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RECORD #180

TITLE: Applicability of 20.203(c) to Plants With STS 6.12

FICHE:

May 9, 1990

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Office of Nuclear Reactor Regulation

SUBJECT: APPLICABILITY OF 20.203(c) TO PLANTS WITH STS 6.12

Recently some issues have come up regarding the applicability of 10 CFR 20.203(c) for licensees with High Radiation Area Access Technical Specifications. In two cases licensees have requested unnecessary Tech. Spec. changes to allow direct surveillance to prevent unauthorized entries into high radiation areas of less than 30 day duration (instead of locking them) in accordance with §20.203(c)(4). In a third case we were questioned whether it was allowable for a licensee to provide remote surveillance through a video camera for positive access control of an unlocked area since it was not in their Technical Specifications.

In all three issues the licensees and the inspectors involved expressed confusion over the relationship of the High Radiation Tech Specs and §20.203(c). The High Radiation Area Access Control Tech. Specs. (STS 6.12) provide an alternate control method "in lieu of the control device" [203(c)(2)(i)] "or alarm signal" [203(c)(2)(ii)]. This tech. spec. does not supersede the other provisions in 20.203(c). For example, having STS 6.12 in their Tech Specs does not preclude a licensee from locking a High Radiation Area (<1000 mR/hr) and controlling access pursuant to §20.203(c)(2)(iii).

/s/  
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Document Name: APPLICABILITY OF PLANTS