



Carolina Power & Light Company
 PO Box 1551
 411 Fayetteville Street Mall
 Raleigh NC 27602

May 5, 1997

Mr. John C. Hoyle
 Secretary
 U.S. Nuclear Regulatory Commission
 Attention: Docketing and Service Branch
 Washington, DC 20555-0001

DOCKETED
 USNRC

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OFFICE OF SECRETARY
 DOCKETING & SERVICE
 BRANCH

PE&RAS-97-045

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

SUBJECT: Changes to Nuclear Power Plant Security Requirements (Proposed Rule)

Dear Mr. Hoyle:

The purpose of this letter is to provide Carolina Power & Light Company's (CP&L) comments on the NRC's proposed changes to 10 CFR Part 73 [Federal Register: February 20, 1997 (Volume 62, Number 34)] [Proposed Rules] [Page 7721-7725] .

CP&L concurs with the proposed rule changes as written, but requests consideration of an additional modification to the proposed rule change.

Proposed Rule Change: Item 2 in the Discussion section of the proposed rule change, *Requirements for Vehicle Escort, Sec., (73.55 (d)(4))*, would eliminate the requirement for an escort of **licensee-owned vehicles** entering the protected area for work related purposes provided that these vehicles are driven by **licensee employees**.

Additional Modification to Proposed Rule Change: At CP&L nuclear facilities, licensee-owned vehicles and non-licensee-owned vehicles undergo the same search process prior to protected area entry. Thus, non-licensee-owned vehicles present no greater security risk than licensee-owned vehicles when properly searched prior to protected area entry. In addition, non-licensee plant workers are screened for unescorted protected area access using the same background reviews and other clearance requirements as licensee workers. Since the same screening requirements are used, there would be no increased security risk in allowing properly screened non-licensee employees with unescorted protected area access to drive appropriately searched vehicles into the protected area (regardless of ownership) without a security escort.

ACKNOWLEDGED BY CARD MAY 15 1997

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Based on this reasoning, CP&L recommends the following wording for 10 CFR 73.55, (d), (4), last sentence:

Escort is not required for vehicles under non-emergency conditions entering the protected area and driven by personnel having unescorted access.

If you have additional questions, please feel free to call me at (919) 546-6901.

Sincerely,



T. D. Walt

Director

Operations & Environmental Support

PNM/pnm

- c:
- Mr. L. A. Reyes, Regional Administrator - Region II
 - Mr. J. B. Brady, USNRC Senior Resident Inspector - SHNPP, Unit 1
 - Mr. B. B. Desai, USNRC Senior Resident Inspector - HBRSEP, Unit 2
 - Mr. N. B. Le, NRR Project Manager - SHNPP, Unit 1
 - Ms. B. L. Mozafari, NRR Project Manager - HBRSEP, Unit 2
 - Mr. C. A. Patterson, USNRC Senior Resident Inspector - BSEP, Units 1 and 2
 - Mr. D. C. Trimble, Jr., NRR Project Manager - BSEP, Units 1 and 2
 - Mr. R. Enkeboll (NEI)