

SEP 30 1987

Docket No. 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 McPeck, 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

8710080076 870930  
PDR ADDOCK 0500052B  
F PDR

DISTRIBUTION W/ENCLOSURES:

RSGB rf	Sec rf
G. McPeck	CBuracker (2)
Region V	J. Lee
E. Licitra	Docket File 50-528/529/530
M. Davis	NRC PDR
Case File	Local PDR
Erickson	LBush
PStarcher	

\* SEE PREVIOUS CONCURRENCE

OFC	: RSGB	: RSGB	: RSGB	: RSGB	: PD V	: PD V	: PD V
NAME	: GMcPeck *	: CBuracker *	: LBush *	: RErickson *	: JLee *	: ELicitra	: MDavis *
DATE	: / /87	: / /87	: / /87	: / /87	: / /87	: 9/30/87	: / /87

1. The first part of the report is a general  
description of the project and its objectives.  
2. The second part is a detailed description of  
the methods used in the study.  
3. The third part is a description of the results  
of the study.  
4. The fourth part is a discussion of the results  
and their implications.  
5. The fifth part is a conclusion.

Mr. E. E. Van Brunt, Jr.  
Arizona Nuclear Power Project

Palo Verde

cc:

Arthur C. Gehr, Esq.  
Snell & Wilmer  
3100 Valley Center  
Phoenix, Arizona 85073

Mr. James M. Flenner, Chief Counsel  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Charles R. Kocher, Esq. Assistant  
Council  
James A. Boeletto, Esq.  
Southern California Edison Company  
P. O. Box 800  
Rosemead, California 91770

Mr. Mark Ginsberg  
Energy Director  
Office of Economic Planning  
and Development  
1700 West Washington - 5th Floor  
Phoenix, Arizona 85007

Mr. Wayne Shirley  
Assistant Attorney General  
Bataan Memorial Building  
Santa Fe, New Mexico 87503

Mr. Jay Ball  
U.S. Nuclear Regulatory Commission  
P. O. Box 239  
Arlington, Arizona 85322

Regional Administrator, Region V  
U. S. Nuclear Regulatory Commission  
1450 Maria Lane  
Suite 210  
Walnut Creek, California 94596

Kenneth Berlin, Esq.  
Winston & Strawn  
Suite 500  
2550 M Street, NW  
Washington, DC 20037

Ms. Lynne Bernabei  
Government Accountability Project  
of the Institute for Policy Studies  
1901 Que Street, NW  
Washington, DC 20009

Mr. Ron Rayner  
P. O. Box 1509  
Goodyear, AZ 85338

Mr. Charles B. Brinkman, Manager  
Washington Nuclear Operations  
Combustion Engineering, Inc.  
7910 Woodmont Avenue Suite 1310  
Bethesda, Maryland 20814

Docket No. 50-528  
50-529  
50-530

ENCLOSURE

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 non-emergency 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 involuntary termination 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., by issuing override keys to appropriate operators and security force members at the start of each shift, or by other acceptable means). Reference 10 CFR 73.55(d)(7)(ii) and Generic Letter 87-08 (Q&A #6).



Revise the commitment on page 14-1 to periodically (annually) review physical security and contingency plans and procedures to indicate an evaluation of potential impact on plant and personnel safety. 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).

