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Omaha Public Power District
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BRANCH

May 6, 1997
LIC-97-074

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)

- References:
1. Docket No. 50-285
 2. Federal Register Volume 62 dated February 20, 1997 (62 FR 7721)

Subject: Comments on Proposed Rulemaking Regarding Changes to Nuclear Power Plant Security Requirements

The Omaha Public Power District (OPPD) has reviewed the subject proposed rulemaking. OPPD generally supports these changes, with the exception of overly restrictive proposed changes to the requirements for vehicle escort, Section 73.55(d)(4). The proposed rule states "Escort is not required for designated licensee vehicles or licensee-owned vehicles entering the protected area and driven by licensee employees having unescorted access."

OPPD proposes that this section be revised to read "Escort is not required for licensee-designated, licensee-owned, or contractor/vendor vehicles entering the protected area for work related purposes, provided that these vehicles are authorized for protected area entry, properly searched, and driven by personnel having unescorted access."


Contractors, vendors, and licensee employees are all subject to the same program requirements for unescorted access, and receive the same general training on security requirements including protected area vehicle access. Like licensee-owned vehicles, licensee-designated and contractor/vendor vehicles are not limited in their use to onsite plant functions and do not have to remain in the protected area except for operations, maintenance, repair, security, and emergency response. These vehicles can be used or parked anywhere outside of the protected area. The qualifications of the vehicle operators and the control of the vehicles are the same for all classes of vehicles described above. For these reasons, the rule change should not be limited to designated licensee vehicles or licensee-owned vehicles.

ACKNOWLEDGED BY CARD MAY 15 1997

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U. S. Nuclear Regulatory Commission
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Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. K. Gambhir', with a horizontal line extending to the right from the end of the signature.

S. K. Gambhir
Division Manager
Engineering & Operations Support

TCM/tcm

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