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 50-369 William B. McGuire Nuclear Station, Unit 1, Duke Powe 05000369
 50-370 William B. McGuire Nuclear Station, Unit 2, Duke Powe 05000370
 50-413 Catawba Nuclear Station, Unit 1, Duke Power Co. 05000413
 50-414 Catawba Nuclear Station, Unit 2, Duke Power Co. 05000414
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AUTH.NAME AUTHOR AFFILIATION
 PARKER,W.O. Duke Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Division of Safeguards

SUBJECT: Notifies that 10CFR73.21 re protection of unclassified safeguards info will not be implemented until Jul 1982 for outlined reasons.Regulations re telecommunication sys & ADP equipment should be reconsidered due to vague nature,

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DUKE POWER COMPANY

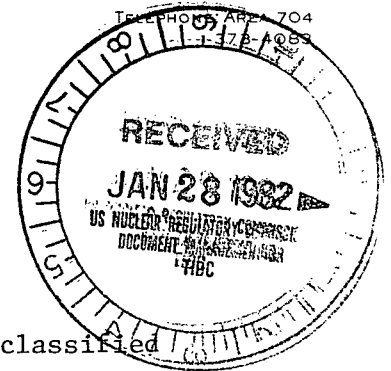
POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

January 20, 1982

Division of Safeguards
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Subject: Implementation of 10 CFR 73.21 (Protection of Unclassified Safeguards Information) by Duke Power Company

Gentlemen:

50-269

Duke Power Company has for some time maintained a program to protect sensitive or proprietary information. This program, described in Attachment A, has been in effect since September 1979, and is similar in intent to the new regulation issued on October 22, 1981; indeed, in some ways the existing program is more restrictive than the new requirements of 10 CFR 73.21.

Duke Power Company is undertaking to comply with the new regulation. However, due to certain immutable factors involved in making an orderly transition to the new program, full compliance will not be achieved until July 1982. Contributing to the need for this extended compliance date are:

- o The large backlog of documents encompassed by the new safeguards rule. Oconee Nuclear Station, for example, has operated for about nine years; as a result, a significant amount of paperwork subject to these regulations has been generated and will require identification and appropriate marking.
- o Ordering and installation of safes, locking bars, and GSA-approved storage repositories.
- o Implementation of software changes to achieve compliance with requirements regarding automatic data processing.

Additionally, Duke considers the regulations applicable to telecommunication systems and automatic data processing equipment to be rather vague and, as a result, difficult to implement. For these and other reasons, Duke Power Company has joined a number of other utilities in requesting reconsideration of certain portions of 10 CFR 73.21. It is requested that the Staff give prompt consideration to the issues raised in this filing such that an effective safeguards plan may be implemented without imposing an undue hardship on licensees.

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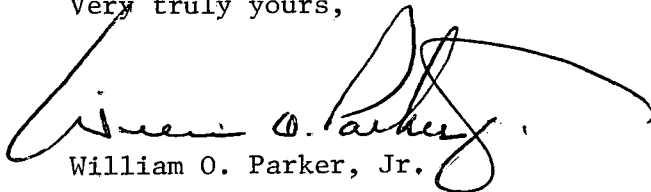
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Division of Safeguards
January 20, 1982
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Finally, Duke Power Company requests the Staff to review, pursuant to 10 CFR 73.2 (mm) (4), the use of certain repositories currently in use within the company. Duke has in use at its Oconee, McGuire, and Catawba Nuclear Stations safes which were manufactured by the Shaw-Walker and Meilink Companies. The general specifications and design features of these safes are discussed in Attachment B. Duke Power Company is requesting that these safes be deemed equivalent for the purposes of 10 CFR 73.21 to those approved by the General Services Administration.

Your prompt consideration of these matters would be appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read "William O. Parker, Jr.", with a large, sweeping flourish extending to the right.

William O. Parker, Jr.

NAR/php
Attachments

APPENDIX F
DUKE POWER COMPANY
STEAM PRODUCTION DEPARTMENT
NUCLEAR STATION
DOCUMENT CONTROL PROCEDURE

Effective Date: September 9, 1979

ALL PERSONS AFFECTED BY THIS PROCEDURE WILL RECEIVE A SECURITY CLEARANCE AS NECESSARY AND BE ADDED TO THE PERSONNEL QUALIFICATIONS DATA BASE ACCORDING TO THE PROCEDURES IN THIS MANUAL (REFERENCE APPENDIX C).

DUKE POWER COMPANY
NUCLEAR STATION
SECURITY DOCUMENT CONTROL PROCEDURE

A. Introduction:

This procedure is designed to establish controls for documents relating to nuclear station security to provide protection for nuclear stations against industrial sabotage.

Controls on security related equipment such as keys, locks, cards and cores, are not included in this document as the safeguarding of those items is provided for in each station security plan.

B. Implementation:

This procedure shall be implemented within each department handling classified documents relating to nuclear station security.

C. Scope:

The purpose of this document is to specify the required control of security documents, the unauthorized disclosure of which could compromise nuclear station security systems.

D. Disclosure:

No document, classified under the provisions of this procedure, nor any part thereof, shall be made available to any individual or organization not authorized to receive it.

Correspondence and reports to or from the Nuclear Regulatory Commission which identify the company's procedures for safeguarding licensed special nuclear material or detailed security measures for the physical protection of a licensed facility or plant in which licensed special nuclear material is possessed or used are deemed to be commercial or financial information, and are therefore, exempt from public disclosure by Federal statute.

(10 CFR Sec 2.790(d))

E. Definitions:

1. Document - Any letter, drawing, tracing, instruction, or procedure used in the design, installation, operation, or maintenance of security systems at nuclear stations.
2. Security System - That combination of physical equipment and administrative controls intended to reduce the vulnerability of nuclear stations to acts of industrial sabotage.
3. Designated Security Personnel (Title Arbitrary)
 - a. Departmental/Station/Project Nuclear Security Document Controller - A designated individual who is responsible for the transmittal, receipt, storage, and control of security documents within a department/station/project, and who has the responsibility of classifying documents originating in that department/station/project.
 - b. Nuclear Security Engineer/Technician/Designer - A designated individual who may prepare or possess security documents for design,

modification, installation, documentation, implementation, testing, maintenance, or repair of security systems, and who shall recommend the appropriate classification of documents originating in that department/station/project.

- c. Nuclear Security Clerk - A designated individual who may process, file, copy, transmit, or otherwise handle security documents.
4. Originated Document - A document originated within Duke Power Company.
5. Vendor Document - A document not originated within Duke Power Company.
6. Transmitted Document - A document transmitted within or between the departments of Duke Power Company.
7. Active Document - A document required in the design, installation, operation, or maintenance of security systems; or development of said document or other documents.
8. Inactive Document - A document which has been superseded or otherwise is not an inactive document. Note: Documents may be active in one department and inactive in another department.
9. Vital Documents (Security V) - Vital documents are those whose contents would allow a compromise of nuclear station security systems or devices to the extent that unauthorized personnel could enter protected or vital areas of nuclear stations without detection. Examples of vital documents are key codings, connection drawings, etc.

Documents so classified shall be marked "Security-V, Special Handling Required."

Vital documents, when submitted to regulatory agencies, shall also be marked "Proprietary - To Be Withheld From Public Disclosure."

10. Protected Documents (Security P) - Protected documents are those whose contents would substantially aid in the compromise of nuclear station security systems or devices to the extent that unauthorized personnel could enter protected or vital areas of nuclear stations without detection. Examples of protected documents include:
 - a. Nuclear station security manuals and complete volumes of nuclear station security procedures.
 - b. Security plan drawings.

Documents so classified shall be marked "Security-P, Keep Locked When Not In Use."

Protected documents, when submitted to regulatory agencies, shall also be marked "Proprietary - To Be Withheld From Public Disclosure."

11. Sensitive Documents (Security S) - Sensitive documents are those whose unauthorized release could be detrimental to nuclear station security. Examples of sensitive documents could include reports of security threats or incidents, results of inspections of Nuclear Regulatory Commission.

Documents so classified shall be marked "Security-S." These documents may be handled in accordance with established management practice.

Sensitive documents, when submitted to regulatory agencies, shall also be marked "Proprietary - To Be Withheld From Public Disclosure," provided such designation is justified by the content of the document.

12. Use - A document is considered to be in use when it is in custody of an authorized individual for current working purposes or being retained for reference purposes.

F. Responsibility:

The Vice President of each endorsing department shall be responsible for the protection of those applicable documents within the department. The Vice President of each affected department may assign, in writing, those security document controllers, engineers, technicians, designers, and clerks necessary for the proper handling of applicable documents within that department. The Vice President of Construction and the Vice President of Steam Production may delegate, in writing, the assignment of station or project nuclear security document controllers, technicians, and clerks to the station or project manager.

The Vice President or departmental nuclear security document controller of each affected department shall maintain a list by name of those persons within that department authorized to possess vital or protected documents.

When a document is in use, its safekeeping is the responsibility of the individual to whom the document is issued.

G. Qualifications of Personnel:

Persons authorized access to the vital and protected documents shall have the need to know the contents of such documents for the proper performance of their assigned duties and shall have been successfully screened by one of the acceptable methods outlined in Appendix 5 of the station security plan.

H. Control of Documents:

1. Identification of Documents

Each vital and protected documents shall be assigned and affixed with a unique identification number. Subsequent copies of such documents shall be assigned a copy number in addition to the identification number.

An exception to the assignment of identification numbers shall be that nuclear station security plans, contingency plans, transportation plans, new fuel plans, and spent fuel plans, and procedures relating to these plans, shall be identified by title and by copy number.

The appropriate originating or receiving departmental/station/project nuclear security document controller shall assure assignment of document identification and copy numbers to each vital and protected documents.

Identification numbers shall be assigned and affixed to vital and protected documents prior to distribution.

A revised document shall carry the same identification number as the original document. However, a revision number shall also be assigned to indicate each successive revision of the document.

Control of draft documents containing material that warrants a security classification shall be maintained by its originator prior to the time it is finally approved, classified, and assigned an identification number.

Distribution of such a document should be limited to individuals authorized access to classified documents. Upon completion of the purpose for which it was distributed, all copies of the draft document should be recovered and destroyed by the originator.

2. Classification of Documents

The appropriate originating or receiving departmental/station/project nuclear security document controller shall assign the appropriate classification for vital, protected, and sensitive documents.

Classification shall be assigned and affixed to documents prior to use or distribution.

A revised document shall be re-evaluated for classification based on its content after revision, and pursuant to classifying criteria contained herein.

Care must be exercised such that documents do not become classified under the authority of this procedure which are beyond the scope of this procedure.

3. Receiving of Vendor Documents

Vendor documents shall be classified, after approval, and thereafter controlled under the provisions of this procedure.

4. Transmittal of Documents

a. Inter-departmental transmittal of documents shall be between Departmental Nuclear Security Document Controllers or between a Departmental Nuclear Security Controller and a Station or Project Nuclear Security Document Controller only.

b. Intra-departmental transmittal of documents may be between any designated security personnel. The transmitter must notify the Nuclear Security Document Controller of the identification and copy number of the document and the identify of the recipient in order that the Controller can record the appropriate transfer for the register.

c. For packaging and methods of transmittal, see Section I,3.

5. Copying of Documents

All copying of protected and vital documents shall be approved by the respective Departmental, Station, or Project Nuclear Security Document Controller of the copying activity, and shall be done by the controller or the Nuclear Security Clerk. Upon completion, the Nuclear Security Document Controller will affix the appropriate copy number to each copy made and record the identity of the recipient.

Only that number of copies approved shall be made. Any extra copies and/or necessary intermediate copies shall be destroyed in a manner to preclude copying.

I. Accountability of Documents:

Accountability of all protected and vital documents, originals and copies, shall be maintained.

Each originating or receiving departmental, station, or project nuclear security document controller shall maintain a register of each original and each copy of vital and protected documents originated, received, or copied. These records shall list the identification and copy number and the disposition of each document and each copy, and date of disposition.

Revisions of a classified document shall be issued by the controller or nuclear security clerk to each individual possessing a copy of the original document. Prior to issue, the identification, revision, and copy numbers shall be assigned and affixed.

Revised pages shall be inserted into the original document by the individual to whom that document is issued. Those pages that have been replaced shall be destroyed. A record of the date of destruction shall be maintained by the appropriate nuclear security clerk.

1. Documents in Use

When a document is in use, its safekeeping is the responsibility of the individual to whom the document is issued.

Vital and protected documents shall be placed in storage when not in use.

2. Documents in Storage

The individual responsible for each storage facility shall maintain records of documents identification and copy number of each protected and vital document in that storage facility and of each document removed from that facility. Such records shall be considered protected documents.

An audit of the storage facility of each nuclear station and each participating department shall be conducted to verify the records of documents contained within that storage facility and the records of documents checked out from that facility. This audit shall be conducted annually or at more frequent intervals as deemed appropriate by each department.

A semi-annual audit of the storage facility of each nuclear station shall be conducted by the security unit of the Steam Production Department.

Any discrepancies noted shall be reported to the Nuclear Security Document Controller for that department, station, or project.

3. Documents in Transmittal

- a. Protected and vital documents shall be transmitted in double packaging. Both packages shall be sealed. The outer package

shall have no marking to indicate that protected and vital information is contained. The inner package shall be marked to identify the highest classification of material it contains.

- b. A return receipt shall be obtained when transmitting protected and vital documents outside Duke Power Company.
- c. Inter-departmental transmittal of protected and vital documents shall be accompanied by a return receipt. This receipt shall identify documents transmitted and documents delivered by document identification and copy numbers.
- d. For each intra-departmental transmittal of a vital or protected document, the Security Document Controller or the nuclear security clerk shall record in the register the date, the identity of the recipient of the document, and the identifying number and copy number of the document.
- e. Documents transmitted between originator and receiver without intermediate handling need not be sealed.

J. Storage of Documents:

- 1. Vital documents shall be stored in repository at least equivalent to commercially available files of substantial construction secured with a combination or key lock, meeting the requirements of Regulatory Guide 5.12.

2. Protected documents shall be stored in a repository at least equivalent to commercially available locking office furniture. Locking desks, credenzas, and cabinets provided by Duke Power Company meet this requirement.
3. All storage repositories and facilities containing protected or vital documents shall be locked when not attended.

K. Retention of Documents:

1. One copy of each vital and protected document shall be retained for a minimum of two years after such document becomes an inactive document.
2. Active documents shall be retained for the life of the station.
3. Preliminary drawings, i.e., those drawings under review for acceptance, may be destroyed upon being superseded.

L. Disposal of Documents:

Disposal of protected documents shall be by any method which will preclude the further use or copying of that document.

Vital documents may be disposed of by shredding, burning, pulping, or by any other method that assures complete destruction of the vital information. The document controller destroying vital documents shall maintain records of the identification and copy number of each vital document destroyed.

Upon disposal of vital or protected document, the originating document controller shall be advised.

M. Missing Documents:

Missing vital or protected documents shall be reported to the originating or receiving departmental nuclear security document controller.

Upon notification of a missing document, the affected departmental Nuclear Security Document Controller shall assess the threat of compromise posed by the missing document, advise his respective Vice President, and initiate those actions necessary to prevent compromise of the affected system.

N. Document Identification:

Document identification numbers shall be in the following format and provide the following information.

Station Identification

Document Number

Revision Number

Originating or Receiving Activity

Copy Number

Copying Activity Identification (If Required)

Sub Copy Number (If Required)

AA - NNNN - NN - AA - NN - AA - NN

Station Identification:

GS - All Nuclear Stations

OS - Oconee

MC - McGuire

CN - Catawba

PK - Perkins

CK - Cherokee

Document Number - 4 digit identification number (may be larger if needed)

Revision Number - 2 digit revision identification number (may be larger if needed). Original shall be revision number 0; first revision shall be number 01.

Originating or Receiving Activity:

CD - Construction Department, General Office
DE - Design Engineering Department
SM - Steam Production Department, General Office
QA - Quality Assurance
OS - Oconee, Steam
OC - Oconee, Construction
MS - McGuire, Steam
MC - McGuire, Construction
CS - Catawba, Steam
CC - Catawba, Construction
PS - Perkins, Steam
PC - Perkins, Construction
KS - Cherokee, Steam
KC - Cherokee, Construction

Originating or Receiving Activity Copy Number - 2 digit identification (may be larger if necessary). The original shall be copy number 0.

Copying Activity Identification - Use same codes as originating or receiving activity.

Sub Copy Number - 2 digit copy identification (may be larger if necessary).

Examples:

MC-4021-02-SM-04

Revision #2, Copy 4 of document #4021, originated by Steam Production Department, General Office, about McGuire Nuclear Station.

MC-4021-02-SM-04-DE-02

Copy #2 made by Design Engineering Department of the above document.

0. All persons allowed access to security related documents per this procedure will receive a security clearance according to the procedures prescribed in the Personnel Security Clearance Screening Program Manual. These individuals will be added to the security portion of the Personnel Qualifications Data Base according to the procedures in Appendix C of this manual; to include using the proper data entry forms to insure that the names are added to the data base correctly.

GENERAL SPECIFICATIONS AND DESIGN FEATURES
MEILINK AND SHAW-WALKER SAFES

Shaw-Walker

Specs:

- 1) Manipulation-Proof Combination provide absolute security against manipulation of lock by sound or feel - even with the aid of electronic listening devices. Bears Underwriters' Laboratories Group 1 Label.
- 2) Added Security - Positive Relocking Trigger locks bolt immovably if forcible entry is attempted by "punching" the spindle...Key-Change permits user to change combination quickly and easily to any of a million combinations.
- 3) Signal Plunger controls all lower drawers. When the Signal Plunger projects, you know lower drawers are not locked.
- 4) Lock Verifier, a Shaw-Walker exclusive, prevents turning combination dial to lock top drawer until the Signal Plunger is depressed, locking all lower drawers.
- 5) Dead Bolts for All Drawers - The Manipulation-Proof Combination Lock operates heavy-duty Dead Bolt in top drawer; Signal Plunger operates solid Dead Bolts in lower drawers.
- 6) Automatic Dead-Bolt Guards, another Shaw-Walker invention, make it absolutely impossible to depress Signal Plunger unless all lower drawers are closed and latched. This prevents accidentally leaving any drawer "locked open".

Shaw-Walker

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- 7) Spy-Proof Dial - eliminates the possibility of visual or photographic detection of the combination while it is being dialed by an authorized person. the numerals, shielded from view by a metal guard, are visible only through opening at top of dial.
- 8) Fire-Files bear the Shaw-Walker Certified Protection and the Underwriters' Laboratories labels certifying that they meet the specifications for one-hour protection. To earn the one-hour label Fire-Files brought their contents safely through furnace tests of the laboratories under exposure to fire on all six sides for at least 60 minutes at a temperature reaching 1700° Fahrenheit, as required by the Standard Time Temperature Curve.
- 9)
 - (a) Thick, steel-walled steel-reinforced fire-insulation.
 - (b) Heavily insulated bulkheads between drawers.
 - (c) Interlocking drawer fronts, all of which combine to make each drawer an individual safe.

Meilink

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Spec:

- 1) All Meilink Four-Hour Safes are built in strict conformity with United Station Federal Specifications AA-S-81-b for Class "A" insulated safes. Section E-2b of these specifications states, "Class 'S' safes shall be able to withstand a standard fire test for four hours without attainment of temperature within the safe at any thermocouple location higher than 350° F. (177° C.) either during or after the fire exposure.
- 2) Safes bearing Class 350-4 hour labels are effective in withstanding:
 - (a) severe fire reaching 2000° F. for at least four hours before the interior temperature reaches 350° F.
 - (b) a combined explosion and impact test to determine whether a sudden heating will cause internal explosion; also, if after drop, loss of contents. The safe is placed in the furnace, pre-heated to 2000° F. for 30 minutes. The safe is removed from furnace and hoisted 30 feet and dropped. After cooling, the safe is again placed into the furnace in an inverted position and heated to 1700° F. for one hour.

Meilink

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- (3) The Underwriters' Laboratories Relocking Device Label certifies that a relocking device is built into the safe and if the lock is forced, the locking mechanism becomes inoperative.
- (4) The impact and explosion tests are the same as those of Underwriters' Laboratories, Inc. with the exception that the safe must be loaded with records of 20 pounds per cubic foot of capacity. The Federal Specifications in addition to the above specify the size and number of locking bolts, kind and type of combination lock and size and thickness of the drill-resistive guard plates that protect the lock and lock connections.
- (5) The new Meilink combination dial has a "cover-up" design which prevents prying eyes from seeing the numbers being dialed. It is larger, too, and easier to operate than the conventional type.
- (6) Both inner and outer shell of heavy gauge steel form the foundation of the entire structure and carry the load of the safe.
- (7) Additional strength is provided by reinforcing "U" shaped steel channels rigidly welded to the outer surface of the inner wall.
- (8) Interlocking door moulding fits tightly against body jamb and effectively retards the penetration of heat during a fire.
- (9) Door and frame design give great strength to the safe and provides protection against severe impact and crushing loads in case of building collapse.
- (10) Heavy gauge steel door plates give the doors exceptional strength and rigidity and make the safe especially resistive to burglarious attack. Heavy steel hinges are electrically welded to angle frames and door plates.
- (11) Meilink's exclusive and time proven Thermo-Cel insulation is solid cast and encased between the steel inner and outer shells of body and door and in the front frame moulding. Thermo-Cel offers great heat resistance and possesses special properties that preserve the metal.
- (12) Bolt operating mechanism and Combination lock are rigidly assembled and protected by a drill resistive steel plate. Compound bolt movement assures ease of operation of locking bolts.