

SEP 26 1989

TO ALL FUEL CYCLE FACILITY LICENSEES WHO POSSESS, USE, OR PROCESS FORMULA
QUANTITIES OF STRATEGIC SPECIAL NUCLEAR MATERIAL

SUBJECT: PROTECTED AREA LONG-TERM HOUSEKEEPING (GENERIC LETTER 89-20)

This generic letter is being issued because of a growing concern that objects, materials and general clutter within the protected area (PA) have the potential of adversely impacting the capability of guards in assessing and responding to alarms. Specifically, the effectiveness of the Tactical Response Teams (TRT), as required by the new comparability rule, may be directly impacted by the lack of unrestricted movement throughout the PA.

Current regulations require that each fuel cycle facility subject to the requirements of 10 CFR 73.46 perform TRT exercises under 73.46(b)(9); have adequate isolation zones for observing activities and people on either side of the PA barrier under 73.46(c)(3); illuminate the isolation zones and all exterior areas within the PA to allow for the monitoring and observation requirements under 73.46(c)(4); detect penetration through the isolation zones to permit response action under 73.46(e)(1); monitor or periodically check all exterior areas within the PA under 73.46(e)(8); require guards to interpose themselves between any adversary attempting entry for purposes of theft of special nuclear material under 73.46(h)(4)(iii)(A); and provide assessment capabilities either by CCTV or other suitable means which limit exposure of responding personnel to possible attack under 73.46(h)(6).

Recent performance-oriented team inspections at fuel cycle facilities have identified PA clutter as having a negative impact on overall security system effectiveness. PA clutter provides potential cover and concealment for adversaries, reduces illumination levels and assessment capabilities, and restricts the movement of responding forces. We believe that the presence of these cluttered areas inside the PA reduces the licensee's ability to meet the system performance objectives of 10 CFR 73.20(a).

In general, the condition of the PA should not provide cover or concealment for an adversary, it should not hinder assessment by either CCTV or a responding guard, and it should not cause the illumination to fall below the 0.2 footcandle level required of the exterior portions of the PA and isolation zone.

Concerns and possible corrective actions covered by this letter include:

o Construction within the PA

- Physically separate construction activities from the rest of the PA with a temporary barrier.
- Control access to and from the construction site. Upon completion of the construction the area should be immediately cleared.

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- o Previous construction areas
 - Clear any lay-down areas leftover from prior construction activities.
 - Fill in and grade earthworks.
 - Remove any temporary fencing or other obstructions.
- o Scrap and waste storage areas
 - Process promptly if scrap, or move offsite if waste, if these areas interfere with the effectiveness of the security system.
 - Any scrap maintained should be in a separately fenced area, no closer than 25 feet to inner PA fence, but within the PA.*
- o Vehicle storage
 - Establish areas within the PA where all designated licensee vehicles are stored and controlled when not in use.
 - Establish this area in a manner that does not add clutter.

In response to this letter licensees should provide a report describing site conditions relating to isolation zones, protected areas, construction, waste and scrap storage, and vehicle storage or other activities that may obstruct observation or reduce illumination levels. The report should include a description of the security maintenance program for the prevention of obstructions which may degrade security system performance.

Pursuant to the Commission's authority in 10 CFR 70.22(d), licensees are requested to submit this report and a schedule for correcting deficiencies within 90 days of the date of this Generic Letter to:

Donald J. Kasun
Acting Chief Domestic Safeguards
and Regional Oversight Branch
Nuclear Regulatory Commission
WFN 4-E-4
Washington, D.C. 20555

*(Note that scrap storage may have no more than .25 gms. of U-235 per liter in 30 gallon or larger containers (73.46(c)(6)).

This reporting requirement has been approved by the Office of Management and Budget under control number 3150-0009 (see 10 CFR 70.8(a)).

If you have any questions about this matter, please contact C. E. Gaskin at (301) 492-0649 or Rocio Castaneira at (301) 492-0392.

Sincerely,

/s/

George W. McCorkle, Acting Director
 Division of Safeguards
 and Transportation, NMSS

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** See previous concurrence *WKC* 9/26*

*9/25/89
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*9/22/89
Dad*