



WISCONSIN PUBLIC SERVICE CORPORATION

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March 23, 1993

10CFR 50.54(p)

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Revision to the KNPP Security Training and Qualification Manual

In response to an NRC concern involving the KNPP Security Training and Qualification Manual (T&QM) physical fitness test, WPSC initiated a review of the test adequacy and, whether it included a level of physical exertion needed to actually respond to a security event. Upon completion of this review, WPSC decided to strengthen the security officer overall physical agility program. Later, after performing an independent technical review of the entire security program, WPSC initiated an effort to up-grade the entire T&QM. This effort resulted in a complete re-write of the manual.

Attachment 1 provides a matrix to assist in the review of the revised T&QM. The matrix provides a section-by-section comparison of the revised T&QM sections and the current T&QM sections that were used as the basis for the revision. In addition a brief description of the changes made to the section or content of the section is provided.

Attachment 2 provides the revised T&QM. The proposed revisions to the T&QM were discussed with NRC Region III staff reviewers on February 18, 1993. During this discussion, WPSC proposed that this manual not be controlled as safeguards information. WPSC further proposed that with the exception of Section 2.3 Physical Fitness Qualification, the manual would be effective immediately. In order to provide an opportunity for security personnel to become familiar with the new physical agility performance requirements, Section 2.3 would not become effective until July 1, 1993.

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Finally, WPSC has determined that these changes do not decrease the safeguards effectiveness required by 10CFR 73 Appendix B and therefore they are submitted in accordance with the provisions of 10CFR 50.54(p)(2). In accordance with the provisions of 10CFR 50.4(b)(4), enclosed you will find the original and three (3) copies of the revised T&QM.

Sincerely,



C.A. Schrock
Manager - Nuclear Engineering

DJM

cc - US NRC - Region III
Senior Resident Inspector, US NRC

Attachment 1 to March 23, 1993

Letter from C.A. Schrock to Document Control Desk

Description of Changes

KEWAUNEE NUCLEAR POWER PLANT TRAINING AND QUALIFICATION MANUAL DESCRIPTION OF CHANGES

The Kewaunee Nuclear Power Plant (KNPP) Training and Qualification Manual (T&QM) has been revised to:

- Present the T&QM in similar format as the KNPP Security Manual.
- Delete obsolete and redundant commitments and statements.
- Incorporate wording found in 10CFR Part 73 Appendix B.

The following matrix is provided to assist in the review of the revised T&QM. The matrix provides a section by section comparison of the revised T&QM and the current T&QM section that were used as the basis for the revision. In addition, a brief description of changes made to the section or content of the section is provided in the last column. The T&QM may or may not utilize the original text of the current T&QM, however the intent of the current T&QM commitments and statements is contained within the new sections.

The current T&QM is classified as Safeguards Information however after a review of the contents (pursuant to 10CFR73.21) the revised T&QM will be declassified when issued.

TRAINING AND QUALIFICATION MANUAL DESCRIPTION OF CHANGES

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
1.0	Introduction	Changed Plant Manager (P.M.) and Security Director (S.D.) as responsible parties for implementation of the program to personnel who are responsible for the protection of KNPP. Reworded to be more consistent with Security Manual (S.M.). Added requirement of contractor staff above rank of Captain to be crucial task qualified only. Added requalification on a nominal 12 month period. Added decertification requirements.
2.0	1.0	Title change from "Employment Suitability and Qualification" to "Security Force Suitability and Qualification Requirement". Made suitability requirement to that of 5.0 in the S.M.
2.1	1.1	Title change from "Personal Background Suitability" to "Suitability". Reduced unnecessary long wording.
2.1.1	1.1.1	Removed GED reference and score percentage and reworded to require Security Force members to pass a state or nationally recognized equivalent performance examination. Added reference to foreign education requirements.
2.1.2	1.1.2	Changed "Criminal Background" to "Felony Convictions". Added FBI fingerprint submittal and review. Determination of reliability removed from Contract Facility Manager and Security Director as it is now part of Access Authorization requirement.

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
2.1.3	1.1.3	Distinguished age requirements for armed and unarmed Security Force members.
2.2	1.2	Title change from "Physical and Mental Qualifications" to "Physical Qualifications". Separated mental and physical qualifications in separate sections.
2.2.1	1.2.1	Title change from "Physical Qualifications" to "General". Changed wording from security officers and armed watchman to Security Force. Changed wording to be consistent with 10CFR73 Appendix B. Moved physical exam requirement to 2.2.2.
2.2.2	1.2.1	Impart from old 1.2.1 physical examination. Changed security officer and armed watchman to Armed Personnel, CAS and SAS Operators. Expanded on old 1.2.1 to allow administration of exams by licensed health care professional and confirmed by physicians. Added section B for written statement of successfully passing exam or that individual is free from weaknesses or abnormalities. Added section C requiring supportive qualifying statements for physical impairments.
2.2.3	1.2.1.1	Physical Requirements - Armed Personnel and CAS/SAS Operators. Divided old 1.2.1.1 into 8 different subsections. Changed wording to be consistent with 10CFR73 Appendix B.

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
A.1		Changed requirement from carry an extra pair of corrective lenses to have available on site.
A.4		Changed requirement for "Facility Manager" to evaluate mild color vision.
A.8		Added corrective eyewear not interfering with assigned duties.
2.2.3.B	1.2.1.3	Divided old 1.2.1.2 into three subsections. Changed wording to be consistent with 10CFR73 Appendix B on use of hearing aid not interfering with assigned duties. Added 2.2.3.B.1.3 for conducting tests above required limits to identify future hearing problems.
2.2.3.C	1.2.1.3	Added 10CFR73 Appendix B wording on lapsing into coma and medication not adversely affecting the individual.
2.2.3.D	1.2.1.4	Added wording to be more consistent with 10CFR73 Appendix B requirement that rehab documentation comes from a licensed health professional trained in drug and alcohol disorders.
2.2.4	1.2.1.5	Title change from "Medical Certification" to "Incapacitation". Added wording to be more consistent with 10CFR73 Appendix B. Changed "individual" to "Armed Personnel and CAS/SAS Operators". Removed "in the judgement of the Facility Manager".

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
2.3	1.3	Physical Fitness Qualification is broken down into four subsections 2.3.1 A, B, C, & D. Changed 30 day requirement of a physical exam prior to agility test to 90 days as it was removed from 10CFR73 Appendix B.
2.3.2	1.3.1	Title change from "Performance Objectives" to "Physical Agility Performance Test Requirements". This section was a complete change. Added requirements for failure of tests.
2.4	1.2 1.3 1.4	Placed all physical requirements under one section. Added nominal period and allowable extension.
2.5	1.2.2	Divided old 1.2.2 into 3 subsections A, B, and C and 2.5.2.A.
2.5.1		Added 2.5.1 as a qualifier for meeting objectives.
2.5.1.A	N/A	Removed Security Officers (S.O.) and Watchman and replaced with individuals who's assigned job duties. Added wording as in 10CFR73 Appendix B.
2.6	1.2.2.1	Title change from "Continued Observation" to "Continual Behavior Observation". Divided old 1.2.2.1 into two subsections. Moved physical disability requirement to 2.2.1.A. Changed implementation of rehabilitation from Facility Manager to those described in 2.5.2.A.

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
2.6.2	1.4	Replaced requirement for annual mental recertification with ongoing Continued Behavior Observation. Physical requalification moved to section 2.4.
3.0	2.0 2.1 2.2 2.3	Expanded explanation of T & Q program. Major revision included dividing the requirements into five separate sections.
4.0	3.1 3.2	This section involved an entire rewrite. Changed to 9mm. Daytime wording eliminated and requirement for weapons qualifications moved to 4.0.
4.3	3.2.2	Replaced hip fire with standing shoulder position. Minimum score requirements upgraded from 50% to 70% overall.
4.4	3.2	Nighttime familiarization moved to section 4.4. Identified how to achieve night time conditions.
5.0	1.5 2.4.1 2.4.2 2.4.3 3.4	Documentation and Retention Periods. Moved documentation and retention requirements into one section.
5.5 5.6	2.4.3	Upgraded to meet new retention standards.

NEW T&QM	CURRENT T&QM	DESCRIPTION OF CHANGE
5.9	2.4.1	Changed to 5.9. Added S.D. or his designee as reviewer and approval of T&Q documents.
6.0	4.0	Title change from "S/O Equipment" to "Security Force Composition and Equipment". Expanded definitions.
7.0	5.0	Quality Assurance - Expanded definitions. QA to be conducted as stated in S.M.
8.0	N/A	Added definitions.
Table 1	Table A-1	Title change. Changed original T&Q schedule to an ongoing initial and annual training schedule.
Table 2	Table 2-1 2-2 2-3	New tables incorporate each category to a specific condition with a standard to be maintained. Each training topic is addressed for the applicable job category.

Attachment 2 to March 23, 1993

Letter from C.A. Schrock to Document Control Desk

Training and Qualification Manual

WISCONSIN PUBLIC SERVICE CORPORATION
KEWAUNEE NUCLEAR POWER PLANT

SECURITY FORCE TRAINING AND QUALIFICATION MANUAL

Rev. 0
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1.0 INTRODUCTION

Security Force personnel who are responsible for the protection of the Kewaunee Nuclear Power Plant (KNPP), (as defined in the KNPP Security Manual and Security Safeguards Contingency Plan), are required to meet the requirements of this manual to assure that they effectively perform their assigned security related duties. This manual outlines the process by which Security Force personnel are selected, trained, tested, and qualified.

In addition to outlining the training process, the KNPP Training and Qualification Manual (T & QM) provides the mechanism for developing, maintaining, validating, and verifying the Security Force training program.

Security Force personnel will not be assigned to a duty until they have successfully completed all training and qualification requirements for that duty. Security Force instructors, management, and supervisory personnel above the rank of captain, because of their job assignments, will not be required to be trained in accordance with the provisions of this plan, but will be qualified in the crucial tasks.

Proficiency will be maintained through daily observation by the security supervisors and by requalification on a nominal twelve (12) month frequency (annual). If, at any time, an officer fails to demonstrate the required degree of proficiency for any crucial task associated with their shift assignment, they will be decertified and will receive retraining until satisfactory performance is demonstrated or a decision is made to permanently disqualify them.

2.0 SECURITY FORCE SUITABILITY AND QUALIFICATION REQUIREMENTS

2.1 SUITABILITY

Prior to assignment of security duties within the KNPP Security Force, an individual shall meet the suitability criteria described in section 5.0 of the S.M. and the following sections.

2.1.1 Educational Development

Members of the KNPP Security Force shall possess a high school diploma or pass a state or nationally recognized equivalent performance examination. In the case of individuals educated in foreign countries, documentation to support the equivalent of a high school education from the country of origin will be considered to have met the educational requirements.

2.1.2 Felony Convictions

Security Force personnel shall have no felony convictions involving the use of weapons and have no felony convictions that reflect on the individual's reliability. Fingerprint cards are submitted to the Federal Bureau of Investigation (FBI) via the U.S. Nuclear Regulatory Commission (USNRC). A review of the individual's fingerprint cards for potential criminal history information is conducted upon receipt.

2.1.3 Age Requirement

Armed members of the Security Force must have attained the age of twenty-one (21) prior to assignment. For unarmed positions within the Security Force a minimum age of eighteen (18) years is acceptable.

2.1.4 A personnel (suitability) record for each member of the Security Force shall be maintained at the Kewaunee Nuclear Power Plant. The record shall contain certification that the background investigation and sections 2.1.1, 2.1.2, 2.1.3 were successfully completed and shall be available for inspection.

2.2 PHYSICAL QUALIFICATIONS

2.2.1 General

Individuals assigned to the KNPP Security Force, whose assigned job duties are directly associated with the implementation of the KNPP Security Manual and Security Safeguards Contingency Plan, shall have no physical weaknesses or abnormalities that would adversely affect the performance of assigned job duties.

- A. Responsible supervisory personnel shall maintain continued observation of Security Force personnel for indications of physical weaknesses or abnormalities that would adversely affect the performance of assigned job duties.

2.2.2 Physical Examination

Armed Personnel, Central Alarm Station (CAS), and Secondary Alarm Station (SAS) Operators shall successfully pass an annual physical examination administered by a licensed physician. The examination shall be designed to measure the individual's physical ability to perform assigned job duties.

- A. The physical examination may be administered by a licensed health professional trained to administer physical examinations. The final confirmation of the individual's physical condition and ability to perform the physical duties and tasks shall be made by a licensed physician.
- B. For Armed Personnel and CAS/SAS Operators the physician will provide either one of the following:
 - 1. A written statement that the individual successfully passed the required examination.
 - 2. A written statement that the individual does not have any physical weaknesses or abnormalities that would adversely affect their performance of assigned job duties or participation in a physical agility test.
- C. In the event of a physical impairment detected during a physical, a licensed physician's supportive qualifying statement of ability to perform assigned job duties shall be sufficient justification to allow the individual to continue their employment within the Security Force.

2.2.3 Physical Requirements - Armed Personnel and CAS/SAS Operators

A. Vision

1. For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye, and 20/40 in the other eye, with eyeglasses or contact lenses. If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall have available on site, an extra pair of corrective eyeglasses or contact lenses while on duty.
2. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye.
3. Field of vision must be at least 70 degrees horizontal meridian in each eye.
4. The ability to distinguish red, green, and yellow colors is required. The affects of mild color vision defects will be evaluated as part of the individual's job duty qualifications to determine if the defect significantly degrades performance of assigned job duties.
5. Loss of vision in one eye is disqualifying.
6. Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means. Controlled glaucoma shall not be disqualifying, provided such medications as may be used for controlling glaucoma does not cause the individual to exhibit undesirable side effects which adversely affect the individuals ability to perform assigned job duties.
7. Where the use of corrective eyeglasses is required, they shall be of the safety glass type.
8. The use of corrective eyeglasses or contact lenses shall not interfere with the individual's ability to effectively perform assigned job duties.

B. Hearing

1. Individuals shall have no hearing loss in the better ear greater than 30 decibels average at 500, 1000, and 2000 Hz, with no level greater than 40 decibels at any one frequency (by ISO 389, "Standard Reference Zero for the Calibration of Purtone Audiometer", (1975) or ANSI S3.6-1969 (R.1973), "Specification for Audiometers").

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2. The use of a hearing aid is acceptable provided the auditory acuity requirements stated in section 2.2.3.B.1 above are met. The affect of the use of such an aid will be evaluated as part of the individual's job duty qualifications to ensure that such an aid does not adversely affect the individual's ability to perform assigned job duties.
3. Testing may be conducted at ranges above those stated in section 2.2.3.B.1 above, but only to identify the possible reduction of hearing. Losses detected in ranges above required testing shall not be disqualifying.

C. Diseases

Individuals shall have no established medical history or medical diagnosis of epilepsy or diabetes. Where such a condition exists a licensed physician shall provide documented medical evidence or a written statement to the affect that the condition can be controlled with proper medication such that the individual will not lapse into a coma or unconscious state and that the medication will not adversely affect the individual's ability to perform assigned job duties.

D. Addictions

Individuals shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction. Where such a condition has existed, the individual shall provide certified documentation from a licensed health professional trained in drug and alcohol disorders, of having completed a medically recognized rehabilitation program. The certified documentation shall provide a reasonable degree of confidence that the individual would be capable of performing assigned job duties.

2.2.4 Incapacitation

Watchman, Armed Personnel, and CAS/SAS Operators who have been incapacitated by a serious or prolonged illness, injury, disease, or operation to the extent that they cannot effectively perform their assigned job duties will be required to provide, prior to resumption of assigned job duties, medical evidence of recovery and ability to perform such assigned job duties.

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2.3 PHYSICAL FITNESS QUALIFICATION

2.3.1 Physical Agility Qualification

- A. The physical agility of Armed Personnel and CAS/SAS Operators to perform assigned job duties will be identified and tested.
- B. Within ninety (90) days, prior to physical agility performance testing, personnel will successfully pass a physical examination as required within Section 2.2.
- C. The physical agility performance test should not be conducted outside in conditions of inclement weather, ie., snow, rain, freezing or high temperatures, etc., or in conditions that would jeopardize the safety of the personnel being tested.
- D. Physical agility tests shall be conducted prior to initial assignment of assigned job duties associated with armed response and annually thereafter.

2.3.2 Physical Agility Performance Test Requirements

- A. The physical agility performance test shall consist of a forty (40) yard dash and a four hundred forty (440) yard run, and requires completion within a given time. Officers shall be equipped with standard issue equipment ie. duty belt, handgun, handcuffs, and radio.
- B. Course Description
 - 1. Phase one of the course consists of a start and finish line forty (40) yards apart on a flat, straight path.
 - 2. Phase two of the course consists of a start and finish line four hundred forty (440) yards apart on a flat surface. The course may be conducted on either an oval or straight track.
 - 3. The sequence of the test requires that the forty (40) yard dash is completed first with a maximum one and one half (1 1/2) minute rest prior to beginning the four hundred forty (440) yard run.
- C. Failure of either phase of the testing will result in failure of the physical agility performance test and will require both phases to be repeated.

D. Running the Course

1. The examinee will start with the forty (40) yard dash at the start line and begin when instructed by the examiner. The dash must be completed within 10.5 seconds.
2. After successfully completing the forty (40) yard dash the examinee may take a rest up to one (1) minute and thirty (30) seconds.
3. The four hundred forty (440) yard run will start with the examinee at the start line and beginning when instructed by the examiner. The run must be completed within two (2) minutes and forty-five (45) seconds.

2.4 PHYSICAL REQUALIFICATION

- 2.4.1 Armed Personnel and CAS/SAS Operators shall be required to meet the physical requirements of sections 2.2.2 (Physical Examinations), 2.2.3 (Physical Requirements), and 2.3 (Physical Fitness Qualification) within a nominal 12 month period with a maximum allowance extension not to exceed three (3) months. The combined time interval for a three (3) year period shall not exceed three years and three months.

2.5 MENTAL QUALIFICATIONS

2.5.1 General Mental Qualifications

- A. Security Force Members, whose assigned job duties are directly associated with the implementation of the KNPP Security Manual and Security Safeguards Contingency Plan, shall demonstrate mental alertness and the capability to exercise good judgement, implement instructions, assimilate assigned job duties, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, audible, visible, or other signals required by assigned job duties.
- B. The successful completion of verbal and/or written tests associated with the Training and Qualification Program, shall serve as a demonstration that the individual possesses the necessary cognitive and communication skills required by their assigned job duties.
- C. Armed Personnel and CAS/SAS Operators shall demonstrate no emotional instability that would interfere with the effective performance of assigned job duties.

2.5.2 Professional Mental Qualifications Examinations

- A. The use of written or other acceptable testing techniques are acceptable, provided the final determination of mental qualification is made by a licensed psychologist, psychiatrist, physician, or other person professionally trained and certified to identify emotional instability.

2.6 CONTINUAL BEHAVIOR OBSERVATION

2.6.1 Supervisory Personnel Responsibilities

- A. Responsible supervisory personnel shall maintain continued observation of Security Force personnel for indications of emotional instability during the performance of assigned job duties.
- B. The identification of potential emotional instability by a responsible supervisor(s) shall be subject to verification by an individual identified in section 2.5.2.A.

2.6.2 Annual Mental Requalifications

Annual mental requalification testing is not required as Security Force members are subject to an ongoing Continual Behavior Observation Program.

3.0 TRAINING AND QUALIFICATION PROGRAM

Successful implementation of the KNPP Security Manual and the Security Safeguards Contingency Plan requires that the Security Force personnel are trained and qualified to perform assigned job duties. The KNPP Training and Qualification Manual was developed to identify the training to be provided for Security Force personnel.

3.1 GENERAL

- 3.1.1 Training will be conducted in accordance with information set forth and established within the task lesson plans.
- 3.1.2 CAS and SAS operations training and qualification standards are provided within lesson plans specific to those duties. CAS/SAS duties are normally performed by supervisors. Due to constant ongoing performance of CAS/SAS functions, annual requalification training is not required for certified operators. Certified CAS/SAS Operators will maintain certification by on-the-job evaluations conducted by either an instructor or qualified evaluator. Certified CAS/SAS Operators who are not involved in a constant ongoing performance of CAS/SAS functions shall receive annual requalification training to maintain certification.
- 3.1.3 Armed Personnel and Watchpersons will be trained and qualified to the level appropriate to their assigned job duties.

3.2 TRAINING PROGRAM OVERVIEW

The KNPP Security Force Training and Qualification program is divided into two (2) major training categories. These categories are initial training and requalification training. Training may be conducted in the environment most conducive to the subject matter and may range from classroom, to lab, to on-the-job training in the field. The demonstration of the ability to perform assigned job duties may be by one or more of the following testing techniques: hands-on component, written component, verbal component. Individual tasks may be performed for qualification under actual or simulated situations/conditions. Certification of individuals shall be provided following documentation by an instructor or a qualified evaluator that the individual satisfactorily demonstrated their ability to perform assigned job duties.

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3.3 INITIAL TRAINING REQUIREMENT

- A. Prior to assignment to the KNPP Security Organization, each individual, who will perform crucial security related tasks, is trained and qualified to perform those tasks associated with the individual's duty assignment.
- B. Individuals with previous security experience at another DOE/NRC licensed facility or that have been trained and qualified in similar security duties, may be exempt from certain portions of the training program. Individuals being exempt from portions of the training program shall demonstrate their ability to perform those duties to the satisfaction of either an instructor or qualified evaluator.
- C. During initial training a minimum score of 70% overall is required to pass.

3.4 INITIAL TRAINING

3.4.1 Initial training is designed for those individuals with no background, experience, or education in nuclear security. The initial training consists of seven (7) basic job categories:

- A. Escort
- B. Compensatory Post
- C. Access Control
- D. Search
- E. Patrol
- F. Response Team
- G. Central and Secondary Alarm Stations (as appropriate).

3.4.2 The job categories, along with the crucial tasks, which are necessary for accomplishing the performance objectives of the KNPP Security Manual are identified in Table 2 of this manual and approved lesson plans.

3.5 ANNUAL REQUALIFICATION TRAINING

- 3.5.1 Annual requalification training in the crucial subject areas shall be limited to:
- A. Significant changes occurring over the past year.
 - B. Areas in which repetitive errors have occurred over the past year.
 - C. Additions of new subject areas over the past year.
 - D. Areas in which requalification cannot be accomplished through on-the-job observation and evaluation.
- 3.5.2 Performance based crucial tasks and sub-task requalifications may be accomplished by direct observation in the work environment by an instructor or qualified evaluator.
- 3.5.3 Requalifications shall be performed within a nominal twelve (12) month period with a maximum allowance extension not to exceed three months. The combined time interval for a three year period shall not exceed three years and three months.
- 3.5.4 During annual requalification training a minimum score of 80% overall is required to pass.

4.0 WEAPONS QUALIFICATION/REQUALIFICATION

Security Force personnel assigned to duties which require the use of a weapon shall demonstrate knowledge and proficiency in the use of their assigned weapons prior to job assignment.

4.1 WEAPONS KNOWLEDGE AREAS

4.1.1 The weapons training program shall be established to provide during initial qualification, classroom associated training in the following weapons knowledge areas:

- A. Mechanical assembly, disassembly, range penetration capability of weapon and target firing.
- B. Weapons cleaning and storage.
- C. Handgun combat firing, day and night.
- D. Safe weapons handling.
- E. Cleaning, loading, unloading and reloading.
- F. When to draw and point a weapon.
- G. Rapid fire techniques for handgun and shotgun.
- H. Close quarter firing with handgun and shotgun.
- I. Stress firing.

4.1.2 Proficiency in the weapons knowledge area shall be demonstrated by achieving a score of at least 70% on a written examination covering those areas which are not performance based.

4.2 HANDGUN

4.2.1 To qualify in the use of a handgun, the armed Security Force member shall fire a combat course which consists of:

- A. A 68-round, 6-phase course
- B. Fired from distances of 3 to 25 yards
- C. Fired at the B-27 full size silhouette target
- D. Fired strong hand from supported, unsupported, standing, kneeling and roll-over prone weaver positions
- E. The functions of recovery, holstering, or returning to the ready position are not considered to be included in the noted time constraints.

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4.2.2 The Handgun Combat Course shall consist of the following:

- A. Begin with three (3) magazines loaded with seventeen (17) rounds each.
- B. Instructors verify rounds.

PHASE I

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
3 yards	12	Weaver position two-hand grip.	Fire two two-round bursts. Fire two four- round bursts. * On command, insert a magazine and chamber one round. Recover and holster. * On command, draw from a snapped holster, fire a two-round burst within three (3) seconds. Return to the ready position. * On command, from the ready position, fire a four-round burst within three (3) seconds. Recover and holster. * On command, draw from a snapped holster, fire a two-round burst within three (3) seconds. Recover and holster. * On command, draw from a snapped holster, fire a four round burst within four (4) seconds. Recover and holster.

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PHASE II

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
5 yards	13	Weaver position.	<p>Fire three two-round bursts. Fire one three-round burst. Fire one four-round burst.</p> <p>* On command, draw from a snapped holster, fire a two-round burst within three (3) seconds. Return to the ready position.</p> <p>* On command, from the ready position, fire a three-round burst, reload without command, and fire a two-round burst within fifteen (15) seconds. Recover and holster.</p> <p>* On command, draw from a snapped holster, fire a two-round burst within three (3) seconds. Return to the ready position.</p> <p>* On command, from the ready position, fire a four-round burst within three (3) seconds. Recover and holster.</p>

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PHASE III

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
7 yards	14	Weaver position.	Fire three two-round bursts, and fire one three-round burst, and one five-round burst. * On command, draw from a snapped holster, fire three two-round bursts within ten (10) seconds. Recover and holster.
		Weaver kneeling position.	* On command, draw from a snapped holster, fire one three-round burst. Assume a kneeling position reload without command, fire one five-round burst within twenty-five (25) seconds. Recover and holster.

Note: After phase III:
Score and change targets.
Reload one (1) magazine with seventeen (17) rounds.
Instructors verify rounds.

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PHASE IV

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
12 yards	15	Weaver position.	Fire six two-round bursts, and fire one three-round burst. * On command, draw from a snapped holster, fire four two-round bursts within ten (10) seconds. Recover and holster. * On command, draw from a snapped holster, fire two two-round bursts, reload without command, and fire one three-round burst, within twenty (20) seconds. Recover and holster.

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PHASE V

Distance

15 yards

Rounds

8

Position

Weaver
position.

Requirements

Fire eight rounds in
either two-round bursts
or single rounds rapid
fire.

* On command, draw from
a snapped holster, fire
four rounds within ten
(10) seconds (can be
either two round bursts
or single rounds rapid
fire). Recover and
holster.

Weaver
kneeling
position.

* On command, draw from
a snapped holster,
assume a kneeling
position, and fire four
rounds within ten (10)
seconds
(can be either two-round
bursts or single rounds
rapid fire). Recover
and holster.

PHASE VI

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
25 yards	6	Barricade (left or right), kneeling, roll-over prone (weaver position).	<p>Fire six rounds in either two-round bursts or single rounds rapid or slow fire.</p> <p>This phase of three positions will be fired within thirty (30) seconds.</p> <p>* On command, draw from a snapped holster, fire two rounds from the standing barricade position (either left or right side, supported or unsupported).</p> <p>* Assume a kneeling position behind a barricade and fire two rounds.</p> <p>* Move to a roll-over prone position, and fire the final two rounds. Recover and holster.</p>

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- 4.2.3 Qualification firing shall consist of 68 rounds fired on command from 3, 5, 7, 12, 15, and 25 yards at a B-27 full size silhouette target. Scoring will be as follows:
- A. All rounds placed in the X, 10, 9, and 8 rings shall score as 5 points
 - B. All rounds in the 7 ring shall score as 4 points
 - C. All other rounds placed elsewhere within the silhouette target shall score as 3 points
 - D. All rounds placed outside the silhouette target shall score as zero points.
- 4.2.4 A minimum qualification score shall be 70% of the total possible score for the course of fire, (340 possible points, requires a minimum of 238 points for qualification).

4.3 SHOTGUN

4.3.1 To qualify in the use of a shotgun, the armed Security Force member shall fire a shotgun course which consists of:

- A. An 8-round, 2-phase course.
- B. Fired from distances of 15 and 25 yards.
- C. Fired at the B-27 full size silhouette target.
- D. Fired standing, using the shoulder firing position.
- E. Fired with a 12-gauge shotgun with a choke ranging from improved cylinder or tighter, up to full choke.
- F. Shotgun shell ammunition used is 00-gauge with 9 pellets per round.
- G. The function of returning to the ready position is not considered to be included in the noted time constraints.

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4.3.2 The shotgun course shall consist of the following:

- A. Begin with 4 rounds loaded in the shotgun.
- B. Instructors verify rounds.

PHASE I

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
15 yards	4	Standing shoulder fire	Fire four rounds at four separate targets. * On command, from the ready position, fire one round at each of the four separate targets within ten seconds. Return to the ready position.

Note: After phase I:
Reload with 4 rounds.
Instructors verify rounds.

PHASE II

<u>Distance</u>	<u>Rounds</u>	<u>Position</u>	<u>Requirements</u>
25 yards	4	Standing shoulder fire	Fire four rounds at four separate targets. * On command, from the ready position, fire one round at each of the four separate targets within ten seconds. Return to the ready position.

- 4.3.3 A minimum qualification score shall be at least 70% (51 of 72), 00-gauge pellets scored within the silhouette portion of the 4 targets used.

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4.4 NIGHTTIME FIRING FAMILIARIZATION

- 4.4.1 Nighttime familiarization firing shall be required only during the individual's initial weapons qualification. Neither qualifying scores or time limitations are required for this course of fire.
- 4.4.2 Nighttime familiarization firing is conducted with the handgun and shotgun. The course is fired under actual reduced lighting conditions or under simulated reduced lighting conditions created by dimming the range lights at indoor ranges.

4.5 ANNUAL WEAPONS REQUALIFICATION

- 4.5.i Annual weapons requalifications shall be conducted in accordance with sections 4.1 (Weapons Knowledge Area), 4.2 (Handgun), and 4.3 (Shotgun).

5.0 DOCUMENTATION AND RETENTION PERIODS

5.1 SUITABILITY

The certification, identified in section 2.1, of successfully meeting the suitability requirements for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.2 PHYSICAL QUALIFICATIONS

The certifications of successfully meeting the initial and annual physical qualifications, for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.3 MENTAL QUALIFICATIONS

- 5.3.1 The certifications of successfully meeting the initial mental qualifications and any required mental requalifications, for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.
- 5.3.2 The certifications of annual evaluation under a Continuous Behavioral Observation Program, for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.4 PHYSICAL FITNESS QUALIFICATIONS

- 5.4.1 The certifications of successfully meeting the initial and annual physical qualifications for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.
- 5.4.2 The certifications of successfully meeting the initial and annual physical agility requirements for armed members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.5 INITIAL TRAINING

The certifications of successful completion of the initial crucial task training, for members of the Security Force, shall be retained for the length of employment plus three (3) years or the life of KNPP plus three (3) years, whichever is shorter.

5.6 ANNUAL REQUALIFICATION TRAINING

- 5.6.1 The certifications of successful completion of the annual requalification training in the crucial task areas, for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.7 TRAINING AND QUALIFICATION MANUAL/TRAINING MATERIALS

5.7.1 KNPP Training and Qualification Manual

The KNPP T & QM shall be retained for the life of the Plant plus three (3) years. Superseded portions of the KNPP T & QM shall be retained for a period of three (3) years after the revision was made.

5.7.2 Supporting Documentation and Records

Superseded or discontinued materials used to support the T & QM program will be maintained as part of the KNPP Security Force training records for a period of three (3) years.

5.8 WEAPONS QUALIFICATIONS AND FAMILIARIZATIONS

The certification form documenting successful weapons qualification and requalification, for members of the Security Force, shall be retained as required in section 18.3 of the Security Manual.

5.9 RECORDS REVIEW AND APPROVALS

Personnel, Initial and Requalification records for members of the Security Force badged for unescorted access shall include documentation of training received during initial and requalification periods as identified in section 2.0, 3.0, and 4.0 of this manual.

Records identified above shall be reviewed and approved by the Security Director or his designee.

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6.0 SECURITY FORCE COMPOSITION AND EQUIPMENT

6.1 SECURITY FORCE COMPOSITION AND EQUIPMENT

The composition and staffing of the KNPP Security Force is specified in the approved KNPP Security Manual. The routine and contingency KNPP Security Force equipment is specified in the approved KNPP Security Manual. Quantities, locations, and availability of routine and contingency equipment are provided in applicable security procedures. Security Force equipment inventory and inspection criteria are provided in applicable security procedures. The types and amounts of weapons and ammunition required for use and available to the Security Force is specified in the KNPP Security Manual and appropriate security procedures.

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7.0 QUALITY ASSURANCE

7.1 AUDITS

- A. Internal audits are performed by Quality Assurance personnel who are independent of the Security Force organization.
- B. Audits shall be conducted as required in section 15.2.1 of the Security Manual.

8.0 DEFINITIONS

Annual - Annual is defined as a nominal twelve (12) month period with a maximum allowance extension not to exceed three months, but the combined time interval for a three year period shall not exceed three years and three months.

Certification - Documented verification by an instructor or qualified evaluator that a member of the Security Force has successfully demonstrated proficiency in performing assigned job duties according to established standards.

Condition - Those environmental, physical, and mental conditions, equipment, posts, etc. that the members of the Security Force could experience during the performance of assigned job duties.

Crucial Task(s) - An action or series of actions performed by a member(s) of the Security Force that produces a product or an achievable result that is crucial to the successful implementation of the KNPP Security Manual or Security Safeguards Contingency Plan, and if improperly executed, could cause unsatisfactory performance and possible danger to the Plant.

Element - An element is an integral part of a task or subtask which, alone or in conjunction with other elements, dictates the outcome of a task or subtask.

Instructor - An individual possessing special skills or knowledge or advanced training in subject areas and empowered to pass these special skills, or knowledge, or advanced training on to others.

Lesson Plan - Provides written information to an instructor as to how specific tasks and their respective elements should be presented to the students.

Qualified Evaluator - A Security Force supervisor who, by virtue of the job assignment, possesses an understanding of the Training and Qualification Manual criteria and other relative performance evaluation criteria as well as having the capability of certifying and decertifying Security Force personnel in the performance of their assigned security-related duties.

Security Officer - A trained and qualified armed member of the Security Force.

Standards - Standards are those measurable and observable characteristics of a task that tell how well the task is being or has been performed. Standards may include time, percentages of correct versus incorrect responses, etc.

Assigned Job Duties - Are specific action(s) performed by an individual or group of individuals in response to situations. Assigned job duties have definite starting and ending points. Assigned job duties contain elements that are measurable, observable by a trained observer, and may be evaluated to determine the acceptability of the overall performance of the task.

Watchperson - An unarmed, trained and qualified member of the Security Force, consistent with Security Manual Definition.

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TABLE 1

TRAINING AND QUALIFICATION SCHEDULE

QUALIFICATION/TRAINING PROGRAM ELEMENT	SECURITY PERSONNEL	FREQUENCY
Physical Examinations	CAS/SAS, Armed Personnel	Initial & Annual
Physical Agility Qualification Testing	CAS/SAS, Armed Personnel	Initial & Annual
Indoctrination Training - General Employee Training	All Personnel	Initial & Annual
Crucial Task Qualification and Requalification	According to Assignment	Initial & Annual
WEAPONS QUALIFICATION AND REQUALIFICATION		
Handgun/Shotgun Proficiency	CAS/SAS, Armed Personnel	Initial & Annual
Nighttime Familiarization	CAS/SAS, Armed Personnel	Initial
Contingency Plan	CAS/SAS, Armed Personnel	Initial & Annual

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TABLE 2

JOB ANALYSIS SHEET

<u>JOB CATEGORY</u>	<u>CRUCIAL TASK</u>	<u>CONDITIONS</u>	<u>STANDARDS</u>
1.0 Escort Officer	1.1 Perform Personnel Escort.	Personnel not cleared for unescorted access to protected, security, or vital areas.	Provide 100% security and control of visitors while in the protected/vital areas.
	1.2 Perform Vehicle Escort.	Non-designated vehicle requires entry to the protected areas.	Perform escort duties in accordance with security control procedures.

Training Topics

Role of Private Security Personnel in Providing Physical Protection to the Nuclear Industry
 Authority of Private Security Personnel
 Power of Arrest and Authority to Detain Individuals
 Authority to Search Individuals and Seize Property
 Basic Armed and Unarmed Defensive Tactics
 Self-Defense
 Use of Non-Lethal Weapons
 Use of Deadly Force
 Mechanics of Detention
 Personal Equipment Use/Operation of Normal/Contingency Operations
 Security Response to Emergency Situations Other Than Security Incidents

JOB CATEGORYCRUCIAL TASKCONDITIONSSTANDARDS

2.0 Compensatory
Officer

2.1 Perform
Compensatory
Measures for
Security
Equipment
Failure/Shutdown.

When any one or
multiple components
associated with the
PIDS, CCTV, and ACS
fail such that security
is posted to compensate
for it.

Take position at the
area of
failure/shutdown and
provide required
security in place of
the equipment per
security control
procedures.

Training Topics

Types of Physical Barriers
Security Command and Control System During Normal Operation
Security Systems Operations After Component Failure
Types of Alarm Systems Used
Exterior and Interior Alarm Systems Operations
Duress Alarm Operations
General Concepts of Fixed Site Security Systems

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<u>JOB CATEGORY</u>	<u>CRUCIAL TASK</u>	<u>CONDITIONS</u>	<u>STANDARDS</u>
3.0 Access Control Officer	3.1 Control Personnel Access To/From the Protected Area.	Personnel request access to/from the Protected Area.	Store, inventory, issue and retrieve security ID badges, process visitors and monitor the personnel portals in the security building.
	3.2 Verify Acceptance of Material.	Personnel request to deliver material.	Ensure that delivery is expected and will be accepted by plant personnel.
	3.3 Operate Vehicle Electronic Gate.	Vehicles require entry to or exit from the protected area.	Open/close gate at the request of the Search Officer.

Training Topics

Facility Security Organization and Operation
Security Logs and Reports
Protection of Safeguards Information
Protected Area Security and Vulnerability

JOB CATEGORYCRUCIAL TASKCONDITIONSSTANDARDS

4.0 Search Officer

4.1 Observe and
Control Personnel
Using the
Security Building
Screening
Equipment.Personnel and/or
packages require entry
to the protected area.Screen all personnel
and packages with the
security screening
equipment or by hands-
on examination before
entry to the protected
area.4.2 Control Vehicle
Access/Egress
To/From the
Protected Area.Vehicle requires
entry/egress to/from
the protected area.Verify authorization
and search vehicle for
contraband.Training TopicsSearch Techniques and Systems for Individuals, Packages, and Vehicles
Contraband Detection Systems and Techniques
Security Equipment Testing

<u>JOB CATEGORY</u>	<u>CRUCIAL TASK</u>	<u>CONDITIONS</u>	<u>STANDARDS</u>
5.0 Patrol Officer	5.1 Patrol the Protected Area.	Officer is assigned to patrol the protected area.	Detect breaches, intrusions, or degradations of perimeter barriers.
	5.2 Respond to Protected Area Alarms and Breaches.	CAS/SAS announces an alarm at a protected area alarm point.	Determine reason for the alarm and operability of the alarm system, respond to intrusion/breach per procedure.
	5.3 Perform Test on Perimeter Security Systems.	When required by procedure or when directed.	Security equipment performance will be tested as described by procedure.
	5.4 Patrol Assigned Areas Inside the Plant.	Officer is assigned to patrol a specific area.	Detect and report safety hazards, unusual activities, or unauthorized personnel. Take required compensatory measures.
	5.5 Respond to In-Plant Alarms.	CAS/SAS announces an alarm at an in-plant alarm point.	Determine cause of alarm and operability of the alarm system, take compensatory measures as required by procedures.

JOB CATEGORYCRUCIAL TASKCONDITIONSSTANDARDS

5.6 Respond to Vital
Area Breach.

Possible vital area
breach is announced or
breach is discovered.

Determine nature and
cause of the breach,
relay information to
CAS/SAS, and stand by
the area to prevent
unauthorized access.

5.7 Test Vital,
Protected, and
Security Area
Portals.

When required by
procedure or when
directed.

Security equipment
performance will be
tested as described by
procedure.

Training Topics

Security and Situation Reporting, Documenting, and Report Writing

Location of Vital Areas Within the Plant

Barriers and Other Delay Systems Around Vital Areas

Protected Area and Security Area Vulnerability

Escort and Patrol Responsibilities and Operations

Response and Assessment Systems and Techniques

Communications Systems Operations

Access Control System and Operations Overview

Recognition of Sabotage Related Devices and Equipment That Might Be Used Against the Licensee's Facility

Response and Assessment to Alarm Annunciations and Other Indications of Intrusions

<u>JOB CATEGORY</u>			<u>CRUCIAL TASK</u>	<u>CONDITIONS</u>	<u>STANDARDS</u>
6.0	Response Member	Team	6.1 Respond to Contingency Events.	Contingency event as described by procedure.	Perform duties prescribed by contingency procedures for each listed event.

Training Topics

Use of Deadly Force
 Security Command and Control During Contingency Operation
 Security Coordination With Local Law Enforcement Agencies
 Contingency Procedures
 Contingency Duties
 Security Alert Procedures
 Response Force Deployment
 Response Force Organization
 Response Force Mission
 Response Force Operation
 Response Force Engagement
 Response Force Tactical Movement
 Response Force Withdrawal
 Response Force Use of Support Fire
 Adversary Group Operations
 Motivation and Objectives of Adversary Groups
 Tactics and Force That Might Be Used by Adversary Groups to Achieve Their Objectives
 Response to Bomb and Attack Threats
 Response to Civil Disturbances
 Contingency Response to Confirmed Intrusion or Attempted Intrusion
 Vulnerabilities and Consequences of Industrial Sabotage of a Facility
 Response to Confirmed Attempted Industrial Sabotage of the Plant
 Response to Hostage Situations
 Site Specific Armed Tactical Procedures and Operation

<u>JOB CATEGORY</u>	<u>CRUCIAL TASK</u>	<u>CONDITION</u>	<u>STANDARDS</u>
7.0 Central and Secondary Alarm Station Operator	7.1 Operation of the Computer Access Control (ACS) and Perimeter Intrusion Detection (PIDS) Systems.	Normal and abnormal situations. Events and responses associated with the ACS and PIDS are received and monitored on the stations CRT's.	Perform duties associated with each situation or as prescribed by procedure.
	7.2 Operation of the Closed Circuit Television System (CCTV).	CCTV units are functioning in normal, alarm, or maintenance modes.	Monitor the CCTV system, assess alarm, and verify criteria following maintenance prescribed by procedure.
	7.3 Operation of Communication Equipment.	Need to communicate with Security Force, LLEA, or Plant Staff Personnel.	Contact various personnel using available mode of communication in accordance with procedures.

Training Topics:

Supervisor Training Program
Alarm Stations Operation