

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 20, 1994

Mr. Rickey Sari, Sr. 1846 Kenilworth Berwyn, IL 60402

Dear Mr. Sari:

I am responding to your letter of August 22, 1994, in which you expressed concerns regarding the Commonwealth Edison Company's (ComEd, the licensee) modification of the security force organization at its 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 security force organization, 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 may be made without prior NRC approval. These changes must, however, be reported to the NRC within two months so that the NRC staff can 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 the security force organization that ComEd has implemented 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. The NRC's response to ComEd's submittals resulted in the licensee revising some proposed changes to its 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 regarding use of unarmed watchmen versus 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

9410270342 941020 PDR ADDCK 05000237 PDR

NMC FILE CENTER COPY

DO1'

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.

Sincerely,

original signed by

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

DISTRIBUTION:		•
<u>DISTRIBUTION:</u> Docket File 50-237/249/373/374/295/	304 (w/incoming)	
PUBLIC (w/incoming)	EDO#0010545	•
J. Taylor	J. Milhoan	D. Crutchfield
H. Thompson	J. Blaha	A. Thadani
W. Russell/F. Miraglia	R. Zimmerman	J. Stang
PDIII-2 r/f (w/incoming)	J. Roe	W. Reckley
OCA	SECY#94-1036	K. Bohrer
R. Capra	OGC	
OPA	NRR Mail Room (EDO#0010	545 w/incoming)
N. Olson	T. Gibbons	,
B. Clayton, RIII	C. Shiraki (w/incoming)	W. Axelson, RIII
C. Moore	J. Martin RIII	L. Cunningham
L. Miller RIII	P. Hiland RIII	,
		· · · · · · · · · · · · · · · · · · ·

DOCUMENT NAME: MANYGTS.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

										
OFFICE	PM:PDIII-2	E	k⁄A:PDIII-2	2	RIIIWARD	E	TSGB L COS-	<u>[</u>	D:PDIII-2	С
NAME	CSHIRAKI:re		CMOORE WK		WAXELSONC.C.	<u> </u>	LCUNNINGHAMO	F	RCAPRA Ra	-
DATE	10/19/94		10/ 494		10/19/94		10/19/94]	0/19/94	
		_	,	FFTAT	AL DECORD COD					

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.

Sincerely,

original signed by

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

DISTRIBUTION:

Docket File 50-237/249/373/374/295/	304 (w/incoming)		. 8 .
	EDO#0010545		
J. Taylor	J. Milhoan	D.	Crutchfield
H. Thompson	J. Blaha	Α.	Thadani
	R. Zimmerman	J.	Stang
PDIII-2 r/f (w/incoming)	J. Roe	W.	Reckley
OCA	SECY#94-1036	Κ.	Bohrer
R. Capra:	OGC TOTAL		e
OPA	NRR Mail Room (EDO#00	10545	w/incoming)
N. Olson	T. Gibbons'		25
	C. Shiraki (w/incomin		
		L	. Cunningham
L. Miller RIII	P. Hiland RIII		

DOCUMENT NAME: MANYGTS.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

				705	
OFFICE	PM:PDIII-2 E	KA:PDIII-2 C	RIII WAS BE	TSGB L COS- E	D:PDIII-2 C
NAME	CSHIRAKI:re	CMOORE WR	WAXELSONC.C.	LCUNNINGHAM	RCAPRA Ra
DATE	10/19/94	10/ 494	10/19/94	10/17/94	10/19/94



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 20, 1994

Ms. Shirley Leparski 8133 Washington Niles, IL 60714

Dear Ms. Leparski:

I am responding to your letter of August 22, 1994, in which you expressed concerns regarding the Commonwealth Edison Company's (ComEd, the licensee) modification of the security force organization at its 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 security force organization, 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 may be made without prior NRC approval. These changes must, however, be reported to the NRC within two months so that the NRC staff can 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 the security force organization that ComEd has implemented 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. The NRC's response to ComEd's submittals resulted in the licensee revising some proposed changes to its 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 regarding use of unarmed watchmen versus 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

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.

Sincerely,

original signed by

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

DISTRIBUTION:	•	
Docket File 50-237/249/373/374/295/	/304 (w/incoming)	
PUBLIC (w/incoming)	ED0#0010545	
J. Taylor	J. Milhoan	D. Crutchfield
H. Thompson	J. Blaha	A. Thadani
W. Russell/F. Miraglia	R. Zimmerman	J. Stang
PDIII-2 r/f (w/incoming)	J. Roe	W. Reckley
OCA	SECY#94-1036	K. Bohrer
R. Capra	OGC	
OPA	NRR Mail Room (EDO#0010	545 w/incoming)
N. Olson	T. Gibbons	
B. Clayton, RIII	C. Shiraki (w/incoming)	W. Axelson, RIII
C. Moore	J. Martin RIII	L. Cunningham
L. Miller RIII	P. Hiland RIII	•

DOCUMENT NAME: MANYGTS.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with, enclosures "N" = No copy

OFFICE	PM:PDIII-2 &	LA; PDIII-2 E	RIII 3 Sever e	TSGB V (VV) V	D:PDIII-2 C
NAME	CSHIRAKI:rc	CNOOREDVR	WAXELSON \	LCUNNINGHAM	RCAPRA Ru
DATE	10/19/94	10/19/94	10/14/94 1	10/ሌ /94	10/19/94

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.

Sincerely,

original signed by

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

DISTRIBUTION:

Docket File 50-237/249/373/374/	⁷ 295/304 (w/incoming)	
PUBLIC (w/incoming)	EDO#0010545	•
J. Taylor	J. Milhoan	D. Crutchfield
H. Thompson	J. Blaha	A. Thadani
W. Russell/F. Miraglia	R. Zimmerman	J. Stang
PDIII-2 r/f (w/incoming)	J. Roe	W. Reckley
OCA	SECY#94-1036	K. Bohrer
R. Capra	OGC	
OPA	NRR Mail Room (EDO#0	0010545 w/incoming)
N. Olson	T. Gibbons	
B. Clayton, RIII	C. Shiraki (w/incom	ing) W. Axelson, RIII
C. Moore	J. Martin RIII	L. Cunningham
L. Miller RIII	P. Hiland RIII	

DOCUMENT NAME: MANYGTS.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with, enclosures "N" = No copy

OFFICE	PM:PDIII-2	e	LA; PDIII-2	E	RIII V Vect. e	TSGBV (VV) V	D:PDIII-2 C
NAME	CSHIRAKI:rc		CMOOREDYR	,	WAXELSON \	LCUNNINGHAM	RCAPRA Run
DATE	10/19/94		10/19/94		10/19/94 1	10/ሌ /94	10/19/94



EDO Principal Correspondence Control

FROM:

DUE: 10/26/94

EDO CONTROL: 0010545

DOC DT: 08/22/94

FINAL REPLY:

Shirley Leparski & Rickey Sais, Sr.

TO:

Chairman Selin

FOR SIGNATURE OF :

** GRN **

CRC NO: 94-1036

Russell or Designee

DESC:

ROUTING:

CONCERN ABOUT COMONWEALTH EDISON'S PLANS TO REDUCE SECURITY AT LASALLE, DRESDEN, AND ZION

NUCLEAR PLANTS

Taylor Milhoan Thompson Blaha

JMartin, RIII

DATE: 10/13/94

ASSIGNED TO:

CONTACT:

NRR

Russell

SPECIAL INSTRUCTIONS OR REMARKS:

Ref. EDO 10453 & 10484.
THESE LETTERS ARE TO BE RESPONDED TO OR ACKNOWLEDGED PER BOB MCOSKER OF THE CHAIRMAN'S OFFICE.

NRR RECEIVED:

October 13, 1994 (

NRR ACTION:

DRPW:ROE

NRR ROUTING:

RUSSELL

MIRAGLIA ZIMMERMAN THADANI

CRUTCHFIELD

BOHRER

ACTION

DUE TO NRR DIRECTOR'S OFFICE

BY 10/21

OFFICE OF THE SECRETARY CORRESPONDENCE CONTROL TICKET

PAPER NUMBER:

CRC-94-1036

LOGGING DATE: Oct 12 94

ACTION OFFICE:

EDO

AUTHOR:

SHIRLEY LEPARSKI

AFFILIATION:

IL (ILLINOIS)

ADDRESSEE:

CHAIRMAN SELIN

LETTER DATE:

Aug 22 94

FILE CODE:

SUBJECT:

COMMONWEALTH EDISON'S (CECO) PLANS TO REDUCE

SECURITY AT ITS LASALLE DRESDEN AND ZION NUC PLANTS

ACTION:

Appropriate

DISTRIBUTION:

SPECIAL HANDLING: NONE

CONSTITUENT:

NOTES:

RICKEY SARI, BERWYN, ILLINOIS NOTE: RESPONSE/ACK

IS REQUIRED FOR THESE LETTERS

DATE DUE:

SIGNATURE:

AFFILIATION:

DATE SIGNED:

Commissioner Ivan Selin Chairman Nuclear Regulatory Commission Washington, DC 20555-0001

Dear Commissioner Selin:

As a resident of northern Illinois, I want to register my concern about Commonwealth Edison's (CECO) plans to reduce security at its LaSalle, Dresden, and Zion nuclear plants.

At the time CECO pushed hard to construct more nuclear reactors in northern Illinois than anywhere else in the country, they made a commitment to the Nuclear Regulatory Commission (NRC), and more importantly, to us that they would maintain the highest level of safety and security possible to protect us.

When we agreed to allow CECO to build all of these plants in our backyards, we put our faith in you. We trusted the NRC to <u>aggressively</u> watch over CECO to make sure that their commitments would be fulfilled, including the one to keep the plants secure. I am concerned that you are prepared to let them do less than they have been doing.

They have already reduced the number of security officers by 40 percent. Now that all their reactors are finished, CECO is telling us they want to save money by taking highly trained armed security officers and making them unarmed guards so they can pay them less money. This, at a time when terrorist threats have hit closer to home then at any time in our recent history.

They have said publicly that they should be allowed to reduce security at their plants because you have let other plants such as Three Mile Island get away with it.

We don't want another Three Mile Island type of plant here in Illinois.

Please help us stop this plan by CECO. Only you have the power to make them live up to their commitments. (Do not let them reduce armed security in Northern Illinois.) Make them put people over profits this time.

I look forward to your response to my plea for assistance.

Sincerely,

Shirly Lipaista 8/33 Washington niles, Il 160714