

# CATEGORY

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SUBJECT: Forwards Duke Energy Corp comments on draft Reg Guide  
         DG-5008 (proposed Rev 2 of Reg Guide 5.62).

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Oconee Nuclear Station Units 1, 2 and 3  
Docket Nos. 50-269, 50-270, 50-287

McGuire Nuclear Station Units 1 and 2  
Docket Nos. 50-369, 50-370

Catawba Nuclear Station Units 1 and 2  
Docket Nos. 50-413, 50-414

Pursuant to a request for comments on Draft Regulatory Guide DG-5008 (Proposed Revision 2 of Regulatory Guide 5.62), please find attached Duke Energy Corporation's comments.

If additional information is required, please contact Terry Keener at 704-382-2056.

M. S. Tuckman

Attachment

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Attachment: Duke Energy Corporation's Comments  
Draft Regulatory Guide DG-5008  
(Proposed Revision 2 of Regulatory Guide 5.62)  
REPORTING OF SAFEGUARDS EVENTS

Ref. section II.(b) of Appendix G (Reportable Safeguards Events) to 10 CFR 73; specifically...

*"II. Events to be recorded within 24 hours of discovery in the safeguards event log.*

*(b) Any other threatened, attempted, or committed act not previously defined in appendix G with the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness."*

There appears to be two distinct criteria contained within this section. The first part of the section clearly addresses a specific 'act' (whether threatened, attempted, or committed), which has the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan.

However, the second part of the section ("*...or the actual condition of such reduction in effectiveness...*") is unclear.

Does this latter part mean that any deviation from a licensee's Security/Contingency Plan should be logged?

Or, is it linked to an 'act' in some way (as is the case in the first part of the section)?