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*Southern California Edison Company*

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E. SCOTT MEDLING  
MANAGER, REGULATORY PROJECTS  
SAN ONOFRE NUCLEAR GENERATING STATION

May 2, 1997

OFFICE OF SECRETARY TELEPHONE  
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BRANCH

Secretary, U.S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D.C. 20555-0001

DOCKET NUMBER  
PROPOSED RULE **PR 73**  
(62 FR 7721)

Subject: Southern California Edison (Edison) Comments on Proposed Changes to 10 CFR Part 73, "Physical Protection of Plants and Materials," (62 Fed. Reg. 34, pg. 7721-7725, February 20, 1997)

Gentlemen:

In the subject Federal Register Notice, NRC solicited comments on proposed rulemaking regarding nuclear power plants physical security requirements. These changes were identified by NRC as marginal to safety, redundant, or no longer effective, and as reducing the regulatory burden on licensees without compromising physical protection.

This proposed rule would eliminate the requirement for escort of licensee-owned vehicles entering the protected area (PA) for work-related purposes provided that these vehicles are driven by licensee employees who have unescorted access.

At San Onofre Nuclear Generating Station (SONGS), and many other nuclear power plants, most vehicles entering the PA are driven by contract employees who undergo the same security screening as licensee employees. Consequently, the proposed change, as written, would not provide the reduction in regulatory burden intended by the proposed change.

Edison recommends that the last sentence of 10CFR73.55(d)(4) be revised as follows:

"Escort is not required for licensee-owned vehicles entering the protected area driven by site workers having unescorted access."

Since contract employees are subjected to the same security requirements as regular employees, this change would not cause any reduction in security effectiveness as compared to the original proposed change.

MAY 09 1997

Should you have any questions, please contact Marty Speer at 714-368-6251.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. J. Medley".

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV  
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV  
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