

## WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305



May 4, 1982

Dr. Harold R. Denton, Director  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Dr. Denton:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Revision of the Kewaunee Industrial Security Manual (ISM) and  
Format Changes to the Security Contingency Plan (SCP) and  
Security Force Training and Qualification Manual (T&QM)

During the periodic review required by Section 9.7 of the ISM, we identified several areas where changes are desirable.

The majority of the changes are typographical corrections, changes to reflect current titles of persons with security responsibilities or to more fully define the area of responsibilities of security personnel. A change not falling in these categories was made on page 3-12. Previous wording of that page stated that key cards would be captured by a mechanical device upon exit from the protected area. The present wording will allow exit from the protected area by using a non-capturing card reader. This change was prompted by the poor performance of the card capturing reader. A statement supporting our determination that this is not a lessening of security effectiveness is attached. This attachment is considered safeguards information within the context of 10 CFR 73.21 and as such must be protected from disclosure.

Also enclosed is a copy of the SCP and a copy of the T&QM. There has been no change in the content of these two documents. However, they are now being produced in a manner which will allow a page-by-page revision and are being provided to you, in whole, for your convenience.

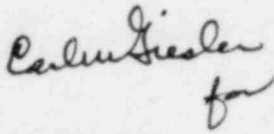
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The entire ISM and the entire SCP are considered Safeguards Information within the context of 10 CFR 73.21 and must be protected from disclosure. The portions of the T&QM which must be protected are marked "Security Safeguards Information."

This submittal is made under the provisions of 10 CFR 50.54(p) as changes which do not lessen the security effectiveness of the plan. In order to assist your review of the revised ISM, a list of affected pages has been included as Attachment 2 to this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "E. R. Mathews", with a small "for" written below it.

E. R. Mathews  
Senior Vice President  
Power Supply & Engineering

snf  
Enc.

cc - Mr. J. G. Keppler, US NRC  
Mr. Robert Nelson, US NRC - w/o enc.

## ATTACHMENT SUPPORTING THE REMOVAL OF THE CARD CAPTURING READER

## AT THE KEWAUNEE PLANT

The purpose of the card capturing reader is to "provide positive control over the access cards, thereby minimizing the probability of compromise of the system by copies of cards."

WPS has contacted Rusco Electronics Systems, the equipment manufacturer, to ascertain the ease in which the cards may be duplicated. We were informed that the cards contain over  $10^{39}$  different code permutations using 55 magnetic read areas. Rusco has contracted several laboratories to duplicate the encoding on the card. Only Underwriters Labs (UL) has been successful in code duplication (and they had to destroy the original to do it) indicating that considerable expertise is needed to increase the probability of Access Control System compromise.

In addition to the inherent security of the card against duplication, several actions will be taken to minimize the probability that the cards will be removed from the site. First, during high traffic times a security officer or watchman will be present at the protected area exit to observe proper deposition of the key cards. Second, the key cards will be inventoried at the end of each shift to identify those cards, if any, which were removed from the site. Any cards removed from the site will be deactivated. These actions are the subject of a Security General Order recently issued (SGO-16).

We feel that the above measures offer equivalent protection of the key cards and, therefore, replacing the card capturing card reader with a read only card reader is properly made under the provisions of 10 CFR 50.54(P).

5/4/82

SECURITY  
SAFEGUARDS  
INFORMATION

## List of pages affected by Revision 3 to the Kewaunee ISM.

3	1-34
1-1	1-35
1-2	Figure 1-1
1-3	Figure 1-2 (deleted)
1-5	3-12
1-8	3-17
1-9	3-23
1-11	4-2
1-12	4-3
1-15	5-1
1-18	5-2
1-22	5-3
1-26	5-4
1-30	Figure 5-10 (added)
1-33	