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RECIP.NAME	RECIPIENT AFFILIATION
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SUBJECT: Forwards response to violations noted in Insp Repts
50-528/95-24, 50-529/95-24 & 50-530/95-24. Corrective actions:
security maint team adjusted alignment & sensitivity.

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Arizona Public Service

PALO VERDE NUCLEAR GENERATING STATION
P O BOX 52034 PHOENIX, ARIZONA 85072-2034

102-03611-WLS/AKK/DRL

February 28, 1996

WILLIAM L. STEWART
EXECUTIVE VICE PRESIDENT
NUCLEAR

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station: P1-37
Washington, DC 20555-0001

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Reply to Notice of Violations 50-528/529/530/95-24-01,
50-528/529/530/95-24-02, 50-528/529/530/95-24-03

Arizona Public Service Company (APS) has reviewed NRC Inspection Report 50-528/529/530/95-24 and the Notice of Violations (NOVs) dated January 22, 1996. Pursuant to the provisions of 10 CFR 2.201, APS' response is enclosed. Enclosure 1 to this letter is a restatement of the NOVs. APS' response is provided in Enclosure 2.

PVNGS welcomes scrutiny as we strive for a strong Physical Security Program. The inspection provided valuable information about our protected area integrity and the current regulations and enhancements have been made. We have some observations about the methods that were used to penetrate the limited barrier testing, relative to Regulatory Guide 5.44. The full protection for the vital area, that the PVNGS Physical Security Plan provides, was tested during the Operational Safeguards Response Evaluation (OSRE). The effectiveness of the PVNGS Physical Security Plan was demonstrated relative to preventing radiological sabotage. During the current inspection, using significant insider knowledge, the intrusion detection system barrier in the multi-barrier process was inspected and was found to have limited vulnerabilities.

APS respectfully requests that the issues identified by the inspectors be considered as advisory since there is no regulatory criteria with which we can use to adequately prevent these types of single failure events.

APS believes that the violations are not warranted for the protected area detection zones and compensatory measures, given the size of our perimeter, the overall number of zones and the number and manner in which zones were defeated. APS accepts the violation for access control/search functions.

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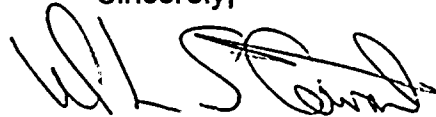
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U. S. Nuclear Regulatory Commission
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Reply to Notice of Violations 50-528/529/530/95-24-01,
528/529/530/95-24-02, 528/529/530/95-24-03
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Should you have any further questions, please contact Ms. Angela K. Krainik at
(602) 393-5421.

Sincerely,

A handwritten signature in dark ink, appearing to be 'WLS' followed by a stylized flourish or surname.

WLS/AKK/DRL/pv

Enclosures:

1. Restatement of Notice of Violation
2. Reply to Notice of Violation

cc: L. J. Callan
B. E. Holian
K. E. Johnston
K. E. Perkins



ENCLOSURE 1

RESTATEMENT OF NOTICE OF VIOLATIONS 50-528/529/530/95-24-01,

50-528/529/530/95-24-02 AND 50-528/529/530/95-24-03

NRC INSPECTION CONDUCTED DECEMBER 11 THROUGH

DECEMBER 15, 1995

INSPECTION REPORT No. 50-528/529/530/95-24



**RESTATEMENT OF NOTICE OF VIOLATIONS 50-528/529/530/95-24-01,
50-528/529/530/95-24-02 AND 50-528/529/530/95-24-03**

During an NRC inspection conducted on December 11-15, 1995, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

Paragraph 2.E. of the Facility Operating License No. NPF-41 for Palo Verde Nuclear Generating Station requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including all amendments to those plans made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55, and pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

- A. 10 CFR 73.55 (c) (4) requires that detection of penetration or attempted penetration of the protected area shall assure that adequate response by the security organization can be initiated.

Paragraph 3.1.5 of the licensee's physical security plan states that the perimeter intrusion detection systems both have a high level of assurance and are designed to detect a running, walking, crawling, rolling, or jumping intruder.

Contrary to the above, on December 12-13, 1995, NRC inspectors and contractors tested the protected area detection systems and determined that five of the zones, using various methodologies within the capabilities of the design basis threat, would not detect a simulated intruder. The failed zones indicate that an adequate response by the security organization would not be initiated.

This is a Severity Level IV violation (Supplement III) (528/9524-01, 529/9524-01, 530/9524-01).

- B. 10 CFR 73.55 (g) (1) requires that the licensee develop and employ compensatory measures including equipment, additional security personnel, and specific procedures to assure that the effectiveness of the security system is not reduced by failures or other contingencies affecting the operation of the security related equipment.

Paragraph 3.1.5 of the licensee's physical security plan requires that compensatory measures are to be taken in the event of partial or total failure of the protected area detection system in accordance with station security procedures.

Paragraph 3.7.1 of Station Security Procedure 20SP-0SK08 states that security shift supervision will post a member of the security force on the affected sector until the system is repaired.

Contrary to the above, on December 13, 1995, the inspectors determined that on December 12, 1995, a security officer posted as a compensatory measure for a failed zone was removed before the zone was properly repaired.

This is a Severity Level IV violation (Supplement III) (528/9524-02, 529/9524-02, 530/9524-02).

- C. 10 CFR 73.55 (d) (1) requires that the licensee access control search function, for personnel entering the protected area, must be accomplished through the use of firearms and explosive detection equipment capable of detecting those devices.

Paragraph 1.6.4.3 of the licensee's physical security plan states that personnel will undergo a search including a search for metal masses by metal detectors.

Paragraph 1.6.6 of the licensee's physical security plan states that access will be granted only after successful authorization of an individual through both systems (key card and hand geometry) except for visitors and emergency personnel access.

Contrary to the above, on December 13, 1995, fixed metal detectors used to search for metal masses such as firearms were determined to be unable to detect test weapons. On August 16, 1995, an employee caused an explosive detector alarm and was allowed to proceed into the protected area without being adequately searched after the alarm. On November 2, 1995, a security officer allowed an authorized employee to enter the protected area without adequate identification after the biometric handreader refused him entry.

This is a Severity Level IV violation (Supplement III) (528/9524-03, 529/9524-03, 530/9524-03).

ENCLOSURE 2

REPLY TO NOTICE OF VIOLATIONS 50-528/529/530/95-24-01,

50-528/529/530/95-24-02 AND 50-528/529/530/95-24-03

NRC INSPECTION CONDUCTED DECEMBER 11 THROUGH

DECEMBER 15, 1995

INSPECTION REPORT Nos. 50-528/529/530/95-24



**REPLY TO NOTICE OF VIOLATIONS 50-528/529/530/95-24-01,
50-528/529/530/95-24-02 AND 50-528/529/530/95-24-03**

A. 50-528/529/530/95-24-01 (Protected Area Detection Zones)

Reason For The Violation

PVNGS denies this violation since we believe that only one of the five zones in question was defeated by the NRC inspection team. Consistent with Regulatory Guide 5.44, APS believes that clarification of the facts is warranted with respect to regulatory requirements, manufacturer's guidance, station guidance and NRC performance testing.

1. Regulatory Requirements

10 CFR 73.55 (c)(4), "Detection of penetration or attempted penetration of the protected area or the isolation zone adjacent to the protected area barrier shall assure that adequate response by the security organization can be initiated"

Regulatory Guide 5.44 (C)(1)(b)(1), Microwave performance criteria, states in part, "A microwave perimeter alarm system should be capable of detecting an intruder weighing a minimum of 35 kilograms passing between the transmitter and receiver at a rate between 0.15 and 5 meters per second, whether walking, running, crawling or rolling"

Regulatory Guide 5.44 (C)(1)(c)(1), E-Field performance criteria, states in part, "An E-Field perimeter alarm system should be able to detect an individual weighing a minimum of 35 kilograms at least 0.5 meters from the sensing wire whether crawling and rolling under the lower sensing wire, stepping and jumping between the field and sensing wires, or jumping over the top sensing wire of the system."



Regulatory Guide 5.44 (C)(1)(f)(1), Infrared performance criteria, states in part, "An infrared perimeter alarm system should be capable of detecting an individual weighing a minimum of 35 kilograms passing between the transmitters and receivers at a rate between 0.15 and 5 meters per second, whether walking, running, jumping, crawling, or rolling."

There is no regulatory guidance identifying specific detection standards associated with jump test performance criteria; e.g., method, assistance, velocity, or height.

2. Manufacturers Guidance

a. Stellar Systems, Inc., E-Field Perimeter Protection System Operations

Manual, states in part:

- (1) Performance Criteria - "An E-Field perimeter alarm system shall detect an individual weighing a minimum of 77 lbs (35 kilograms) whether crawling and rolling under the lower sensing wire, or stepping and jumping between the field and sense wires at a minimum velocity of 3 cm per second."
- (2) Performance Tests - "Crawl Test, states in part: This test applies to all E-Field fence configurations where crawl detection is required. A person weighing at least 77 lbs (35 kilograms) is required for the test. After allowing several seconds for the system to stabilize, the intruder attempts to slide under the wire.

The intruder's body should be perpendicular to the sensor wires to minimize the length of wire affected by the intruder. Every effort should be made to restrain any sudden movements. The intruder should crawl slowly, less than 3 cm per second, and should avoid touching the sensor wire if possible."

During the review of Stellar Systems criteria, PVNGS identified a discrepancy in the operations manual regarding minimum velocity detection capabilities between performance criteria and crawl test criteria; e.g., minimum velocity of 3 cm per second versus less than 3 cm per second.



The manufacturer was contacted telephonically, acknowledged the discrepancy, and recommended that all testing be performed in accordance with the specified criteria found in Regulatory Guide 5.44, specifically, the minimum detection velocity of 0.15 meters per second (15 cm/sec).

b. Racon Incorporated, Racon Intrusion Detection Systems, microwave system specifications:

- Target Size: 12" (30 cm) sphere.
- Velocity: Less than 1" (2.5 cm) per second.

There is no manufacturer guidance identifying specific detection standards associated with jump test performance criteria; e.g., method, assistance, velocity, or height.

3. Station Guidance

Security Plan, Section 3.1.5 states in part, "An intrusion detection system is employed to detect penetrations of the protected area perimeter barrier."

"The microwave and photoelectric perimeter intrusion systems both have a high level of assurance and are designed to detect a running, walking, crawling, rolling, or jumping intruder, weighing 77 pounds or more, passing between the transmitter and receiver at a rate of between 0.5 and 20 feet/second."

"The E-Field perimeter intrusion detection system has a high level of assurance and is designed to detect an individual weighing 77 pounds or more, crawling and rolling under the lower sensing wire, stepping and jumping between the field and sensing wires, or jumping over the top sensing wire."



Security Plan Section 5.2.2 states in part, "Intrusion detection equipment meets the requirement for detection probability and confidence factor as recommended in Regulatory Guide 5.44, Revision 2, dated May 1980."

Procedure 20DP-OSK29, Security System Testing, Section 3.20.1 states in part, "Performance testing of perimeter intrusion equipment is a Security Plan Commitment. The performance test was designed with the aid of Regulatory Guide 5.44, Revision 2. This test shall be conducted on E-Field and/or microwave perimeter intrusion detection systems each quarter..."

Procedure 20DP-OSK29, Security System Testing, Section 3.20.3.1 states, "Jump tests shall be conducted for microwave mounting poles closest to the outer fence in zone overlap areas. The MSF attempting to approach the mounting pole shall walk at a normal pace until even with the pole and stand by for 5-10 seconds. If an alarm is received, this test is satisfactory."

Procedure 20DP-OSK29, Security System Testing, Section 3.20.4.2 states in part, "The testing MSF shall approach the E-Field locations by moving from the outer fence into the E-Field. Approach to within 12" of the E-Field and in one movement, squat down beside the zone and attempt to crawl thru the 2 bottom wires, stopping when an alarm is caused. The penetration test of the zone shall be at a pace no slower than 6 inches per second."

After reviewing the procedural requirements and developmental references, it was determined that present testing methods, as defined in 20DP-OSK29, are in compliance with established regulatory requirements and manufacturer guidance.



4. NRC Performance Testing

A review of the testing standards performed during the NRC inspection established the following performance criteria:

Zone Segment:	1
Component:	E-Field
Test Method:	Crawl
Target Velocity (Regulatory Guide 5.44):	Silent on E-Fields
Target Velocity Recommended (Mfr.):	0.15 m/sec to 5 m/sec
Target Distance (Regulatory Guide 5.44):	0.5 m from wire
Target Distance/Velocity (PVNGS Testing):	12" (.30m) from wire @ 0.15 m/sec
Recorded Velocity (NRC Testing):	0.0265 m/sec
Result:	Failed

Corrective Action: Security Maintenance Team (SMT) increased field sensitivity, and deterrent material was added to decrease the probability of an adversary attempting to gain access at that point.

Issue: Since RG 5.44 does not identify a target velocity for E-field, PVNGS, after discussion with the manufacturer, is applying the same target velocity used for microwave to its E-field testing criteria. Therefore, using this criteria, the test conducted on zone 1 was performed below the minimum detection velocity.

Zone Segment:	14A
Component:	Microwave
Test Method:	Three man jump
Target Velocity Recommended (Mfr.):	0.15 m/sec to 5m/sec



Target Velocity (Regulatory Guide 5.44):	0.15 m/sec to 5 m/sec
Target Velocity (PVNGS Testing):	0.15 m/sec to 5 m/sec
Recorded Velocity (NRC Testing):	Not Applicable
Result:	Failed

Corrective Action: SMT adjusted alignment and sensitivity.

Issue: The test conducted on zone 14A was performed in a method that circumvented the ability of the zone to detect intrusion. The test consisted of one individual climbing on to the shoulders of the other two individuals, thus elevating him to a height from which he could jump over the zone of detection and land on unstable ground.

The issue is the height to which a zone must be able to detect. NRC regulations and other guidance are silent on the issue of height. The project does believe that the information provided by the team is valuable and requests that this type of NRC testing should be considered as advisory.

Zone Segment:	15
Component:	Microwave
Test Method:	Climb
Target Velocity Recommended (Mfr.):	0.15 m/sec to 5 m/sec
Target Velocity (Regulatory Guide 5.44):	0.15 m/sec to 5 m/sec
Target Velocity (PVNGS Testing):	0.15 m/sec to 5 m/sec
Recorded Velocity (NRC Testing):	0.0265 m/sec
Result:	Failed



Corrective action: SMT adjusted alignment and sensitivity. Climbing platforms were removed and additional deterrent material was placed into position to decrease the probability of an adversary attempting to gain access at that point.

Issue: The test conducted on zone 15 was performed below the minimum detection velocity as specified by Regulatory Guide 5.44 and PVNGS testing procedures. Although the test, from initialization to completion, was performed under the minimum velocity associated with microwave detection capabilities; velocity, in conjunction with the selected path of intrusion, contributed to the defeat of the intrusion detection system.

The test consisted of one individual climbing approximately 16 foot up the side of a structure, maneuvering through and removing barriers (razor ribbon and barbed wire) to avoid the zone of detection.

Zone Segment:	21
Component:	Microwave
Test Method:	Three man jump
Target Velocity Recommended (Mfr.):	0.15 m/sec to 5 m/sec
Target Velocity (Regulatory Guide 5.44):	0.15 m/sec to 5 m/sec
Target Velocity (PVNGS Testing):	0.15 m/sec to 5 m/sec
Recorded Velocity (NRC Testing):	Not Applicable
Result:	Failed

Corrective Action: SMT adjusted the alignment and sensitivity. Deterrent material was added to decrease the probability of an adversary attempting to gain access at that point.

Issue: The test conducted on zone 21 was performed in a method that circumvented the ability of the zone to detect intrusion.



The test consisted of one individual climbing on to the shoulders of the other two individuals, thus elevating him to a height from which he could jump over the zone of detection and land on unstable ground.

The issue is the height to which a zone must be able to detect. NRC regulations and other guidance are silent on the issue of height. The project does believe that the information provided by the team is valuable and requests that this type of NRC testing should be considered as advisory.

Zone Segment:	.45A
Component:	E-Field
Test Method:	Jump
Target Velocity (Regulatory Guide 5.44):	Silent on E-Field
Target Velocity Recommended (Mfr.)	0.15 m/sec to 5 m/sec
Target Distance (Regulatory Guide 5.44):	0.5 m from wire
Target Distance (PVNGS Testing):	12" (0.3 m) from wire
Target Distance (NRC Testing):	0.6 m from wire
Result:	Failed

Corrective Action: Deterrent material was added to decrease the probability of an adversary attempting to gain access at that point.

The project believes it is important to put the testing in perspective. PVNGS has the longest protected area perimeter in the United States with thirty-eight (38) zones covering 8,501 feet. The NRC team spent sixty-four (64) hours in the clear zone assessing avenues of attack. This type of assessment is not available to anyone other than Security and SMT personnel.



PVNGS estimates that more than seventy (70) areas were evaluated as potential paths. The project recorded forty-three (43) actual attempts being made, of which five (5) attempts failed to detect the aggressor. As previously identified, the project asserts that only one (1) of the five zones was defeated by techniques consistent with published NRC guidelines and manufacturer's specifications.

Corrective Steps That Have Been Taken and Results Achieved

1. Zone configuration alignments were performed by the Security Maintenance Team which increased the probability of detecting an unauthorized intrusion attempt.
2. Deterrent devices were placed in identified areas of vulnerability which effectively removed the potential of an unauthorized intrusion attempt.

Corrective Steps That Will Be Taken To Avoid Further Violations

With the exception of zone 45A, PVNGS believes the actions taken are an enhancement to the existing intrusion detection system requirements in accordance with the PVNGS Physical Security Plan and that the project meets the regulatory requirements and manufacturer's recommendations.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 13, 1995, when the NRC identified deficiency within zone 45A was compensated for in accordance with PVNGS Security Procedure 20SP-OSK08, "Compensatory Measures for Loss of Security Equipment Effectiveness." Although compensated for, PVNGS does not believe that the other NRC identified deficiencies within this violation were out of compliance with regulations.



B. 50-528/529/530/95-24-02 (Compensatory Measures)

Reason For The Violation

PVNGS denies this violation since we do not believe the zone in question was defeated in accordance with RG 5.44 requirements by the NRC inspection team. APS believes that clarification of the facts is warranted with respect to regulatory requirements, manufacturer's guidance, station guidance and NRC performance testing.

Zone Segment:	15 (Re-test)
Component:	Microwave
Test Method:	Climb
Target Velocity Recommended (Mfr.):	0.15 m/sec to 5 m/sec
Target Velocity (Regulatory Guide 5.44):	0.15 m/sec to 5 m/sec
Target Velocity (PVNGS Testing):	0.15 m/sec to 5 m/sec
Recorded Velocity (NRC Testing):	0.0210 m/sec
Results:	Failed

Corrective Action: SMT readjusted alignment and sensitivity, removed climbing platforms, and placed additional deterrent material into position to decrease the probability of an adversary attempting to gain access at that point.

Issue: The test conducted on zone 15 was performed below the minimum detection velocity as specified by Regulatory Guide 5.44 and PVNGS testing procedures. Although the test, from initialization to completion, was performed under the minimum velocity associated with microwave detection capabilities; velocity, in conjunction with the selected path of intrusion, contributed to the defeat of the intrusion detection system.



The test consisted of one individual climbing approximately 16 foot up the side of a structure, maneuvering through and removing barriers (razor ribbon and barbed wire) to avoid the zone of detection.

The removal of established compensatory measures in zone 15, after the initial test, was based on successful completion of intrusion detection system testing in accordance with PVNGS operating procedures which are developed using regulatory guidance and manufacturer's specifications.

Corrective Steps That Have Been Taken and Results Achieved

1. Zone 15 configuration alignment and sensitivity was readjusted by the Security Maintenance Team to increase the probability of detecting an unauthorized intrusion attempt.
2. Additional deterrent devices were placed in the identified areas of vulnerability to decrease the probability of an adversary attempting to gain access at that point.

Corrective Steps That Will Be Taken To Avoid Further Violations

PVNGS believes the actions taken are an enhancement to the existing intrusion detection system requirements in accordance the PVNGS Physical Security Plan and that the project meets the regulatory requirements and manufacturer's recommendations.

Date When Full Compliance Will Be Achieved

Although compensated for, PVNGS does not believe that the NRC identified deficiency within this violation was out of compliance with regulations.

C. 50-528/529/530/95-24-03 (Access Control/Search Functions)

Reason For The Violation

PVNGS accepts the violation.



1. Fixed Metal Detectors

The results of the investigation determined that failure to properly adjust metal detector sensitivity according to the manufacturer's recommendation as committed to in the PVNGS Physical Security Plan was the root cause of this event.

Based on PVNGS security technician experience, the Phillips Dynascreen WT-50 walk through metal detector, when placed in the operating environment present in PVNGS Security Headquarters, can exhibit sensitivity fluctuations. These fluctuations in sensitivity can vary based on the following factors:

- air temperature
- relative humidity
- saturation
- operation of other machinery in the area

Sometime after the introduction of these detectors, a decision was made to adjust them below the manufacturer's recommendations and begin using the minimum sensitivity settings to meet the testing guidance provided in the security systems testing procedure. This decision was based on an unacceptable number of false/nuisance alarms. Ultimately, this decision in conjunction with the environmental conditions created the possibility that the metal detectors sensitivity may drop below the minimum required to detect test devices (Colt or Titan .25 cal).

Amendment 39 to the PVNGS Physical Security Plan, Section 12.1 states "security equipment tests and inspections shall be performed in accordance with Regulatory Guide 5.44 for perimeter intrusion equipment and manufacturer's recommendations for the balance of security equipment. Deviations from the manufacturer's test and inspection performance requirements will be documented in approved engineering documents."



The evaluation was not performed and had not been discovered prior to this NRC inspection. On January 19, 1996, engineering document change 95-00127 was issued to correct this oversight.

2. Explosive Detector Alarm

On August 18, 1995, a PVNGS employee received a nitrate alarm while processing through the search area just prior to entering the Protected Area (PA).

This individual then proceeded to process through the turnstile and enter the PA without being stopped by members of the security force (MSF).

The root cause of this event was identified as a cognitive personnel error in that one of the MSF failed to stop the employee from entering the PA due to a distraction (personal telephone call) which kept him from performing his job related responsibilities and the other MSF was unable to lock the turnstile in time due to confusion over which button to push.

3. Biometric Handreader

On November 2, 1995, a PVNGS employee received an ID verified at the biometric handreader but was unable to proceed through the turnstile. After notifying the MSF, the employee was instructed by the MSF to try the biometric handreader again. The employee received an ID verified from the handreader and was again unable to proceed through the turnstile. The MSF believed that the employee was proceeding slowly from the handreader to the turnstile because of tools he was carrying and decided to allow the employee to enter through door H40. The MSF then received notification of an invalid ACAD, due to site access training expiration, from CAS and immediately entered the PA and escorted the employee to Security Headquarters where he was subsequently escorted out of the PA.



The root cause of this event was a cognitive personnel error on the part of the MSF in that he allowed the individual access and did not contact shift supervision.

Corrective Steps That Have Been Taken and Results Achieved

1. **Fixed Metal Detectors**

- a. An approved engineering document change was issued allowing a deviation from the manufacturer's test and performance requirements for the Phillips Dynascreen WT-50 walk through metal detectors prior to their replacement.
- b. The old detectors were replaced with four new detectors (Garrett Magnascanner MT5500 Model 1167700) on January 24, 1996 and acceptance testing was completed on January 31, 1996.

2. **Explosive Detector Alarm**

- a. The ingress telephone has been changed to only ring down to the central alarm station (CAS).
- b. The turnstile lock down button has been color coded red to eliminate future confusion and minimize reaction time on the part of MSF and security personnel have been briefed on this change.
- c. This event is being added to security industry events training as a briefing for MSF.

3. **Biometric Handreader**

- a. The MSF received coaching from his immediate supervision on the correct procedures for handling this type of situation in the future.

- b. This event is being added to security industry events training as a briefing for MSF.

Corrective Steps That Will Be Taken To Avoid Further Violations

1. **Fixed Metal Detectors**

The corrective action which has been taken for this event should preclude further violations.

2. **Explosive Detector Alarm**

The corrective action which has been taken for this event should preclude further violations.

3. **Biometric Handreader**

The corrective action which has been taken for this event should preclude further violations.

Date When Full Compliance Will Be Achieved

1. **Fixed Metal Detectors**

Full compliance was achieved on January 17, 1996, when the sensitivity level was increased to manufacturers specifications on the Phillips Dynascreen WT-50 walk through metal detectors.

2. **Explosive Detector Alarm**

Full compliance was achieved on August 16, 1995, when the employee was subsequently re-searched (approximately 2-3 minutes later), and no alarms were received.

3. **Biometric Handreader**

Full compliance was achieved on November 2, 1995, when the employee was subsequently escorted out of the PA.

