



**SMUD**

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ P. O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211  
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

MPC&D 01-041

March 19, 2001

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

Docket No. 72-11  
Rancho Seco Independent Spent Fuel Storage Installation  
**Continual Surveillance of the Rancho Seco Independent Spent Fuel Storage  
Installation Protected Area**

Attention: Randy Hall

During an NRC Security Inspection on March 14 and 15, 2001, NRC Region IV Inspector Dennis Schaefer raised a concern regarding compliance with 10 CFR 73.51(d)(3). In part, 10 CFR 73.51(d)(3) states,

*“The perimeter of the protected area must be subject to continual surveillance and be protected by active intrusion alarm system...”*

The NRC raised the concern that under the current security configuration (i.e., prior to implementation of Phase II of the ISFSI Physical Protection Plan), “continual surveillance” of the ISFSI Protected Area Barrier is not addressed. The NRC considers continual surveillance to be frequent checks of the facility.

Based on discussions with the NRC, SMUD Security will initiate Compensatory Post Orders that will establish the ISFSI as the primary base of responsibility for the Vehicle Patrol Officer. The NRC and SMUD Management agreed that establishing the ISFSI as the primary base of responsibility for the Vehicle Patrol Officer will ensure that the officer is in sufficient proximity to provide continual surveillance of the ISFSI Protected Area boundary and is adequate to comply with the intent of 10 CFR 73.51(d)(3).

We will begin implementing the Compensatory Post Orders on March 31, 2001.

*Wm Schaefer*

If you, or members of your staff, have questions requiring additional information or clarification, please contact Bob Jones at (916) 732-4843.

Sincerely,

A handwritten signature in black ink that reads "Steve Redeker". The signature is written in a cursive style with a large, stylized "S" at the beginning.

Steve Redeker

Manager, Plant Closure & Decommissioning

Cc: Andrew Rayland, NRC Rockville  
Dennis Schaefer, NRC, Region IV  
E. W. Merschoff, NRC, Region IV