

# PUBLIC SUBMISSION

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**Docket:** NRC-2014-0172  
Licensee Requirements for Physical Protection of Plants and Materials

**Comment On:** NRC-2014-0172-0004  
Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; Notice of Docketing of Petition for Rulemaking and Request for Comment

**Document:** NRC-2014-0172-DRAFT-0006  
Comment on FR Doc # 2014-25540

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## Submitter Information

**Name:** Bryan Ford

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## General Comment

Entergy comment letter Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; Notice of Docketing of Petition for Rulemaking and Request for Comment. See attached file

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## Attachments

CNRO-2015-00004



Entergy Operations, Inc.  
1340 Echelon Parkway  
Jackson, MS 39213

**Bryan S. Ford**  
Senior Manager,  
Fleet Regulatory Assurance

CNRO-2015-00004  
January 12, 2015

Ms. Annette L. Vietti-Cook  
Secretary  
Attn: Rulemaking and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Petition to Amend Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material: Request for Comments (*Federal Register Vol. 79, 64149*, dated October 28, 2014 - Docket ID NRC-2014-0172)

Dear Ms. Vietti-Cook:

The October 28, 2014 Federal Register Notice (FRN) (*79 Fed. Reg. 64149*) docketed (Docket ID NRC-2014-0172) a petition for rulemaking (PRM-37-01) to amend its regulations regarding "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," and requested comments by January 12, 2015.

Entergy endorses the petition and recommends the NRC promptly initiate rulemaking to implement the changes proposed.

Entergy has always placed a priority on the security of nuclear facilities and materials and recognizes the threat of theft or diversion posed to Category 1 and Category 2 quantities of radiological materials. Entergy has a long history of addressing the security of all radioactive materials. Entergy implements security measures consistent with existing rules and regulations as defined within 10 CFR 73, "Physical Protection of Plants and Materials." Entergy believes that the security program in place in accordance with Part 73 exceeds the requirements of Part 37. Entergy agrees with the petition and believes Part 37 imposes duplicative and burdensome requirements affording no greater protection of Category 1 and Category 2 materials.

Entergy believes the changes proposed in the petition would have an immediate positive impact on reducing unnecessary burden. Entergy has installed additional alarm systems at two of our sites, cameras and lighting at one site and all sites have been required to provide additional training to personnel already trained on the control of radioactive material. Entergy does not believe these measures, taken to comply with Part 37, significantly improve safety.

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Ms. Annette L. Vietti-Cook  
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If there are any questions, or if additional information is required, please contact Bryan Ford at 601-368-5516 or bford@entergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Ford". The signature is fluid and cursive, with the first name "Bryan" written in a larger, more prominent script than the last name "Ford".

c: The Honorable Stephen G. Burns Chairman, NRC  
The Honorable Kristine L. Svinicki, Commissioner, NRC  
The Honorable William C. Ostendorff, Commissioner, NRC  
The Honorable Jeff Baran, Commissioner, NRC  
Mr. Mark A. Satorius, EDO, NRC  
Mr. James T. Wiggins, NSIR, NRC