

YANKEE ATOMIC ELECTRIC COMPANY

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USNRC



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OFFICE OF SECRETARY
DOCKETING & SERVICE
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FYC 95-011

DOCKET NUMBER
PROPOSED RULE PR 73

(60 FR 24803)

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTENTION: Docketing and Service Branch

SUBJECT: YANKEE ATOMIC ELECTRIC COMPANY COMMENTS - PROPOSED RULE
TO CHANGE NUCLEAR POWER PLANT SECURITY REQUIREMENTS
ASSOCIATED WITH CONTAINMENT ACCESS CONTROL (60 FR 24803,
May 10, 1995)

Dear Mr. Hoyle:

Yankee Atomic Electric Company (YAEC) appreciates the opportunity to comment on the proposed rule concerning changes to nuclear power plant security requirements associated with containment access control. YAEC owns the nuclear power plant in Rowe, Massachusetts. Yankee Nuclear Services Division also provides engineering and licensing services to other nuclear power stations in the Northeast.

We fully endorse the proposed rule change and urge expeditious action on the part of the Commission in completing this rulemaking so that licensees can be offered the benefits of the expected cost savings and the reduction in unnecessary radiation doses to their personnel as soon as possible. The comments that accompanied the proposed rule for containment leakage testing, which were issued earlier this year (60 FR 9634), noted that "by allowing requirements with marginal effect on safety, but which impose a significant cost on licensees, to remain in effect is to essentially misallocate a portion of the NRC's and the industry's resources on activities for which there is no commensurate return in safety." We believe that it is obvious that this truism applies in equal measure to the proposed deletion of this unnecessary security requirement.

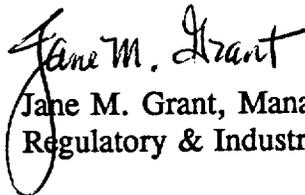
We are concerned about one detail in the discussion which accompanies the proposed rule change. This discussion includes the statement: "It should be noted that this change

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JUN 20 1995

Mr. John Hoyle
June 9, 1995
Page 2

would apply only to access from vital areas into reactor containment... ." We believe that this statement is unnecessary and that it has the potential to inappropriately deny a number of plants the benefits of the proposed rule change. There are plants at which access to the containment is not from an area formally designated as a vital area. However, in our experience, these areas are invariably provided with access controls and other security features that provide reasonable assurance that the security of such areas exceeds that of the plant's protected area. We believe that the acceptability of such arrangements has been demonstrated by the fact that the physical security plan of every plant has been reviewed and approved by the NRC. In order to minimize the potential for confusion and the need for exemption requests by licensees, we strongly recommend that the statement in the discussion be removed.

Sincerely,
YANKEE ATOMIC ELECTRIC COMPANY


Jane M. Grant, Manager
Regulatory & Industry Affairs