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July 12, 1974

William C. Parler, Esq., Chairman  
 Atomic Safety and Licensing  
 Appeal Board  
 U. S. Atomic Energy Commission  
 Washington, D. C. 20545

Dr. John H. Buck  
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 Appeal Board  
 U. S. Atomic Energy Commission  
 Washington, D. C. 20545

Dr. Lawrence R. Quarles  
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In the Matter of  
 Consolidated Edison Company of New York, Inc.  
 (Indian Point Nuclear Generating Station, Unit No. 2)  
 Docket No. 50-247

Gentlemen:

Reference is made to Supplemental Decision (ALAB-197R) dated April 25, 1974. On May 1, 1974, Consolidated Edison Company of New York, Inc. (Con Ed) submitted a revised security plan for the entire Indian Point Station. Copies of the plan were furnished to the Appeal Board and Counsel for CCPE on May 2, 1974. The Regulatory Staff, on June 5, 1974, advised Con Ed that the security plan had been reviewed for compliance with 10 CFR Part 50, Section 50.34(c) and the regulatory position described in Regulatory Guide 1.17 and the plan was found to be acceptable.

With respect to the Appeal Board's request on Page 20 and 21 of the slip opinion in ALAB-197R, the Staff herewith submits its report on items A.1, 2, 3, 4, 5 and 6. The applicant has advised that each of the revisions to the security plan to be discussed herein has been implemented. The regulatory staff has scheduled an inspection on July 16, 1974 to confirm these facts:

1. The licensee has redefined security areas within the facility such that the entire area within the control building including the watch foreman's office and surrounding areas is now defined as a vital area. The visitors area adjacent to the control room is no longer in existence. On April 23, 1974 the applicant submitted revisions to security plan wherein the former visitor's area is now Indian Point 2 watch foreman's office. The former watch foreman's office is now Indian Point 1 watch foreman's office. The keyboard is now in the control room (Security Plan - May 1, 1974 - Pages 21-22).

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| DATE →    | 7/12/74              |  |  |  |  |

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A vital area is one to which access is controlled and limited to authorized persons having a need to enter such areas. This now precludes access to this area to many groups of persons including general visitors.

2. The licensee procedures for checking visitors requires confirmation with the Station Office or department involved before a visitor is to be allowed access. There is also a metal detector at gatehouses 1 and 3. Visitors are escorted to and from their destination inside the Station and must wear a visitor's badge. We consider that these procedures, when taken in conjunction with the redefined vital areas shown in Figure 3 of the Station Plan dated 5/1/74 provides increased control over access to many areas of the facility, provides acceptable visitor control procedures, and meets currently applicable requirements.
3. The licensee at section 4.0 of his security plan has committed to meet section 4.4.2 of ANSI-N18.17, July, 1973. Section 4.4.2 of ANSI-N18.17 scopes the training and retraining requirements for the guard force and includes items such as operation and testing of security systems at the facility, basic self-defense and weapons qualifications, bombs and bomb threats, actions for responding to civil disturbances, methods of search and seizure, traffic and access control, and communications. In section 4.4 the licensee defines the qualifications for security force members. We consider that these items now conform to currently applicable requirements.
4. The licensee in section 4.2 of his plan has committed to having written procedures covering those subjects listed at section 4.2.1 of ANSI-N18.17, July, 1973. These subjects include items such as bomb threats, civil disturbances, lock and key procedures, patrol procedures, access control, surveillance requirements and procedures, testing and maintenance of security systems, reporting requirements and support from off-site security forces.
5. The licensee has installed his augmented electronic surveillance system for intrusion alarms. The system was placed into operational status on May 23, 1974, at 4 p.m.
6. The staff has considered in its review of the plan the licensee's provisions for protection of vital equipment; whether located indoors or outdoors. All vital equipment located outdoors is located within the protected area and is then enclosed within a

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separate fenced area. Access to this separate fenced area is controlled by a locked and alarmed gate, the key to which is kept in a locker in the unit's control room. We consider these provisions for the protection of vital equipment located outdoors acceptable and in conformance to currently applicable requirements.

Sincerely,

Myron Karman  
Counsel for AEC Regulatory Staff

cc: Leonard Trosten, Esq.  
Anthony Z. Roisman, Esq.

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