8EP 30 1887

Docket Nos. 50-528/529/530

Mr. E. E. Van Brunt, Jr. Executive Vice President Arizona Nuclear Power Project P. O. Box 52034 Phoenix, Arizona 85072-2034

Dear Mr. Van Brunt:

SUBJECT: MISCELLANEOUS AMENDMENTS/SEARCH REQUIREMENTS PALO VERDE NUCLEAR GENERATING SYSTEM (TAC #65220/ 65221/65222)

This is to acknowledge receipt of the Arizona Public Service Company letter, dated November 21, 1986, which transmitted a proposed amendment to the Palo Verde Nuclear Generating Station Physical Security Plan, in response to the Miscellaneous Amendments and Search Requirements.

The submitted document has been reviewed and we have determined that additional information and revisions to the plan are required prior to our approval. The enclosed comments are based upon pertinent NRC regulations and published guidance describing methods, acceptable to the NRC staff, for implementing specific parts of those regulations.

It is requested that you provide your response to these comments within 30 days from receipt of this letter.

The reporting and/or record keeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Should you have any questions concerning the enclosed comments, please contact the reviewer, Gene McPeek, at (301) 492-4968.

Sincerely,

E. A. Licitra, Project Manager Project Directorate V Division of Reactor Projects III, IV, V and Special Projects Office of Nuclear Reactor Regulation

Enclosure: Physical Security Plan Comments cc w/enclosure: See next page		DISTRIBUTION W/ENCL RSGB rf G. McPeek Region V E. Licitra M. Davis		<u>OSURES:</u> Sec rf CBuracker (2) J. Lee Docket File 50-528/529/530 NRC PDR			
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Mr. E. E. Van Brunt, Jr. Arizona Nuclear Power Project

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ENCLOSURE

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COMMENTS ON PHYSICAL SECURITY PLAN CHANGES (MISCELLANEOUS AMENDMENTS AND SEARCH REQUIREMENTS) PALO VERDE NUCLEAR STATION

Expand the statement on page 1-5 to include that in a plant safety emergency, reasonable action may be taken to suspend any safeguards measures in accordance with 10 CFR 50.54(x) and (y) when this action is immediately needed to protect the public health and safety. Also add a statement that suspension of safeguards measures must be reported under 10 CFR 73.71. Reference 10 CFR 73.55(a) and Generic Letter 87-08 (Q&A #2).

State that vital area access controls will not be dropped for life threatening situations not involving public health and safety. Reference 10 CFR 50.54(x) and (y) and Generic Letter 87-08 (Q&A #3).

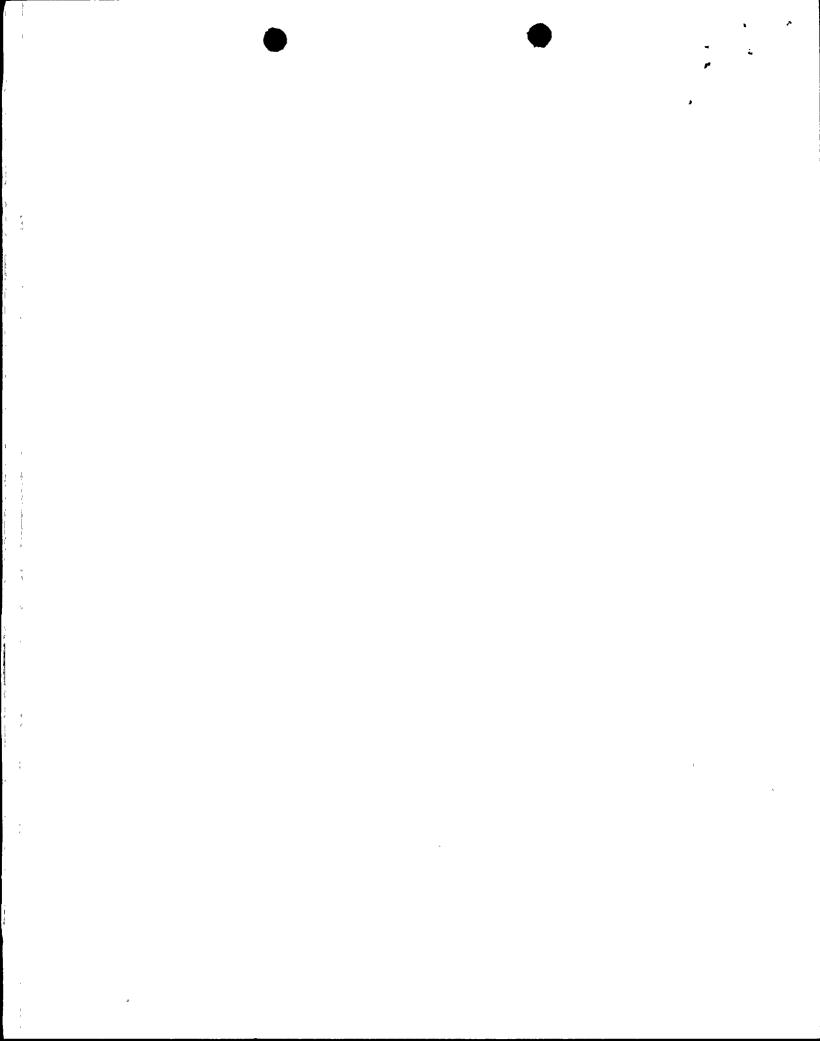
Provide a commitment that if security force members leave the protected area to perform official duties subsequent to their initial entry and search, they will be searched prior to re-entry into the protected area if they have not been under direct observation or accompanied by another member of the security force. Clarify on page 1-27 that the guards performing the vehicle search are not leaving the protected and or they will be subject to being searched each time entering the protected area. Reference 10 CFR 73.55(d)(1) and Generic Letter 87-08 (Q&A #11).

Revise the statement on page 1-28 that only bona fide Federal, State, and local law enforcement personnel on official duty are exempt from the required equipment searches upon entry to the protected area for emergency and nonemergency situations. Reference 10 CFR 73.55(d)(1).

Provide a commitment to positively control, in accordance with the current approved access lists, all points of vehicle access to vital areas. Reference 10 CFR 73.55(d)(7)(i)(B).

Revise the commitment on page 1-30 that in the case of an individual's <u>involuntary termination</u> for cause, the individual's unescorted facility access will be revoked, and identification badge and other entry devices shall be retrieved prior to or simultaneously upon notification of termination. Reference 10 CFR 73.55(d)(7)(i)(C).

Revise the commitment on pages 3-5 and 5-6 to ensure prompt access to vital equipment to accommodate the potential need for rapid ingress or egress of individuals during emergency conditions or situations. Indicate how this prompt access will be ensured (e.g., <u>by issuing</u> override keys to appropriate operators and security force members <u>at the start of each shift</u>, or by other acceptable means). Reference 10 CFR 73.55(d)(7)(ii) and Generic Letter 87-08 (Q&A #6).



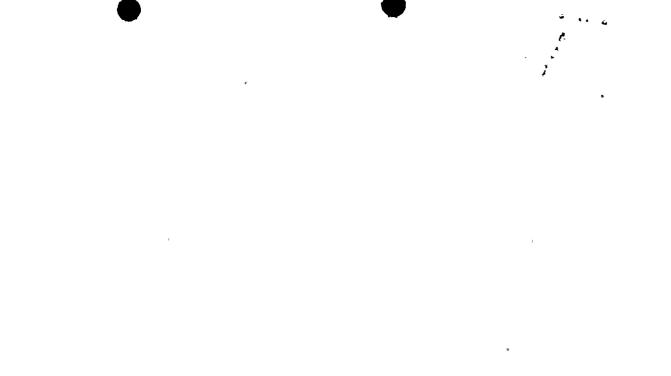
page 2

Revise the commitment on page 14-1 to periodically (annually) review physical security and contingency plans and procedures to indicate an evaluation of <u>potential impact on plant and personnel safety</u>. Reference 10 CFR 73.55(d) (7) (ii) (B) and Regulatory Guide 5.65.

Provide a specific commitment that the secondary power supply systems for both the alarm annunciator equipment and non-portable communications equipment shall be located within a vital area. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #16).

Indicate what specific components of the secondary power supply system will be protected as vital. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #18).

Revise the commitment on page 122 to maintain a log indicating name, badge number, time of entry, to include time of exit of all individuals granted access to a vital area except those individuals entering or exiting the reactor control room. Reference 10 CFR 73.70(d).



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