

PR 50, 72 and 73
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Comment No. 1

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I would like to submit the following comments for the proposed changes to the Power Reactor Security Requirements:

73.2 Definitions for enhanced weapons should include remote operated weapons. There is some pressure to regulate remotely operated weapons and rules may be set soon prohibiting these weapons. Some sites already implement these weapons to defend against a larger attacking force without having to expand the number of security armed responders. Concussion type devices, commonly referred to as "flash bags" should also be covered by this proposed rule as a significant addition the armed responders available equipment. There may be a need for armed responders to aggressively move through enclosed areas to interpose themselves at a vital target set, these enclosed areas may be occupied by adversaries and concussion type devices would help the responders.

73.55(b)(2) The proposed language to "detect, assess, intercept, challenge, delay, and neutralize...) The consideration to the language of "intercept would be the act of placing a person at an intersecting defensive position..." I believe this limits the licensee from employing futuristic and mechanical solutions to trap an adversary force. As a cost saving concept I would imagine the future implementation of man-traps, or other electronic/ mechanical means.

73.55(e)(6)(v) The level of the bullet-resisting barrier should be defined. A common definition used is the National Institute of Justice (NIJ) standards. A good recommendation for the control room envelope would be at least NIJ level IV bullet resistance.

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