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NUCLEAR REGULATORY COMMISSION
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TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT, WATTS BAR NUCLEAR PLANT
All Power Reactor Licensees and Applicants With Applications for
A License to Operate or Construct a Power Reactor

Gentlemen:

This letter and enclosed NUREG-0219 titled "Nuclear Security Personnel for Power Plants, Content and Review Procedures for a Security Training and Qualification Program," dated July 1978, are being sent to all licensees authorized to operate a nuclear power reactor and to all applicants with applications for a license to operate or construct a power reactor.

Within the next few weeks the Commission is scheduled to publish in final form amendments to 10 CFR 73 to impose upgraded qualification, training, and equipping requirements for security personnel protecting against theft of special nuclear material and industrial sabotage of nuclear facilities or nuclear shipments. The enclosed document provides a basis on which commercial nuclear reactor applicants and licensees can develop acceptable programs to implement these new requirements.

A second draft of this document was published for comment on April 21, 1978 and as a result the staff has considered the comments received and incorporated many changes. The following summarizes the major comments received and how the NRR staff addressed them in preparing the final document:

1. Approximately one third of the 32 that commented stated that the sample plan indicated an excessive amount of detail and the guidance should not exceed that currently given for safety related training.

The final document contains only 25 pages of guidance (Parts 1&2); the remainder is a sample plan. The sample was provided to assist the applicants and licensees in preparation of a plan based on a new approach. As noted in item 3 below, the sample should not be considered a requirement.

The staff reformed the sample plan to reduce the amount of detail and removed many tasks based on the ratings submitted in response to the request in Draft 2. This resulted in a reduction of 46% in the number of pages devoted to performance objectives (173 vs. 94) and a reduction of 44% in the number of performance objectives (344 vs. 191). A further reduction should be realized when the site analysis is completed, since the sample plan includes many tasks that are not appropriate for all sites.

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2. Many comments stated that the number of onsite evaluations by the NRC was excessive (i.e., 1 by NRR every 2 years and 3 each year by I&E).

The I&E schedule set forth in the draft was based on the established frequency of onsite I&E physical security inspections with the assumption that these inspections would be expanded to include training and personnel qualification. However, all references to I&E inspection have now been deleted from the final version since this document addresses NRR policy only.

3. Some commented that although we state that each site is required to develop a qualification program based on a site specific job analysis, that the NRR reviewers would treat the sample plan in NUREG-0219 as the only acceptable approach.

The NRR staff feels that the sample plan provides valuable guidance and should remain in the document. However, the final version was revised to stress that the sample is not a requirement. One example is found on page 1-1 and reads:

"It must be stressed that it is the responsibility of each site, using the methodology described in this document, to identify its site-specific tasks, elements, and performance objectives. The security program selected must evaluate each individual's ability to implement the site-approved physical security and contingency plans. Training and evaluation are not done for their own sake.

The sample qualification plan found in part 3 should not be considered a requirement, but only a guide; Each specific site plan is reviewed on its own merits."

4. Other comments stated that tasks shown in the sample were too extensive. They indicated that the sample program exceeded that required by most military and police organizations and/or the requirements to meet the 73.55 threat level. A few commented that the type of response indicated in the sample plan is outside the responsibility and capabilities of private security.

The applicants and licensees are required to identify in their qualification plan only those security tasks critical to successful implementation of the site contingency and physical security plans. If a licensee can develop acceptable contingency plans that meet the threat and do not require police or military tactics, then the tactical tasks can be deleted. However, it must be realized that the military and police are the only organizations with experience dealing with such problems. The vast majority of the military and police related tasks contained in the sample are at the basic training level.

5. Finally, a few commented that the NRC should hold working sessions with the utilities to develop its detailed requirements.

Although the actual development of training and qualification plans are the responsibility of each licensee, NRR is planning to hold a series of workshops with the utilities to develop a mutual understanding of how to implement the methodology described in NUREG-0219. These workshops will be small and devoted to actual plan development.

Additional copies of NUREG-0219 can be obtained from the National Technical Information Service, Springfield, Virginia 22161 at current prices.

Sincerely,



D. B. Vassallo, Assistant Director
for Light Water Reactors
Division of Project Management

Enclosure:
NUREG-0219

cc w/o encl:
See page 4

Tennessee Valley Authority - -

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