

December 30, 1999

Mr. D. R. Gipson
Senior Vice President
Nuclear Generation
The Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERM 2 SECURITY ISSUE RESOLVED

Dear Mr. Gipson:

Section S.1.1 of Inspection Report No. 50-341/97012 dated September 25, 1997 identified an unresolved item pertaining to the adequacy of compensatory measures relating to the VBS (vehicle barrier system). This issue has been reviewed and resolved by the Safeguards Branch, Division of Reactor Program Management, Office of Nuclear Reactor Regulation and is discussed below.

The unresolved item concerned what constitutes adequate compensatory measures for VBS gates with inoperable tamper alarms when the gate is located outside the protected area and is not under surveillance by closed circuit television.

Licensees are required by 10 CFR 73.55(c)(7) to provide protection against the design basis threat vehicle and vehicle bomb. Licensees are also required by 10 CFR 73.55(c)(4) to detect penetration or attempted penetration of the protected area barrier in order to ensure that an adequate response by the security organization can be initiated. Licensees are required by 10 CFR 73.55(g)(1) to develop and employ compensatory measures to assure that the effectiveness of the security system is not reduced by failure of security related equipment or structures. NUREG-1045, "Guidance on the Application of Compensatory Safeguards Measures for Power Reactor Licensees," recommends that compensatory measures should: (1) be applied only for the minimum time necessary, (2) provide an equivalent level of protection, and (3) meet the general performance objective and requirements of 10 CFR 73.55(a).

Inadequate compensatory measures could reasonably allow an adversary to remain undetected while defeating the VBS gate with hand tools. The adversary could then penetrate the protected area with the design basis vehicle before the security organization could initiate an adequate response. The purpose of a physical protection system is achieved only if the safeguards or compensatory measures selected allow response personnel to confront and control an adversary in a timely manner.

PDR ADOCK

D. Gipson

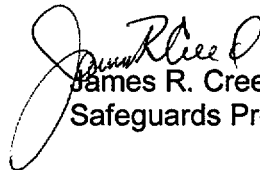
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NRR Headquarters has concluded that acceptable compensatory measures in this case are limited to the use of alternate detection systems, procedures, and equipment that possess detection capabilities equivalent to those provided by a properly operating tamper alarm, or installation of temporary barriers that provide protection equivalent to the surrounding VBS.

Resolution of this issue is being provided so your staff can assure adequate compensatory measures for a failed tamper alarm associated with an active VBS gate.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice", a copy of this letter will be placed in the NRC Public Document Room (PDR).

Sincerely,





James R. Creed
Safeguards Program Manager

Docket No. 50-341
License No. NPF-43

cc : N. Peterson, Director, Nuclear Licensing
P. Marquardt, Corporate Legal Department
Compliance Supervisor
R. Whale, Michigan Public Service Commission
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MI Department of State Police

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