



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

50-454/455/456/
457
50-237/249

September 23, 1994

The Honorable Cardiss Collins
Member, United States
House of Representatives
Suite 3880
230 South Dearborn Street
Chicago, IL 60604-1665

Dear Congresswoman Collins:

I am responding to your letter of August 17, 1994, in which you forwarded concerns raised by Local 73 of the General Service Employees Union regarding the Commonwealth Edison Company's (ComEd, the licensee) modification of the security force structure at their nuclear facilities.

U.S. Nuclear Regulatory Commission (NRC) regulations require licensees to establish and maintain physical protection systems for facilities possessing special nuclear material. These regulations require licensees to implement security plans approved by the NRC. The security plans describe the structure of the security force, physical barriers, response plans, and monitoring equipment in place to meet NRC regulations. The regulations also require the protection of safeguards information. The protected information includes most of the security plan, including details of the staffing and response capabilities of nuclear facility security forces.

The regulations also address the required reviews for changes to security plans and the criteria to be used in determining the need for NRC approval of proposed changes. Changes that do not decrease the effectiveness of the security plan can be made without prior NRC approval. These changes must, however, be reported to the NRC within two months so that the NRC staff may evaluate the changes and verify that effectiveness has not been reduced. The staff also periodically inspects licensee activities to ensure the security plans remain effective. Proposed changes that reduce the effectiveness of a security plan are required to be submitted as an application to amend the facility's operating license. The licensee may implement such changes only after obtaining NRC approval.

The NRC is aware of the changes in security force structure that ComEd has implemented and is planning for its nuclear facilities. These changes, some of which fall outside the scope of NRC regulations, include both reductions in the size of the security force and changes in status for some security personnel from armed guard to unarmed watchman. The NRC evaluated those changes that have been implemented and concluded that they do not represent a decrease in effectiveness. NRC response to ComEd submittals resulted in the licensee revising some proposed changes to their security plans. The plans, as implemented, ensure that the security forces at ComEd sites have maintained the capabilities required to meet NRC regulatory requirements. Changes

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regarding use of unarmed watchmen verses armed guards for certain functions have been evaluated by NRC staff to assure that the individual's function did not require their being armed. Use of unarmed security watchmen for certain security functions is a common, acceptable practice at most power reactor sites. NRC will evaluate future changes to the security plans at ComEd nuclear facilities to ensure that the plans remain effective.

The NRC staff has been monitoring licensee and security force performance as part of our inspection programs. We have discussed the effect of changes with licensee management and a representative sample of the security force and found no decline in performance affecting the protection of the public. Our staff will continue to make onsite evaluations of the performance of guard forces and licensee managers in NRC-regulated activities.

In regard to Mr. Brem's request to discuss these issues in a public forum, we are limited, for obvious reasons, from revealing details of licensee security plans in open meetings. I wish to emphasize that the NRC has been closely monitoring the effects of security related changes at ComEd nuclear facilities. Inspection reports, meeting announcements, and correspondence with the licensee include general descriptions of the security areas inspected and discussions held between the licensee and NRC staff. Our responses to Senator Moseley-Braun regarding similar inquiries into security concerns at ComEd nuclear facilities are also part of the public record. We have also supported interviews with local media representatives regarding these issues. While it is true that specific details of the licensee's security force structure have not been discussed in open forums, our review process and conclusions are publicly available.

Sincerely,

Original Signed by:

James L. Milhoan

JLM
James M. Taylor
Executive Director
for Operations

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FOR SIGNATURE OF :

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CRC NO: 94-0862

Executive Director

DESC:

ROUTING:

ENCL. LETTER FROM THOMAS BREM, GENERAL SERVICE
EMPLOYEES UNION, RE PLANS BY COMMONWEALTH EDISON TO
REPLACE ITS HIGHLY TRAINED, ARMED SECURITY GUARDS
AT ILLINOIS NUCLEAR FACILITIES

Taylor
Milhoan
Thompson
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Martin, RIII

DATE: 09/02/94

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AUTHOR: REP CARDISS COLLINS
AFFILIATION: U.S. HOUSE OF REPRESENTATIVES

ADDRESSEE: RATHBUN

LETTER DATE: Aug 17 94 FILE CODE: S-16

SUBJECT: COMMONWEALTH EDISON COMPANY PLANS TO REPLACE MOST
OF THE HIGHLY TRAINED, ARMED SECURITY OFFICERS AT
ILLINOIS NUC FACILITIES WITH UNARMED GUARDS

ACTION: Signature of EDO

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