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 AUTH. NAME      AUTHOR AFFILIATION  
 RUEGER, G.M.      Pacific Gas & Electric Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Comment supporting proposed GL on reconsideration of NPP security requirements for internal threat.

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Pacific Gas and Electric Company

77 Beale Street, Room 1451-B14A  
San Francisco, CA 94105  
Mailing Address: RECEIVED  
Mail Code B14A  
P.O. Box 770000  
San Francisco, CA 94177  
415/973-4684  
Fax 415/973-2313

10700  
Gregory M. Rueger  
Senior Vice President and  
General Manager  
Nuclear Power Generation

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Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Unit 1 and 2

Comments on Proposed Generic Letter XXXX on Security Requirements

Gentlemen:

In the Federal Register dated November 2, 1994 (59 FR 54923), the NRC published for public comment proposed Generic Letter XXXX on reconsideration of nuclear power plant security requirements for an internal threat.

Pacific Gas & Electric Company (PG&E) supports the comments presented to the NRC by the Nuclear Energy Institute (NEI) on this subject. Furthermore, PG&E requests that the commission take action on the other issues presented by NUMARC (now NEI) in a letter dated June 24, 1992.

PG&E has the following additional comments:

1. In the last paragraph under Section I of the Discussion, it states that "Since these changes would reduce slightly the effectiveness of the security program, most changes would need to be processed in accordance with the provisions of 10 CFR 50.90." Would item "B. Maintenance of Discrete Vital Area Access Lists," fall within this category? Which measures of paragraph (I) would require security plan change requests in accordance with 10 CFR 50.90?
2. In the same paragraph described above, the Commission states "If appropriate, changes in security plans should include commitments to the measures described in paragraph (I) above. To ensure unrestricted emergency access, the NRC staff notes the advantages of (1) having the ability to remotely unlock doors to vital areas from each alarm station, (2) ensuring that malfunctions result in doors failing unlocked rather than locked, and (3) allowing all operators and auxiliary operators to carry metal keys that

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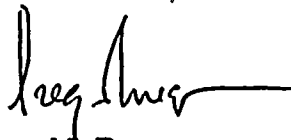


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can override keycard-operated lock mechanisms. Do licensees have to commit to all three conditions stated above to take advantage of the proposed Generic Letter? Must the licensee commit to any of the conditions, if other means are available to address the issue of unrestricted emergency access? Can the licensee commit to one or a combination of two of the three conditions to address the issue of unrestricted emergency access by operators and auxiliary operators?

PG&E believes the proposed generic letter would be beneficial to the nuclear power industry by reducing or eliminating unnecessary or marginally effective security measures against insider threat.

Sincerely,



Gregory M. Rueger

cc: L. J. Callan  
Mary H. Miller  
Kenneth E. Perkins  
Sheri R. Peterson  
Diablo Distribution

Enclosure

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