

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8508130377 DOC. DATE: 85/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-000 Generic Docket 05000000
 50-263 Monticello Nuclear Generating Plant, Northern States 05000263
 50-282 Prairie Island Nuclear Station, Unit 1, Northern Stat 05000282
 50-306 Prairie Island Nuclear Station, Unit 2, Northern Stat 05000306
 AUTH. NAME AUTHOR AFFILIATION
 MUSOLF, D. Northern States Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests exemption from requirements of 10CFR73, App B, Section IV re shotgun training in hip fire point position. Requests use of safer, more accurate, expert-endorsed kneeling position instead. W/Natl Rifle Assoc 841105 ltr. Fee paid.

DISTRIBUTION CODE: S003D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: Non-Proprietary Info Re Security Plans

NOTES: 05000263
 OL: 09/08/70 05000282
 OL: 08/09/75 05000306
 OL: 10/29/74

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	NRR ORB2 BC		1	0		NRR ORB3 BC		1	0
	NRR ORB2 LA		1	0		KREUTZER, P.		1	0
	ROONEY, V		1	0		DIANNI, D		1	0
INTERNAL:	ACRS	07	1	1	ADM/LFMB		1	0	
	IE/DI/ORB5		1	1	NMSS/SGPL	04	1	1	
	NRR/DE/SAB	09	1	1	NRR/DL/SSPB	SGI	1	1	
	<u>REG FILE</u>	01	1	1	RGN3	06	1	1	
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1	1	

w/ check #150
 recv. 8/14/85



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

August 5, 1985

Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

Prairie Island Nuclear Generating Plant
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60
Monticello Nuclear Generating Plant
Docket No. 50-263 License No. DPR-22

Request for Exemption from Requirement
of 10 CFR Part 73, Appendix B, Section IV

The purpose of this letter is to request, in accordance with the provisions of 10 CFR Part 73, Section 73.5, an exemption from the requirement of 10 CFR Part 73, Appendix B, Section IV.C for shotgun training in the hip fire point position. A check in the amount of \$150.00 is attached as the review application fee for this exemption request in accordance with the requirements of 10 CFR Part 170.

On October 11, 1984 Northern States Power Company submitted revision six to the Security Force Training and Qualification Plan for the Monticello and Prairie Island Nuclear Generating Plants. Revision of the Plan is permitted by our operating licenses if procedures provided for in 10 CFR Part 50.54(P) are followed. This revision substituted shotgun firing from the shoulder point kneeling for shotgun firing from the hip fire point. By letter dated November 15, 1984 from Mr W L Axelson, Chief, Nuclear Materials Safety and Safeguards Branch, Region III, USNRC this revision was disapproved since the requested change was in conflict with 10 CFR Part 73, Appendix B, Section IV. To permit this change to be made to our Security Force Training and Qualification Plan, an exemption from this regulation is requested.

We wish to eliminate the shotgun hip fire point position for four basic reasons:

- a. Range Safety - It is very difficult (especially for small individuals) to maintain safe control of a shotgun from the hip fire position due to recoil.
- b. Target Identification - In our view, a shot fired from the hip is a "snap-shot" and does not allow for sufficient target identification.

DUPE 5508130377 S003 w/check \$150.00 Rec'd 8/14/85

Director of NRR
 August 5, 1985
 Page 2

- c. Accuracy - Both on the range and in actual firing situations, accuracy is minimal in the hip fire position. It is not a stable position. The risk of injury to nearby innocent persons in a real situation is too high to justify this type of shooting.
- d. No Longer Endorsed by Experts - The National Rifle Association is no longer teaching the hip firing method for the shotgun. Nor do they advocate this method as stated in the attached letter dated November 5, 1984 from Mr Thomas Llewellyn, Security Firearms Training Department, National Rifle Association, to Mr Bill Anderson, Northern States Power Company. Mr Llewellyn, in addition to agreeing that this is not a stable firing position, notes that the hip is where security personnel carry their handguns. This is where, as usually instructed, the stock of the shotgun would be placed. There is a possibility of dislodging the handgun from the holster or accidental discharge of the handgun as a result of the recoil from the shotgun being discharged.

As an alternative to the hip fire point requirement in 10 CFR Part 73, Appendix B, we would propose the following shotgun qualification:

RANGE	POSITION	NO. ROUNDS	TARGET
15 Yards	Shoulder Point-Kneeling	2	B-27
	Shoulder Point-Standing	2	B-27
25 Yards	Shoulder Point-Kneeling	2	B-27
	Shoulder Point-Standing	2	B-27

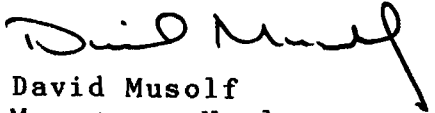
The kneeling position is a fast position security personnel can drop to that would usually be clear of floor or ground obstacles. The recoil from the shotgun can be better taken on the upper half of the body.

Accordingly, we are at this time requesting the foregoing exemption from the requirements of 10 CFR Part 73, Appendix B, Section IV. Following approval of this request, Northern States Power Company will implement revisions to our Security Force Training and Qualification Plan reflecting the shotgun firing requirements shown in the above table and resubmit the revision to Region III for concurrence that the change does not decrease the safeguards effectiveness of the Plan.

The Commission, in lieu of granting this exemption, may choose to initiate a rule change to delete the hip fire point from 10 CFR Part 73 Appendix B. In this event we will withdraw our request for exemption.

Director of NRR
August 5, 1985
Page 3

Please contact us if you have any questions related to this request or if we can furnish additional information related to this issue.



David Musolf
Manager - Nuclear Support Services

c: Regional Administrator III, NRC
W L Axelson, Region III, NRC
Resident Inspector, NRC
NRR Project Manager, NRC
G Charnoff
Secretary of the Commission (Original + 2 Copies)

Attachment

NATIONAL RIFLE ASSOCIATION OF AMERICA

Publishers of

THE AMERICAN RIFLEMAN
AND
THE AMERICAN HUNTER



1600 Rhode Island Avenue, N.W. • Washington, D.C. 20036 • (202) 828-6000

November 5, 1984

Mr. Bill Anderson
Northern States Power Company
Corporate Security Department
414 Nicollet Mall
Minneapolis, MN 55401

Dear Bill:

Per your conversation with Eliot Ness, please find attached a copy of our shotgun qualification course of fire.

As you will note, the course of fire reflects the standing from the shoulder and the kneeling positions from both the 15 and 25 yard lines.

We no longer utilize nor do we recommend firing the shotgun from the hip position. There are several reasons for this logic.

To begin with, it has been shown that firing from the hip position at these distances is not accurate. The tendency for most shooters when firing from this position is to shoot low and or high. It is not a stable position.

Additionally, another factor that must be taken into consideration, is that most people carry their handgun on the hip. This is where, as most people instruct the position, the stock of the shotgun would be placed. With the handgun so attached, the shooter would not be able to assume a good hip level firing position.

I hope that this will aid you in your position for justification for change.

Sincerely,


Thomas E. Llewellyn
Security Firearms Training Department

TEL/lah
encls.

NRA SECURITY FIREARMS INSTRUCTOR DEVELOPMENT SCHOOL

SHOTGUN QUALIFICATION COURSE

5 Rounds Rifled Slugs

5 Rounds 00 Buckshot (9 Pellets) only

B-27 Target is Required

Score of 86% Required to Qualify

No Malfunctions Allowed

Rifled Slugs

50 yards	1 Round, standing from the shoulder	10 Seconds
40 yards	2 Rounds, one standing from the shoulder, 1 round kneeling	15 Seconds
25 yards	2 Rounds, one kneeling, one standing from the shoulder, (Change Targets)	15 Seconds

00 Buckshot (9 Pellets)

25 yards	3 Rounds, one standing from the shoulder, two kneeling. <u>Time will include loading time.</u>	20 Seconds
15 yards	2 Rounds, standing from the shoulder	10 Seconds

Note: 25 yard buckshot stage will start with shotgun in "Cruiser. Safe: condition." (Magazine tube loaded, safety on, chamber empty). After firing, on all stages and positions, action open, safety on, barrel up (above head level).

Scoring:

Rifled Slugs, B-27 Target, each hit within the 7 ring, 2 points, any other hit in the black, 1 point.

00 Buckshot (9 Pellets) No other load is allowed

B-27 Target-any hit in the black, 2 points

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8508130377 DUC.DATE: 85/08/05 NOTARIZED: NO DOCKET #
 FACIL: 50-000 Generic Docket 05000000
 50-263 Monticello Nuclear Generating Plant, Northern States 05000263
 50-282 Prairie Island Nuclear Station, Unit 1, Northern Stat 05000282
 50-306 Prairie Island Nuclear Station, Unit 2, Northern Stat 05000306
 AUTH.NAME AUTHOR AFFILIATION
 MUSOLF, D. Northern States Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests exemption from requirements of 10CFR73, App B, Section IV re shotgun training in hip fire point position. Requests use of safer, more accurate, expert-endorsed kneeling position instead. Natl Rifle Assoc 841105 ltr encl.

DISTRIBUTION CODE: S003D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: Non-Proprietary Info Re Security Plans

NOTES: 05000263
 OL:09/08/70
 05000282
 OL:08/09/75
 05000306
 OL:10/29/74

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	NRR ORB2 BC		1	0		NRR ORB3 BC		1	0
	NRR ORB2 LA		1	0		KREUTZER, P.		1	0
	ROONEY, V		1	0		DIANNI, D		1	0
INTERNAL:	ACRS	07	1	1	ADM/LFMB		1	0	
	IE/DI/ORPB5		1	1	NMSS/SGPL	04	1	1	
	NRR/DE/SAB	09	1	1	NRR/DL/SSPB	SGI	1	1	
	<u>REG FILE</u>	01	1	1	RGN3	06	1	1	
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1	1	



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

August 5, 1985

Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

Prairie Island Nuclear Generating Plant
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60
Monticello Nuclear Generating Plant
Docket No. 50-263 License No. DPR-22

Request for Exemption from Requirement
of 10 CFR Part 73, Appendix B, Section IV

The purpose of this letter is to request, in accordance with the provisions of 10 CFR Part 73, Section 73.5, an exemption from the requirement of 10 CFR Part 73, Appendix B, Section IV.C for shotgun training in the hip fire point position. A check in the amount of \$150.00 is attached as the review application fee for this exemption request in accordance with the requirements of 10 CFR Part 170.

On October 11, 1984 Northern States Power Company submitted revision six to the Security Force Training and Qualification Plan for the Monticello and Prairie Island Nuclear Generating Plants. Revision of the Plan is permitted by our operating licenses if procedures provided for in 10 CFR Part 50.54(P) are followed. This revision substituted shotgun firing from the shoulder point kneeling for shotgun firing from the hip fire point. By letter dated November 15, 1984 from Mr W L Axelson, Chief, Nuclear Materials Safety and Safeguards Branch, Region III, USNRC this revision was disapproved since the requested change was in conflict with 10 CFR Part 73, Appendix B, Section IV. To permit this change to be made to our Security Force Training and Qualification Plan, an exemption from this regulation is requested.

We wish to eliminate the shotgun hip fire point position for four basic reasons:

- a. Range Safety - It is very difficult (especially for small individuals) to maintain safe control of a shotgun from the hip fire position due to recoil.
- b. Target Identification - In our view, a shot fired from the hip is a "snap-shot" and does not allow for sufficient target identification.

8508130377 850805
PDR ADDCK 05000263
F PDR

S003
11

Director of NRR
 August 5, 1985
 Page 2

- c. Accuracy - Both on the range and in actual firing situations, accuracy is minimal in the hip fire position. It is not a stable position. The risk of injury to nearby innocent persons in a real situation is too high to justify this type of shooting.
- d. No Longer Endorsed by Experts - The National Rifle Association is no longer teaching the hip firing method for the shotgun. Nor do they advocate this method as stated in the attached letter dated November 5, 1984 from Mr Thomas Llewellyn, Security Firearms Training Department, National Rifle Association, to Mr Bill Anderson, Northern States Power Company. Mr Llewellyn, in addition to agreeing that this is not a stable firing position, notes that the hip is where security personnel carry their handguns. This is where, as usually instructed, the stock of the shotgun would be placed. There is a possibility of dislodging the handgun from the holster or accidental discharge of the handgun as a result of the recoil from the shotgun being discharged.

As an alternative to the hip fire point requirement in 10 CFR Part 73, Appendix B, we would propose the following shotgun qualification:

RANGE	POSITION	NO. ROUNDS	TARGET
15 Yards	Shoulder Point-Kneeling	2	B-27
	Shoulder Point-Standing	2	B-27
25 Yards	Shoulder Point-Kneeling	2	B-27
	Shoulder Point-Standing	2	B-27

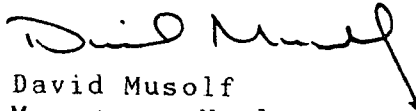
The kneeling position is a fast position security personnel can drop to that would usually be clear of floor or ground obstacles. The recoil from the shotgun can be better taken on the upper half of the body.

Accordingly, we are at this time requesting the foregoing exemption from the requirements of 10 CFR Part 73, Appendix B, Section IV. Following approval of this request, Northern States Power Company will implement revisions to our Security Force Training and Qualification Plan reflecting the shotgun firing requirements shown in the above table and resubmit the revision to Region III for concurrence that the change does not decrease the safeguards effectiveness of the Plan.

The Commission, in lieu of granting this exemption, may choose to initiate a rule change to delete the hip fire point from 10 CFR Part 73 Appendix B. In this event we will withdraw our request for exemption.

Director of NRR
August 5, 1985
Page 3

Please contact us if you have any questions related to this request or if we can furnish additional information related to this issue.



David Musolf
Manager - Nuclear Support Services

c: Regional Administrator III, NRC
W L Axelson, Region III, NRC
Resident Inspector, NRC
NRR Project Manager, NRC
G Charnoff
Secretary of the Commission (Original + 2 Copies)

Attachment

NATIONAL RIFLE ASSOCIATION OF AMERICA

Publishers of THE AMERICAN RIFLEMAN
AND
THE AMERICAN HUNTER



1600 Rhode Island Avenue, N.W. • Washington, D.C. 20036 • (202) 828-6000

November 5, 1984

Mr. Bill Anderson
Northern States Power Company
Corporate Security Department
414 Nicollet Mall
Minneapolis, MN 55401

Dear Bill:

Per your conversation with Eliot Ness, please find attached a copy of our shotgun qualification course of fire.

As you will note, the course of fire reflects the standing from the shoulder and the kneeling positions from both the 15 and 25 yard lines.

We no longer utilize nor do we recommend firing the shotgun from the hip position. There are several reasons for this logic.

To begin with, it has been shown that firing from the hip position at these distances is not accurate. The tendency for most shooters when firing from this position is to shoot low and or high. It is not a stable position.

Additionally, another factor that must be taken into consideration, is that most people carry their handgun on the hip. This is where, as most people instruct the position, the stock of the shotgun would be placed. With the handgun so attached, the shooter would not be able to assume a good hip level firing position.

I hope that this will aid you in your position for justification for change.

Sincerely,

Handwritten signature of Thomas E. Llewellyn.

Thomas E. Llewellyn
Security Firearms Training Department

TEL/lah
encls.

NRA SECURITY FIREARMS INSTRUCTOR DEVELOPMENT SCHOOL

SHOTGUN QUALIFICATION COURSE

5 Rounds Rifled Slugs

5 Rounds 00 Buckshot (9 Pellets) only

B-27 Target is Required

Score of 86% Required to Qualify

No Malfunctions Allowed

Rifled Slugs

50 yards	1 Round, standing from the shoulder	10 Seconds
40 yards	2 Rounds, one standing from the shoulder, 1 round kneeling	15 Seconds
25 yards	2 Rounds, one kneeling, one standing from the shoulder, (Change Targets)	15 Seconds

00 Buckshot (9 Pellets)

25 yards	3 Rounds, one standing from the shoulder, two kneeling. <u>Time will include loading time.</u>	20 Seconds
15 yards	2 Rounds, standing from the shoulder	10 Seconds

Note: 25 yard buckshot stage will start with shotgun in "Cruiser Safe: condition." (Magazine tube loaded, safety on, chamber empty). After firing, on all stages and positions, action open, safety on, barrel up (above head level).

Scoring:

Rifled Slugs, B-27 Target, each hit within the 7 ring, 2 points, any other hit in the black, 1 point.

00 Buckshot (9 Pellets) No other load is allowed

B-27 Target-any hit in the black, 2 points