

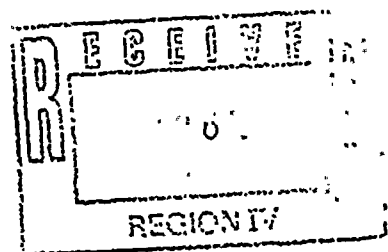
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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

April 19, 1999  
GO2-99-074



Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21,  
RESPONSE TO NRC INSPECTION REPORT 50-397/99-01

Reference: Letter dated March 19, 1999, GM Good (NRC) to JV Parrish (Supply System),  
"NRC Inspection Report 50-397/99-01"

In the reference the NRC Staff requested that the Supply System provide an evaluation of our provisions to maintain an adequate level of security. As requested in the reference, this response does not contain safeguards information.

The Staff was concerned that the practice of relocating armed personnel may invalidate the Supply System's response to the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a). Also, the Staff noted a difference between the number of armed personnel described in the physical security plan and the number used during the recent Operational Safeguards Response Evaluation (OSRE). Thus, the Staff questions the Supply System's ability to respond to a design basis threat with the number of armed personnel presently specified in the WNP-2 physical security plan. The Staff did acknowledge in the reference that subsequent to the recent OSRE the Supply System has maintained an appropriate number of on-duty armed security personnel inside the protected area.

The Supply System has reviewed the Staff's concerns and has determined that provisions are presently in place to maintain an adequate level of security at WNP-2. Regarding the practice of relocating armed personnel, our compensatory measure guidelines have been changed for specific environmental conditions so that fixed compensatory measure positions are no longer required. Regarding our response to a design basis threat with the number of armed personnel specified in our physical security plan, the Supply System has used the consulting services of Nuclear Security Services Corporation (NSSC) to review and validate our defense strategy. We have concluded that WNP-2 maintains an appropriate level of security (as presently defined in our physical security plan) to defend against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a). Our conclusions are based, in part, on the following:

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RESPONSE TO NRC INSPECTION REPORT 99-01

- The number of armed response personnel and their locations are adequate to defend against the design basis threat.
- The posture of the WNP-2 defensive strategy provides for defense-in-depth and a high probability of interdiction, neutralization and survival.
- The defensive positions are not predictable or exploitable due to their physical nature and manning requirements.
- Armed response personnel now continually maintain a defensive posture through validated response times to plant target sets and weapons deployment. This was accomplished, in part, because of changes in the compensatory measure guidelines as discussed above.
- Armed response personnel carry appropriate response equipment and use appropriate defensive cover/positions.

In summary, the Supply System has a defensive strategy in place to defend against the design basis threat using the number of security forces specified in our physical security plan.

Should you have any questions or desire additional information regarding this matter, please call DW Martin at (509) 377-8628 or PJ Inserra at (509) 377-4147.

Respectfully,



R. L. Webring  
Vice President, Operations Support/PIO  
Mail Drop PE08

REB

cc: EW Merschoff - NRC RIV  
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