

PR 2,30,40,50,52,60,63,70,71,73,76 and 150
(71FR64003)

Detroit Edison



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DOCKETED
USNRC

January 4, 2007 (3:35pm)

December 29, 2006
NRC-06-0081

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U. S. Nuclear Regulatory Commission
Washington, D C 20555-0001
Attention: Rulemaking and Adjudications Staff

Reference: Federal Register Notice (71FR64004) dated October 31, 2006

Subject: Detroit Edison Comments on "Protection of Safeguards Information;
Proposed Rule" - RIN 3150-AH57

Detroit Edison, owner and operator of Fermi 2 Nuclear Power Plant, endorses the specific comments being provided by the Nuclear Energy Institute (NEI) and the associated recommendations on the proposed rule discussed in the referenced Federal Register notice.

In addition to the industry comments provided by NEI, Detroit Edison is concerned with the proposed §73.22(g)(2) since it restricts the use of various storage media when processing Safeguards Information on a computer and does not provide appropriate flexibility for locating computers used for processing Safeguards Information. This section should permit external storage media use as long as the media are properly controlled and should allow use of controlled access areas (e.g. locked and alarmed, when unattended by persons authorized access to Safeguards Information) in conjunction with password protection for locating computers.

Detroit Edison recommends that §73.22(g)(2) be modified to state (additions shown in *Italics*): *"Each computer must have password protection and be located within a controlled access area (e.g. locked and alarmed, when unattended by persons authorized access to Safeguards Information) or be located within an approved and lockable security storage container that is used to process Safeguards Information. Each computer not located within a controlled access area or an approved and lockable security storage container must have a removable storage medium with a bootable operating system. The bootable operating system must be used to load and*

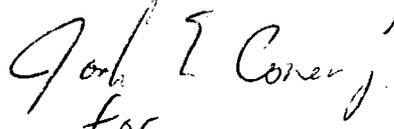
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Rulemaking and Adjudications Staff
USNRC
NRC-06-0081
Page 2

initialize the computer. The removable storage medium must also contain the software application programs, and all data must be processed on the same removable storage medium. *The data may be saved on the same removable storage medium or on other storage media as long as the media are adequately controlled.* The removable storage medium must be secured in a locked security storage container when not in use.”

Should you have any questions or require additional information, please contact me at (734) 586-5197.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron W. Gaston". The signature is written in a cursive style with a large initial "R" and "G".

for
Ronald W. Gaston
Manager – Nuclear Licensing