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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
U.S. Nuclear Regulatory Commission
Attention: Docketing and Service Branch
Washington, DC 20555

DOCKET NUMBER
PROPOSED RULE PR 73
(60 FR 24803)

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395,
COMMENTS ON CHANGES TO NUCLEAR POWER PLANT
SECURITY REQUIREMENTS ASSOCIATED WITH
CONTAINMENT ACCESS CONTROL

This letter provides comments on Nuclear Regulatory Commission's proposed rule published in the Federal Register on May 10, 1995, amending 10 CFR Part 73, "Changes to Nuclear Power Plant Security Requirements associated with containment access control."

South Carolina Electric and Gas Company (SCE&G) agrees that the requirements to control access to reactor containments during periods of high traffic are too stringent and should be revised to decrease the regulatory burden for the licensee. These requirements are not necessary to reduce an internal threat and can be decreased without compromising the physical protection of the health and safety of the public against radiological sabotage.

The proposed deletion of 10 CFR 73.55(d)(8) does not relieve SCE&G of physical security requirements that are marginal to safety, redundant, or out-of-date. The proposed rule will actually impose additional regulatory burdens upon the Virgil C. Summer Nuclear Station.

The reactor containment at Virgil C. Summer Nuclear Station is a vital area and the areas adjacent to the reactor containment entry portals which provide access to the building, are protected areas. The containment doors are closed, locked, and alarmed during periods of operation. During periods of high traffic when containment integrity is not required, the containment doors are open.

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Acknowledged by card.....

Positive access controls to ensure that only authorized personnel enter the reactor containment is currently established by posting a member of the security force at the affected portal. Current regulations allow either a guard or watchman to exercise this positive access control. The proposed rule will impose the more restrictive standard compensatory action for a vital area physical barrier by requiring the use of an armed guard.

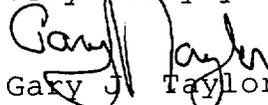
It is not practical to provide positive access control to the containment vital area with card reader controlled locks on the containment portals and it is not practical to cycle the portal doors open and closed as required for containment access during periods of high traffic.

This amendment would impose new requirements on Virgil C. Summer Nuclear Station and contrary to the backfit analysis would not be voluntary. The proposed rule will require either a modification to the design of the facility or a modification to the procedures or organization required to operate the facility. The backfit rule, 10 CFR 50.109 does apply to this proposed rule. This rule change will not meet the requirements of providing a substantial increase in the overall protection of the public health and safety or the common defense and security. The direct and indirect implementation costs have not been justified.

SCE&G recommends that the Nuclear Regulatory Commission amend current 10 CFR 73.55(d)(8) to read: "Any time frequent access is permitted to containment such as during refueling or major maintenance, positive access control must be exercised by access through an adjacent vital area or by the licensee, with an armed guard, watchperson, or non-security personnel who are trained and qualified to perform the task and who are provided with appropriate communications equipment." This will provide licensees with the option to voluntarily implement the amendment and the backfit rule will not be applicable.

SCE&G appreciates the opportunity to review and provide comment on this petition for rulemaking.

Very truly yours,


Gary J. Taylor

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File (73.011)
Central File System (CFS)
RTS (PR 950014)