

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

November 4, 1994

Ms. Deborah Russell
1515 N. Lincoln #54
Springfield, IL 62702

Dear Ms. Russell:

I am responding to your letter of August 25, 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

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sites. The 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.

Sincerely,

original signed by

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

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AUTHOR: DEBORAH RUSSELL
AFFILIATION: IL (ILLINOIS)

ADDRESSEE: CHAIRMAN SELIN

LETTER DATE: Aug 25 94 FILE CODE: IDR-5 LASALLE

SUBJECT: COMMONWEALTH EDISON'S (CECO) PLANS TO REDUCE
SECURITY AT LASALLE, DRESDEN AND ZION NUCLEAR
PLANTS

ACTION: Appropriate

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