REGULATORY DEFRET FILE COPY

JUNE 1 0 1980

Docket No. 50-331

Mr. Duane Arnold, President Iowa Electric Light & Power Company P. O. Box 351 Cedar Rapids, Iowa 52406 Distribution W/ENCLOSURE -Docket OI&E (3) ACRS TKevern

W/O ENCLOSURE NRC PDR DEisenhut Local PDR NSIC NRR Reading TERA ORB #2 SNorris **RPurple** TNovak GLainas RTedesco J01shinski TIppolito SNorris GMcCorkle

Dear Mr. Arnold:

By letter dated April 25, 1980, you submitted a revised safeguards contingency plan for the Duane Arnold Energy Center. Our review of your plan has indicated the need for additional modifications. The staff comments are identified in the enclosure. Please provide your response within 60 days of receipt of this letter.

The enclosure contains information of a type specified in 10 CFR 2.790(d) and isobeinge withheld from public disclosure.

Sincerely,

Thomas A. Ippolito, Chief Operating Reactors Branch #2 Division of Licensing

8007070207

Enclosure: Staff Comments - Safeguards Contingency Plan

cc w/o enclosure: Mr. Robert Lowenstein, Esquire Harold F. Reis, Esquire Lowenstein, Newman, Reis and Axelrad 1025 Connecticut Avenue, N. W. Washington, D. C. 20036

ORB #2

TIppolito

6/10/80

Cedar Rapids Public Library 426 Third Avenue, S. E. Cedar Rapids, Iowa 52401

ORB #2

TKeyer ... mjf

\O/80

NRC FORM 318 (9-76) NRCM 0240

OFFICE

DATE

SURNAME

☆U.S. GOVERNMENT PRINTING OFFICE: 1979-289-369

STAFF COMMENTS - SAFEGUARDS CONTINGENCY PLAN DUANE ARNOLD ENERGY CENTER DOCKET NO. 50-331

General Comments

It is requested that you submit revised plan pages bearing the appropriate revision number and date.

Add a specific commitment within the contingency plan to the requirements of 73.40(c) and (d).

Specific Comments

Add to the Generic Planning Base an event description for both Security Emergency and Security Alert which corresponds to the information in the Responsibility Matrix.

4.0 Responsibility Matrix

Event 1

It is recommended that since the event describes a threat situation only, the calling of the bomb disposal team should be deleted since event 6B describes a discovered sabotage device.

Event 3

Identify who will monitor the demonstration. If members of the security force are the monitors, add a column heading "Security Force" and describe their duties during the incident.

Event 4B

Include a Security Force column with actions to notify the CAS in case they make the report of unidentified persons within the perimeter.

Event 4C

Include a Security Force column with actions to notify the CAS if they receive the report of a perimeter barrier breach. Also, include actions for the Security Force to follow the Event 4D procedures if directed to do so by the Property Protection Supervisor.

Event 5B

Include a Security Force column with actions to notify the CAS if they receive the report of an unidentified person at or within a vital area. Also, indicate that they will follow Event 7 procedures as directed.

Event 5C

Include a Security Force column with actions to notify the CAS if they receive the report of an unlocked, unattended or breached vital area barrier.

Event 6A

Add a statement that if a guard is found incapacitated another guard will replace him at this post.

Event 6B

Include within the Security Force column an action to notify the SSE if a report of a suspected bomb or sabotage device is received.

21.54

Event 6C

Include with the Security Force column an action to notify the Shift Supervisor if a report of a fire, explosion, etc. is received.

Confirm that the initiation of the facility's Emergency Plan will not interfere with the security organization's ability to respond to this safeguards contingency event.