since submission of pertinent data or physical modifications have been accomplished. License Condition 9.3.10 was for a one-time calibration test which has been completed. License Conditions 9.18.1 through 9.18.6 related to time extensions which have expired. It is understood, through telephone conversation with George McCorkle (Division of Safeguards) that the K-M license is scheduled for revision and reissuance.

With respect to Section 3 license conditions, covered during this inspection were 3.9.11, 3.9.12, 3.9.13, and 3.9.18 (1) through (5). These conditions, while appearing in a section relating more specifically to material accountability, pertain to physical security requirements and hence were covered during this inspection. Other conditions in Section 3 were covered, in part, during the IE:III inspection of March 6-12, 1975 (Report No. 070-1193/75-04)

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III. SECURITY ORGANIZATION

1. [PSP][LC-9.1][70.32(e)] Does the current facility organization chart indicate all individuals, groups, or organizations responsible for security? A new position, manager of Safeguards and Security was added to the table of organization. (See attached sheet) Not entirely
2. Does the security organization assure continuous responsibility for physical protection practices by:
- A. [73.50(a)(1)] Using a security organization including guards, to protect the facility and SNM, and Yes
- B. [73.50(a)(2)] Maintaining at least one (1) security supervisor onsite at all times? Yes
3. [73.50(a)(3)] Has the licensee established written security procedures which document:
- A. The structure of the security organization, and Yes
- B. The duties of guards, watchmen and other individuals responsible for security at the site? Yes
4. Are the following employees used to protect the facility:
- A. Guards, Yes
- B. Watchmen, and/or No
- C. Other individuals? No
5. Are the following contracted individuals used to protect the facility:
- A. Guards, No
- B. Watchmen, and/or No
- C. Other individuals? No

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Comment on Section III, Item 1

Since the last inspection, a change in the security organization has taken place. Previously the Security Officer, [Fred Welch], reported directly to the Manager of Administration and Accountability, [Raymond Janka]. A new position was created as Supervisor of Safeguards and Security and its incumbent is [Ronald Adkisson] to whom [Welch] now reports. [Adkisson] reports to [Janka] who reports to [Morgan Moore], Cimarron Facility Manager. The functional responsibility of the Security Organization is unchanged.

Were the following individuals trained prior to security duties:

and/or
individuals?

Yes

DNA

DNA

training? Oklahoma City Police, K-M security officer.

Curriculum used by the licensee for training purposes in
with AEC furnished Regulatory Guides for:

20] Points of Law,

Yes

20] Security Skills, and

Yes

17] Local Security Matters?

Yes

Is the licensee using qualified guards and
to protect the facility?

Yes

ations of all individuals used for security purposes

Yes

and oral examinations after training,

Yes

job training, and/or

Yes

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11. List equipment used by the following individuals to protect the facility:

A. Guards ~~*38~~ caliber revolvers, night sticks and ~~3-12~~ guage ~~shotguns~~ *2*

B. Watchmen, and/or

C. Other individuals.

12. [73.2(c)] Is each guard on duty equipped with a loaded firearm? Yes

A. Describe firearm (at least .38 caliber). ~~*.38~~ caliber - mostly Smith and Wesson or Colts.

13. Has supervision of the licensee's security organization inspected all security equipment in the past three (3) months? Yes

14. What were the results of this inspection? Equipment operated satisfactorily or was otherwise in usable condition.

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[REDACTED]

12. [73.50(a)(4), 73.50(f)(4)] Is the equipment provided to the following individuals by the licensee adequate to aid in protecting the facility?

Yes

A. Guards,

Yes

B. Watchmen, and/or

-

C. Other individuals?

-

13. [73.50(a)(4)] Have all guards and watchmen employed by the licensee for physical protection purposes:

A. Demonstrated their ability to understand the facility's security procedures,

Yes

How? Written test and annual review and test conducted during April 1975.

B. Demonstrated their ability to execute all required duties, and

How? On-the-job performance

C. Requalified at least annually?

Yes

Has each individual used for security purposes been tested and requalified according to the following schedule?

A. [73.50(a)(1)] Annually - General duties and responsibilities

Yes

B. [RG-5.20] Semi-annually - Specific duties and responsibilities

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[REDACTED]

III-5

- C. [RG-5.20] Semi-annually - Communications equipment _____
- D. [RG-5.20] Semi-annually - All other security equipment
(i.e., arms qualification) _____ Yes _____
- E. [RG-5.20] Annually - Medical examinations _____

Not committed to _____
annual physicals in _____

18. [73.50(g)(2)] During this inspection period, did the security organization detect the abnormal presence or activity of persons or vehicles (unusual occurrences) within an:

- A. Isolation zone, _____
- B. Protected area, _____
- C. Material access area, and/or _____
- D. Vital area? _____

No

No

No

No

19. Upon detection of unusual occurrences within the PA, Isolation zone, VA and MAA, how did the security organization demonstrate their capability of:

- A. [73.50(g)(2)(i)] Determining the existence of a threat, _____

DNA

- B. [73.50(g)(2)(ii)] Assessing the extent of the threat, and _____

DNA

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III-6

C. [73.50(g)(2)(iii)] Taking immediate measures to neutralize the threat by one of the following means:

(1) Appropriate action by licensee guards, or _____ DNA

(2) Calling for assistance from LLEA, or _____ DNA

(3) Performing both items 1 and 2 above? _____ DNA

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IV. PHYSICAL BARRIERS AND LIGHTING

1. [73.50(b)(1)] Has the licensee located Vital Equipment (VE) within Vital Areas (VA's)?

Yes

2. [73.50(b)(1)] Has the licensee located VA's within a PA?

Yes

3. [73.50(b)(1)] Does access to VA's require passage through at least two physical barriers?

Yes

4. Are physical barriers surrounding PA's in accordance with 73.2(f)?

Yes

If not, explain:

5. [73.50(b)(3)] Is each PA physical barrier separated from any other physical barrier designated as a physical barrier for VA's and MAA's?

Yes

6. [73.50(b)(3)], [73.50(b)(4)] Is an isolation zone established around any portion of a building wall used as a physical barrier to the PA's?

Yes

7. Do all physical barriers of VA's and MAA's meet the qualifications of 73.2(f)?

Yes

8. [73.2(f)(2)] Do door, window and opening covers in walls serving as physical barriers to the PA, MAA and VA provide sufficient strength that the integrity of the wall is not lessened?

Yes

9. [73.50(b)(3)] Does the licensee monitor or periodically check (at least once a day) the intervening space between the PA physical barrier and VA and MAA physical barriers?

Yes Fence
Insure
on each sh

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IV-2

See page 1 of 2

10. [73.50(b)(4)] Does the licensee continuously monitor the PA isolation zone?

Yes

How? [redacted] alarm, [redacted] of fence line.

Functional test performed by inspectors established its effectiveness.

- 11. [73.50(f)(1)], [73.60(d)(1)] Is the licensee maintaining physical barriers in an operable and effective condition?

Yes

12. [PSP] Does the licensee inspect all physical barriers used for physical protection purposes at a frequency of not less than once per day?

Yes

13. [73.50(b)(5)] Is each isolation zone and all clear areas illuminated sufficiently to aid guards and watchmen in their response to the breaching of any physical barrier?

Minimum
Yes Light Level
S.E. Side

14. [73.50(b)(5)] Are isolation zones and clear areas illuminated not less than 0.2 foot candles at all times?

Yes

15. Are all entrances to the PA, VA, MAA illuminated sufficiently to aid guards or watchmen in performing access controls?

Yes

Withhold

IV-3

16. Does the licensee have emergency lighting that is capable of illuminating all facility access controls points? NO

Describe methods of providing emergency lighting. External illumination not on

Emergency Power. One light off, top of staircase motor control room.

Light levels in isolation zone exceed. 2 fc.

17. Describe mechanism to turn lighting "on and off."

This page can be released in total

V. KEYS, LOCKS, AND COMBINATIONS

1. [73.50(c)(7)] What controls does the licensee utilize to minimize the possibility of compromise for:

A. Keys, Card keys issued to employees for access to main gate. Card
key also serves as ID.

B. Locks, and Keys

X Vault door 5&6 Special six tumbler. X (935)

C. Combinations? *Pu except outer door - 30 day change for change room
doors to process area, push button. X Combination on vault door
changed to key. X

2. [73.50(c)(7)] Upon evidence of compromise, did the licensee promptly change:

A. Keys,

None

B. Locks, and

Detected

C. Combinations?

3. [73.50(c)(7)] Upon termination of any employee having access, did the licensee promptly change:

A. Keys,

Yes

B. Locks, and

Yes

C. Combinations, and

D. Other security related equipment?

Card Key retrieval

*Procedure KM-NC-22-8 Rev. 1. Date 6/4/74 "Changing of locks and combinations."

This page can be released in total

4. [73.50(c)(7)], [73.50(c)(7)] maintained for con
for physical protec

5. Do all facility loc
the required specif

Vault - key iss
key issued.

Medico 6 pin t
Medico Mortise

Inadequate copy

[REDACTED]

VI. PERSONNEL AND VEHICLE CONTROLS

1. [RG-5.20] Does the licensee have at least one vehicle dedicated to security operations? Not at present

2. [73.50(b)(4)] Are parking facilities for both employees and visitors, located outside the isolation zone? Yes

3. [73.50(c)(6)] Under emergency conditions, does the licensee permit private vehicles within the PA? No

4. [73.50(c)(5)] Are drivers of delivery and service vehicles escorted at all times while within the PA? Yes

5. [73.50(c)], [73.60(a)(5)] Does the licensee check the identification and authorization for each vehicle entering a PA, VA, and MAA? Yes

6. [73.50(c)(4)] Does the licensee assure that access to VA and MAA is limited to individuals who require access to perform their duties? Yes

7. [73.50(c)(5)] Does the licensee physically escort all visitors within the PA by using:

A. Guards, Yes

B. Watchmen, and/or _____

C. Other individuals? Yes

8. [73.50(c)(1)], [73.50(c)(5)] Subsequent to search, are drivers of delivery and service vehicles escorted at all times while within the PA? Yes

This page can be released in total

VI-2

9. [73.50(c)(5)], [73.70(c)], [73.70(d)] Are all visitors required to register prior to being permitted into PA's and VA's?
10. [73.60(a)(5)] Are authorized individuals used to control access to each MAA?

This page can be released in total

VII. BADGING

1. [73.50(c)(3)] Has the licensee provided picture badges to all individuals who are authorized access to the PA without escort?
2. [73.50(c)(4)], [73.50(c)(5)] Has the licensee provided specially coded badges to non-escorted individuals which indicate PA's, VA's and MAA's to which access authorization has been authorized?
3. [73.50(c)(5)] Does the licensee provide badges to all visitors to the PA?
4. [73.50(c)(5)] Do all non-picture visitor badges indicate that an escort is required?
5. [73.50(c)(5)] Are individuals not employed by the licensee who require frequent and extended access to a PA or VA provided picture badges which:
 - A. Are picked up on entrance to the PA, and
 - B. Are returned each time he leaves the PA?
6. [73.50(c)(4)], [73.50(c)(5)] Do badges for individuals who require frequent and/or extended access to MAA's, VA's and PA's indicate:
 - A. Nonemployee - no escort, required,
 - B. Areas to which access is authorized, and
 - C. Period for which access is authorized?
7. [73.50(c)(3)], [73.50(c)(4)] Do all facility badges indicate areas to which access authorization is granted?

This page can be released in tot.

VII-2

8. Describe badges used at the facility. Plastic Polaroid picture badges Red and White
strip - unlimited access - no escort required. Red-Pu Plant-No escort
admittance permitted if approved by a work schedule maintained by Guard.
Gold - U Plant employee - escort required in Pu Plant.
White - Escort required (mainly for visitors) sign log.
Pink No Health Safety training - must sign log and
Green be provided with escort.

9. How are badges protected against compromise? Security Officer controls
camera and Polaroid cartridges in locked cabinet.

This page can be released in total

VIII.

1. [73.50(c)(1)], [73.50(c)(2)] Does identification (ID) and access authority to the PA and VA for:
 - A. Personnel, visitors and employees
 - B. Packages?
2. [73.50(c)(1)] Does the licensee perform the following manner:
 - A. A physical search, or
 - B. Use equipment capable of detecting be used for industrial sabotage
3. Does the licensee perform the following searches of persons and vehicles prior to entry into a facility?
 - A. [73.50(c)(1)] All individuals,
 - B. [73.50(c)(1)] A random search
 - C. [73.50(c)(1)] All hand carried items
 - D. [73.50(c)(2)] A random search of packages? Packages to be opened. These are items
4. Are random searches of AEC-clearance personnel performed with sufficient frequency to assure that each employee is searched at least once per month (or more frequently if records)?
5. [73.50(c)(1)] Are drivers of delivery vehicles searched prior to entry into the facility?

*Active Q&L AAs are possessed by a number of personnel search procedure. All employees

Inadequate copy

VIII-2

113.60(a)(6)] Except when packages are searched prior to entry into a PA and the package has been tampersealed and escorted by an AI or is immediately escorted by two (2) AI's to the MAA, does the licensee perform package searches for the following items prior to entry into any MAA:

A. Firearms, and

Yes

B. Explosives and incendiary devices, and

Yes

C. Counterfeit items which could be used for theft or diversion of SNM?

Yes

113.60(b)] When exiting from a MAA, unless exit is into a contiguous MAA, is the licensee making searches for concealed SNM of the following:

A. Each individual,

Radiation Monitor

B. Each vehicle, and

Do Not Enter

C. Each package?

Not Permitted

Are records maintained of all routine searches performed?

If not, explain. No Records, 100% search entering, metal detector and gamma scan exiting.

Describe methods employed by the licensee to perform searches. Metal Detectors, sniffers, radiation monitors.

IX. SNM CONTROLS

- | | | |
|---------------------------------|---|------------------|
| 1. [73.50(b)(2)], [73.60(a)(2)] | Has the licensee located MAA's only within a PA? | Pu. Bldg.
Yes |
| 2. | Are all physical barriers and access controls for each MAA used by the licensee to control the use and storage of SNM described in the PSP or license condition? | Yes |
| 3. | [73.50(b)(2)] Does access to each MAA require passage through at least two (2) physical barriers? | Yes |
| 4. | [73.50(c)(4)], [73.60(a)(5)] Does the licensee assure that access to SNM is limited to individuals who require access to perform their duties? | Yes |
| 5. | [73.60(a)(1)] Except for scrap SNM containing less than 0.25 grams U-235 per liter, does the licensee store and process SNM only within the confines of a MAA? | Yes |
| 6. | [73.60(a)(1)] Does the licensee prohibit activities other than those that require access to SNM or equipment employed in processing, use and storage of SNM within any MAA? | Yes |

If no, explain:

* 7. [73.60(a)(3)] Does the licensee store SNM not in process in a:

- * A. Vault, or ~~This room no longer qualifies as a vault per 73.2 because of modification to the door and locking mechanism~~
- B. Vault type room? Recite as item of noncompliance - See attached sheet.

Item of Noncompliance, Section IX.7

The room which serves as the central storage location for SNM neither qualifies as a vault or vault-type room at the present time. Although there is a motion-detector alarm within the room and a contact alarm on the door, it is the door and locking mechanism which fail to meet requirements. Three holes have been cut in the steel door which reduces the integrity of the barrier and this matter is currently being reviewed by Licensing. (Reference Letter dated April 4, 1975, R. G. Page to W. J. Shelley)

According to Fred Welch, the combination lock on the SNM storage room was replaced by a six pin key-lock in about January, 1975 because of the frequent malfunctioning of the combination lock. Welch acknowledged that he had not solicited approval for this lock change from Licensing because he did not consider that it decreased the security of the storage room. The inspector pointed out that in Section 3.7.1 of the K-M security plan it is stated, "a combination lock is installed in the metal door of a three positional dial type changeable combination meeting the Underwriters Laboratories standards. . . ." Further, the inspector quoted 10 CFR 73.2(m) which states, "Lock in the case of vaults or vault type rooms means a three position, manipulation resistant, dial-type, built-in combination lock or combination padlock. . . ."

Because the existing lock fails to meet security plan commitments and the intent of Part 73.2(m), a citation for noncompliance was issued. (See Infraction No. 2 - Summary of Findings)

IX-2

8. [73.60(a)(3)] Is each vault or vault type room used to store SNM controlled as a separate MAA? Vault
MAA
Yes
9. [73.60(a)(5)] Does the licensee use Authorized Individuals (AI) to control admittance to each MAA? Yes
10. [73.60(a)(7)] Does the licensee use methods which assure that when two individuals occupy a MAA, each individual is subject to observation of the other at all times? Yes
- If not, explain current practices: Procedure, explain that after all SNM and each MAA checked by the supervisor concerned and reported to the the areas may be entered by one person.
11. [73.60(a)(4)] Does the licensee store any enriched uranium (EU) scrap in a locked and separately fenced outside storage area? No
12. [73.60(a)(4)] Is each outside storage area located within a PA? DNA
13. [73.60(a)(4)] Is each outside storage area located at least 25 feet from the perimeter fencing of the protected area? DNA
14. [73.60(a)(4)] Are 30-gallon or larger containers used to store EU scrap in outside storage areas? Yes
15. [73.60(a)(4)] Is each outside storage area maintained in a locked condition when not in use? Yes *
- *Locked Trailer within PA.

This page can be released in total

IX-3

10. [73.60(a)(4)] Do the containers used for storing EU scrap in an outside storage area contain less than 0.25 grams U-235 per liter (~1 gm U-235/gal) per container? Yes

17. [73.60(a)(4)] Is each perimeter physical barrier of each unoccupied outside storage area used for storing EU scrap protected by:

A. Fandom guard or watchmen patrols at intervals not exceeding 4 hours, or

B. An active intrusion alarm?

Two patrols per shift
1/ outside gate - fence ch
2/ one inside patrol)

18. Describe EU scrap being stored in an outside storage area. Scrap stored in 55 gal. drums in a locked trailer (without wheels) within the PA.

19. How does the licensee control waste SNM? Stored in waste weigh columns within MAA until reprocessed. Columns situated within the processing area.

X. DETECTION AIDS

1. [73.50(b)(4)] Are responses to all unusual occurrences within the isolation zone made by an armed member of the security organization?

Yes

2. [73.50(c)(1)], [73.60(b)] Are devices and equipment used by the licensee to search individuals and packages capable of detecting the presence of (must meet the requirements of RG 5.7):

Yes

A. Firearms,

Yes

B. Explosives,

Yes

C. Incendiary devices, and

Yes

D. Special Nuclear Material

3. [73.50(d)(1)] Do all facility alarm systems annunciate in at least two (2) continuously manned stations?

Yes

4. [73.50(d)(1)] To eliminate the possibility that single act cannot remove the capability of calling for assistance or otherwise responding to an alarm, are the facility alarm systems annunciators located:

A. Within a protected area and protected as a VA, and

Yes

B. At another location, not necessarily onsite?

Yes

5. [73.50(d)(2)], [73.60(c)] Are emergency exits continuously alarmed for:

Yes Pu

A. Protected areas,

Yes Pu

B. Vital areas, and

Yes Pu

C. Material access areas?

This page can be released in total

X-2

6. [73.60(a)(3)] Are all vault type rooms used to store SNM equipped with intrusion alarms?

Yes

7. [73.50(d)(2)], [73.60(c)] Are the following areas protected by an active intrusion alarm:

Yes

A. Vital areas, and

B. Material access areas?

Yes

8. Are facility alarms systems installed in a manner such that each alarm system:

A. [73.3(1)] Is capable of annunciating by means of audible and visible signals, and

Yes

B. [73.50(d)(1)] Components are self-checking and tamper indicating?

C. [73.50(d)(1)] Is equipped with an emergency power source, that is protected as a VA, and that would permit 24 hours of continuous operation after the loss of primary power?

(Diesel genera:
Yes

D. [73.50(d)(1)] Annunciates at the onsite central manned (primary) station to indicate:

(1) The type of alarm (intrusion, emergency, etc.), and

Yes

(2) The location of each alarm?

Panel
Yes Display

9. [73.50(d)(1)] Do the following alarm systems meet the performance and reliability levels specified by GSA Interim Federal Specification W-A-00-150 B (GSA-FSS):

A. Intrusion alarms,

Yes

B. Emergency alarms, and

C. Line Supervisory systems?

Yes

This page can be released in total

X-3

10. [73.50(f)(2)], [73.60(d)(2)] Is each intrusion alarm functionally tested for operability and required performance at the following times:

A. Beginning and end of each interval for which it is used for security, but

Yes

B. Not less frequently than once every seven (7) days when in use?

Yes

11. [73.60(c)] Is each unoccupied MAA locked and protected by an active intrusion alarm? Emergency Exit Door
alarmed - Main door,
armed guard.

12. [73.50(d)(1)], [73.60(d)(1)] Is the licensee maintaining intrusion alarms in an operable and effective condition?

Yes

13. Does each alarm system operate in a manner to adequately protect the area for which it is used?

Yes

14. Is each mechanical or electrical search device used to perform searches at the facility equipped with an alarm mechanism?

Yes

15. [73.50(f)(1)], [73.60(d)(1)] When in use, does the licensee make a daily inspection of detection aids used to perform searches?

Checked once a day
(second shift)

This page can be released in total

XI. COMMUNICATIONS

1. [73.50(g)(1)] Has the licensee established liaison with Law Enforcement Authorities (LLEA's) Gave luncheon meeting last fall to all local PD and FBI. Lecture on SNM identity shipments.
2. Name of LEA

Yes

Guthrie, OK

3. What is the committed response time and manpower to be provided by LEA?

Manpower Allotted

Response Time

Date of Agreement

15 Guthrie Sheriff

in one unit

January, 1974

Update agreement w/Logan County

4. [73.50(c)(1)] Is continuous communication capability provided with the central continuously manned (primary) station for each of the following individuals on duty:

A. Guards, and

B. Watchmen?

Walkie Talkie

DNA

5. [73.50(c)(1)] Is an individual on duty at the PA continuously manned (primary) station capable of calling for assistance from:

A. Each guard on duty,

B. Each watchman on duty, and

C. LLEA's

Yes

DNA

Yes

6. Has the licensee provided equipment, delegated authority and responsibility to the individual on duty at the PA continuously manned (primary) station for calling for assistance from the above persons?

Yes *

7. [73.50(c)(3)] Is the continuously manned (primary) alarm station equipped with conventional telephone service and two-way radio voice communication with LLEA's?

Yes

*Pa guard post has authority to call LLEA without checking supervision.

In emergency the guards may also call in personnel as required before notifying supervision.

XI-2

8. [73.50(e)(3)] Does each two-way radio voice communication system that is used for physical protection purposes terminate within the continuously manned central (primary) station that is located within a PA? Yes
9. [73.50(e)(4)], [73.50(f)(1)] Does each communication system have the capability of remaining in an operable and effective condition after the loss of the primary power source? (Batteries) Yes
10. [73.50(f)(3)] Are all communication equipment tested for operability and performance not less frequently than once at the beginning of each security personnel work shift? Yes
11. [73.50(f)(1)], [73.60(d)(1)] Are all security related devices maintained in an operable condition? Yes

This page can be released in total

[REDACTED]

XII. SECURITY EDUCATION

1. Does the licensee routinely indoctrinate new employees on physical protection practices employed at the facility?
2. Is the indoctrination given prior to being permitted access to vital equipment, VA's, MAA's, and SNM?
3. Is there a continuing reindoctrination program in effect at the facility? (Drills)
4. Does the licensee have an outline of all security indoctrinations used at the facility?

Yes

Yes

See attached sheet
for details

Yes

This page can be released in total

Item of Noncompliance - Section XII.3

Section 5.6 of the K-M security plan states, "The security officer designs drills to test each phase of the security program with one drill occurring at least quarterly. The outline of the drill and the evaluation of the response is described in writing by the security officer and circulated to facility management for their review. At least annually, all drills and their results are summarized by the security officer in writing and circulated to Kerr-McGee Nuclear Corporation Management for their review. Corrective action determined as a result of observation of inadequacies in the drill are determined jointly by the security officer, manager of administration and accountability and the corporate security officer, and revised procedures and additional training immediately instituted."

Contrary to this commitment, only one formalized drill was conducted on April 24, 1975 and this drill was documented in the files. No other drills were conducted, no outlines were prepared, only one summary report was circulated to facility management for review. Also, although the security program has been in effect for over one year, no annual report of drills and their results have been summarized in writing by the security officer and circulated to corporate management. (See Infraction No. 3 - Summary of Findings).

This page can be released in total

[REDACTED]

RECORDS AND REPORTS

1. [73.50(a)(3)] Does the licensee maintain written security procedures, which describe:

A. The structure of the physical protection organization,

Yes - ^{*} P.S.P. 5.2

5.3.3

B. The detailed duties of the following individuals responsible for security at the site:

(1) Guards (in-house or contract),

Company Employees

(2) Watchmen, and

None

(3) Other individuals used for physical protection purposes?

Emergency Procedures
Use Emp. 6.2.7 of

P.S.P.

2. [73.50(a)(4)] Does the licensee maintain records of training for:

A. Guards, and

Yes

B. Watchmen?

DNA

3. [73.50(a)(4)] Does the licensee maintain records of the qualifications for:

A. Guards, and

Yes

B. Watchmen?

DNA

4. [73.50(a)(4)] Does the licensee keep requalifications records of all guards and watchmen used for physical protection purposes?

Yes

5. [73.70(a)] Does the licensee maintain records of the names and addresses of all AI's?

Yes (Note)

Note: Addresses not posted since Karen Silkwood affair.

6. [73.70(b)] Does the licensee maintain records which indicate names, addresses and badge numbers of individuals authorized to have access to vital equipment, SNM, MAA's, and VA's?

Color coded badges

This page can be released in total

[REDACTED]

XIII-2

Records maintained to indicate control of all badges issued to employees who have been furnished picture badges to VA?

Yes*

Records maintained of specially coded and numbered badges employees and non-employees which indicate VA's and VA's to which authorization has been granted?

Yes

70(c)] Do records of the registration of visitors to each include:

Name of visitor,

Visitor Logs

Purpose of Visit,

Visitor Logs

Date,

Visitor Logs

Time in and out,

Visitor Logs

Employment affiliation,

Visitor Logs

Citizenship,

Visitor Logs

Name and badge number of escort, and

Visitor Logs

Name of individual visited?

Visitor Logs

70(h)] Does the licensee maintain up-to-date records and procedures used for the control keys, locks and combinations?

Yes

70(h)] Does the licensee's procedures reflect access controls individuals, vehicles and packages at each entrance to the PA's?

Yes

70(e)] Does the licensee maintain records which indicate condition of all security related equipment?

Yes

It should be noted that old and/or extra Photo Badge inserts are stored in an open folder on top of a desk, not in a locked container.

This page can be released in total

XIII-3

licensee documented time and manpower
from the security organization and from

*Yes

licensee maintain records of random

~~*No~~ Random Patrols
~~*Two~~ per shift,
~~Scheduled~~

is being maintained of all individuals
normally unoccupied VA, which include:

Yes

Yes

Yes

Yes

Yes

and

licensee maintain records which document

Yes

tours and inspections, and

and maintenance on:

Yes

fers,

Yes

ams,

Yes

ons equipment, and

Yes

related devices?

licensee have records of tests performed
violation zone and clear areas are
than 0.2 feet candles at all times?

Yes

This page can be released in total.

XIII-4

18. [73.70(f)] Do records of alarm system activities include:

A. Each onsite alarm annunciation,

Yes

B. Location of each alarm, false alarm and alarm checks, and

Yes

C. Tamper indication alarms?

19. [73.70(f)] Do records indicate the following data on each alarm annunciated:

A. Type of alarm,

Yes

B. Location of each alarm,

Yes

C. Alarm circuit,

Yes

D. Date of alarm, and

Yes

E. Time of alarm?

Yes

20. [73.70(f)] Does the licensee maintain a detailed record of response by facility guards and/or watchmen to each alarm and/or other security incident?

Yes

21. Does the licensee maintain an outline of all aspects of the security education program (See PSP)?

Guard Training on Video
Tape. Employee training
not documented

22. [73.71(b)] During this inspection period were there security incidents which involved:

A. Attempted theft of SNM,

No

B. Suspected theft of SNM,

No

C. Attempted diversion of SNM,

No

D. Suspected diversion of SNM, and

No

E. Acts of:

This page can be released in total

[REDACTED]

XIII-5

- (1) Industrial sabotage and No
- (2) Suspected or attempted acts of industrial No
sabotage?
23. [73.71(b)] Did the licensee immediately report security DNA
incidents of any of the above items to RO?
24. [73.71(b)] Was a written report of investigation of the above DNA
items reported to RO within 15 days from the date of the
initial report?
25. [73.71(b)] Was the substantive additional information gathered DNA
subsequent to the written report immediately reported to RO?
26. [70.32(c)] Has the licensee submitted all reports to RO which No
contain descriptions and the effects of all changes in the
facility PSP?
27. [70.32(c)] Were all changes in the licensee PSP submitted No
to RO within two months after the effective date of the
changes?

*Change to vault door, decreased overall protection.

This page can be released in total

[REDACTED]