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DOCKETED  
USMRC

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH



May 6, 1997

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET NUMBER  
PROPOSED RULE PR 73  
(62FR 7721)

**ATTENTION:** Docketing and Services Branch

**SUBJECT:** Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Comments on Proposed Rule: Changes to Nuclear Power Plant Security Requirements

**REFERENCE:** (a) Federal Register Notice 62FR7721, dated February 20, 1997, Proposed Rule, Changes to Nuclear Power Plant Security Requirements; Request for Public Comments

The Baltimore Gas and Electric Company is pleased to provide comments on the subject proposed rule changes.

The proposed rule would eliminate the requirement for security personnel to escort licensee-owned vehicles entering the Protected Area for work-related purposes, provided they are driven by licensee employees who have unescorted access.

We propose the following minor changes:

1. Change the vehicle from "licensee owned" to "licensee owned or leased." *To state only licensee-owned vehicles are exempt could be misinterpreted when a great number of licensees routinely lease their fleet of vehicles as a normal business practice.*
2. Change the driver requirements from "licensee employees" to "persons granted unescorted facility access." *To limit vehicle operators to licensee employees only is too restrictive. Both company and contract employees must satisfy the same access authorization requirements as stated under 10 CFR 73.56 for unescorted access. All employees with unescorted access are also covered under the licensees' fitness for duty/continual observation programs.*

Document Control Desk

May 6, 1997

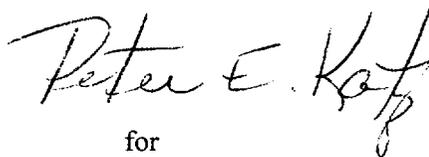
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Title 10 CFR 73.55 currently recognizes unescorted facility access as an indication of trustworthiness and reliability. Title 10 CFR 73.55(d)(8) states, "The licensee shall issue keys, locks, combinations, and other access control devices to protected and vital areas only to persons granted unescorted facility access." If the Code recognizes unescorted access as a condition to obtain keys to vital and protected areas, it should be the standard to operate a vehicle in protected and vital areas.

We appreciate the opportunity to comment on the proposed rule changes and look forward to their issuance.

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



for

C. H. Cruse

Vice President - Nuclear Energy

CHC/SJR/dlm

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