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USNRC

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OFFICE OF SECRETARY
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BRANCH

June 9, 1995
NRC-95-0073

Secretary,
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D. C. 20555

DOCKET NUMBER
PROPOSED RULE **PR 73**
(60 FR 24803)

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Proposed Rule, 10 CFR Part 73, Changes to Nuclear Power Plant Security Requirements Associated with Containment Access Control, 60 FR 24803, dated May 10, 1995

Subject: Detroit Edison Comments on the Proposed Rule for Security Requirements Associated with Containment Access Control

The purpose of this letter is to support the subject proposed rule and endorse the NEI response to Reference 2.

Detroit Edison fully supports the proposed rule changes especially for the following reasons cited in the discussion section of the Federal Register:

- Earlier rule making (Access Authorization, Criminal History Checks and Fitness for Duty) increased the protection against the insider threat.
- Personnel entering containment have already been given access to plant vital areas.
- Material entering containment has already been searched and cleared when entering the protected area.

At Fermi 2, this rule change would reduce two 24 hour per day posts during a refueling or major maintenance outage where heavy traffic into containment is

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required. This represents a substantial burden reduction without compromising physical protection of the facility.

In addition, Detroit Edison endorses the NEI response to the subject proposed rule for Security Requirements Associated with Containment Access Control.

If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

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